

**BEFORE A HEARINGS PANEL
OF THE FAR NORTH DISTRICT COUNCIL**

I MUA NGĀ KAIKŌMIHANA MOTUHAKE O TE HIKU O TE IKA

Under the	Resource Management Act 1991 (RMA)
In the matter	of a request for rezoning of land in the Kerikeri-Waipapa area under the proposed Far North District Plan

**STATEMENT OF EVIDENCE OF JANE MAREE RENNIE IN SUPPORT OF SECTION 42A
REPORT FOR HEARING 15D**

URBAN DESIGN

10 September 2025



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1. INTRODUCTION

- 1.1 My full name is Jane Maree Rennie. I am an Urban Designer and Partner at Boffa Miskell Limited. I have been in this position since 2009. I hold the qualifications of Bachelor of Planning from Auckland University (1994) and a Post Graduate Diploma (Merit) in Urban Design from the University of Westminster (London) (2005).
- 1.2 I am a Full Member of the New Zealand Planning Institute. I am a member of the Urban Design Forum, a Crime Prevention Through Environmental Design (**CPTED**) Practitioner¹ and a member of the Lyttelton Design Review Panel. The role of the Panel is to provide design advice to promote good design and a quality urban environment that expresses the local character and identity of Lyttelton. I am an Approved Urban Design Expert Certifier on behalf of Christchurch City Council.
- 1.3 I have 30 years' experience working in Urban Design and Planning in New Zealand, North America, and the UK for both the public and private sectors. My professional areas of expertise include concept and master planning, spatial planning, precinct plans, urban amenity and character studies, urban design assessments, policy development and guidance, land use and public transport integration, public and stakeholder engagement and CPTED. In my work at Boffa Miskell I have been involved in the urban design for a number of town centres and medium density residential and intensification areas. I contribute to urban design content in District Plans and review of Plan content. I have prepared evidence for and appeared in resource management consent and plan hearings, Environment Court mediations and Environment Court hearings.
- 1.4 I have been asked to provide evidence in relation to urban design, to support the evaluation report prepared under s 42A of the RMA.
- 1.5 I have been assisting the Far North District Council (**Council**) on the Te Pātukurea Kerikeri Waipapa Spatial Plan (**Spatial Plan**) since 2024. As part of this process, I have provided urban design advice into the future urban form of Kerikeri and

1 International Security Management and Crime Prevention Institute Advanced Workshop Training, 2017 / Advanced CPTED Training Course, Frank Stoks, 2010.

Waipapa, including consideration of the role of intensification and medium density housing. I have also provided urban design evidence in relation to the Proposed Far North District Plan (**PDP**).

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

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

2. SCOPE OF EVIDENCE

2.1 This evidence relates to the urban design effects associated with KFO's rezoning request. To determine the effects, it is necessary to consider whether there will be a positive (beneficial) or negative (adverse) urban design effect in the context of Kerikeri and Waipapa.

2.2 As such, my evidence will cover the following matters:

- (a) site description and proposal;
- (b) urban form, character and connectivity of the KFO proposal;
 - (i) urban form policy context;
 - (ii) urban form and impacts on existing centres;
 - (iii) connectivity and a compact and consolidated urban form;

- (c) Proposed District Plan – Recommendations Version (**PDP-R**) option to provide development capacity;
- (d) internal layout of the KFO proposal;
- (e) policy evaluation;
 - (i) National Policy Statement Urban Development (**NPS-UD**);
 - (ii) Northland Regional Policy Statement (**NRPS**);
 - (iii) PDP;
- (f) proposed plan provisions; and
- (g) conclusion.

2.3 I visited the site with Ms Melean Absolum and Mr Jerome Wyeth on 24 June 2025. I am familiar with the wider context.

3. SUMMARY OF EVIDENCE

- 3.1 In my opinion, urbanisation of the KFO site would give rise to a number of adverse urban design effects, including:
- (a) **Loss of Local Character:** The proposal risks altering the unique townscape qualities of Kerikeri and Waipapa.
 - (b) **Erosion of Town Identity:** The proposal will diminish the distinctive role and function of both towns, impacting what the community value about Kerikeri and Waipapa.
 - (c) **Compromised Urban Boundaries:** Existing defensible urban edges will be weakened, likely leading to urban sprawl in the future.
 - (d) **Inefficient Urban Growth:** The proposal will not support a compact and efficient growth pattern, undermining the ability to achieve a compact

and consolidated urban form for Kerikeri and Waipapa as envisioned in the Spatial Plan.

- (e) **Poor Connectivity:** The proposal lacks integration with the existing urban areas creating physical barriers and reducing accessibility.
- (f) **Car-Centric Design:** The proposed layout promotes private car dependency, limiting support for multimodal transport options.
- (g) **Unresolved Layout Issues:** The internal design has a number of shortcomings and has not been fully tested through the various planning documents, which will lead to adverse urban design outcomes.

3.2 It is my opinion that the proposed Precinct Chapter (objectives, policies, rules and Structure/Precinct Plan) does not address a number of place-based or good practice urban design considerations. I do not consider it to be fit-for-purpose in achieving the vision for the site. While future development is expected to respond to the site and context, there is a lack of certainty about how the unique qualities and identity of the site and overall vision are reflected and how these outcomes would be achieved in a staged manner. Although the Structure/Precinct Plan has been included in the Precinct Chapter, it is unclear how it will inform decision making, with no link to the Plan in the Comprehensive Development Plan provisions or assessment matters and no overall consideration of urban design. In addition, it is my opinion that the Structure/Precinct Plan layout does not align with best practice urban design principles.

3.1 I consider that the proposal does not align with the policy intent of the NPS-UD, the NRPS, or the current land use patterns in Kerikeri and Waipapa. In my opinion, the proposal will not achieve a well-functioning urban environment.

3.2 The Spatial Plan directs growth to occur within and immediately adjacent to the existing built-up environments of Kerikeri and Waipapa and away from rural areas. This supports a consolidated approach to growth, in order to enhance the vibrancy and sense of community and optimise land use patterns, while maintaining the environment quality and character of the townships. The proposal will undermine the ability to achieve these growth outcomes.

- 3.3 In conclusion, I do not support the proposed urban zoning of the KFO site from an urban design perspective. I consider that the proposal is not sound in its execution and the associated provisions are not suitably robust and comprehensive to ensure a positive urban design outcome. The proposed urban zoning would result in a number of adverse urban design effects.

4. SITE DESCRIPTION AND PROPOSAL

- 4.1 The site which is the subject of the submission is located between the townships of Waipapa and Kerikeri. It is bound by State Highway 10, which passes north-south along the western boundary of the land, the Bay of Islands Golf Club, which is located to the south, and the Kerikeri River running along the northern boundary.
- 4.2 The site is approximately 197 hectares in size. The site includes large areas of flat land along with some topographical features that result in moderate sloping land. A large part of the site is in grazed pastoral grassland. An eastern 'amphitheatre' comprises indigenous vegetation and a wetland.
- 4.3 The site is proposed to be zoned Rural Production under the PDP. KFO seeks a change to an urban zoning comprising General Residential, Mixed Use and Natural Open Space and a flood prone area overlay (see Figure 1). The request seeks to enable urban development and provide capacity consistent with the anticipated demand for housing and business land over the short, medium and long term, while timing provision of infrastructure, integrating with the existing environment of Kerikeri and Waipapa, protecting the natural environment, facilitating connectivity, and managing effects of potential natural hazards.

