

9 March 2023

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Cc: - Greg Wilson, Manager District Planning Greg.Wilson@fndc.govt.nz
Cc: - Roger Ackers, Planning & Policy Manager Roger.Ackers@fndc.govt.nz

Dear Jill,

RC 2230381 - 3 Clark Road (Commercial Zone)
RC 2230382 – 4 King Street (Residential Zone)
And any updated and future RC applications for:
3 Clark Road
5 Clark Road
4 King St

115 Kerikeri Road

REQUEST TO HALT MEDIUM DENSITY HOUSING & CLUSTERED KĀINGA ORA PROJECTS IN KERIKERI TOWN CENTRE & SURROUNDS

There are several applications for Clark Road and King Street medium density housing by Gemscott King Ltd on behalf of Kāinga Ora, and we believe they have acquired more land at 5 Clark Road and 115 Kerikeri Road for the same purpose. Accordingly, we request that:

- a) a hold is put on all medium density Housing Resource Consent applications in Kerikeri's town centre until the town is prepared with a confirmed and well consulted Masterplan and the completion of the Spatial Plan. This approach should also apply to any proposed residential developments in the Commercial and future Mixed Use zone.
- b) At the very least these applications are publicly notified.
- c) The cumulative effect of these proposed developments be considered as a whole including all properties purchased by Developers for and on behalf of Kāinga Ora that have not yet had resource consents applications submitted. Full disclosure of all properties currently in due diligence or that have been purchased should be formally requested from Kāinga Ora when determining the wider impact of the collective developments on the community.

Our community has voiced concerns that Council is underprepared for the level of medium intensity development proposed by Gemscott King Ltd on behalf of Kāinga Ora. This is not an issue about the need for affordable homes which most people strongly support. This is an issue of how we do it successfully so our community, including residents of such housing developments, can be assured of the best possible outcomes.

The impact of these developments needs to be considered both singularly, and as a whole.

The applications all variously fail to comply with:

Residential intensity, Stormwater Management, Noise Mitigation, Traffic Intensity, Parking, Access, Size and Allotment Dimensions. It also appears that there is under provision of open space for residents. For example, each dwelling has a 10m² deck. Even by KO's own standards (available on their website), these designs fail to meet the needs of children and we note they fall well short of design guidelines used in other places like Christchurch.

Kerikeri is a growing town and each of these developments, let alone combined, has a wider environmental effect, and this kind of ad hoc development has the potential to limit, if not ruin, future growth and the social fabric of our town. We understand that GemScott Ltd located the properties above and then approached Kāinga Ora with an offer of developing the site for social housing. Gemscott's design for the 12 plex on 3 Clark Rd had to meet Kāinga Ora's budget. The high price of this land per square metre requires increased building intensity with no greenspaces other than for carparks and pathways.

1. **Inappropriate development in existing Commercial Zone and Proposed District Plan Mixed Use**
 - a. Whether it's public housing or not, the existing Commercial zone was not anticipated to have solely residential development like these proposals.
 - b. Future mixed-use zone is not anticipated to have solely residential development, whether it be social housing or million dollar units. Mixed use developments with retail / commercial on the ground floor are intended to create an interactive and lively street frontage that incorporates green spaces, cycle ways etc.
2. **Taking future commercial space for a growing town**
 - a. Kerikeri is a growing town and to be successful, the town centre needs to be the place where commercial activities are concentrated, as per the zoning and future proposed zone.
3. **Future Arterial Road Location and Traffic generation**
 - a. Kerikeri already suffers from traffic issues, with under provision of roading and a lack of alternate routes through town.
 - b. Where the applications state that traffic generation will be minor, we disagree as this area is particularly problematic currently.
 - c. All planned or probable future arterial roads must be considered, assessed and integrated into a spatial plan.
 - d. We note that one of the applications asks for the removal of a building line restriction (King Street), planned for future road widening. We do not believe that one applicant should have the ability to limit the future potential of road widening in this significant location.

4. Parking and Public Transport

- a. As the proposed developments intend to under-provide parking per District Plan requirements, it is anticipated that residents would park on the surrounding streets which are already full due to limited day parking in central Kerikeri.
- b. Where the developers have said that residents will walk, this is not currently a practicable solution, as services and employment opportunities, and recreation, are not all located within close proximity, and during inclement weather residents would not wish to walk. It also implies a level of fitness that may not exist, particularly with Waipapa being the preferred location for big-box retailers.
- c. There is no public transport available as an alternative.

