

Before the Far North District Council Hearings Committee

In the Matter of the Resource Management Act 1991 ("**RMA**")

And

In the Matter of the Proposed Far North District Plan.

Evidence of Joseph Brady Henehan on behalf of Musson Family Trust (Submitter number S404)

Dated 9 June 2025

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1. Introduction

- 1.1 My name is Joseph Brady Henehan. I am a planning consultant working for Reyburn and Bryant in Whangarei. I hold a Bachelor of Environmental Planning from the University of Waikato. I am a full member of the New Zealand Planning Institute (MNZPI).
- 1.2 I have 11 years of experience as a planning consultant in the Northland region. My role has typically been to lead project teams through various resource consent, notice of requirement, and plan change processes, and to provide environmental and strategic planning advice for these projects.
- 1.3 Most of my work has been in the Northland Region, and so I am very familiar with the history, content, and structure of the Far North District Plan and the higher-level planning documents.

2. Code of conduct

- 2.1 I have read and agree to abide by the Environment Court's Code of Conduct for Expert Witnesses (2023). This evidence is within my area of expertise. I have not omitted to consider any material facts known to me that might alter or detract from the opinions expressed.

3. Scope of evidence

- 3.1 This evidence is focussed on the zoning applied to 21 titles located on both sides of Houhora Heads Road, Pukenui under the Proposed Far North District Plan ("PFNDP"). This relates to submission number 404 made by the Musson Family Trust ("MFT").

4. Original submission

- 4.1 The original submission sought that 21 titles located on both sides of Houhora Road are rezoned Settlement Zone ("SETZ"), or any other relief with similar effect. This is referred to as 'the submission area' for the remainder of this evidence.
- 4.2 **Attachment 1** includes plans showing the extent of the submission area and the zoning sought by the submission. The plans are addressed where relevant in this evidence.
- 4.3 The MFT owns one of the 21 titles within the submission area. The title is located at 30 Houhora Heads Road, is referenced as 864007, is legally described as Lot 4 DP 530683, and has a total area of 8,704m².
- 4.4 The following summarises the key characteristics of the submission area and surrounding environment:
 - (1) Soil composition: Under the LUC system, the soils within the submission area are class 4. Given this classification, the submission area is not 'highly productive' under the National Policy Statement for Highly Productive Land ("NPS-HPL") and the soils are not 'highly

versatile' under the Regional Policy Statement for Northland ("RPS").

- (2) Built form: The majority of the titles located on the eastern side of Houhora Road accommodate residential development. Two of the titles (864008 and 864005) are vacant, while the title located on the western side of Houhora Heads Road (NA132C/87) is also vacant.
- (3) Ground cover: Beyond the existing built form and associated curtilage areas, the submission area is primarily in pasture. There are scattered areas of mixed vegetation, which is primarily located along property boundaries on the eastern side of Houhora Heads Road and along the road boundaries and around the small watercourses on the western side of Houhora Heads Road.
- (4) Topography: The submission area is essentially flat. There are some localised undulations, primarily around the small watercourses that traverse the submission area.
- (5) Archaeology: The submission area is largely free of recorded archaeological sites. The Far North District Council ("FNDC") 'historic sites' GIS shows that there is one recorded site located near the western boundary of the title located on the western side of Houhora Heads Road (NA132C/87).
- (6) Operative zonings and overlays: The submission area is zoned Coastal Living, while parts are identified as being flood susceptible Under the Operative Far North District Plan ("OFNDP").
- (7) Proposed zonings and overlays: The submission area is zoned 'Rural Lifestyle', while parts are subject to the Coastal (Zone 1 – 3) and River (10 and 100 year) Flood Hazards under the PFNDP. A small portion of the title located on the western side of Houhora Heads Road (NA132C/87) is also subject to the Coastal Environment overlay.
- (8) Surrounding environment: The surrounding area features a mix of zone types. To the west are two clusters zoned 'Settlement' under the PFNDP – Raio and Pukenui – separated by Rural Lifestyle zoned land. The submission area lies immediately east of the Raio Settlement and is part of a broader 'Rural Lifestyle Zone'. Further west and across the Houhora Harbour to the east, the land is zoned 'Rural Production'.