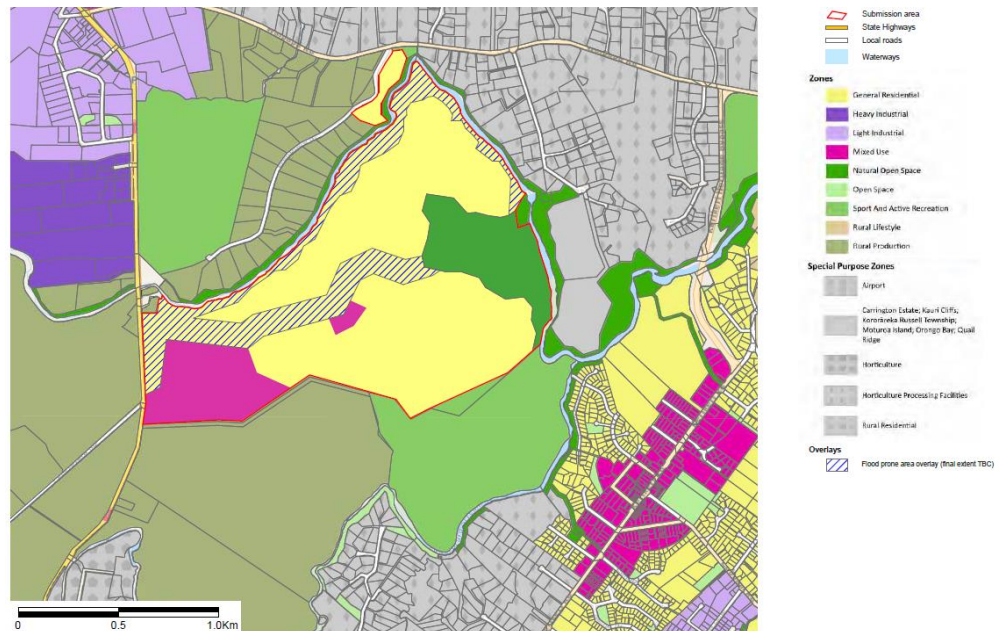


Figure 1: Proposed Zoning Plan and Flood Prone Area Overlay (source: Pacific Environments Architects)

4.4 The rationale for the zoning request as set out in the KFO submission of particular relevance to urban design, includes:

- (a) the Site is a logical place for urban development that cannot be provided by infill development alone, while bridging the gap and integrating with the two urban areas of Kerikeri and Waipapa;
- (b) the mix of zonings will accommodate the various needs of urban growth whilst recognising and avoiding development of significant ecological features;
- (c) enabling the social and economic well-being of the community in Kerikeri and Waipapa by providing housing supply to meet demand; and
- (d) give effect to the objectives and policies of the NPS-UD and the Regional Policy Statement for Northland.

4.5 In support of the submission, KFO have prepared a **Precinct Plan** that contains the objectives, policies, rules and a plan that would apply to development on the site and provision of infrastructure. The zoning rules and district wide rules align with

Parts 2 and 3 of the PDP. Specific provisions are outlined to manage the amount of retail floor space to ensure the area does not detrimentally compete with the existing Kerikeri town centre. The proposal indicates between 1,500-2,000 dwellings and up to 44,500sqm of commercial and employment use plus hotel, neighbourhood and local centre uses of up to 10,000sqm².

4.6 Of particular relevance to urban design is proposed Objective TPW-01 in creating a 'well-functioning, quality urban environment' and Objective TPW-04 in achieving 'Connected, quality, multi-modal transport connections that provide high amenity and resilience for the community are provided in conjunction with urban development' (noting that neither objective specifies the level of quality sought, i.e. 'exemplar high quality' as set out in the KFO vision). Objective TPW-05 seeks to 'Ensure commercial activities are of an appropriate scale and nature that support the neighbourhood community and do not detract from the Kerikeri Town Centre'.

4.7 The Precinct Plan is based on a **Structure Plan** prepared for the site, which identifies how the Precinct Plan has been developed and how the PDP provisions will apply spatially to the Site (see Figure 2). The Structure Plan which is included within the Precinct Chapter (and referred to as the Precinct Plan) includes the following vision for the site:

*"To create an exemplar high-quality urban environment, reflecting a strong pattern of natural elements, providing seamless connections to Waipapa and Kerikeri whilst contributing to the overall unique character and vitality of Kerikeri - the largest urban centre in the Far North District. The land exhibits high quality natural features that can be protected and enhanced. The opportunity to manage flood hazards in the area provides further opportunity to strengthen natural environment elements and the land is strategically well placed to provide strong multi modal transportation connectivity."*³

2 Team Report, dated 19 October 2022 (and forming part of the Submission document).

3 Pacific Environments/The Planning Collective, Structure Plan: Brownlie Land – Kerikeri -Waipapa, 21 October 2022, Executive Summary, page 1.

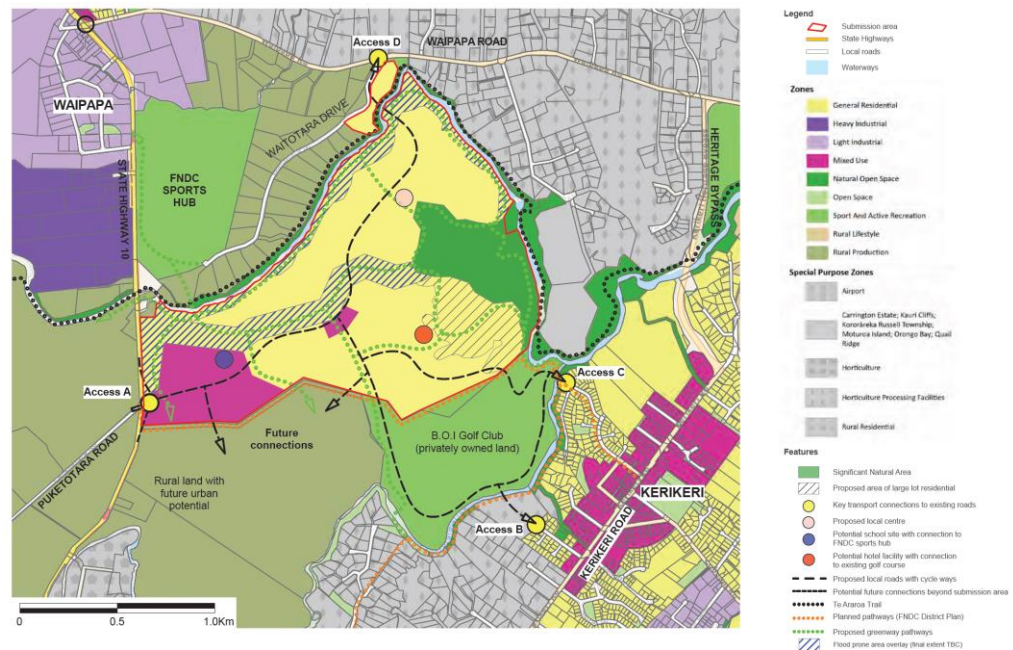


Figure 2: Proposed Structure Plan (source: Pacific Environments Architects)

4.8

Section 4.1.6 of the Structure Plan document sets out the urban design context and section 7.1 sets out the 'Urban Design Principles'. The 'Landscape and Urban Design Principles' set out under Section E of the Landscape and Character Assessment (Littorailis) are :

- (a) *“Development is to provide a high level of living amenity that reflects and is respectful to the form and character of Kerikeri.*
- (b) *Achieve a compact and efficient urban form that responds to the physical characteristics and constraints of the Site.*
- (c) *Provide a mix of residential living opportunities supported by an appropriate extent and mix of non-residential activity such as commercial and retail activities.*
- (d) *Use the open space zones as a framework that ties the development together. The use of the open space and natural open space zone is to be multifaceted (i.e., stormwater, wildlife, transport connections, amenity).*
- (e) *Promote non-vehicular modes of transport.*

- (f) *Minimise barriers between public and private spaces.*
- (g) *Support higher density development in close proximity to amenity, transport connections and access to open space.”*

4.9 The relief sought by KFO requires assessment of Kerikeri-Waipapa as a Tier 3 urban environment under the NPS-UD, consideration under the PDP and the National Policy Statement for Highly Productive Land and various outcomes relating to the objectives and policies within the General Residential Zone, Mixed Urban Zone and the Natural Open Space Zone.

