

Deliberations Report

Draft Te Pātukurea – Kerikeri/Waipapa Spatial Plan

16 May 2025



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1 Executive Summary

This report responds to public submissions received during consultation on the draft spatial plan for Kerikeri-Waipapa – Te Pātukurea. It summarises key themes and issues raised by the community, hapū, and stakeholders, and provides context and analysis to support Council decision-making. Individual submission points are not addressed directly; instead, similar matters are grouped under overarching themes.

A total of 392 submissions were received: 39% supported the draft plan, 42% did not, and the remainder were either unsure or did not clearly state a position. Supportive submissions generally endorsed the plan's focus on housing diversity, walkable neighbourhoods, a compact urban form, protection of productive land, and avoidance of natural hazard areas. Most opposition centred on Scenario F, an alternative growth option not included in the draft plan. These submitters favoured growth elsewhere, rather than opposing growth or a spatial plan in principle.

Te Pātukurea affirms the partnership between Council and mana whenua. The Hapū Rōpū Governance Group played a significant role in shaping the draft plan and supported its intentions and principles. However, during consultation, Ngāti Rēhia and Ngāti Hineira diverged from the wider group: Ngāti Rēhia opposed excluding Scenario F from growth areas, while Ngāti Hineira shared this position, and considered flood risk management in Waipapa insufficiently addressed. Other hapū reaffirmed the importance of ongoing participation in decision-making and better outcomes for Māori in the area.

Rangatahi were engaged through targeted outreach, resulting in 132 submissions. A significant majority (63%) supported the draft plan, highlighting the importance of increased housing choice, improved public spaces, connectivity, amenity, and environmental protection.

Submissions reinforced **strong support for the plan's principles**, including housing diversity, compact urban form, environmental protection, and walkable, well-connected neighbourhoods. There was also clear endorsement—particularly from rangatahi and some hapū—of planning that considers future generations, sustained partnership, and the interconnection of environment and community wellbeing. At the same time, the report acknowledges areas for improvement and proposes several amendments to strengthen the plan's objectives and implementation pathway.

The project team does not recommend changes to the proposed growth areas' spatial extent, except to investigate reconfiguring a discreet area of proposed industrial activity within the existing spatial extent in Waipapa. While feedback reflected mixed views, much of the opposition focused on including Scenario F. However, analysis concludes Scenario F presents significant risks and **does not align with the objectives of Te Pātukurea or national and regional policy direction (e.g., the National Policy Statements for Urban Development and Highly Productive Land)**.

The project team does not recommend incorporating Scenario F into the draft plan. Council is obliged to plan responsibly for future growth and mitigate infrastructure risk. Scenario F poses multiple constraints and uncertainties—flooding, servicing, highway access, productive land, and lack of integration with urban areas. It does not meet Te Pātukurea’s objectives and may fail statutory tests for urban zoning. Notably, some Scenario F supporters acknowledged its development limitations and the need to resolve them before development.

Supported by external subject matter experts, the project team recommends retaining the plan’s structure and direction, with refinements to better reflect community, partner, and stakeholder aspirations. The plan continues to provide a clear foundation to guide sustainable growth, infrastructure investment, and improved wellbeing across Kerikeri-Waipapa.

Considering submissions and technical analysis, the project team recommends the following **key changes**:

Amendments to the draft spatial plan:

- add ‘efficiency’ to the objective relating to infrastructure
- recognise the value of:
 - arts, culture, and creativity to social, cultural and economic wellbeing
 - key cultural institutions (e.g., Turner Centre, Te Ahurea)
 - Regional Deals and regional tourism/economic development strategies.

Updates to the implementation plan:

- explore supporting hapū in identifying/protecting sites of significance, and explore co-governance/co-management opportunities, subject to future Council decisions and funding
- include rangatahi in actions related to growth and development (e.g. structure/master planning)
- investigate the reconfiguration of residential and industrial land in Waipapa
- strengthen collaboration between Council and NZ Transport Agency for a well-functioning transport system
- review the district-wide parking strategy
- reference strategic private infrastructure (e.g., telecommunications) and consult early with providers as development occurs
- commit to future development of Te Puāwaitanga, collaborating with Baysports and stakeholders to secure Waipapa’s sporting facilities
- update economic development actions to reference Regional Deals.

2 Introduction

2.1 Purpose

The purpose of this report is to provide elected members with appropriate contextual information and analysis they need to make informed decisions concerning the draft spatial plan. In response to community feedback, the project team has produced additional analysis to inform these deliberations, and we have made a series of recommendations on the issues raised during consultation. In producing the report additional expert advice has been sought and it informs the discussion that we present.

Given the volume of submissions we received, and repetition of issues, it is not practical to address each point individually. Instead, similar submission points are grouped into key themes.

To maintain the report's focus on submission deliberations, background material from the Consultation Summary Report and earlier reports is not repeated. The report addresses only those submissions requiring further comment and does not specifically respond to submissions in support of the draft plan. A detailed summary of public support and reasons for it is available in the [Consultation Summary Report](#).

2.2 Structure

The Deliberations Report has organised the public views we received into thematic categories, which permits a systematic analysis of all the issues raised. The discussion and analysis of each issue is presented in the sections that follow. Each key theme is discussed in turn, outlining submitters' concerns, providing analysis, and offering staff recommendations where required.

The themes are:

- Growth, housing and land use
- Transport and connectivity
- Infrastructure and flood control
- Social infrastructure, culture, recreation and amenity
- Urban design
- Environmental concerns
- Economic development
- Scenario F.

The consultation also produced numerous requests for specific land use changes, which, due to their site-specific nature have been considered and summarised in the Land Use Change Summary document, Appendix 4. Recommended land use changes are discussed in Section 8 - *Growth, housing and land use* section of this report.

2.3 Approach

This report has been prepared by the Te Pātukurea project team. In preparation of this report, additional advice on key themes has been sought from a range of external subject matter

experts to support the analysis and to inform the recommendations the report presents. Internally, advice has been received from:

- Transportation Services
- Infrastructure (3W) Services (Find Time Solutions – Asset management and infrastructure planning)
- District Plan Team
- Growth Planning and Placemaking Team including Parks and Reserves Planner.

External organisations providing advice are:

- Boffa Miskell– urban design and planning
- Beca – planning, infrastructure assessment and data analysis
- Market Economics Ltd – economic assessment
- Northland Regional Council – technical expertise specifically in relation to strategic policy planning and flood risk and mitigation.

The technical advice by external specialists is provided in Appendices to this report. Advice provided by all subject matter experts has been incorporated into this report’s analysis. The advice received confirms the overall concept for urban development and change in Kerikeri and Waipapa and supports the report’s analysis and conclusions.

Notably, **Northland Regional Council (NRC)** did not submit its views to Council during the consultation period, in line with its existing practice. However, advice was received in relation to matters arising from public submissions. These views largely related to flood mitigation and land issues relating to Scenario F, and these views are discussed in the section of the report focusing on Scenario F. In general, however, NRC policy staff consider the draft spatial plan, “provides useful guidance for a well-planned urban expansion of Kerikeri and Waipapa over the next 30 years and consistency with the broader [regional] strategic direction”.

Several **Government agencies** provided feedback on the draft spatial plan. Key feedback is summarised as follows:

- **NZ Transport Agency – Waka Kotahi:** Support for the preferred spatial plan scenario as it will provide good access opportunities for the new growth areas which benefit from being able to connect to the existing transport network, and it avoids large areas of greenfield development which often requires expensive transport infrastructure.
- **Ministry for Housing and Urban Development (MHUD):** MHUD did not make a formal submission on the draft spatial plan, instead confirmed they are comfortable with their initial submission on the growth scenarios in November 2024. In this submission, they stated support for compact urban growth and inclusion of mixed housing typologies to address housing demand and acknowledged that although not technically required, the methodology and overall approach used to develop Te Pātukurea closely align with the National Policy Statement – Urban Development (NPS-UD). They also noted that though Scenario F has resilience and infrastructure issues to overcome, as a single large

landholding it may offer greatest opportunity to achieve standard residential development densities and a comprehensively planned outcome.

- **Kāinga Ora – Homes and Communities:** Supports the draft spatial plan, particularly the use of spatial planning as a tool to guide growth, investment, and urban form and welcomes the refinement of growth scenarios, structure planning for key areas, sequencing development with infrastructure investment, and exploration of infrastructure funding tools.
- **Te Tāhuhu o te Mātauranga - Ministry of Education:** Generally supportive of continued growth, development, and expansion of the established urban areas of Kerikeri and Waipapa as this will assist in optimising the established supporting infrastructure networks, including social facilities already in place. Also supportive of directing growth away from areas that have significant land and natural constraints, and patterns of development which provide opportunities to improve safe walking and cycling transport options for students to travel to school.

3 He Whakaputanga, Te Tiriti o Waitangi me ngā tirohanga a ngā hapū (hapū perspectives)

Te Pātukurea acknowledges the identity of hapū with an interest in the study area as mana whenua and ahi kā. It affirms their tino rangatiratanga as expressed in both He Whakaputanga and Te Tiriti o Waitangi. The draft spatial plan recognises the deep ancestral and cultural connections hapū have with the land, waterways, species, wāhi tapu and wāhi whakahirahira of the Kerikeri-Waipapa area. It also upholds the right of hapū to be genuine partners in local planning and decision making, and to play a leading role in shaping the future of their communities—particularly in relation to community well-being, sustainable development, and the protection of cultural heritage. The Council also acknowledges its responsibility to take appropriate account of Te Tiriti o Waitangi when performing its functions, and to maintain and improve opportunities for Māori to contribute to decision making.

While hapū often share common values and priorities, Te Pātukurea recognises that their perspectives and interests are not uniform.

Council, through its project team, has worked closely with the Te Pātukurea Hapū Rōpū throughout the project to understand hapū aspirations and reflect these in the draft spatial plan. The Hapū Rōpū produced a cultural impact assessment, outlining hapū identity, values and aspirations in relation to the Kerikeri-Waipapa area (see [Cultural Impact Assessment](#)).

Hapū have supported the work undertaken to prepare Te Pātukurea and of the principles guiding the development of the draft plan. They have described their interest as partners in future development, their responsibility for the well-being of the entire community and their strong support for well-planned growth and urban development. The draft implementation plan anticipates ongoing partnership between hapū and Council in achieving the vision of Te Pātukurea.

At the outset of formal consultation, there was broad agreement on the long-term goals, the importance of sustainable development, and unified support for the hybrid growth scenario. However, by the end of the consultation period, this consensus had not been sustained.