5. Reasons for the request

5.1 The reasons for the proposed rezoning are outlined below:

Housing supply and affordability

- (1) The Far North District faces a significant housing affordability challenge, with the Housing and

Business Development Capacity Assessment (“HBA”) classifying the market as severely unaffordable and identifying a growing shortfall in low-cost housing options. The current Rural Lifestyle Zone (“RLZ”) limits development density and restricts the ability to deliver smaller, more affordable dwellings. Rezoning the submission area to SETZ would enable a broader range of housing types and densities, directly responding to identified demand and better aligning with the district’s strategic housing objectives. Local real estate advice (refer to the two letters at **Attachment 2**) confirms that only five vacant sections are currently available in the Pukenui/Houhora area, with supply constrained by limited residential zoning and long-term land retention by local families. Demand remains strong among both permanent and seasonal residents, reinforcing the need to unlock more land for residential development.

Zoning and development potential

- (2) The application of the RLZ under the PFNDP represents a down-zoning relative to the OFNDP. While both plans provide for controlled subdivision into 2-hectare lots, the OFNDP also allows for 8,000m² lots as a restricted discretionary activity and 5,000m² lots as a discretionary activity. In contrast, the PFNDP only provides for subdivision below 2 hectares via a non-complying pathway. This reduces practical development potential and limits the ability to respond to existing and future housing demand. Retaining a more enabling zoning framework is therefore critical to facilitating the small-lot residential development the area can support.

Constraints on other SETZ land

- (3) Although the PFNDP proposes additional SETZ land in the wider Pukenui area, much of this land is constrained and unlikely to support full development. The large site immediately north of the submission area contains extensive wetlands, which significantly limit its yield. Similarly, SETZ land on Waterfront Road is affected by numerous archaeological sites and lacks appropriate road infrastructure, with any upgrades likely to incur substantial costs. In contrast, the submission area is unconstrained and readily serviceable, making it a more efficient and immediately developable location. The proposed rezoning would therefore help to offset yield lost from more constrained areas and support district-wide housing supply objectives.

Existing development pattern

- (4) The submission area already reflects a density and development pattern more aligned with the SETZ. Of the 21 existing titles, 20 are smaller than the 2ha minimum lot size anticipated by the RLZ, ranging between 4,000m² and 1.9ha. These lots are already developed or used for lifestyle and residential purposes. The remaining 10.84ha title sits between this cluster and another large title proposed to be zoned SETZ, reinforcing the appropriateness of

applying the SETZ to better reflect existing land use and subdivision patterns.

Transport infrastructure

- (5) The submission area is well located in terms of transport infrastructure. It is accessed via Houhora Heads Road, a local road that connects to State Highway 1 without requiring direct access. The intersection provides good sight distances, and although it lacks deceleration lanes or a median strip, any upgrades can be addressed through future development consenting processes. Notably, Waka Kotahi NZ Transport Agency has not opposed the rezoning, indicating no major concerns with the proposed access arrangements.

Productive land values

- (6) The submission area does not contain highly productive land under the NPS-HPL, nor does it accommodate highly versatile soils as defined in the RPS. As such, the proposed rezoning will not compromise productive rural values or result in the loss of valuable agricultural land.

6. Alignment with FNDC ‘general guidance criteria for rezoning submissions’ (Minute 14)

- 6.1 The following section of this evidence addresses the rezoning request in the context of the ‘general criteria’ for rezoning submissions included in final minute 14 issued by the independent hearing panel.

Strategic direction

- 6.2 The strategic direction chapter includes 6 sections. Each section includes high-level objectives that are intended to ensure that growth and development across the district supports community wellbeing, protects environmental and cultural values, enables a resilient and efficient settlement pattern, and responds proactively to climate change and natural hazards.
- 6.3 The objectives and policies from the Rural Environment section are of most relevance to the proposed rezoning. The Rural Environment section seeks to support efficient primary production (SD-RE-O1) and to protect highly productive land from inappropriate development (SD-RE-O2). The submission area is not identified as highly productive under the NPS-HPL or the RPS and is therefore not subject to the protection intent of SD-RE-O2. With respect to SD-RE-O1, both the RLZ and the SETZ enable primary production as a permitted activity. As such, the proposed rezoning will not compromise the efficiency or viability of rural production activities in the area and remains consistent with the rural environment objectives of the plan.
- 6.4 With respect to the Historic and Cultural Wellbeing section, the submission area does not contain any sites of significance to Māori and there is only one recorded archaeological site located near the property at NA132C/87. Regardless, the rezoning does not alter legal obligations or the

application of relevant plan provisions, which remain in place regardless of zoning. Future resource consent and archaeological authority processes will ensure Te Tiriti o Waitangi is given effect to, and that tangata whenua values and kaitiakitanga are reflected in decision-making. The rezoning is therefore consistent with the objectives of the Historic and Cultural Wellbeing section.

