

**BEFORE HEARING COMMISSIONERS DELEGATED BY FAR NORTH
DISTRICT COUNCIL / TE KAUNIHERA O TE TAI TOKERAU KI TE RAKI AT
KAIKOHE**

UNDER the Resource Management Act 1991 (RMA)
IN THE MATTER of the hearing of submissions on the Proposed Far North
District Plan

**MEMORANDUM OF COUNSEL FOR KIWI FRESH ORANGE COMPANY
LIMITED (SUBMITTER 554)**

29 AUGUST 2025

Solicitor acting:
M J Doesburg
Wynn Williams
PO Box 2401, AUCKLAND 1140
Tel +64 9 300 2600
mike.doesburg@wynnwilliams.co.nz

WYNN WILLIAMS

MAY IT PLEASE THE PANEL

- 1 Kiwi Fresh Orange Company Limited (**KFO**) seeks appropriate directions from the Panel to admit supplementary traffic evidence in relation to Hearing 15D on the Proposed Far North District Plan (**PDP**).
- 2 As foreshadowed by memorandum of counsel dated 16 May 2025 and by the transport evidence of Philip Brown dated 16 June 2025, KFO has been working with Flow Transport Specialists (the holder of the Council's transport model for Kerikeri/Waipapa) to model the potential traffic effects of KFO's rezoning proposal.
- 3 Owing to capacity constraints under the timetable for evidence exchange, the modelling report was unable to be completed by the deadline for submitter evidence. As explained by Mr Brown's evidence, the additional modelling was undertaken to holistically access the range of access options for the site, with due consideration to other spatial planning matters being considered by the Council.
- 4 The final modelling report by Flow Transport Specialists was received on 28 August 2025, and TEAM Traffic has since produced a covering summary.
- 5 The report and accompanying summary are **enclosed** for filing. Copies have been provided to the Council and s 42A reporting officer earlier today.
- 6 Accordingly, KFO seeks directions:
 - (a) Granting leave (as needed) to admit the report and covering summary as supplementary evidence of Mr Brown; and
 - (b) Providing that if any further submitter wishes to respond, they may do so in rebuttal evidence which is due for filing on 22 September 2025.

Dated 29 August 2025



Mike Doesburg
Counsel for Kiwi Fresh Orange Company Limited