Ngāti Rēhia do not support the draft spatial plan, because it excludes Scenario F, which they now favour. On reflection, they believe Scenario F could offer more affordable housing and that a single-site development by one developer may be more cost-effective than other options.

Ngāti Hineira do not support the draft spatial plan, primarily because of insufficient attention being paid to flood risk and mitigation in Waipapa, and stated their general support for Scenario F.

Remaining hapū represented by the **Hapū Rōpū** support the draft spatial plan and explicitly stated they do not support Scenario F due to unresolved development issues.¹ They also reiterated their interest in ensuring continued hapū participation in local decision making and in addressing specific issues, such as environmental protections and achieving social and economic outcomes for Māori and the wider community.

3.1 Recommendations

As a result of these recognitions and of hapū input to the spatial plan development to date, the project team makes the following recommendations:

- Council explores supporting hapū in their work to establish their own strategic and planning frameworks in areas of concern to them, and that this support is referenced in the spatial plan, subject to funding and Council decisions
- implementation plan items involving the hapū in steering the development of the Kerikeri-Waipapa area are maintained
- explore supporting hapū interest in identifying and protecting sites of significance in the implementation plan, subject to future council decisions and funding opportunities
- co-governance and co-management opportunities are explored as part of this work
- additionally, a structured process (i.e. involved in implementation plan steering group) be identified in the implementation plan to realise hapū aspirations in relation to housing, social, economic and cultural development in Kerikeri-Waipapa.

4 Rangatahi voice

Te Pātukurea values all community voices and recognises the importance of including ‘hard to reach’ or underrepresented groups. Council has worked closely with the Kerikeri-Waipapa community, including local young people, to ensure their views are reflected in the draft spatial plan. For a detailed overview of rangatahi feedback, see the [Consultation Summary Report](#).

Overall, a significant majority (63%) of local young people who provided their views to Council (132 submissions in total) support the draft spatial plan. Only 0.03% opposed it, with the remainder unsure. Key matters raised in young people’s feedback included support for urban development that offers greater housing choice and affordability, support for enhancing the vibrancy of Kerikeri’s town centre, and improved public amenities—while also supporting protecting natural areas, tree cover, and the wider environment.

¹ The remaining Hapū Rōpū includes representatives from Ngāti Korohue, Ngāti Mau, Ngāti Rangī, Ngāti Torehina ki Mataka, Te Uri Taniwha, and Te Whiu

4.1 Recommendations

As a result of the level of engagement and consistency of views received from local young people, the project team recommends specifically including rangatahi in spatial plan implementation items relating to urban growth and development. Thus:

- ensure that final spatial plan text recognises rangatahi and their role in determining the future of the Kerikeri-Waipapa area
- ensure that rangatahi are included in implementation plan actions which specifically address growth and development in Kerikeri-Waipapa, such as structure and master planning processes and assessments of community facilities.

5 Summary of submissions – overall balance of support and opposition

A total of 392 unique submissions were received on the draft spatial plan². Of these:

- **152 (39%) supported** the draft plan
- **165 (42%) did not support** the draft plan
- **62 (16%) were unsure**, and
- **13 (3%) were either unclear or not classified**

Among those who opposed the draft plan, a **majority (65%) referenced Scenario F** (the “Our Kerikeri / Vision Kerikeri” proposal), which was not included in the draft plan. This indicates that much of the opposition centred on a desire for alternative growth approaches rather than blanket rejection of planning for growth.

Supportive submissions highlighted:

- a need for a mix of housing types and housing choice (including affordable and medium-density housing)
- the benefit of well-planned urban development and avoiding urban sprawl
- the benefit of development which avoids natural hazards and protects productive land
- the benefit of improvements in walking and cycling options.

Opposing submissions raised:

- the protection of productive land from urban development
- transport connectivity and congestion
- support for ‘Scenario F’ as an additional or alternative development pathway for the area
- the effect of growth on rural lifestyles and Kerikeri’s ‘village character’
- concerns about infrastructure capacity and affordability.

Public suggestions for change commonly called for:

- the provision of high-quality public space and amenity, including recreational facilities

² See Consultation Summary Report, p. 6 for specific detail on overall submissions.

- improving transport networks and providing public transport
- protection of cultural and historic character
- reconsideration of industrial locations and inclusion of Scenario F.

Feedback on the planning principles and implementation plan was less detailed, but generally expressed support for balanced development and inclusivity, while questioning the pace and cost of implementation.

Submissions were mostly from older residents (63% over 60), with 132 (34 %) submissions from young people/rangatahi through targeted engagement. Most submitters identified as Pākehā/NZ European (82%), with 6% identifying as Māori.

Process criticisms

Submissions were received raising concerns regarding the process of developing the spatial plan, and regarding the level of engagement undertaken throughout the project. A best-practice approach has been taken in the development of Te Pātukurea. Spatial planning technical expertise was obtained to ensure a sound process resulted in a plan grounded in evidence, incorporating varied and iterative subject matter expertise input and ensuring that engagement was appropriate for the different categories of interested parties: mana whenua, stakeholders and the wider public.

The project team does recommend reconsulting with the public on the draft spatial plan, or earlier stages of the project, for reasons relating to robustness of process or engagement.

6 Key themes and analysis

The project team has aggregated the key concerns observed in community feedback into themes. These are presented below and form the basis of the report's discussion and recommendations.

The following method was used to categorise the consultation data and identify the relative prominence of each theme within the overall community feedback. Initially, a manual review of consultation and the overall submissions summary was produced. The themes identified in this process were further refined to produce the eight broad themes that this report discusses. Having established the thematic categories, artificial intelligence was used to determine the number of all comments received across each of the four consultation questions and to categorise each comment by theme. Categorisation using keywords was progressively refined, ultimately producing the counts of each theme (see Table 1, below). In some case comments include more than one theme. In these cases, all themes are counted. In addition, each submitter had the opportunity to provide several verbatim comments. This results in an overall 'quantity of comments' more than the number of unique submissions. Duplicates have been removed from the count.

The purpose of this exercise was to illustrate the approximate overall prominence of each theme within the consultation data.

Lastly a ‘sentiment analysis’ was performed to understand the approximate sentiment towards each of the themes as expressed in the verbatim feedback received.

Table 1. Consultation themes

Theme	Number of comments
Uncategorised	60
Growth, housing and land use	135
Transport and connectivity	110
Scenario F	90
Infrastructure and flood control	54
Social infrastructure, culture, recreation and amenity	46
Environmental concerns	38
Urban design	32
Economic development	19

‘Uncategorised’ refers to incomplete or otherwise unusable comment, such as “I don’t know” “several concerns” or “it’s a stupid idea”. Each of the substantive themes identified in the analysis are discussed in turn.

While we have focused on criticisms and suggested changes to the draft spatial plan, in the sections that follow, a brief description of **the proportion of views in support of the draft spatial plan** is also presented.

7 Decision making guidance

The purpose of this report is to inform elected members in their decision making. It is necessary therefore to briefly outline the implications for Council of either:

- making substantial, significant changes to the draft spatial plan beyond what could reasonably be considered as an amendment, or;
- not adopting a spatial plan.

In the preparation of Te Pātukurea, Council has pursued an iterative process, progressively refining the future growth scenarios for Kerikeri and Waipapa. This process included an earlier stage in which a range of growth scenarios were considered and consulted on, and which resulted in the ‘hybrid scenario’. This scenario has been clearly indicated as the focus of consultation during the Special Consultative Procedure, which contemplated three alternative outcomes: adoption of the spatial plan, adoption with amendments or a decision not to adopt a spatial plan.

Substantial, significant change to the draft spatial plan prior to adoption, such as the inclusion of scenarios or parts of scenarios which were not included in the consultation, may be considered unfair from a procedural perspective, exposing Council to the risk of legal proceedings.

Consequently, change of this kind would likely necessitate further consultation with the community and significant disruption to Council's planning and development sequencing. This includes disruption to the Proposed District Plan decision making process, and either delaying that work or proceeding in the absence of an agreed 'blueprint' for development in Kerikeri and Waipapa. Proceeding without a spatial plan may result in ad hoc decision making, additional cost and uncertainty.

There are also several risks and implications for not adopting a spatial plan. These include:

- ad hoc decision making and poor development outcomes
- no clear direction for setting future development contribution fees
- no certainty to inform Council's infrastructure strategy and Long-Term Plan
- no endorsement from Council for the preferred form of long term growth for Kerikeri Waipapa informing the Proposed District Plan
- significant limitation on Council's participation in regional spatial planning, as contemplated in the Government's Resource Management Act reforms.

8 Growth, housing, and land use

8.1 Submissions

The overall impact and implications of forecasted growth within Kerikeri and Waipapa is a prominent theme within consultation feedback.

In line with the method described above, **55 out of 135** comments received in relation to **growth, housing and land use** expressed a positive view of the draft spatial plan. The remaining comments were either critical (10) or neutral/unclear (70).

The primary concerns and suggestions raised are:

- the costs relating to growth, such as the infrastructure and servicing required to support the expansion of housing and commercial/industrial areas, are significant
- there is a need to ensure that new developments address the issue of housing affordability
- future growth should avoid sensitive areas, such as constrained land³, horticultural and rural/highly productive lands
- to avoid sensitive areas in Kerikeri, such as areas with fertile soils, some residential zoning should be reallocated to Waipapa. Re-zoning should occur to protect horticultural lands south of Kerikeri
- that the expansion of industrial, commercial and residential land uses should be reconsidered
- the 'Bing/Turnstone Development' should provide for mixed-use, with commercial river frontage and high-quality cycling and walking connections to Kerikeri township
- that the overall 'village character' of Kerikeri and associated rural lifestyles may change significantly.

Concerns relating to **growth, housing and land use** can be summarised as follows:

- development cost and housing affordability within the anticipated growth areas
- protection of sensitive and rural lands
- potential changes to rural lifestyles and overall character of the Kerikeri township
- consider alternative locations for industrial, commercial and residential land uses.

8.2 Discussion & analysis

8.2.1 Development, affordability and lifestyle

Te Pātukurea forecasts the Kerikeri-Waipapa population to increase from approximately 14,000 presently, to approximately 25,000 by 2054. Consequently, almost 5,000 additional dwellings will be required (see [Technical Report](#)). Most of the development required to accommodate this growth is proposed to occur in the urban areas of Kerikeri and Waipapa. Some extension of these areas is necessary and the draft spatial plan's 'hybrid scenario' proposes most of this

³ Constrained land is land that is not free of constraint for the purpose of development, such as being subject to flooding, natural hazards, protected soils, or containing sites of significance.

growth will be within and adjacent to the existing urban areas; for instance, in the Kerikeri south and Waipapa northeast areas.