- 6.5 The proposal is consistent with the Natural Environment Chapter as it proposes a zone that reflects existing and approved lot sizes for the submission area. There is no elevated landscape values identified for the submission area under the PFDNP. The Coastal Environment provisions apply regardless of the underlying zoning, ensuring that the values associated with the small portion of the title located on the western side of Houhora Heads Road (NA132C/87) are retained.
- 6.6 The proposal aligns with the objectives of the Economic and Social Wellbeing and Infrastructure and Development sections. It enables additional housing opportunities in a location with demonstrated demand and the capacity to accommodate on-site infrastructure. The rezoning supports local housing supply, contributes to social wellbeing, and represents an efficient use of land already fragmented and developed for lifestyle and residential purposes.
- 6.7 The Urban Form and Development section primarily relates to urban centres and is not relevant to the proposed rezoning. Likewise, the objectives within the Infrastructure and Social Wellbeing section that address renewable energy are not applicable to this proposal.

Alignment with zone outcomes

- 6.8 Alignment with the objectives and policies for the SETZ is demonstrated in **Table 1** below.

Table 1: *Assessment in context of SETZ objectives and policies.*

Objective	Assessment
RSZ-O1	The proposed rezoning reflects the existing residential and lifestyle development pattern and will enable further residential use consistent with the zone's primary purpose.
RSZ-O2	The existing lots are for the most part small and developed in a settlement-style pattern. Rezoning will formalise the existing character and will not increase density beyond what the area can absorb.
RSZ-O3	The land is unconstrained, not subject to significant environmental limitations, and has capacity for on-site servicing. Infrastructure requirements can be addressed at the resource consent stage. The MFT has also obtained two geotechnical suitability reports for previous development on their property (Attachment 3), which did not

	identify any impediments to development, indicating that the land is generally suitable.
RSZ-O4	The area is already characterised by residential and lifestyle uses. Additional development will not introduce new sensitive activities and will be compatible with surrounding land uses.
Policy	Assessment
RSZ-P1	The proposed rezoning enables residential use in line with the purpose of the zone. There are no existing non-residential activities that are in conflict with the existing or anticipated role, function, or predominant character and amenity of the area.
RSZ-P2	Not applicable at this stage. Any future development will be assessed for servicing at the resource consent stage.
RSZ-P3	Any future proposals would be required to meet these criteria.
RSZ-P4	The proposal reflects existing development pattern and land use, with which residential activity is compatible.
RSZ-P5	The proposal aligns with the existing scale and pattern of development, can be serviced, and avoids areas of cultural or natural significance. Any future development will be subject to resource consent requirements to manage effects.

- 6.9 Overall, the proposed rezoning is consistent with the objectives and policies of the SETZ. It enables residential development in an area that already exhibits a settlement-style development pattern, with small, fragmented lots and existing lifestyle use. The submission area is physically suited to further development, can be serviced, and does not present environmental or cultural constraints that would preclude rezoning. The proposal will not give rise to reverse sensitivity effects and supports the intent of the zone to provide for residential living at a scale and intensity compatible with rural and coastal settlement character.

Higher order direction

NPS-HPL

- 6.10 Under the LUC system, soils within the submission area are Class 4. They are therefore not considered 'highly productive' and the NPS-HPL is not relevant to this rezoning request.

RPS

- 6.11 The RPS provides a framework for managing the region's natural and physical resources. The requested rezoning is consistent with the relevant objectives and policies of the RPS. Specifically:

Regional form and development (objective 3.11 and policies 5.1.1 and 5.1.3)

- 6.12 The proposed rezoning supports a consolidated and coordinated settlement pattern consistent with Objective 3.11 and Policy 5.1.1 of the RPS. The submission area is already highly fragmented, comprising predominantly small titles used for residential and lifestyle purposes. It adjoins land proposed to be zoned SETZ and is located in close proximity to existing infrastructure and the State Highway network. The submission area does not contain highly productive soils and has limited capacity for primary production, meaning the rezoning will not compromise rural productivity. In accordance with Policy 5.1.3, the proposal enables growth in a location that is well suited to absorb additional residential development without undermining the viability of nearby urban areas, supporting a logical extension of the existing settlement form.