5. URBAN FORM, CHARACTER AND CONNECTIVITY OF THE KFO PROPOSAL

5.1 At the outset, I agree with the need for housing and business land to support Kerikeri and Waipapa’s growth. However, urban growth needs to be in a location that supports appropriate outcomes in terms of urban form, character and connectivity.

Urban form policy context

5.2 Through the process of preparing the Spatial Plan, it has been acknowledged by the Council that the population of Kerikeri will exceed 10,000, and as such the area will equate to an ‘urban environment’ which is subject to the Tier 3 requirements under the NPS-UD. Therefore, there is a requirement to reflect the new policy focus of the NPS-UD as it relates to design and built form on the quality and functionality of the future built environment.

5.3 The NRPS is also of relevance to urban form, with Issue 2.4 stating that: *“Unplanned and un-coordinated development and poor urban design can lead to reduced levels of amenity, higher infrastructure costs, and reduced community wellbeing.”*

5.4 The PDP sets out a number of strategic direction objectives relating to urban form and development under Objectives SD-UFD01-04. Of specific relevance is SD-

UFDO1 *“The wellbeing of people who live in and visit towns in the Far North is considered first when it comes to planning places and spaces”* and SD-UFDO2 *“Urban growth and development consolidated around existing reticulated networks within town centres, supporting a more compact urban form, affordability and providing for a mix of housing typologies.”*

- 5.5 The Spatial Plan⁴ sets out how the Council will manage growth over a 30-year period by identifying areas appropriate for housing, business and industry along with open space and social infrastructure. The Spatial Plan acknowledges the role of Kerikeri within the District as a key commercial and residential centre and demand for growth in Waipapa. The Spatial Plan outlines provision for 4,690 additional dwellings, 18.5ha of business land and 4.7ha of industrial land. This includes a focus on more efficient use of existing land through intensification in central locations and along key corridors (future public transport corridors).
- 5.6 Specifically, the Spatial Plan identifies 20-40% of residential growth through intensification (through a mix of infill and greenfield development), by enabling medium-density development within Kerikeri where appropriate, to support greater housing choice and affordability. This allows for duplexes, terraces, and walk-up apartments. These typologies are largely absent from the housing market and by broadening housing choice, they can help rebalance a market that is presently skewed toward lower-density, standalone dwellings. Areas of medium density residential have been identified immediately adjacent to the existing town centre (and within new growth areas) (see Figure 3 – orange / orange ‘hatched’ area). The Spatial Plan sets out what intensification within the existing urban areas ‘could’ look like, including consolidation achieved by intensifying activities in and around the centre and increasing residential density in key locations (see Figures 4 and 5) to achieve densities around 40-48 dwellings per hectare.
- 5.7 In addition to focusing on achieving a compact and consolidated urban form as sought through the PDP Strategic Directions, the Spatial Plan identifies a new residential and mixed use neighbourhood immediately to the south of the town by way of greenfield expansion within the existing urban area of Kerikeri and

4 Adopted by the Council in June 2025.

supporting a contiguous urban environment. This will provide for a mix of low and medium density housing options to cater to diverse lifestyle preferences. Grouped around these locations will be amenities such as small parks, local shops, cafes, and community facilities supporting a compact urban form that promotes walking and cycling and encourages more connected communities.

- 5.8 The Spatial Plan includes Scenario F as a 'Contingent Future Growth Area'. The inclusion of Scenario F in this way does not change the adopted growth scenario or the infrastructure planning basis of the Spatial Plan at this time. Any formal incorporation of this area will be subject to further consultation and/or plan review, if required.

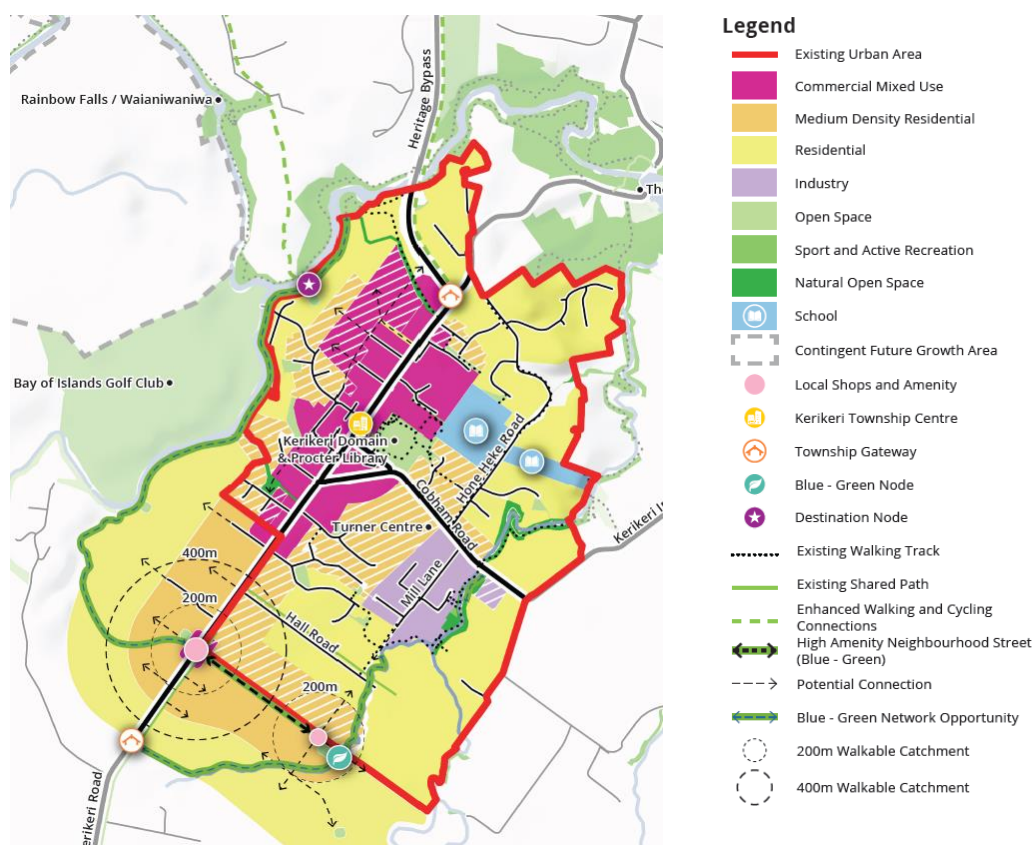


Figure 3: Extract of the Spatial Plan – The orange / orange hatched area represents medium density residential