This pattern of development seeks to achieve a 'compact urban form' (see [Te Pātukurea – draft spatial plan](#), pp. 23-28), which makes most efficient use of existing infrastructure, and limits urban sprawl and its negative consequences. Importantly, compact urban development promotes alternative transport modes to private car use, further reducing demands on infrastructure and enhancing community sustainability and well-being.

Intensification of housing development can enable housing choice and affordability, as opportunity exists for the development of greater variety of housing types than is currently present in Kerikeri and Waipapa and to make use of economies of scale associated with medium-density housing development.

Compact development also protects rural land from fragmentation and in doing so preserves rural lifestyles beyond the urban boundaries, while also enhancing the vibrancy of urban life by locating residential development close to town centres.

For these reasons it is not considered necessary to add additional land for residential development in Kerikeri beyond what is already contemplated.

8.2.2 Sensitive land

The Kerikeri south area is proposed to receive most of the greenfield development. Te Pātukurea proposes greater intensification in this area to achieve the draft spatial plan's overall objectives relating to urban development, infrastructure efficiency, housing choice and affordability and environmental protection. However, concerns have been raised in consultation in relation to the loss of 'highly productive land' in this area.

To safeguard the district's most productive soils, areas with Land Use Capability (LUC) 1 and 2 and which meet the definition of highly productive land under the National Policy Statement for Highly Productive Land (being LUC 1, 2, or 3 land that is in a general rural zone or rural production zone and forms a large or geographically cohesive area), are mapped as Wāhi Toitū (no-go) areas.

LUC 3 soils meeting the 'highly productive' definition (i.e. located in general rural or rural production zones) are mapped as Wāhi Toiora (go carefully).

Some LUC 2 land exists within the Kerikeri south area, which has historically been horticultural land. However, this land is not classified as highly productive due to the current and proposed district plan zoning (residential and rural lifestyle / rural residential). The current zoning has been in place since 2007 when Far North District Plan became partly operative. The current land use has resulted in tracts of residential development and general fragmentation across much the proposed growth area in Kerikeri south therefore proposing growth in these areas does not represent a loss of highly productive land.

8.2.3 Mixed used and amenity

The draft spatial plan indicates a river side 'destination node' which is currently part of the 'Bing property' being developed by Turnstone Trust. At present this site is zoned Residential (General

Residential in the Proposed District Plan), however the Turnstone Trust is seeking approximately half the site (closest to Kerikeri Road) to be re-zoned Mixed-Use under the Proposed District Plan, which, if accepted, would permit a variety of activities. The river frontage area of the Bing site is not included in the re-zoning request. An additional plan change would be required to re-zone the area of the 'destination node'.

8.2.4 *Land use changes*

Some submitters raised concerns in respect to the expansion of the industrial area in Kerikeri, particularly as it is near the Wairoa stream. Submitters also suggested relocating the area for industrial growth in Waipapa from the east of SH10 to the west and consider more residential land be planned for Waipapa.

Waipapa is expected to see the bulk of future industrial growth, consistent with existing patterns of industrial land use, and capturing the advantages of Waipapa's proximity to the state highway network. However, Kerikeri will attract the bulk of the projected residential growth (78% of total forecast), and therefore some expansion of industrial land in Kerikeri is required to support the needs of future communities (see [Technical Report](#)).

A 1.4ha expansion of Kerikeri's industrial land is proposed for southeast of Wairoa Stream, as this location is serviced and co-located with the existing Mill Lane industrial area. This area can be provided with a sufficient setback from the stream to permit riparian buffering and blue-green network opportunities. The challenges of expanding industrial areas are acknowledged, and careful attention must be paid to environmental and amenity mitigations when this area (and additional industrial land in Waipapa) undergoes structure planning in the future. For these reasons, the project team recommend retaining the proposed expansion of the industrial area in Kerikeri.

In relation to industrial growth and residential sites in Waipapa, we note the following:

- due to the existing settlement pattern in Waipapa, decisions around future land uses need to be carefully considered to create a cohesive urban form. Consequently, the project team investigated several configurations of land use.
- the proposed area of residential expansion in Waipapa is staged (shown on the maps as Medium Density Residential and Potential Future Medium Density Residential). This approach has been taken as residential growth in Waipapa is currently anticipated in the medium to long term. At present, the infrastructure necessary to support residential growth in the short-term is limited, and improvements are necessary to support the amount of housing required. Because of this, and as the growth targets set are ambitious, the current amount of residential growth is considered sufficient in Waipapa.
- The proposed area for industrial expansion was more extensive than Kerikeri. The area selected for expansion was selected as it would contribute to a cohesive future urban form, reflect economically efficient locations, and it accounted for the constraints in the area (for instance, it is located outside areas subject to flooding). On review, the project team consider that there is merit in reviewing the area selected to determine if a different land use pattern can better achieve the outcomes sought in Waipapa, noting that this may also necessitate a commensurate change to the location of residential

land use. For these reasons, the project team recommend further investigation into reconfiguring a discreet area of proposed industrial activity within the existing spatial extent in Waipapa. Specifically, whether any reconfiguration within the existing spatial extent is possible.

The discussion presented here relating to overall quantity of land required to accommodate forecast housing and industrial growth is treated in more detail the [Technical Report](#) and the [Housing and Business Development Capacity Assessment](#).

8.3 Recommendations

As a result of this discussion, the project team makes the following recommendations:

- no change occurs to the overall form and spatial extent of the housing growth proposed in Kerikeri, to promote high quality development and preserve rural lifestyles and community vibrancy
- the protections for sensitive land are maintained in the spatial plan
- Te Pātukurea continues to pursue the 'destination node' located in the Turnstone Trust development
- the proposed expansion of industrial land in Kerikeri is maintained and the expansion is noted as sensitive
- add an action to investigate the ability to reconfigure the residential and industrial land in Waipapa in the implementation plan.

9 Transport and Connectivity

9.1 Submissions

Community feedback relating to transport focuses on traffic congestion and connectivity, public transport and parking.

In line with the method described above, **38 out of 110** comments received in relation to **transport and connectivity** expressed a positive view of the draft spatial plan. The remaining comments were either critical (11) or neutral/unclear (61).

The key concerns raised by the community in relation to transport issues are outlined below:

- addressing traffic congestion and creating new transport routes (roads)
- improving connectivity within the study area for both traffic and active transport, such as walking and cycling
- improving Kerikeri's one-way system
- improving public transport
- improving carparking
- opposing the removal of carparking requirements within new developments (however recognising this regulation concerns Tier 3 authorities under the National Policy Statement for Urban Development).

Concerns relating to **transport** can be summarised as follows:

- traffic congestion and system improvements, including for active modes and connectivity
- public transport improvement
- carparking.

9.2 Discussion & analysis

9.2.1 System improvements and congestion

The draft spatial plan anticipates new infrastructure and upgrades to existing traffic systems will be required over time. But, the final scope of traffic system and transport improvements will be subject to future traffic modelling and to structure planning, as staged development occurs. As with other infrastructure investments, provision of infrastructure is subject to funding decision-making via Long-Term Plans and/or external sources of funding being available.

The new infrastructure that Te Pātukurea anticipates includes intersection upgrades, new roading connections, pedestrian and shared path improvements. Some key features of these projects are already underway, such as developing the Kerikeri CBD road and the Hone Heke Road roundabout upgrade. The Mill Lane-Hall Road link project has received resource consent approval and is in progress.

At present, analysis indicates that the overall Kerikeri-Waipapa traffic system has sufficient capacity to absorb the forecast increase in demand (until 2032). The key risks for the transport system beyond 2032 are the capacity of the Heritage Bypass and the State Highway 10/Waipapa Road roundabout.

Te Pātukurea's implementation plan outlines key transport assessment steps, such as completing a Kerikeri-Waipapa Transport Model and Transport Network Strategy. Central to this work will be the evaluation of options to increase capacity such as road and bridge widening, and roundabout upgrades on the Heritage Bypass.

The responsibility for State Highway improvements remains with the NZ Transport Agency (NZTA). However, Council and NZTA collaboration on interdependent network issues, such as sustained support for active transport networks, congestion on both local roads, and works in relation to the highway network in Waipapa, will require strengthened implementation plan actions to ensure system integration and risk, mitigations and inter-dependencies are managed. Notably, NZTA has submitted in broad support of the draft spatial plan and in working in collaboration with Council to achieve a well-functioning transport system.

A key point within the existing traffic analysis is that growth that occurs within existing urban areas is likely to generate fewer and shorter trips than growth that occurs elsewhere (see [Te Pātukurea – Transport Assessment](#)). The overall urban development concept for Te Pātukurea captures this insight. It does this by proposing a staged, compact urban form, maximising walkability and alternatives to car travel for residents, and minimising the addition of traffic into the system, particularly at peak times.

The draft implementation plan includes items which strengthen collaboration and engagement between Council and NZTA in relation to network capacity, local-national road network interdependency, and integrating Te Pātukurea 'active transport modes' goals within the overall transport system.

9.2.2 Public transport

Additionally, concentrating development in urban areas and close to existing transport corridors increases the feasibility of future public transport systems. The future development of a public transport system linking Kerikeri and Waipapa depends on several factors, such as overall population and financial viability of a public transport model, but infrastructure estimates for known costs, such as bus stops, are included in the draft spatial plan's infrastructure estimates.

Several actions within the Implementation Plan support the long-term development of a public transport network, such as developing a transport model, updating the Transport Strategy and contributing to the Transport Network Plan.

9.2.3 Carparking

The draft spatial plan does not consider the level of detail which includes carparking. The Proposed District Plan provides guidance on how car parking may be treated in the future, as the urban areas of Kerikeri and Waipapa develop. If the draft spatial plan is adopted, Kerikeri-Waipapa will meet the criteria for an area 'intended to be' an urban environment under the National Policy Statement for Urban Development (NPS-UD), consequently, the Council will be classed as a Tier 3 local authority.

The NPS-UD requires that Tier 3 authorities do not set minimum car parking requirements, other than for accessibility purposes. Council is currently developing a district-wide parking strategy.

This strategy will be reviewed alongside other Council strategies should Te Patūkurea be adopted and Tier 3 changes implemented.