Natural character, features, and landscapes (objective 3.14 and policy 4.6.1)

- 6.13 While a small portion of the submission area is located within the coastal environment, this is consistent with the development pattern of the wider Pukenui/Houhora area, where similar overlays apply to land proposed to be zoned SETZ. Importantly, the coastal overlay provisions under the PFNDP will continue to apply irrespective of the underlying zone, ensuring that any future development will be subject to appropriate controls to avoid, remedy, or mitigate adverse effects on natural character.

Sustainable infrastructure (objective 3.8 and policy 5.2.2)

- 6.14 The submission area is located near existing transport networks, and three waters are capable of being managed on-site. The rezoning request therefore supports efficient service provision and will not impose additional infrastructure demands.

Tangata whenua participation (objective 3.12 and policy 8.1.1)

- 6.15 Although direct engagement with tangata whenua has not yet occurred, the proposed rezoning aligns with Objective 3.12 and Policy 8.1.1 of the RPS, which seek to ensure that the principles of Te Tiriti o Waitangi are given effect to and that tangata whenua values are recognised and provided for. Any future subdivision (and some land uses) will require resource consent, providing statutory opportunities for tangata whenua engagement. The proximity of the submission area to the coast and a recorded archaeological site is acknowledged. Overlay provisions under the PFNDP and authority requirements under the Heritage New Zealand Pouhere Taonga Act 2014

will continue to apply while there will be further opportunities for tangata whenua to engage through the resource consent or subdivision process.

Climate change and hazard risk (objective 3.13 and policies 7.1.1 and 7.1.2)

- 6.16 While there are hazards that apply, there is limited exposure given that these areas are limited to areas adjoining the small watercourses that traverse the submission area. Future development can be located in hazard free locations. Future subdivision or building consents would also be subject to site-specific hazard assessments, allowing for detailed hazard avoidance and / or mitigation. The hazard overlay provisions in the PFNDP will continue to apply, regardless of zoning. These provisions will ensure that natural hazard risks are identified, assessed, and appropriately managed at the time of subdivision or development. The general suitability of the land is demonstrated in the two geotechnical reports obtained by the MFT (**Attachment 3**).

Productive land and soils (objective 3.9 and policy 5.3.1)

- 6.17 The submission area does not comprise high-class soils/highly productive land. The fragmented nature of the land further reduces productive values. These characteristics ensure that the requested rezoning does not undermine these RPS provisions.

Conclusion

- 6.18 Overall, the requested rezoning is consistent with the objectives and policies of the RPS.

National Policy Statement on Urban Development ("NPS-UD"):

- 6.19 The NPS-UD primarily addresses urban areas and is not directly applicable to SETZ. Therefore, the NPS-UD is not relevant to the proposed rezoning.

National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health ("NES-CS"):

- 6.20 Based on available information, there are no indications of soil contamination in the submission area. If there are any historical activities that may have led to soil contamination, the NES-CS would apply and would need to be addressed at subdivision/development stage.

New Zealand Coastal Policy Statement ("NZCPS")

- 6.21 The proposed rezoning from RLZ to SETZ is consistent with the NZCPS, noting that only a very small portion of one of the 21 titles within the submission area lies within the coastal environment. Given this limited extent, the potential for adverse effects on coastal values is minimal. The existing provisions of the PFNDP that manage natural character, landscape, and cultural values

within the coastal environment will continue to apply, ensuring that any future development is appropriately assessed and managed in accordance with the NZCPS.

Assessment of site suitability and potential effects of rezoning

Natural environment and overlays (including natural hazards)

- 6.22 The proposed rezoning poses minimal risk from natural hazards, as these are confined to areas near small watercourses. Future development can be directed to hazard-free locations, with site-specific hazard assessments required at the subdivision or building consent stage to enable appropriate avoidance or mitigation. The natural hazard overlay provisions in the PFNDP will continue to apply regardless of zoning, ensuring that risks are identified and managed through future consenting processes. As outlined above, the general suitability of the land is demonstrated by the two geotechnical suitability reports that the MFT obtained for previous development on their property (**Attachment 3**), which did not identify any impediments to development.
- 6.23 As outlined above, given the limited extent of the submission area that is located within the Coastal Environment, the potential for adverse effects on coastal values is minimal. The existing provisions of the PFNDP that manage natural character, landscape, and cultural values within the coastal environment will continue to apply, ensuring that any future development is appropriately assessed and managed.
- 6.24 The rezoning request also supports future opportunities for tangata whenua to engage through the resource consent or subdivision process.