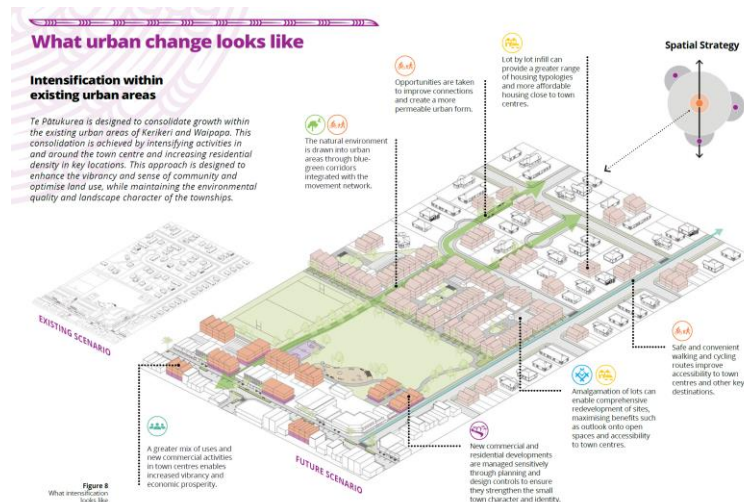


Figure 4: Extract from page 27 of the Spatial Plan – What intensification could look like



Figure 5: Extract from page 28 of the Spatial Plan – Opportunities for a mix of housing types

Urban form, character and impacts on existing centres

5.9 The proposed urbanisation of the KFO site would have several effects on the overall urban form of Kerikeri and Waipapa. Kerikeri and Waipapa are currently spatially separate urban areas and have a different role, function and character. Kerikeri and Waipapa are separated by rural land uses and rural lifestyle development. Kerikeri and Waipapa each have distinguishable urban form characteristics as follows:

- (a) **Kerikeri:** As outlined in the Spatial Plan, the Kerikeri area has evolved from the historic Kerikeri Basin, initially established as a missionary

settlement in the early 19th century given to its fertile land, navigable waterways, and access to trade routes. Over time, the settlement grew around horticulture, tourism and commercial activity. These factors have shaped Kerikeri to date and the town is now the District's primary urban centre and a key visitor destination.

- (b) **Waipapa:** As outlined in the Spatial Plan, the origin of the settlement is grounded in its rural support function. Over time it has expanded into a commercial and industrial hub due to its strategic location along State Highway 10 and its ability to accommodate larger-format development and industrial activities.

5.10 As outlined in the Spatial Plan, the physical landscape has played a defining role in the urban development patterns. State Highway 10 and Waipapa Road/Kerikeri Road connect the townships and have been key influences in their urban form development over time. A floodplain and extensive pastoral land between the Kerikeri River and Puketotara Stream has also created a distinct physical separation between the main urban areas. As such, the Kerikeri River, Puketotara River, and Wairoa Stream have influenced the morphology of development, acting as natural barriers that continue to shape the town's urban footprint.

5.11 As noted in the Spatial Plan, while Kerikeri has retained its small-town centre feel, historically there has been ever-increasing rural lifestyle growth on the periphery around both Kerikeri and Waipapa, which, overtime has eroded the ability to maintain a vibrant town centre and retain a functional rural environment. This has resulted in large expansive detached houses and growth spread throughout rural areas that is logistically challenging and has, in my opinion, undermined the creation of sustainable development patterns. Figure 6 from the Spatial Plan is useful in highlighting the current spatial pattern of development.

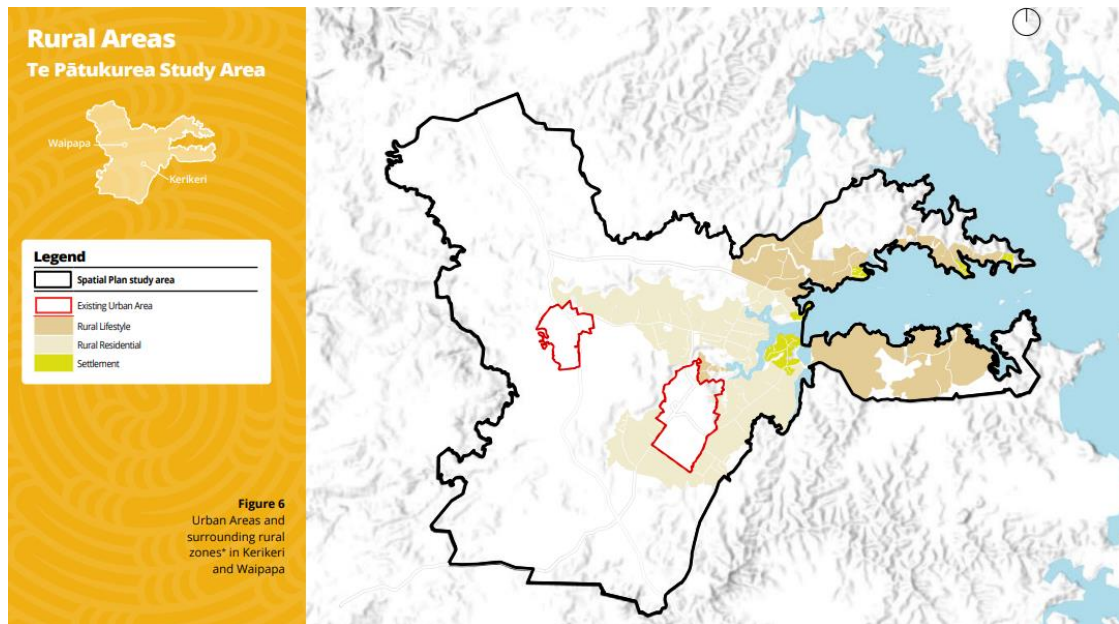


Figure 6: Extract from page 13 of the Spatial Plan – Figure 6 Urban Areas and surrounding rural zones in Kerikeri and Waipapa

5.12 Mr Neill states in his evidence that the KFO proposal will not require a ‘change of character to be forced on an existing community. Its edges can be sympathetic to its connecting urban environment and housing densification can take place internally to the Site, in a planned, strategic and connected way’.⁵ In my view, this statement does not properly acknowledge that urbanisation of the site will result in a change to the character of the site, the context of both towns and the overall urban form. Mr Neill’s statement in fact suggests less urban integration and more the creation of a separate third settlement.

5.13 It is my opinion that KFO’s proposed urbanisation of the site will result in the currently spatially separate towns becoming one urbanised area. I consider that this will undermine the distinctive role and function of the two towns and the character values appreciated and enjoyed by the community. The site would comprise streets and urban blocks and the visual and design characteristics of buildings and development.

5.14 The urbanisation of the site will also result in a change to the edges and boundaries of the urban areas. Edges assist with defining the geographic limits and avoiding

5 Statement of Evidence of Grant Neill on behalf of Kiwi Fresh Orange Company Limited (Urban Design), 16 June 2025 at [46].

urban sprawl, with edges comprising landscape features, land use or a density transition, i.e. features that make it harder to extent into or over.

5.15 In relation to the southern urban edge or boundary of Waipapa, the proposed Mixed Use Zone aligning with the State Highway will result in an extension of the urban area of Waipapa to the south. Currently the southern boundary of Waipapa is contained by the Waipetakoura River/Kerikeri River and this forms a natural edge to the township and a clear demarcation or gateway into the town. The current industrial area and waterway/floodplain provides a substantive separation and barrier between these areas.

5.16 The landscape report prepared by Littoralis, lodged with the KFO submission, addresses the impression of the Sports Hub when viewed from State Highway 10 and the eastern end of Puketotara Road. The report states that:

“Whilst the overall impression of the Sports Hub will probably remain as being predominantly open and grassed, it will take on a far more urban character that will relate as much to the built fabric of Waipapa commercial area as to nearby farmland. In effect, the development of the Sports Hub will shift the perceived urban margin of Waipapa into close physical proximity with the Site.