9.4 Recommendations

As a result of this discussion, the project team makes the following recommendations:

- the draft implementation plan be amended to include items which strengthen collaboration and engagement between Council and NZTA in relation to:
 - network capacity
 - local-national road network interdependency
 - integrating Te Pātukurea ‘active transport modes’ goals within the overall transport system
- no change is made to the draft spatial plan in relation to public transport matters.
- the draft implementation plan includes a review of the district-wide Parking Strategy.

10 Infrastructure and flood control

10.1 Submissions

In line with the method described above, **21 out of 54** comments received in relation to **infrastructure and flood control** expressed a positive view of the draft spatial plan. The remaining comments were either critical (5) or neutral/unclear (28).

Community concerns relating to infrastructure tended to focus on the capacity of existing systems to cope with forecast growth, and on the cost of providing additional infrastructure to support growth as it occurs. Flood control and stormwater management was also prominent in the community views we received, and infrastructure and flood control are addressed separately below.

The key concerns raised by the community in relation to infrastructure issues are outlined below:

- pressure on existing systems and services, such as roads and congestion, wastewater systems, rubbish collection
- the significant scale and cost of necessary new infrastructure and uncertainties as to how this investment will be funded
- the need to ensure that developer contributions are levied, and the burden of development costs does not fall to ratepayers
- the efficiency and affordability of growth was suggested as an addition to Te Pātukurea's objectives, as an expansion of the objective of infrastructure resilience
- better integration between public sector and private sector infrastructure networks is necessary.

The key concerns raised by the community in relation to flood control issues are outlined below:

- flood control, especially in Waipapa was a prominent theme in general
- a detention dam should be considered in Waipapa to mitigate flood risk and any additional risk that results from the expansion of commercial and industrial development there
- a development moratorium should be imposed in the Waipapa flood plain until adequate flood mitigation measures are in place
- once this is achieved a separate wastewater treatment plant should be built to service Waipapa, and development should be enabled to the south of Waipapa
- in relation to urban stormwater, permeable surfaces should be promoted and additional infrastructure to manage stormwater constructed.

Concerns relating to **infrastructure and flood control** can be summarised as follows:

Infrastructure

- pressure on existing infrastructure and services, and costs of future infrastructure
- funding uncertainty and ensuring adequate developer contributions to avoid costs to ratepayers.
- adapting Te Pātukurea's objectives to include infrastructure efficiency and affordability
- a wastewater treatment plant for Waipapa to enable development

- public-private infrastructure integration.

Flood control

- Waipapa flood control, including development moratorium until adequate mitigation in place
- additional stormwater infrastructure and permeable surfaces regulations in general.

10.2 Discussion & analysis

10.2.1 Infrastructure – existing pressures and future costs

Te Pātukurea promotes a compact, sustainable urban form, concentrating most housing and business growth in the urban centres of Kerikeri and Waipapa. Intensifying development in existing urban areas makes most efficient use of existing infrastructure, such as roading and three-waters systems. But upgrades to existing systems and new infrastructure will also be required.

To ensure infrastructure is affordable, Te Pātukurea foresees the staging of infrastructure development overtime. The draft spatial plan promotes integrated strategic development planning, including spatial planning, structure and infrastructure planning and placemaking. In practice, this means that infrastructure planning can systematically anticipate future need, and infrastructure can be provided efficiently. Staging development in this way means that funding certainty can be achieved prior to development taking place.

10.2.2 Infrastructure finance and funding

Sustainable infrastructure funding is a critical long-term issue. The Growth Scenarios Report frames infrastructure funding as a ‘collaborative effort’ involving the Council, developers and the community.

The report explicitly identifies a variety of funding tools and policies that should be explored and implemented. These include developer contributions, financial contributions, targeted rates, land-value capture and central government funding and grants, alongside traditional local government tools, such as general rates. 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.

A funding and financing strategy for any spatial plan adopted will be developed through the associated implementation plan to explore ways to reduce reliance on rates. At present infrastructure cost recovery from developers has not been considered in the draft spatial plan’s infrastructure cost estimates, given the long-term nature of spatial planning, the need for flexibility, and uncertainty around costs in the absence of specific approved projects.

Under pillar two of the Government’s Going for housing growth programme a policy framework for charging ‘development levies’ is being developed. Development levies policy is intended to provide greater flexibility for councils in calculating and charging developers for the costs of growth and permitting the imposition of targeted rates on new developments. This policy may provide Council with additional ways to finance the long-term cost of infrastructure.

Ultimately however, specific policy decisions relating to infrastructure finance and the provision of public funding for infrastructure are taken during the development of Long-Term Plans.

10.2.3 Resilience, efficiency and affordability

At present, Te Pātukurea's long-term objectives include:

Our infrastructure is resilient to the impacts of natural hazards, growth and climate change.

In planning for future growth, resilient infrastructure is that which can adapt to pressures such as population increase, land use change, and environmental impacts without significant loss of function. This includes not only the capacity of systems like stormwater or wastewater to manage extra demand, but also their design, durability, and timely delivery.

Efficiency compliments resilience. Infrastructure that is well-designed, appropriately located, and planned with long-term costs in mind is more adaptable and less likely to require costly fixes later. Affordable, right-sized solutions that are properly funded help ensure infrastructure can be maintained and improved over time—supporting future communities without creating financial strain. Notwithstanding, a rigid focus on affordability may produce infrastructure decisions that produce poor community outcomes; for instance, those which trade-off other values, such as environmental or amenity values for affordability.

10.2.4 Waipapa wastewater treatment

Specific projects, such as a reticulated wastewater system for Waipapa, are subject to normal Council analysis and planning processes, such as structure planning, infrastructure assessment and requirements, and funding decisions. At present the reticulated wastewater system in Waipapa is indicated for the medium term (4-10 years) in Te Pātukurea's Implementation Plan.

10.2.5 Public – private infrastructure system integration

The substitution of public infrastructure systems with private systems (and their integration), such as wastewater treatment and disposal, has been raised during the consultation period. While there may be some benefits from sharing costs or developing short-term solutions to infrastructure provision, 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. The National Policy Statement for Urban Development (NPS-UD) anticipates that 'development infrastructure' when providing for development capacity, is provided by a Council, or Council Controlled Organisation. The PDP adopts the following definition from the NPS-UD:

development infrastructure means the following, to the extent they are controlled by a local authority or council-controlled organisation (as defined in section 6 of the Local Government Act 2002): network infrastructure for water supply, wastewater, or stormwater land transport (as defined in section 5 of the Land Transport Management Act 2003).

Notwithstanding the attractiveness of potential upfront cost savings, Council bears an obligation to plan responsibly for future growth and to mitigate risks relating to infrastructure provision. Lastly, given the discussion above, private-public integration of the kind being promoted for wastewater treatment in relation to Scenario F should be seen as contrary to the purpose of a spatial plan.

Lastly, a specific request was received on the adequate recognition of the importance of private infrastructure networks such as telecommunications systems. Inclusion within the draft implementation plan of a specific item concerning pro-active consultation with telecommunication network developers and operators in relation to new or intensified development was recommended.

10.2.6 Flood control in Waipapa

Within Te Pātukurea a precautionary approach has been taken to managing the risk of flooding. For instance, the draft spatial plan avoids enabling new residential development in flood-prone areas. The constraints presented by natural hazards such as flooding are a fundamental consideration for the draft spatial plan. This approach is confirmed by advice from Northland Regional Council (NRC), which recognises that growth areas under the draft spatial plan are unlikely to be an issue, if these areas are located outside floodplains.

There is currently not enough certainty around proposed flood mitigation, water storage, or hydro-generation projects in the Waipapa area to include them in the draft spatial plan. However, the plan, if adopted, will be regularly reviewed and updated if major infrastructure changes, such as flood control or dam projects proceed.

NRC is leading a flood mitigation assessment for Waipapa, with an independent review underway, but no timeline for the completion of this work has been provided. Updated NRC flood maps and modelling are also pending and will inform future updates to any spatial and implementation plans which Council adopts.

Additionally, updated modelling will guide future, infrastructure business cases, structure plans, and plan changes. When it is available, stormwater modelling will also be included in an upcoming catchment management plan for Kerikeri and Waipapa.

The draft implementation plan includes actions for Council to work with NRC on flood control and coordinate with other infrastructure providers to support the plan's goals and long-term flood mitigation in Kerikeri-Waipapa.

10.2.7 Development moratorium in Waipapa

As development moratorium in Waipapa to reduce the effect of flood damage until such time as comprehensive flood control measure are in place is not considered necessary or appropriate. At present land at risk from flooding in Waipapa is already zoned for urban uses, which permits appropriate development activity to take place. At present and range of existing tools and measures exist for landowners and developers to use to reduce the risk from flooding. In general, the appropriateness and use of these tools is explored and mandated during building and resource consenting.

10.2.8 Impermeable surfaces

The Proposed District Plan includes an impermeable surfaces rule to control stormwater in urban areas. Depending on the zone, the rule specifies different ratios for maximum permissible impermeable surface within lots. At present this maximum has been ‘rolled over’ from the Operative District Plan. This rule contains allowances for variations to the maximum impermeable surface, considering mitigations, such as on-site stormwater management or cumulative effects, such as total catchment impermeability.

10.3 Recommendations

As a result of this discussion, the project team makes the following recommendations:

- no change is made to the draft spatial plan in relation to how infrastructure is strategically planned
- no change is made to the draft spatial plan in relation to establishing future funding tools to support infrastructure affordability, sustainability and resilience
- amend the draft spatial plan objective relating to infrastructure to include focus on ‘efficiency’
- no change is made the spatial plan/implementation plan in relation to a Waipapa wastewater treatment plant, as this item already exists
- no change is made to the spatial plan in relation to consideration of integration of private infrastructure with public systems
- the draft implementation plan should be amended to include reference to strategic private infrastructure, such as telecommunication systems, and to include early consultation with providers of these systems as structure planning and future plan changes occur
- no change is made to the draft implementation plan in relation to flood control.
- no development moratorium in Waipapa be pursued
- no change to impermeable surfaces rules be considered within the spatial plan (as these matters are managed by the District Plan).

11 Social infrastructure, culture, recreation and amenity

11.1 Submissions

In line with the method described above, **17 out of 46** comments received in relation to social **infrastructure, culture, recreation and amenity** expressed a positive view of the draft spatial plan. The remaining comments were either critical (10) or neutral/unclear (19).