5. Infrastructure Demands and Taxpayer funding

- a. It is generally acknowledged that Kerikeri's water infrastructure is below par.
- b. We question the capacity and the loading that this density of development would have at this stage on Kerikeri's wastewater and stormwater infrastructure, and its implications for future development in the area.
- c. As Kāinga Ora is a government body, any development contributions they make would come from the public purse – tax-payer money.

6. Services, Social Impact and Plan

- a. These current applications are all concentrated into one area in the centre of town, and we need to understand the social impact. Other towns have learned from experience that the number and concentration of social houses or social housing developments in a small area increases the likelihood that troublesome tenants will interact and form groups more likely to exhibit anti-social behaviours and intimidate or cause problems with neighbours. The best practice from a spatial design perspective is to accommodate fewer people in any one building and spread the buildings across a broader geographic area, integrated with other housing development types with adequate connectivity and greenspace.
- b. Town centre services for the existing population are at capacity.
- c. There is no plan to provide additional services for people who are relocated here.
- d. Kāinga Ora stated that the residents could come from anywhere.
- e. People relocating into these homes need to have hope, opportunity and be supported by the necessary services and structures so they can feel welcome and settle into the existing neighbourhoods. Just providing walls and a roof is not enough to ensure socially integrated development. Councils in other towns evaluate the social and demographic structures of medium density housing developments and provide recommendations on what facilities are required to support them and help assimilate them into host neighbourhoods. How will these residents be integrated into the Kerikeri community and what support, facilities, services and amenities will be provided for them?
- f. How will the tenants and properties be managed and inspected by Kāinga Ora? We need specific examples of how these have been managed successfully elsewhere. Based on the density proposed across all of the properties, will there be a live-in onsite Manager and well-resourced wrap around services available?
- g. Social housing to this density, has not been undertaken in a small town such as ours previously and the impact of these developments and this level of intensification needs to be well considered and understood by the community.
- h. It is understood that across NZ it takes extreme situations for a Kāinga Ora tenant to have action taken against them for anti-social behaviour, and there are examples of tenants intimidating neighbours and creating anti-social issues (even as close by as Paihia).

7. Aesthetics + Visibility, Urban Design Guidelines + Private Investment

- a. Part of Kerikeri's function is as a tourist town, and many people live, and relocate here because of its beauty. If the town is not carefully developed, we believe it could become a less desirable place to live and work, and private investment in the town will disappear.
- b. Infrastructure such as roading and signage, together with landscaping, new (and renovated) buildings in the town centre, including on Kerikeri Road, the main thoroughfare, should demonstrate a cohesive character and quality urban design.
- c. Guidelines detailing quality urban design features should be developed and included in the relevant Town Plans (Masterplan / Spatial Plan). The guidelines need to assess the character values of the host neighbourhoods and develop design guides which recognise and respond to existing character and promote quality outcomes in general. There are examples of such guidelines in other small tourist towns in New Zealand.

8. Setting a precedent

Allowing purely residential development in the FNDC's current Commercial, and future Mixed-Use zone could set a precedent for ad-hoc development in inappropriate areas, that the town is not prepared for.

9. Public Notification

We request that these applications and developments are put on hold until the spatial plan and a downtown masterplan is in place; at the very least they should be publicly notified.

Section 95A of the RMA relates to public notification in special circumstances:

"Step 4: Public notification in special circumstances"

9. Determine whether special circumstances exist in relation to the application that warrant the application being publicly notified and
 1. (a) if the answer is yes, publicly notify the application

As indicated from our recent survey where over 400 community members responded in 72 hours, along with general community discussion, this matter is of significant public interest, with potential for a momentous negative impact on the future of Kerikeri.

It poses not only a substantial change to central Kerikeri, but a potential change to the social fabric of the town as we are under-prepared, thus creating special circumstances that require public consultation.

10. Masterplan:

We suggest that as a matter of urgency there is a commitment to a masterplan and completion of spatial plan before these types of developments occur.

11. Attachments:

We include the following attachments which we believe demonstrate the need to hold these developments until plans are in place to define scale, flexibility, intensity and purpose of space:

Survey

Newspaper article

Article from OKK's recent e-newsletter

As a rapidly growing town and as recommended in the NPS-UD 2021, we believe it is essential to have a place based approach to planning. (NPS-UD 2021 - *A place-based approach is to be taken: 'This is because every place is unique, with different characteristics – including challenges or problems – arising from local history, culture and heritage, geography, economy, and resources.'*) Spatial plans and a Masterplan must be created with community involvement before these applications are processed and all public housing/increased density housing applications in the town centre by Gemscott King Limited and Kāinga Ora should be publicly notified per Section 95A of the RMA due to significant public interest.

Yours Sincerely

OUR KERIKERI COMMUNITY CHARITABLE TRUST



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