...

Commercial activities within the Mixed Use zone would stand in contrast with adjacent farmland would, effectively, be perceived as sliding the gateway to Waipapa’s existing commercial signature to the south by almost 1km.”⁶

5.17 I disagree with these statements. I do not consider that the existing Sports Hub is ‘far more urban in character’. I consider that the extent of the playing fields, their overall sense of openness along with the extent of the large established trees along the boundary with properties along Waitotara Drive has a green space focus and contrasts with the industrial and State Highway activities (see Figure 7). I therefore do not consider that the Sports Hub is a justification for the urban edge of Waipapa

6 Section F Effects Assessment, Landscape, Rural Amenity and Natural Character Assessment report by Littoralis, dated October 2022, page 24.

to be extended to encompass KFO's proposed Mixed Use area adjoining State Highway 10.



Figure 7: Photo of Sports Hub looking east towards Waitotara Drive and the site beyond

- 5.18 I consider that the proposed urban edge outlined in the KFO Structure Plan will be weak given a lack of features to contain it. This may enable development to spread through subsequent plan changes.

Connectivity and a compact and consolidated urban form

- 5.19 The interrelationship between built form, land use intensity, connectivity and accessibility is key to any future growth strategy. When looking at the KFO rezoning proposal and the possible urbanisation of rural production land, I consider there is no clear strategy at play. It is my opinion that there is a risk of creating an isolated island of development or a piecemeal development of small subdivisions with low densities. As such, I consider that the urbanisation of the site will affect the ability to support a compact and consolidated urban form for Kerikeri and Waipapa as proposed in the Spatial Plan and PDP. There is no indication in the proposed plan provisions of how future urban development will achieve a compact and efficient urban form both within the site and as part of the wider urban area (i.e. to support higher density development near amenities, transport links and open spaces).

5.20 I disagree that the KFO proposal will achieve 'seamless'⁷ connectivity and integration with the existing urban areas through delivery of the Structure Plan, given the site includes a number of constraints and barriers, such as floodplains, topography, golf course location and natural features. Specifically, in relation to the integration with Kerikeri, I consider that the topographic constraints will make connectivity difficult. In addition to the golf course and proposed large lot residential sites in close proximity to the Kerikeri town centre, there is approximately 30 metres of elevation change⁸ between the flat areas of the site and Kerikeri. In my opinion, this topography in conjunction with the golf course and natural features will undermine a well-connected residential development, with little consideration given to the significance of the Puketotara Stream valley in enabling a truly connected and contiguous residential environment, with other locations considered more logical to expand the town too.

5.21 The Structure Plan constraints and opportunities analysis sets out:

*"The Site is centrally located between Kerikeri and Waipapa providing the opportunity to connect these two areas. 800m radius pedestrian shed circles can be overlaid to demonstrate that a viable walking and cycle network can be incorporated, to achieve non-vehicular access to both townships from the area, and from Kerikeri to Waipapa. This provides opportunities for a residential population to be within a walkable distance of the larger employment catchments of Waipapa and Kerikeri and the proposed and consented FNDC Sports Hub."*⁹

5.22 The 800-metre pedestrian shed (walkable catchment) circles do not take into account the topography of the site. I consider that the Puketotara Stream valley in this case represents a significant barrier to connectivity and integration of the urban form given only one crossing point, with the potential for the area to be car dependent and pedestrians and cyclists not able to easily access day-to-day services located in Kerikeri. I also note that given the proposed Structure Plan layout,

7 Pacific Environments/The Planning Collective, Structure Plan: Brownlie Land – Kerikeri -Waipapa, 21 October 2022, Executive Summary vision, page 1.

8 30 metre drop down to Golf Links Road and then a climb up from the bridge up to the centre- see *Flood Scheme Investigation and Proof-of-Concept Design report by E2 Environmental, dated October 22.*

9 *s6 Constraints and Opportunities, Location, Brownlie Land Structure Plan, by Pacific Environments and The Planning Collective, dated October 2022, page 48.*

including the flood plain, Waitotara Drive and the Sports Hub, the ease of accessibility and overall connectivity between the Site and Waipapa is overstated. The potential exclusion of a road connection to the site via Fairway Drive would further exacerbate the barriers to connectivity and overall integration of the urban form.

- 5.23 The proposal includes a large scale Mixed Use area that does not assist to reinforce and consolidate the existing centres. As a result, I consider that the proposed Mixed Use Zone area is likely to result in a third (and I contend separate) commercial area within the Waipapa/ Kerikeri context. It is unclear from an urban design perspective how this area is appropriate and how it would not impact on the character and urban vitality of Kerikeri, and a consolidated and compact urban form. It is unclear what the intent and purpose of this area is from a retail perspective.
- 5.24 In summary, it is my opinion that urbanisation of the site will have a number of adverse effects on the urban form of Kerikeri and Waipapa that cannot be resolved by amending the proposed provisions and will not contribute to achieving a well-functioning urban environment. These include:
- (a) **Loss of Local Character:** The proposal risks altering the unique townscape qualities of Kerikeri and Waipapa.
 - (b) **Erosion of Town Identity:** The proposal will diminish the distinctive role and function of both towns, impacting what the community value about Kerikeri and Waipapa.
 - (c) **Compromised Urban Boundaries:** Existing defensible urban edges will be weakened, likely leading to urban sprawl in the future.
 - (d) **Inefficient Urban Growth:** The proposal will not support a compact and efficient growth pattern, undermining the ability to achieve a compact and consolidated urban form for Kerikeri and Waipapa as envisioned in the Spatial Plan.

- (e) **Poor Connectivity:** The proposal lacks integration with the existing urban areas creating physical barriers and reducing accessibility.
- (f) **Car-Centric Design:** The proposed layout promotes private car dependency, limiting support for multimodal transport options.

6. PDP-R OPTION TO PROVIDE DEVELOPMENT CAPACITY

- 6.1 The Spatial Plan identifies a preferred growth option comprising the expansion of both Kerikeri and Waipapa. This was selected based on an ability to balance growth efficiently, strengthen key centres and align with cultural and environmental priorities. It specifically directs growth to occur within and immediately adjacent to the existing built-up environments of Kerikeri and Waipapa and away from rural areas. Walkable catchments are applied to promote a compact and sustainable urban form, enabling medium-density development within Kerikeri and Waipapa, where appropriate. The Spatial Plan identifies greenfield expansion immediately south of the existing urban area of Kerikeri aligning with the Kerikeri Road corridor and in such a way that supports connected communities and a contiguous urban area.
- 6.2 The Spatial Plan seeks to facilitate commercial and industrial growth in Kerikeri to strengthen its position as the district's primary economic hub. The Spatial Plan seeks to enable commercial and industrial growth in Waipapa in a manner that safeguards the economic vitality of Kerikeri. At the same time, town-centre growth and the intensification of commercial development are supported in both Kerikeri and Waipapa. This includes promoting a more functional layout for large-format retail within the two townships to enhance overall urban efficiency and accessibility.
- 6.3 I discuss these approaches to growth in part in my evidence for Hearing 14,¹⁰ specifically Kerikeri town centre growth and intensification and application of a Medium Density Residential Zone to support more efficient use of land and a

10 Statement of Evidence Jane Rennie on behalf of Far North District Council (Urban Design) 20 June 2025, Town Centre at [5.1] – [5.25]; and Statement of Evidence Jane Rennie on behalf of Far North District Council (Urban Design) 20 June 2025, Medium Density Residential at [5.1] – [5.28].

walkable catchment around the centres. The PDP-R, as described in the s 42A report, will implement intensification aspects of the Spatial Plan, but not expansion of the urban areas to the south of Kerikeri and the north of Waipapa (which will need to be considered through future planning processes). From an urban design perspective, I consider that this growth strategy is preferable to dispersal of development over rural land.