Community feedback relating to social infrastructure, recreation and amenity raised several specific matters which are out of scope for spatial plans, such as the provision of schools, hospitals and other health facilities, and of specific commercial activities, such as restaurants and shopping malls. Broadly however, Te Pātukurea proposes sufficient commercial land in both Kerikeri and Waipapa to accommodate forecast growth. Likewise, at present sufficient land area is provided within the expanded urban areas to accommodate the social infrastructure that maybe required in future, such as schools. The Ministry of Education has advised they are not planning to acquire more land in Kerikeri-Waipapa, but rather to maximise the use of existing landholdings first.

The draft implementation plan contains items relating to ongoing engagement with social infrastructure providers, such as the Ministry of Education and Te Whatu Ora Health New Zealand to ensure that critical social infrastructure is enabled.

Community feedback clearly stated the need to provide recreational and other public amenity to ensure Kerikeri and Waipapa are attractive places to live and to visit, and, in particular, the needs of local young people are considered seriously. In addition, the long-term needs of sporting organisations were highlighted to Council, as was the need to recognise arts and culture as significant contributors to local identity, vibrancy and liveability.

The key concerns raised by the community in relation to social infrastructure, recreation and amenity are outlined below:

- new facilities are required in the study areas, such as an indoor pool, indoor sports and recreation facilities
- the potential for existing sports facilities to expand should be understood and acknowledged
- an emphasis should be placed on creating high quality public space and amenity to enhance community life and to provide recreational opportunity for young people and residents in general
- due recognition should be given in the spatial plan to the existing and future infrastructure and development patterns that support the arts, cultural expression and heritage.

Concerns relating to **social infrastructure, recreation and amenity** can be summarised as follows:

- new recreation facilities, high quality public spaces and amenities, providing for young people's needs in particular
- existing sports facilities should be supported as they expand and develop

- ensuring the value of arts, culture and heritage is recognised and supported.

11.2 Discussion & analysis

11.2.1 *New facilities, spaces and amenities*

The draft spatial plan does not consider the nature of recreational facilities, such as pools or indoor sports facilities. However, at a high level it identifies the spatial distribution of likely green and recreational space, including at Te Puāwaitanga. Structure planning will enable more detailed consideration of recreation provision. Additionally, the draft implementation plan includes the completion of a community facilities benchmarking exercise, which will establish the extent of community facilities required to meet the demands of growth. Funding for community facilities is generally provided for via Long-Term and Annual Plans but also through grants, central government and other entities.

In general, Te Pātukurea's design principles directly support the development of urban and public space that enables and promotes active lifestyles and social connection, in ways that enhance our natural spaces and their use.

The public and recreational spaces that will be required as development takes place are included in the overall extent of draft spatial plan's proposed urban areas. In line with the commitment to walkability and active transport modes, this will include public spaces such as parks, walkways and bike lanes. These will connect areas within the Kerikeri and Waipapa and make getting around without a car easier, as well as providing opportunities to connect with nature and green space. The proposed spatial extent of the Kerikeri-Waipapa urban areas includes provision for these kinds of public spaces and infrastructure.

At present an Open Spaces Strategy is being developed, and this will guide the future provision of open public spaces and the interconnection of these spaces through blue-green and other network connections as the staged development that Te Pātukurea describes takes place.

11.2.2 *Support for existing sports facilities*

Te Puāwaitanga is envisioned as a district-wide sporting hub and a centre for sporting facilities. The future development and uses for Te Puāwaitanga will be shaped by a masterplanning process for that facility. The development of Te Puāwaitanga in conjunction with the expansion of urban development in northeast Waipapa has implications for the existing Baysport facility. At present, some consolidation of Baysport's activities to Te Puāwaitanga is proposed. Baysport has indicated a desire to work with Council to plan the relocation of some sporting codes from the Baysport site to Te Puāwaitanga and to ensure the future needs of their codes are met. As development occurs, the future expansion of Baysport to accommodate growth may be constrained.

11.2.3 *Arts, culture and heritage*

At present the draft spatial implies the value of arts, culture and heritage to the overall quality of life in Kerikeri-Waipapa. The draft spatial plan also refers to integrating with the recently adopted [Far North Toi Mana Arts Culture and Heritage Strategy](#). Submissions noted that limited specific detail is provided however, in relation to how the spatial plan will support or leverage existing

arts, culture and heritage infrastructure or activities to maximise the contribution these make to social, cultural and economic life in the area.

Submitters noted how cultural expression, creativity and diversity contribute to community vibrancy and cultural development in the future, and how these qualities can be supported through the draft spatial plan.

A number of submissions, including those by the Hapū Rōpū, local young people/rangatahi, and the Turner Centre pointed to the value of recognising and embedding culture as development takes place, of providing a broad range of activities and opportunities for young people to engage with, and of recognising the strategic value of facilities such as the Turner Centre in regional artistic, cultural and economic life.

11.3 Recommendations

As a result of this discussion, the report makes the following recommendations:

- include the future development of Te Puāwaitanga in the draft implementation plan, including a commitment to collaborate with Baysports and other key stakeholders to secure the future of sporting facilities in Waipapa
- implementation plan items involving the hapū in steering the development of the Kerikeri-Waipapa area are maintained
- explore supporting hapū interest in identifying and protecting sites of significance in the implementation plan, subject to future council decisions and funding opportunities
- implementation items make specific reference to the involvement of young people in steering the development of the Kerikeri-Waipapa area.
- recognition of the value of arts, culture and creativity to social, cultural and economic life is included in the spatial plan, including the spatial recognition of key creative and cultural institutions such as the Turner Centre and Te Ahurea.

12 Urban design

12.1 Submissions

The principles shaping Te Pātukurea’s aspirations for urban design were specifically consulted on within the consultation. The community was asked whether the draft spatial plan’s six design principles will help to achieve the plan objectives. In total 336 submitters responded to this question.

- 142 said yes
- 128 said no
- 67 submitters said they did not know.

As highlighted in the [Consultation Summary Report](#), most submissions that did not support Te Pātukurea’s growth strategy (164 responses out of a total of 403 unique submissions) made general criticisms about the draft plan (not specifically relating to design principles) or referred to the points made in the submission by the Our Kerikeri and Vision Kerikeri community organisations.

Additionally, **15 out of 32** comments which referred to **urban design** expressed a positive view of the draft spatial plan. The remaining comments were either critical (4) or neutral/unclear (13).

Specific concerns raised by the community in relation to urban design issues are outlined below.

- Te Pātukurea requires an urban design protocol and new developments require masterplans to guide high-quality future growth
- urban development should deliver a clear spatial hierarchy of zone and building heights moving out from the CBD areas
- ‘precincts’ should be identified to ensure connectivity and protect character/amenity.
- ‘pepper potting’ (meaning locating social housing within affluent areas) multi-storey buildings should be controlled
- growth and intensification are supported in general, but care should be taken to avoid imposing intensification without regard for context or existing ‘village character’
- the cultural and historic character of Kerikeri and Waipapa should be preserved
- accessibility (access for those with disabilities) is an important consideration.

Concerns relating to **urban design** can be summarised as follows:

- development and design protocols required to guide urban change
- intensification is supported, but careful planning is necessary to ensure high-quality future urban growth outcomes
- preserving the existing ‘village character’ of Kerikeri.

12.2 Discussion & analysis

12.2.1 Guiding principles and urban design framework

Te Pātukurea is shaped by six planning and urban design principles (see [Te Pātukurea – draft spatial plan](#), pp. 47-48):

- Te Taiao – protecting and enhancing our unique landscape
- Āhuetanga taone – sustainable urban form
- Kōwhiringa whare – housing choice
- Ahi Kā – local character and identity
- Ara tūhono – accessibility
- Whanaungatanga – connected community

These principles will be further developed and form the basis of an Urban Design Framework, which will shape how development takes place in Kerikeri and Waipapa in the future. This framework will focus on creating high-quality, sustainable and liveable places, addressing the aspects of urban design such as neighbourhood master planning, building design, public spaces, streetscapes and connectivity, including between precincts that many submitters have referenced. This framework will also address specific concerns such as accessibility for people with disabilities by incorporating universal design principles. High quality urban design is operationalised through master planning/structure planning or placemaking processes and implementation of design guidelines.

12.2.2 High-quality urban growth

In relation to the design of urban areas, a spatial plan is concerned with structuring the overall ‘urban form’. Urban form refers to the spatial extent of urban areas, how people move around the community, and how people access the things they need, such as shops and public spaces. The spatial plan outlines the design *principles* that will shape urban change, with future planning processes considering the specific layout and design of neighbourhoods and precincts.

Overall, Te Pātukurea is premised on the development of Kerikeri and Waipapa as high quality, well-planned and designed, efficient and vibrant urban centres, which enhances the existing function and character of the towns. Developing an Urban Design Framework to guide Kerikeri-Waipapa’s future development is included in the draft implementation plan.

12.2.3 Existing ‘village character’

Few specific definitions of ‘village character’ were observed in public views presented to Council. Our Kerikeri’s submission outlines a goal for “revitalising and preserving our vibrant village feel”. This submission describes a “people-first place for living, business, connections and enjoyment”.

Guided by clear design principles, Te Pātukurea provides the opportunity to enhance the character and identity of Kerikeri. It does this by promoting a connected and liveable ‘compact urban form’ for both Kerikeri and Waipapa, featuring high-quality medium density residential areas, housing choice and affordability, and efficient, sustainable resource and infrastructure

use. Conversely, the plan seeks to minimise the negative impact of ad hoc or poorly planned development has on village character, such as inefficient resource use, sprawl and dependency on private vehicles

High-quality urban growth does not preclude the provision of social and affordable housing. Rather, taking a 'people-first approach', best practice urban planning locates social housing close to amenity, social infrastructure and employment, and reduces dependence on high-cost transport, such as private car use.

The development of an Urban Design Framework will enable consideration of the key village characteristics and how these can be enhanced through future urban development. This will also inform more focused structure planning and detailed plans and guidelines for specific areas including the public realm and streetscapes and residential and commercial areas.

The development of the different planning tools which will shape the ultimate urban form and design of the Kerikeri-Waipapa urban area is proposed to take place in the short-term (1-3 years) and is outlined in the Te Pātukurea Implementation Plan (see [Te Pātukurea - draft spatial plan](#)).

12.3 Recommendations

As a result of this discussion, the project team makes the following recommendations:

- no change is made to the spatial plan or implementation plan relating to urban design and development. The need for design 'protocols' is addressed in the existing strategic urban design approach which anticipates a 'design framework' and associated planning provisions to guide future growth and development.

13 Environmental concerns

13.1 Submissions

In line with the method described above, **12 out of 38** comments received specifically in relation to **environmental concerns** expressed a positive view of the draft spatial plan. The remaining comments were either critical (3) or neutral/unclear (23).