Compatibility and reverse sensitivity

- 6.25 The submission area directly adjoins residential zoned land and is not in proximity to any RPROZ land or large-scale productive rural activities. As a result, the proposed rezoning to SETZ is compatible with both the existing development pattern and reasonably anticipated land uses in the surrounding environment.
- 6.26 The proposed rezoning to SETZ is compatible with the surrounding rural lifestyle character and anticipated land uses, particularly as the submission area is already proposed to be rezoned to RLZ. Both zones enable low-density development, and the shift to SETZ does not introduce activities that are out of character with the area. Reverse sensitivity effects are unlikely, as future residential activities will be consistent with those already occurring or anticipated under the RLZ, and any potential effects can be managed through existing district plan provisions.

Infrastructure (three waters) servicing

- 6.27 Each lot will rely on on-site water supply, stormwater management, and wastewater management arrangements. This is consistent with rural-residential servicing expectations. Each of the existing dwellings within the submission area rely on such arrangements, signalling that there is no impediment to on-site servicing. This is confirmed in the geotechnical suitability reports included as **Attachment 3**. There will be no connections required to Council reticulated three waters infrastructure.

Transport infrastructure

- 6.28 The submission area is serviced by an existing Council maintained public road (Houhora Heads Road). No direct access to State Highway 1 is required. The intersection between Houhora Heads Road and State Highway 1 provides good sight distances, and although it lacks deceleration lanes or a median strip, any upgrades can be addressed through future development consenting processes. Notably, Waka Kotahi NZ Transport Agency has not opposed the rezoning, indicating no major concerns with the proposed access arrangements.
- 6.29 Applicants will be required to address access arrangements beyond the existing maintenance points on the public roads at the time of future subdivision or development. The provisions from the Transport Chapter of the PFNDP are sufficient to ensure that appropriate arrangements are provided.

Consultation and further submissions

Consultation

- 6.30 Consultation has primarily occurred through the statutory PFNDP submissions process. While no direct engagement with tangata whenua has occurred (given the absence of sites of significance and that there is only one recorded archaeological site that is partially located within the submission area), no submissions have been received expressing an interest in the submission area.
- 6.31 As each of the 21 titles located within the submission area can be accessed via Houhora Heads Road and that no direct access is required from State Highway 1, no consultation has been undertaken with Waka Kotahi NZ Transport Agency. They have not opposed the rezoning, indicating no major concerns with the proposed access arrangements.

Further submissions

- 6.32 There are no further submissions.

Section 32AA evaluation

6.33 A Section 32AA evaluation is provided in the following tables:

Table 2: *Efficiency and effectiveness.*

Matter	Assessment
Efficiency	<p>The proposed rezoning to SETZ is considered efficient. The submission area is fragmented, comprising 21 small titles that are already used predominantly for lifestyle or residential purposes. Rezoning to SETZ better aligns with existing land use and provides a clearer, more enabling framework for future development, reducing compliance costs and unnecessary consent requirements. Importantly, the rezoning would enable a broader range of housing types and densities, directly supporting improved housing supply and affordability in the Far North District, which is identified in the HBA report as facing a severe affordability challenge and a growing shortfall in low-cost housing. Local real estate advice confirms a very limited supply of vacant sections in the Pukenui/Houhora area, with strong demand from both permanent and seasonal residents. The area is serviced by public roading and can accommodate on-site infrastructure for water, wastewater, and stormwater. Natural hazard risks are confined to watercourse margins and can be managed through site-specific assessments, with existing hazard overlays continuing to apply.</p>
Effectiveness	<p>The rezoning is effective in achieving the objectives and policies of the SETZ, which provides for low-density residential development in locations with an existing settlement pattern and limited productive land use potential. The zone enables housing opportunities that respond to local demand while maintaining rural character and amenity. It also allows for smaller, more affordable dwellings that are not as easily delivered under the RLZ framework, helping to address the district's housing supply and affordability issues. The rezoning reflects the land's physical characteristics — including existing fragmentation, low-quality soils, and environmental constraints — and ensures that sensitive values are protected through the continued application of overlay provisions. Overall, the SETZ offers a more effective planning approach that supports both community housing needs and sustainable land use.</p>