7. INTERNAL LAYOUT OF THE KFO PROPOSAL

- 7.1 As outlined above, I do not support the rezoning proposal because it will result in a number of adverse urban form effects. In addition, it is my opinion that the internal layout proposed for the site has a number of shortcomings that will also result in additional adverse urban design effects.
- 7.2 As discussed earlier, the site includes several constraints and physical features and barriers that have resulted in the site remaining in rural land use to this day. I question the ability to utilise the land in an efficient manner and achieve a compact and consolidated urban form, and consider it likely that the proposal will result in a low-density outcome. It is my opinion that urban growth is better located elsewhere.
- 7.3 The NPS-UD focuses on achieving well-functioning urban environments. There is no indication of how future urban development will achieve a compact and efficient urban form (i.e. supports higher density development near amenities, transport links and open spaces). It is unclear why a good practice walkable catchment approach has not been applied to the site and the centres strategy. There is no specific consideration of medium or higher density housing specifically identified surrounding the local and neighbourhood centre, Mixed Use commercial area or key corridors. There is no specific consideration of the impacts of the overall size of the Mixed Use area on the urban vitality of Kerikeri town centre from an urban design perspective.
- 7.4 As outlined earlier in my evidence, an area of large lot residential is proposed in closest proximity to Kerikeri. I consider that this will also contribute to a poor level

of integration / efficient layout of the site with Kerikeri in conjunction with the location of the existing golf course and topography in this area. In addition, the KFO proposal does not clearly outline the impacts of the existing contours on accessibility and developability of different parts of the site and connectivity beyond the site. As such, it is unclear how the layout will impact on walkability, cycling and direct routes for public transport services in the future, with no 'direct' access into Waipapa (i.e. not via the SH). It is unclear how routes via the golf course will address CPTED matters and provision of safe connections with Kerikeri town centre. The routes do not align with optimal locations for connections to support convenient and efficient community connections between the site and Kerikeri town centre in particular.

- 7.5 No specific information is provided on how the site can accommodate 1,500-2,000 dwellings through a mix of living environments (or 1,600 as indicated in the Transport Assessment) from a built form (3D) perspective. It is likely that a low-density development will result and an inefficient use of currently rural zoned land. It is unclear how provision of housing diversity and affordability will be achieved, with no specific provisions within the Precinct to enable this. No master planning exercise has been undertaken or is anticipated through the provisions to demonstrate the built form outcomes identified for the site, including the character of development or provision of community infrastructure.
- 7.6 I acknowledge that a structure planning process can enable a comprehensive approach to the design and potential development of a site in the future. However, I consider that a more detailed structure planning framework is required to understand the built and urban form implications of the rezoning proposal. This would consider in addition to network routes, open spaces and infrastructure a greater understanding of the urban form at the neighbourhood scale (i.e. potential layout, land uses, diversity of lot sizes, provision of open space). I acknowledge that the Structure Plan seeks to protect natural features and enhance open space networks. Recreation reserves align with the internal streams/wetland with a esplanade reserve aligning with the Kerikeri River, including areas to retain existing vegetation and where intermittent stream diversions are required. A network of

greenway connections are proposed to connect with the Te Araroa Trail and the Kerikeri River walkway.

- 7.7 I consider that the natural features on the site will provide for the development of high amenity areas and inform the character of the development. The introduction of new roads through the site will also enable better connectivity between the two towns, albeit this does not equate to justification for urban development and noting that these connections are not necessarily 'direct' (or guaranteed in the case of the connection with Kerikeri). Pedestrian greenways will offer wider benefits to the community.
- 7.8 In summary, I consider that the internal layout has not been sufficiently tested through the plan change documents and has a number of shortcomings that will result in adverse urban design effects.

8. POLICY EVALUATION

- 8.1 There are a number of relevant policy considerations from an urban design perspective, including the NPS-UD, NRPS (including evaluation of the NZ Urban Design Protocol) and Strategic Direction set out in the PDP. I do not consider that the proposal aligns with the outcomes sought in these documents and I discuss this further in the following sections. This includes consideration of the design strategy applied to the site, particularly a lack of recognition of a walkable catchment approach to local and neighbourhood centres and intensification in key strategic locations.

National Policy Statement Urban Development

- 8.2 Of specific relevance are NPS-UD objectives and policies seeking to achieve well-functioning urban environments. Specifically, Objective 1 sets out that:

"New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future."

8.3 Objective 3 states that:

“Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:

- a) *the area is in or near a centre zone or other area with many employment opportunities*
- b) *the area is well-serviced by existing or planned public transport*
- c) *there is high demand for housing or for business land in the area, relative to other areas within the urban environment. “*

8.4 In terms of urban form, Policy 1 requires planning decisions to contribute to well-functioning urban environments and as a minimum:

- a) *“have or enable a variety of homes that:*
 - (i) meet the needs, in terms of type, price, and location, of different households; and*
 - (ii) enable Māori to express their cultural traditions and norms; and*
- b) *have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*
- c) *have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and*
- d) *support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*
- e) *support reductions in greenhouse gas emissions; and*
- f) *are resilient to the likely current and future effects of climate change.”*

8.5 Policy 5 sets out that:

“Regional policy statements and district plans applying to tier 2 and 3 urban environments enable heights and density of urban form commensurate with the greater of:

- a) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or*
- b) relative demand for housing and business use in that location”.*

8.6 Mr Neill sets out in his evidence a number of reasons why he considers that development in accordance with the Structure Plan will contribute to a well-functioning urban environment in Kerikeri-Waipapa.

8.7 I do not agree with a number of his conclusions for the following reasons:

- (a) there is no certainty that diverse housing options will be delivered;
- (b) although the site can be connected, there is no certainty that multiple connections are possible and will be implemented;
- (c) although local active mode connections may be possible, wider connections will rely on car-based travel;
- (d) the absence of a defensible boundary is likely to result in urban sprawl through later plan changes;
- (e) sufficient Mixed Use zone growth has been identified in the Spatial Plan, thereby resulting in the creation of a new standalone Mixed Use zone, impacting on the vitality of the existing commercial centres; and
- (f) it is unclear, besides a floor area restriction, how the proposal will be complementary with Kerikeri and Waipapa, including the ability to support intensification and urban expansion within the existing urban area and directly adjacent to it.

- 8.8 In conclusion, given concerns around lack of certainty in delivering diverse housing, limited connectivity and reliance on car travel, potential urban sprawl, impacts on existing commercial centres and unclear alignment with the broader urban intensification goals for Kerikeri and Waipapa, I consider that the KFO proposal will not give effect to the NPS-UD.