Consultation feedback relating to environmental matters focused on three main themes:

- concern over the effect of growth on green space, trees and recreational areas
- the importance of maintaining natural open spaces, walkways and natural environments, such as tree cover
- protecting the environment from discharge or pollution, specifically the discharge of treated wastewater into wetlands and using nature-based solutions to mitigate environmental damage.

Concerns relating to the **environment** can be summarised as follows:

- maintaining and improving access to appropriate green space, natural environments and public spaces when planning for growth and intensification
- protecting the environment from pollution.

13.2 Discussion & analysis

13.2.1 Public space and amenity

In line with the discussion above, the draft spatial plan anticipates a well-designed urban form, providing access to open spaces, parks, walkways and ways of getting around without a car and which access nature-connected walking and cycling paths. Ultimately the provision of these forms of public amenity will be in-line with the Open Spaces Strategy and structure planning as it occurs.

The draft spatial plan assumes that all future demand for active park space will be consolidated in Waipapa at Te Puāwaitanga (moving some activities away from Baysports displaced by residential development), creating a centralised hub for recreational activities. Additionally, provision has been made for five neighbourhood parks, each approximately 0.2 hectares in size. These include two parks in greenfield medium-density areas in Waipapa, two in greenfield low density residential areas in Kerikeri, and one on the Turnstone land, ensuring access to adequate green spaces for future residential developments.

13.2.2 Green space and natural environments

In addition, concern over the extent and protection and enhancement of existing natural and green spaces was raised by submitters, including concern over the quality of planting and canopy cover in developed areas. A prominent sentiment observed was that while the form of urban development proposed in Te Pātukurea is supported, submitters did not want to see the further loss of trees and natural spaces as development took place. NRC echoed this concern, observing that the draft spatial plan's objective to enhance the environment could be

strengthened through a commitment in the plan to achieve a 'net biodiversity gain' as development takes place.

Suggestions such as revising landscape design and planting guides for suitable species were also made, as well as using landscape and ecological features to both improve biodiversity, achieve green space and amenity objectives and to explore the use of environmental systems to reduce the risk from flooding and inundation.

As discussed above, an urban design framework will include the integration of these considerations and work to enhance and enhance the landscape character of Kerikeri and Waipapa's urban areas.

13.2.3 Pollution control

Lastly concern was expressed relating to environmental pollution, from sources such as industrial zones and from wastewater discharge. As discussed above, Te Pātukurea is grounded in design principles that enhance and protect our environment, with features such as 'blue-green networks' both providing riparian buffers to protect waterways, providing natural flood protection and providing opportunities to access and enjoy natural space. Notwithstanding, however, measures that directly control pollution, such as resource consents administered by NRC and other national and regional environmental protection policy, will continue to apply in all contexts.

13.3 Recommendations

As a result of this discussion, the report makes the following recommendations:

- no change be made to the spatial plan in relation to how urban design will shape public and green spaces, and how natural environments will be enhanced and protected
- no change be made to the spatial plan in relation to pollution control.

14 Economic development

14.1 Submissions

In line with the method described above, **10 out of 19** comments received in relation to **economic development** expressed a positive view of the draft spatial plan. The remaining comments were either critical (1) or neutral/unclear (8).

Consultation feedback relating to economic development referred to:

- the absence of economic development matters in the draft spatial plan in general
- an under-estimation of the total quantity of commercial land required to accommodate future growth in Kerikeri
- the importance of tourism to the economy of the study area
- the need to align economic development strategy in Kerikeri and Waipapa with regional and national strategies.

Concerns relating to **economic development** can be summarised as follows:

- a lack of focus on economic development and a need to align growth strategies with higher order policy.

14.2 Discussion & analysis

14.2.1 Business land distribution

The Kerikeri-Waipapa area has, in recent decades, experienced GDP and population growth significantly higher than other parts of the Far North District. It is currently the district's largest economic and employment centre, generating 33% of the district's total GDP. Looking ahead, this area is projected to account for 50% of the district's future economic growth.

Over the 30-year forecast period, the draft spatial plan anticipates demand for an additional 18.5 hectares of commercial land and 4.7 hectares of industrial land, split between Kerikeri and Waipapa. This business growth is expected to support the creation of 1,276 new jobs. This forecast is indicative, and more detailed economic analysis will be required to fully understand the spatial plan's long-term economic impacts. Further information is provided in the [Technical Report](#) and the [Housing and Business Development Capacity Assessment](#).

Drawing on this modelling, the spatial plan has been criticised for underestimating business land demand in Kerikeri and for not adequately addressing where business land should be best located. Specifically, expanding commercial land to include the 'Packhouse node' along Kerikeri Road has been suggested.

Additional economic advice (refer to Appendix 2) has clarified that these criticisms may not account for the extent of existing vacant business land, that can be used to accommodate a portion of business growth over the short, medium and long-term. The available capacity is included when considering business land sufficiency and reduces the need for additional business land capacity to be added. Reflecting existing capacity is key to ensure that the land resources is sustainably managed and that already zoned capacity is factored into any sufficiency calculation.

It is also important to note that the location of business land is only one component of overall economic development and efficiency. Economic outcomes depend on a range of additional factors, including infrastructure, natural resources, agglomeration considerations, connectivity, labour market factors, and access to markets.

Assessing the spatial plan's contribution to economic activity requires a broader lens than simply evaluating land allocations, job forecasts, and business land estimates. Consideration should also be given to how the plan can support vibrant, well-functioning towns that enable and support economic activity over time.

As noted above, the urban growth strategy for Kerikeri and Waipapa focuses on creating compact, connected urban areas featuring high-quality public spaces, improved integration with the natural environment, and town centres that reflect each community's unique character, culture, and history. These elements contribute to a town's overall appeal, liveability, and vibrancy, which in turn supports economic efficiency by attracting visitors, new residents, and business investment.

14.2.2 Regional Deals and tourism

Recently, regional tourism and economic development initiatives have been announced as part of the Government's Regional Deals policy. Northland Inc is the lead agency for these initiatives. The draft implementation plan presents an opportunity to strengthen alignment between the spatial plan and these regional initiatives, helping to maximise economic and tourism-related benefits for Kerikeri and Waipapa.

14.3 Recommendations

As a result of this discussion, the report makes the following recommendations:

- no change be made to the spatial allocation of business land in Kerikeri
- Regional Deals initiatives and regional tourism/economic development strategy are recognised in the spatial plan, and relevant implementation plan items include this recognition.

15 Scenario F

15.1 Submissions

Most submissions in opposition to the draft spatial plan referenced support for Scenario F, which had been discounted as part of a prior process and not included in the current consultation (see [Growth Scenarios Evaluation Report](#)).

In line with the method described above, **52 out of 90** comments received in relation to **Scenario F referred to that scenario as an additional or alternative location for growth in Kerikeri and Waipapa over the next 30 years**. The remaining comments were either critical (5) or neutral/unclear (33).

Written submissions were also received in support of this scenario by Kiwi Fresh Orange Company Ltd (the landowner of Scenario F), Vision Kerikeri, Our Kerikeri Trust and other individuals and community groups. These submitters consider that Scenario F:

- enables connectivity and links Kerikeri and Waipapa through new roads and off-road walking and cycling routes, reducing traffic, travel time, and emissions
- avoids urban sprawl and minimises loss of valuable horticultural land
- allows for development of a large area, addressing land cost, supporting diverse and affordable housing, and overcoming slow subdivision rates in existing residential areas
- better aligns with the objectives of the plan and includes flood mitigation and infrastructure delivery, with costs covered by the developer rather than ratepayers.

In summary, **Scenario F** was favoured by submitters as in their view, it would:

- improve connectivity between Kerikeri and Waipapa
- support diverse and affordable housing through large-scale development by a single landowner
- minimise environmental impact associated with urban sprawl and the loss of horticultural land
- deliver infrastructure and flood mitigation at the developer's cost —reducing the financial burden on ratepayers.

Notably however, submissions which favoured **Scenario F** acknowledged 'critical success factors:

- addressing the site's limitations, explicitly stating that support is contingent on reliable flood mitigation for Waipapa (i.e. a Waipapa detention dam) and downstream areas (i.e. across Scenario F)
- the need for a comprehensive cost benefit assessment
- the developer being contractually obliged to deliver the public amenities and housing outcomes identified in their concept, including affordable housing; and
- developer contributions clearly quantified and tied to specific infrastructure and amenity outcomes, noting that without these 'guarantees' the cost burden may fall back onto rate payers and weaken the viability of Scenario F.

15.2 Discussion & analysis

Public feedback was sought on Scenario F and five other scenarios from 1 November to 29 November 2024. This feedback was included as part of the growth scenario evaluation process, which also included an infrastructure cost analysis, subject-matter expert multi-criteria assessment and a Hapū Rōpū Cultural Analysis. Scenario F was discounted for several reasons, including that:

- a high proportion of development would be within highly productive land, which conflicts with our principle of protecting horticultural land and unlikely to comply with the requirements of the National Policy Statement for Highly Productive Land
- it was not identified as the most cost-effective option for infrastructure servicing, even if the developer pays for all additional key infrastructure required to enable development of the site
- it risks creating a dormant suburb, or residential sprawl, with limited services and high car dependency, impacting connectivity and vibrancy
- a substantial portion of the land is classified as flood prone, requiring the establishment, and reliance on, flood protection mitigation structures to enable housing and business land to be established.

Considering the number of submissions received, the project team, with external SME support, undertook the exercise of exploring whether Scenario F or any part of it could be incorporated into the draft spatial plan. Specifically, planning and urban design, economic, and infrastructure expertise (three-waters and transport) was sought to explore whether unconstrained parts of Scenario F (i.e. not subject to flooding or highly productive land classification) could be added to the spatial plan as future growth areas. For reasons discussed below, the project team could not find a viable option for including some or all of Scenario F into the spatial plan. Refer to Appendix 1 & 2 for specific urban design and economic analysis.

15.2.1 Connectivity

Scenario F is a site to the west of Kerikeri. Albeit Scenario F has potential for a comprehensive master-planned development with integrated parks, infrastructure, and green spaces, the site has several features that hinder integration with Waipapa and Kerikeri. The boundary of the site to the north/east/west is defined by the Kerikeri River and associated significant natural open space which provides natural limits and act as barriers to connectivity and achieving an effective and efficient pattern of development. The river corridor also includes a flood plain area through the site, providing additional constraints to development (approximately 45% of the site is identified as a flood plain). In addition, land to the west of Kerikeri River (i.e. to the east of Waipapa beyond Scenario F land), is also subject to flooding, further restricting integration with Waipapa. The Kerikeri golf course is located at the southern boundary of the site, providing a physical separation with the urban area of Kerikeri.