Northland Regional Policy Statement

- 8.9 The NRPS identifies 'regional form' as an 'issue' (clause 2.4) and includes a number of related objectives and policies. Clause 2.4 states *"Unplanned and un-coordinated development and poor urban design can lead to reduced levels of amenity, higher infrastructure costs, and reduced community wellbeing."*
- 8.10 Objective 3.11 of the NRPS outlines that: *"Northland has sustainable built environments that effectively integrate infrastructure with subdivision, use and development, and have a sense of place, identity and a range of lifestyle, employment and transport choices."*
- 8.11 The explanation to Objective 3.11 states that *"Developing sustainable built environments means consolidating new urban development within and adjacent to existing settlements."*
- 8.12 Although I concur with Mr Neill that the Structure Plan will facilitate guided development (but noting it is not included in the provisions), we are not in agreement that the development will be well connected with the surrounding areas, certainly not in a 'seamless' way. As I have outlined earlier, there is no certainty that a range of housing options will be achieved and while the transport choices are provided in theory, they will not enable easy and accessible access other than via private car, with the distances to travel and topographical changes restricting access for younger and older generations. I have discussed above that the natural context will create a sense of place, however there are no provisions within the Precinct Chapter that assist with delivering a sense of place and identity in response to the site's unique characteristics.

- 8.13 The Structure Plan aspirations have not sufficiently translated into District Plan provisions, with the exception of specific infrastructure provision. I am not in agreement with Mr Neill that the proposed development will consolidate new urban development adjacent to existing settlements.
- 8.14 Policy 5.1.1 of the NRPS provides that subdivision, use and development should be located, designed and built in a planned and co-ordinated manner which is guided by the Regional Urban Design Guidelines in Appendix 2 of the RPS. These guidelines focus on the seven “Cs” of the New Zealand Urban Design Protocol. Mr Neill sets out an evaluation of the proposal against each of the principles in relation to the Structure Plan and I comment further on these below.
- (a) **Context:** I have acknowledged that the existing natural character and features of the site currently will assist to provide a sense of place and identity, although it is unclear how this will be translated into the built environment outcomes on the site, with no specific provisions included in the Precinct Chapter. It is also assumed by Mr Neill that the connection of the two towns via the site is a positive outcome, but in the same sentence he identifies that they both have unique urban contexts. It is my opinion that the urban form and context of each of the towns is not sufficiently assessed as part of the KFO proposal, with little or no analysis provided to justify that the site can or should be integrated into the existing urban form without any adverse urban design effects. It is unclear how relocating the gateway to the south of Waipapa will create a legible gateway to the urban area of Waipapa when approaching the town from the south (in comparison to the arrival experience after crossing the Waipapakoura River/Kerikeri River) without any adverse urban design effects.
- (b) **Character:** I agree with Mr Neill that placing residential land closest to the golf course makes sense, although I note that some of the area is identified for large lot residential in response to the topography. As such, suggesting that there will be ease of accessibility between the site and

Kerikeri is somewhat overstated. Mr Neill outlines that introduction of a Mixed Use zone is of a scale appropriate for Waipapa, but it is unclear how this scale has been determined and is warranted or justified both in terms of demand and from a built form perspective. He also notes that the Mixed Use zone of this scale located next to the existing sports fields and open space areas in some way will result in a positive outcome, but it is unclear how. No specific provisions are outlined to ensure this is the case. Mr Neill states that the nature of the proposal also means that the character of Kerikeri can be largely preserved. It is unclear how the development of the site for urban activity will mean that the character of Kerikeri will be preserved when the urban form and character is partly derived from the setting of the town.

- (c) **Choice:** Mr Neill states that different housing typologies will be provided to suit all market sectors including affordable housing. It is unclear how this is the case, given the proposed provisions do not require this outcome.
- (d) **Connections:** I have discussed earlier my concerns in relation to the level of connectivity and accessibility that will be achieved. I concur that the proposal will enable internal and perimeter green network connections, although it is unclear how one can assume they are safe based on the information provided. Active mode connections may well be provided between Kerikeri and Waipapa but the likelihood that these will result in non-car based journeys is unlikely.
- (e) **Creativity and Custodianship:** I am unclear how the proposal is creative and innovative. The proposal does not adopt a 'nature based solution' to flooding and climate resilience challenges of the site, nor does it seek to provide creative and innovative solutions to housing affordability. No certainty is provided in relation to diversity of housing, a sense of place in relation to the built and landscape environment outcomes and provision of social infrastructure. Collaboration is noted between experts and the community in shaping the Structure Plan, although it is unclear how the

responsive design principles to benefit future generations have been incorporated into the Precinct provisions.

- 8.15 In conclusion, I acknowledge the Structure Plan for its intent to guide development, but concerns remain around its lack of integration into the District Plan provisions, limited connectivity, uncertain housing diversity, and insufficient alignment with urban design principles and regional planning objectives, particularly in terms of creating a cohesive, accessible, and context-responsive urban environment. I consider that the proposal has a number of shortcomings in relation to the Regional Urban Design Guidelines,¹¹ particularly in relation to impacts on the existing context and character of Kerikeri and Waipapa, and how the stated good practice principles will be translated into positive outcomes on the ground. As such, I do not consider that the proposal gives effect to the NRPS.

Proposed District Plan

- 8.16 The 'Strategic Direction' section of the PDP includes policy on urban form and development stating "*...the overarching direction for the district's urban form and development and aims to improve efficiency and affordability for communities, seeks to contribute to the vibrancy and viability of town centres and solidifying the investment Council makes in development infrastructure.*" The specific objectives for urban form and development include SD-UFO-01 to 04, as follows:

Objectives	
SD-UFD-01	The wellbeing of people who live in and visit towns in the Far North is considered first when it comes to planning places and spaces.
SD-UFD-02	<u>Urban</u> growth and development consolidated around existing reticulated networks within town centres, supporting a more compact <u>urban</u> form, affordability and providing for a mix of housing typologies.
SD-UFD-03	Adequate <u>development infrastructure</u> in place or planned to meet the anticipated demands for housing and business activities.
SD-UFD-04	<u>Urban</u> growth and development is resilient and adaptive to the impacts from <u>natural hazards</u> or climate change.

11 Northland Regional Policy Statement, Regional Urban Design Guidelines, Appendix 2.

8.17 Mr Neill has provided an assessment of the Proposal against these objectives and I comment further where relevant below.

- (a) **Objective SD-UFD-01:** I broadly concur with Mr Neill’s understanding of wellbeing in the context of urban design. More specifically in relation to urban form and development, how we plan our communities to support health, wellbeing and equity (through access to well-designed homes, safe and active transport choices, environmental quality and essential services and employment and recreational opportunities) is key. Although the Structure Plan addresses some of these concepts, I consider that the layout of the Structure Plan falls short. I have highlighted that a number of these desirable aspirations are not present in the proposed planning framework. As such, unless changes are made to the Structure Plan layout and Precinct provisions, I do not consider that the KFO proposal currently aligns with this objective.

- (b) **Objective SD-UFD-02:** Mr Neill focuses his evaluation on issues to do with reticulation. I will leave issues to do with reticulation to other experts and instead focus on urban growth to support a consolidated and compact urban form. I have noted that the Spatial Plan seeks to achieve a combination of infill development and urban expansion within an already urbanised area that enables direct integration in a way that positively contributes to character and sense of place and overall urban form. This takes into consideration the demands of an aging population and requirement for greater housing choice in accessible locations and an expectation under the NPS-UD that our urban environments will evolve. I note that developing the KFO site *will* change the urban form and character of both Kerikeri and Waipapa including the urban boundaries, with further growth beyond the site identified in the Structure Plan. I do not consider that the KFO proposal will assist to promote a consolidated approach to growth of housing and town centre growth for either township. As such, I do not consider that the KFO proposal aligns with this objective.