Given the natural environment context of the site, several bridges and multiple roads will be necessary to support any future urban development of the area, given the ‘internalised’ and somewhat isolated nature of the site (see Appendix 1).

These connections include:

- an extensive new road network, with parts of the network inside flood prone areas
- two new bridges and an upgrade to the Golf View Road bridge, and transport links through the Bay of Islands Golf Club land.
- a major new intersection (roundabout) on State Highway 10
- a network of walking and cycling paths, to support multimodal accessibility across longer distances (compared with the more compact urban form as proposed within the draft spatial plan) to both Kerikeri and Waipapa.

The certainty of any connections is unclear as submissions from members of the Bay of Islands Golf Club on the draft spatial plan strongly oppose any future roading connections through the golf course. Additionally, NZTA has not provided comment on the proposed major new intersection (roundabout) at State Highway 10 that would be required for Scenario F, though NZTA has indicated support overall for the draft spatial plan which avoids large areas of greenfield development.

The draft spatial plan promotes physical connectivity through a compact urban form, walkable catchments, cycling routes, and blue-green networks. Notwithstanding, connectivity is not dependent on the amount of land developed. Instead, proximity to town centres is key to walkability, and enhanced walking, cycling, and public transport connections between Kerikeri and Waipapa are planned. Future infrastructure upgrades will include walking and cycling facilities and bus services.

During the assessment of the growth scenarios, overall, Scenario F scored lower than Scenarios D and E for urban form and public transport accessibility, as D and E would better encourage the development of public transport services and connectivity between the centres. These criteria considered the following:

- **Urban form:** Whether the scenario would achieving an effective and efficient pattern of development through higher density development in urban areas, and enabling a vibrant town centre, good urban design, multi-modal transport options (walkable, cyclable, low carbon) access to social, business and civic hubs, and green space and high-quality public space.
- **Public transport accessibility:** whether the scenario would encourage the development of public transport services.

15.2.2 Urban sprawl and horticultural land

The draft spatial plan promotes a compact urban form and infill development rather than urban sprawl as it will enhance connectivity by making destinations closer and more accessible. NRC is supportive of compact urban form to maintain productive land in accordance with the National Policy Statement – Highly Productive Land (NPS-HPL) and Regional Policy Statement (refer Appendix 3). In their submission NZTA stated their support for the preferred spatial plan scenario as it will provide good access opportunities for the new growth areas which benefit from being able to connect to the existing transport network. They also noted that the draft spatial plan also avoids large areas of disconnected greenfield development which may require

expensive transport infrastructure. A compact urban form is also supported by the Ministry for Housing and Urban Development.

Land that is zoned for rural lifestyle or rural residential use in either the operative or proposed district plans is excluded from the definition of ‘highly productive land’ and has no protection under the NPS-HPL. This exemption applies to land zoned rural residential in the study area that would have been classed as highly productive, such as parts of the Kerikeri south area (Scenario D). Conversely, Scenario F (zoned rural production) includes a significant portion of highly productive land that is not exempt from protection. Development within the area of Scenario F would therefore see the loss of highly productive land.

In addition, the NPS-HPL directs that rezoning of highly productive land can occur only if there are no other reasonably practicable and feasible options for providing at least sufficient development capacity within the same locality and market while achieving a well-functioning urban environment. The draft spatial plan demonstrates that there are reasonably practicable alternatives therefore Scenario F does not meet the necessary statutory tests.

In recognition that the Government has signalled their intention to remove Land Use Class 3 (LUC-3) from the NPS-HPL⁴, LUC3 was classed as Wāhi Toiora (instead of Wāhi Toitū). Any changes to the NPS-HPL will require public input before they are confirmed and have legal effect. As such, LUC-3 still requires protection under the NPS-HPL.

15.2.3 Development issues and affordability

Minimising costs is crucial for delivering affordable housing. Submitters have pointed to the idea that greenfield development will be lower in cost and therefore better achieve the affordable housing outcomes sought by the plan. However, whilst greenfield developments might have cheaper upfront land costs, the full picture is more complex and depends on factors such as location, infrastructure costs, and the regulatory environment. Greenfield projects often incur elevated costs due to the need for extensive new infrastructure, such as roads, water supply, wastewater systems, and community facilities.

A greenfield development is not necessarily a more cost-effective option relative to intensification options. Intensification can provide cost savings that accrue across the urban system and to potential homeowners and renters. This is because higher land values provide developers with incentives to make better (more intensive) use of urban land, enabling higher-density typologies to be financially viable. Intensification also leverages existing infrastructure to support efficient growth.

A key point raised in submissions has been that dealing with a single, large developer will enable efficient development to occur in response to growth pressure. At a development-wide level, dealing with one, or a small number of landowners may make the overall process easier. However, this point is less relevant when considering the overall Kerikeri-Waipapa development landscape, which includes significant proportion of brownfield development. An essential element of supporting the residential market is to ensure a competitive housing market

⁴ and will consult on establishing ‘special agriculture zones’ that includes LUC 1, 2 and 3 as part of Phase 2 of RM Reforms.

operates. This includes being able to develop across multiple locations. In fact, having few, large developers, has the potential to create adverse economic effects within the land and housing markets, with significant market power accruing to a small number of landowners. A situation of concentrated market power may be inconsistent with the NPS-UD in so far as relying on a single developer, or small number of developers, to service the bulk of housing demand for several decades to come may limit choice - such as in relation to housing type, location and price - and potentially undermine the competitive operation of the land and development markets generally.

Lastly, expanding development into the Scenario F site, including the further spatial dispersal of commercial development, is likely to undermine the benefits that the draft spatial plan is seeking to achieve, such as the agglomeration effect⁵ of concentrating development in the key urban centres of Kerikeri and Waipapa. Establishing new commercial nodes undermines agglomeration effects and undermines overall system efficiencies, such as encouraging additional traffic to new areas.

15.2.4 Infrastructure servicing

Infrastructure servicing costs were considered for each potential growth scenario, resulting in the following cost estimates:

- hybrid growth scenario (parts of D and E) \$145M to \$248M + unquantified stormwater costs
- Scenario F \$134M to \$234M + unquantified stormwater costs
- original Scenario D \$145M to \$207M + unquantified stormwater costs.

The cost estimates for Scenario F did not include costs for the following additional key infrastructure necessary to service Scenario F, which are assumed to be costs borne by the developer:

- two new and one upgraded transport bridges spanning Kerikeri River and Puketōtara Stream
- flood mitigation
- new access onto State Highway 10
- private wastewater treatment plant for eventual vesting to Council.

There is no certainty that the developer is committed to paying for the infrastructure required to service Scenario F. Despite the expectation that some infrastructure costs could be recovered through development contributions, agreements or similar, by including Scenario F in the spatial plan Council bears the ultimate responsibility of providing the necessary infrastructure.

Likewise, that this is a greenfield site, network infrastructure will need to be provided up-front of development and will be difficult to stage. More specifically:

⁵ the benefits that businesses and households gain by being close to each other. Physical closeness reduces transaction costs (e.g., transport, time, communication). That is, being near related or complementary businesses—like suppliers, service providers, or competitors—encourages collaboration, competition, and innovation. In a small-town context, such as Kerikeri and Waipapa, agglomeration can be achieved through spatial clustering of businesses (e.g., in a main street or near key intersections).

- A significant water supply extension is 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 pressure/quality perspective.
- An extension of the Kerikeri wastewater network is 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 are 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 Scenario F, as suggested by Kiwi Fresh Orange Company (KFO), as a temporary option until public reticulation is funded and installed, is not preferred due to the on-going maintenance and operational requirements. We have discussed issues relating to private-public system integration above – see Section 10 - *Infrastructure and flood control*.
- 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.

As several submitters have requested that Scenario F is added to the existing hybrid scenario, were that to occur, infrastructure servicing costs would be additional to the cost estimates for the hybrid scenario, increasing the overall cost of growth.

15.2.5 Could part of Scenario F be incorporated?

We have also considered whether areas that are unconstrained by wāhi toitū and wāhi toiora could be integrated as part of the draft spatial plan. While there are discrete portions of Scenario F that are technically developable, none of these were able to be integrated as successful growth scenarios that achieve well-designed and functional urban/economic areas.

Developing part of the site reduces the overall scale of development, but the issues with connectivity and urban form remain. The area of land that is developable on the site still requires significant infrastructure to gain access in and through the site, and to service any residential area.

As the full extent of the site would not be developed, the cost of providing the infrastructure is likely to be a significant barrier to development due to lower economies of scale. Substantial infrastructure investment would continue to be needed, and the scale of this investment will affect development costs and housing affordability.

Cost estimates for infrastructure to service only the developable part or parts of Scenario F have not been developed, on the basis that the key infrastructure necessary (listed above) is expected to make development of only part of Scenario F uneconomic.

15.2.6 Flood mitigation

A significant proportion of the Scenario F site is subject to risk of flooding. Scenario F proposes flood mitigation in the form of a floodway to convey SH10 overflows through the site, and a

stopbank along the true right bank of the Kerikeri River downstream of the SH10 to prevent overflows into the site from the Kerikeri River. The proposal differs from the spillway scheme previously investigated by NRC.

As highlighted by NRC (Appendix 3) there is no information relating to costs, ownership, operation or maintenance of the proposed flood mitigation assets over life of the asset. If the intention is for the assets to be vested in either of the Councils, costs to the rate payer may be more justifiable if there were wider catchment benefits to areas north of the river. However, the benefits are largely limited to the Scenario F site, and the flood risk for Waitotara Drive, Waipapa Road, and Rainbow Falls Road is not significantly reduced.

Council's Infrastructure Group representative has provided comment regarding flood mitigation proposed for Scenario F: Extraordinary weather events of the last 2 years are driving a rethink of flood resilience. Notwithstanding proposed flood mitigations, there are long-term risks associated with directing development within the Scenario F land and questions regarding management of on-site flood mitigations and costs for installing and maintaining these structures.