- (c) **Objective SD-UFD-03:** I note the inclusion of open space, community infrastructure and social infrastructure including schools within the broader definition of infrastructure. As Mr Neill rightly points out, these are important to overall community wellbeing. I note that the Structure Plan identifies a school within the Mixed Use zone along with medical facilities. No information is included in the Precinct provisions that talks to the provision of a school (or other specific community infrastructure) and a requirement to deliver this as part of the proposal. It is unclear why the school has been identified in the Mixed Use zone and not the new residential neighbourhoods proposed. Given a proposal for between 1500 and 2000 houses, a greater understanding of expectations around delivery of community benefits is considered necessary.

8.18 In relation to the PDP Residential General Zone, this zone forms the basis for the large part of residential activities proposed across the district. While the zone does provide for some variety of housing, within the context of the NPS-UD and in order to achieve the intent of the rezoning proposal to *‘support higher density development in close proximity to amenity, transport connections and access to open space’*¹² and *‘a mix of residential living opportunities’*,¹³ it is my opinion that, if the rezoning proposal is to be supported, a Medium Density Residential zone is required. This will also support the principle of achieving *‘a compact and efficient urban form...’*¹⁴. This should apply within a specified walkable catchment of the local and neighbourhood centres and along key future public transport routes in establishing a well-functioning urban form within the site. If a greenfield development of this nature is to be supported, the land is required to be used as efficiently as possible with residential densities beyond 40hh/ha considered appropriate.

8.19 The purpose of the Mixed Use Zone is to provide for the District’s commercial, community and civic activities, including providing residential activities where it is

12 Page 63 of KFO submission – ‘Landscape and urban design’ Structure Plan guiding principles (Pacific Environments)

13 Page 63 of KFO submission – ‘Landscape and urban design’ Structure Plan guiding principles (Pacific Environments)

14 Page 63 of KFO submission – ‘Landscape and urban design’ Structure Plan guiding principles (Pacific Environments)

complimentary to these activities. In the context of both Waipapa and Kerikeri I am unclear on the aspirations for the area, what impact this could have on the urban vitality of Kerikeri in particular and what the built form issues might be. Mr Neill does comment in detail on the MU zone, albeit noting that during the Structure Plan process they 'tested' the site with mixed use typological templates including schools in accordance with best practice, but unhelpfully none of this information is provided with the proposal.

- 8.20 In conclusion, while the KFO proposal demonstrates some alignment with urban design objectives, it falls short in key areas such as delivering a compact urban form, ensuring housing diversity, and providing clarity around community infrastructure. Without stronger integration of these aspects in the planning framework, particularly around residential zoning, connectivity, and the role of the Mixed Use Zone, I consider that the KFO proposal does not fully align with the outcomes sought by the relevant objectives and policies of the PDP.

9. PROPOSED PLAN PROVISIONS

- 9.1 The Structure Plan document includes a number of aspirations and a large number of design principles. However, there are no place-based urban design provisions identified (including policies) incorporated into the Precinct Chapter. As such, there is a general disconnect between what is stated and what is contained in the proposed Precinct Chapter. While future development is expected to respond to the site and context, it is unclear how the unique qualities and identity of the site and overall vision are reflected and how these outcomes will be achieved including through the policy framework (i.e. achieve a compact and efficient urban form, provide a mix of living opportunities, support higher density development in close proximity to amenity etc).

- 9.2 Specifically, the objectives and policies do not address:

- (a) good practice urban design outcomes across the development;

- (b) provision of a mix of housing typologies to support density, choice and affordability;
- (c) provision of community facilities and education as part of future development;
- (d) how the layout will support a future public transport network; and
- (e) how the character of Kerikeri will be reflected in future development, including its strong Maori and European heritage and presence of horticultural activities.

9.3 There are no place-based urban design provisions in the Precinct Chapter, aside from retail floor space limits that seek to recognize the existing roles of Kerikeri and Waipapa (and the above points). The Precinct Chapter does not include:

- (a) built form provisions to align with the specific characteristics of the site and proposed layout (and with a general lack of clarity around the built form outcomes to be achieved);
- (b) specific provisions on housing diversity, affordability and density. This includes where large-lot residential and medium density are proposed, or consideration of minimum densities;
- (c) specific provisions in relation to the quality and functionality of the public realm and the unique characteristics of Kerikeri / urban character;
- (d) specific provisions in relation to achieving a road connection between the site and Kerikeri; and
- (e) specific provisions in relation to how large-scale retirement villages and/or hotel developments or visitor accommodation generally will be assessed.

- 9.4 The Precinct Chapter requires a restricted discretionary consent for a Comprehensive Development Plan that must be submitted for approval as part of the first resource consent application for any subdivision, use or development within the Precinct. There are certain information requirements listed, and non-compliance is a discretionary activity.
- 9.5 Proposed rule BL-R4 (the correct numbering would be TPW-R4) states that “Once approved the Comprehensive Development Plan can be implemented in stages as per granted resource consent applications.” It therefore seems there is no mandatory requirement to implement the Comprehensive Development Plan. It follows that the proposed Comprehensive Development Plan is not an effective method to secure good urban design outcomes.
- 9.6 The proposed provisions include a Precinct Plan (incorporated from the Structure Plan), but the rules do not specifically require compliance with the Precinct Plan. This results in an absence of spatial guidance which is problematic for such a large-scale proposal.
- 9.7 Proposed rule BL-R4 also does not require an urban design assessment. I consider that the information required is not sufficiently aligned with the overall vision, design principles and key outcomes sought for the site, i.e. in relation to character and identity, housing choice/affordability and achieving a compact/legible urban form. As a result, I do not consider this consenting pathway will provide certainty of outcome and a sufficiently robust assessment, given the lack of focus on urban design outcomes in the objectives and policies. This may result in disjointed and *ad hoc* development.
- 9.8 Given the nature and scale of the proposal, I consider it appropriate for a detailed plan to be included within, and required by, the Precinct Chapter. This would better guide future decision making.

9.9 I consider that the Precinct Plan has a number of shortcomings:

- (a) the layout does not apply a walkable catchment approach with no intensification proposed around the local and neighborhood centres or the key future public transport corridors;
- (b) the layout does not include a range of residential living options including medium density development outcomes;
- (c) it is unclear what the large lot residential would comprise;
- (d) it is unclear why the Mixed Use Zone is the size outlined;
- (e) the layout does not include a range of open spaces to support the residential catchment area; and
- (f) it is unclear why the location of the school is included in the Mixed Use Zone and not located in association with the residential catchment.

9.10 I consider that there is a lack of information in relation to the street network, in ensuring a good level of connectivity and accessibility. It is unclear how the development would provide for day-to-day movements as a pedestrian within the different areas, or the impacts of contours on walkability and cycling. In my experience with designing projects of this nature, preparing an indicative layout is particularly important for sloping sites, ridgelines etc. More detailed design as part of the plan-making process enables the viability of access and land use integration considerations and enables an understanding of compact and walkable neighbourhoods, road structure and location and shape of the local commercial.

10. CONCLUSION

10.1 In conclusion, it is my opinion that urbanisation of the KFO site would give rise to a number of adverse urban design effects. I consider that urban zoning of the site as proposed is not sound in its execution and the associated Precinct provisions that

are proposed are not suitably robust and comprehensive to ensure a positive urban design outcome.

- 10.2 I consider that the proposal does not align with the policy intent of the NPS-UD, the Northland Regional Policy Statement, or the current land use patterns in Kerikeri and Waipapa. I consider that the proposed rezoning will not achieve a well-functioning urban environment, including a compact and consolidated urban form.

Jane Maree Rennie

10 September 2025