Additional risks include:

- use of hard protection structures: There are residual risks associated with stopbanks, including over-topping and structural failure.
- no consideration is given to over-design events: the flood mitigation proposed for Scenario F does not discuss or consider over-design events. Following a series of exceptionally large floods across New Zealand there is a move towards adopting a more conservative approach for land use planning in floodplains, and flood scheme design.
- the proposed floodway: It is not clear if the floodway would be formed from excavation or bunding, or a combination of the two. Excavation would reduce residual risks and allow for drainage, including overland flows from the south.
- access: The Structure Plan Land Use plan provided (by KFO for proposed urban development of Scenario F) shows proposed local roads and cycleways through the site. Three of these routes from the site cross major water courses and the fourth route connects to the SH10 at the Puketōtara Road intersection. All access routes may be affected during large flood events. All new bridge crossings would need to have sufficient freeboard above design flood levels to mitigate debris blockage risk. The proposed road to the north would require a bridge crossing over the Kerikeri River between the north corner of the site and Waitotara Drive.

These risks are acknowledged in several submissions which favour the Scenario F growth model. These submissions point to the need for additional comprehensive flood mitigation works as a solution for the flood risk to Waipapa and to enable the Scenario F site's development. A measure frequently cited is the construction of a flood detention dam north of Waipapa.

15.2.7 Overall plan objectives

Finally, some submitters state that an alternative scenario would better achieve the objectives of the spatial plan. The evaluation process did not reach this conclusion, instead identifying that a combination of scenarios D and E best achieve the objectives of the plan. This conclusion is reinforced by the analysis presented throughout the report.

15.2.8 Impact to project timelines

Incorporating all or part of Scenario F into the spatial plan would be considered a substantial, significant change to the draft spatial plan that was consulted on between March and April 2025. Such a change would likely necessitate another round of public consultation meaning the spatial plan could not be adopted in June 2025.

Council's development of the draft spatial plan has been undertaken over an extended period first commencing in 2022. The process has been iterative with a progressive refinement of the range of scenarios under consideration. While Scenario F was considered at an earlier stage of development, it did not form part of the draft spatial plan approved by Council for consultation in October 2024.

The options identified in the consultation undertaken under the Special Consultative Procedure (SCP) contemplate three alternative outcomes: adoption of the draft spatial plan, adoption of the draft spatial plan with amendments, or a decision not to adopt the draft spatial plan. Following an analysis of the process undertaken to date, including the practical implications of revising the current draft to incorporate Scenario F, staff are of the view that a decision by Council to incorporate Scenario F, or parts thereof, would constitute a significant change which could not be categorised as simply an amendment of the existing draft.

Furthermore, having regard to the decision-making requirements under Part 6 of the Local Government Act 2002 and public law principles of fairness, any decision to incorporate Scenario F into the draft spatial plan without undertaking further formal consultation would likely be "unfair" from a procedural perspective exposing Council to risk of legal proceedings. This is because incorporation of Scenario F would result in a plan substantially different to the proposal consulted on and therefore an outcome which could not have been reasonably contemplated based on Council's consultation.

Lastly, if another round of public consultation is required, there will be implications for the Proposed District Plan (PDP) hearings and decision-making processes. Either Council would need to decide to seek an extension of time from the Ministry for the Environment (for extended PDP timeframes) likely pushing the date for a decision on the PDP out to 2027. Alternatively, Council would need to decide to proceed with the PDP hearings timetable, meaning the Proposed District Plan proceeding in advance of an agreed blueprint that provides strategic direction for growth and urban change, the implications being ad hoc and disjointed decision-making, additional costs and uncertainty in respect to Council's plans for growth.

15.3 Recommendations

In response to submissions received on the draft spatial plan, the project team has, with support from our subject matter experts, explored the potential to incorporate unconstrained Scenario F lands into the draft spatial plan. For the reasons set out above, and summarised

below, the project team confirm that Scenario F, in part or in full, does not result in the best outcome for long term urban growth of Kerikeri and Waipapa. The critical issues for Scenarios F are:

- disconnection from the existing urban areas
- it contains a large proportion of highly productive land
- development issues, including the potential to create inefficiencies in the local development market and to undermine development efficiencies
- significant infrastructure and servicing needs and associated costs
- significant flood risk.

Many of the submitters in support of Scenario F acknowledged there are caveats to their support, noting that the following matters would need to be addressed before they would fully support Scenario F outright: reliable flood mitigation, obligation to deliver on outcomes offered by KFO, comprehensive cost benefit analysis, and developer funding of infrastructure.

Therefore, we recommend that Scenario F continues to be excluded for long term growth within Te Pātukurea.

Further, we note that any decision to include Scenario F in the spatial plan for future urban use would mean that Council is committed to rezone that land for urban use either as part of the Proposed District Plan or in the future. Rezoning commits Council to bear infrastructure costs associated with servicing that future urban land. Any decision to rezone the land needs to be supported by a robust evidence base that would pass the necessary Resource Management Act statutory tests (including giving effect to the National Policy Statement and Regional Policy Statement direction). Based on existing available information, Council staff are not confident that Scenario F would pass the necessary statutory tests, including:

- requirement to achieve a well-functioning urban environment under the NPS-UD (good accessibility, well-connected, resilient to the likely current and future effects of climate change)
- requirement to protect highly productive land under NPS-HPL (rezoning of highly productive land only if there are no other reasonably practicable and feasible options for providing at least sufficient development capacity within the same locality and market while achieving a well-functioning urban environment)
- requirement to minimise the risks of natural hazards, avoid inappropriate new development in 10 and 100 year flood hazard areas, and promote long-term strategies that reduce the risk of natural hazards impacting on people and communities. (Sections 3.13 and 7 of the [Northland Regional Policy Statement](#)).

In addition, there are several other pre-requisites that constrain the ability for Scenario F to be delivered. These include significant flood mitigation works (and their funding and regulatory approval), numerous additional roads, accesses and bridges, and the regulatory approval and practical establishment of a wastewater treatment plant and associated suitable location for discharge of treated wastewater, and other servicing requirements. There is uncertainty over whether Scenario F can access the required landholdings to deliver this infrastructure.

Therefore, there is uncertainty whether the Scenario F option could be implemented. The constraints may also delay the ability to deliver housing outcomes (assuming they could be adequately resolved).

16 Summary of recommendations

The final section of the report summarises the project team's recommendations to Council.

Hapū Rōpū

- Council will explore supporting hapū in their work to establish their own strategic and planning frameworks in areas of concern to them, and that this support is referenced in the spatial plan, subject to funding and future Council decisions
- implementation plan items involving the hapū in steering the development of the Kerikeri-Waipapa area are maintained
- includes items exploring supporting hapū interest in identifying and protecting sites of significance in the implementation plan, subject to funding and future Council decisions
- co-governance and co-management opportunities are explored as part of this work
- additionally, a structured process be identified in the implementation plan to realise hapū aspirations in relation to housing, social, economic and cultural development in Kerikeri-Waipapa.

Rangatahi

- ensure that final spatial plan text recognises rangatahi and their role in determining the future of the Kerikeri-Waipapa area
- ensure that rangatahi are included in implementation plan actions which specifically address growth and development in Kerikeri-Waipapa, such as structure and master planning processes and assessments of community facilities.

Growth, housing and land use

- no change occurs to the overall form and spatial extent of the housing growth proposed in Kerikeri, to promote high quality development and preserve rural lifestyles and community vibrancy
- the protections for sensitive land are maintained in the spatial plan
- Te Pātukurea continues to pursue the 'destination node' located in the Turnstone Trust development via Proposed District Plan process or future plan change
- no change occurs to the expansion of industrial land in Kerikeri, but that the expansion is noted as sensitive, but it is necessary to service future growth
- an implementation action is added to investigate the reconfiguration of residential and industrial land in Waipapa.

Transport and connectivity

- the draft implementation plan includes items which strengthen collaboration and engagement between Council and NZTA in relation to:
 - network capacity
 - local-national road network interdependency

- integrating Te Pātukurea ‘active transport modes’ goals within the overall transport system
- no change is made to the draft spatial plan in relation to public transport matters
- the draft implementation plan includes a review of the district-wide Parking Strategy.

Infrastructure and flood control

- no change is made to the draft spatial plan in relation to how infrastructure is strategically planned
- no change is made to the draft spatial plan in relation to establishing future funding tools to support infrastructure affordability, sustainability and resilience
- amend the draft spatial plan objective relating to infrastructure to include focus on ‘efficiency’
- no change is made the spatial plan/implementation plan in relation to a Waipapa wastewater treatment plant, as this item already exists
- no change is made to the spatial plan in relation to consideration of integration of private infrastructure with public systems
- the draft implementation plan should be amended to include reference to strategic private infrastructure, such as telecommunication systems, and to include early consultation with providers of these systems as development occurs
- no change is made to the draft implementation plan in relation to flood control
- no development moratorium in Waipapa be pursued
- no change to impermeable surfaces rules be considered within the spatial plan.

Social infrastructure, culture, recreation and amenity

- include the future development of Te Puāwaitanga in the draft implementation plan, including a commitment to collaborate with Baysports and other key stakeholders to secure the future of sporting facilities in Waipapa
- implementation plan items involving the hapū in steering the development of the Kerikeri-Waipapa area are maintained
- includes items supporting hapū interest in identifying and protecting sites of significance in the implementation plan, subject to funding and future Council decisions
- implementation items make specific reference to the involvement of young people in steering the development of the Kerikeri-Waipapa area
- recognition of the value of arts, culture and creativity to social, cultural and economic life is included in the spatial plan, including the spatial recognition of key creative and cultural institutions such as the Turner Centre and Te Ahurea.

Urban design

- no change is made to the spatial plan or implementation plan relating to urban design and development. The need for design ‘protocols’ is addressed in the existing strategic

urban design approach which anticipates a ‘design framework’ and associated planning provisions to guide future growth and development.

Environmental concerns

- no change be made to the spatial plan in relation to how urban design will shape public and green spaces, and how natural environments will be enhanced and protected
- no change be made to the spatial plan in relation to pollution control

Economic development

- no change be made to the spatial allocation of business land in Kerikeri
- Regional Deals initiatives and regional tourism/economic development strategy are recognised in the spatial plan, and relevant implementation plan items include this recognition.

Scenario F

- the project team recommends that Scenario F continues to be excluded for long term growth within Te Pātukurea.

17 APPENDICES

Appendix 1: Urban Design Memorandum prepared by Jane Rennie, Boffa Miskell

Appendix 2: Economics Memorandum, prepared by Lawrence McIlrath, Market Economics Ltd.

Appendix 3: Letter from Northland Regional Council (dated 7 May 2025) and 3A staff Email (dated 9 May 2025)

Appendix 4: Summary of Land Use Changes