Table 3: *Appropriateness in achieving the purpose of the RMA.*

Section	Alignment
Section 5 – Purpose of the RMA	The proposed rezoning to SETZ promotes the sustainable management of natural and physical resources by enabling people and communities to provide for their social, economic, and housing needs while safeguarding the environment for future generations. It reflects existing rural-residential use and facilitates more efficient use of fragmented, low-productive land without compromising environmental outcomes. While a small part of the submission area lies within the coastal environment and some areas are subject to flooding, these constraints are managed through existing overlay provisions in the PFNDP, which will continue to apply and ensure that development avoids or mitigates adverse effects.
Section 6 – Matters of National Importance	The proposal is consistent with Section 6 matters. Although the submission area is not subject to any landscape or heritage overlays, a small portion lies within the coastal environment and some areas are identified as flood susceptible. These matters are addressed through existing plan overlays, which apply regardless of zoning. Any future subdivision (and some development) will be subject to resource consent processes, allowing for assessment and management of potential effects on natural character and natural hazard risks, in line with section 6(a) and 6(h).
Section 7 – Other Matters	The proposed rezoning supports the efficient use and development of natural and physical resources (s7(b)) by applying a zoning framework that reflects the existing land use pattern and the site's low productive capacity. It maintains and enhances amenity values (s7(c)) by recognising and supporting the established rural-residential character of the area. It also promotes the ethic of stewardship (s7(aa)) by encouraging more active land management on smaller, individually maintained lots, and contributes to maintaining environmental quality (s7(f)) through continued application of relevant plan overlays.
Section 8 Treaty of Waitangi	Section 8 requires that the principles of the Treaty of Waitangi be taken into account. While there has been no direct engagement with tangata whenua on this rezoning, consideration of impacts on cultural and environmental values will be considered in future resource consent

	processes. This framework helps ensure that the principles of Te Tiriti o Waitangi are recognised and provided for through ongoing statutory processes.
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- 6.34 The proposed rezoning aligns with Part 2 of the RMA by enabling efficient use of land already used for rural-residential purposes, supporting housing supply and affordability, and responding to community needs. It manages environmental effects through existing overlay provisions and avoids inappropriate development in sensitive areas. Overall, the rezoning promotes sustainable management and gives effect to the purpose and principles of the RMA.

Table 4: Costs and benefits.

Category	Benefits	Costs
Environmental	<ul style="list-style-type: none"> - Maintains existing environmental protections through continued application of overlay provisions. Specifically, overlay controls ensure natural hazard risks and sensitive coastal areas remain appropriately managed. - Enables development consistent with existing land use patterns and the zoning under the OFNDP. - Provision of on-site infrastructure avoids pressure on public networks. 	None identified.
Social and Cultural	<ul style="list-style-type: none"> - Broadens housing choices, allowing smaller, more affordable dwellings than typically permitted under RLZ. - Responds to identified housing demand, helping alleviate local shortages and affordability challenges. - Supports both permanent residents and seasonal population needs with more flexible housing options. 	None identified.

Economic	<ul style="list-style-type: none"> - Provides clearer and more enabling planning framework, reducing uncertainty and resource consent costs. - Facilitates more efficient land use aligned with actual development potential, improving land value and utility. - Supports local economy by enabling controlled population growth and accommodating seasonal workers. 	None identified.
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Risk of acting or not acting

- 6.35 The risk of not proceeding with the proposed rezoning includes perpetuating existing constraints on housing supply and affordability, which may exacerbate social and economic pressures in the area. Maintaining the current RLZ zoning could limit development opportunities despite the fragmented and low-productivity nature of the land, leading to inefficient land use and ongoing demand for more suitable residential options. Conversely, the risk of acting is low, as environmental and hazard risks are managed through existing overlay provisions and resource consent processes. The rezoning therefore enables responsive, managed growth while safeguarding key values, minimizing potential adverse effects through established planning controls.

Overall conclusions

- 6.36 The proposed rezoning from RLZ to SETZ represents an efficient and effective response to the existing character and use of the land within the submission area. The land is already fragmented and primarily used for rural-residential purposes, with limited productive potential. Environmental and hazard risks are managed through existing overlay provisions that continue to apply irrespective of the underlying zoning, ensuring protection of sensitive areas and sustainable development outcomes.
- 6.37 In the context of section 32AA, the proposed rezoning is a more appropriate method to achieve the objectives of the PFNDP and the purpose of the RMA. It promotes sustainable management by aligning zoning with actual land use and community housing needs, supporting improved housing supply and affordability while maintaining amenity values. The benefits of the rezoning clearly outweigh the costs, and the risk of not acting – continuing with a less efficient zoning framework – is greater than the risk associated with the proposed change.

7. Conclusion and relief sought

7.1 The proposed rezoning from RLZ to SETZ is appropriate and justified. It better reflects the existing land use and development pattern, responds to local housing needs and land capability, and aligns with the objectives of the PFNDP, RPS, and NZCPS, while being consistent with Part 2 of the RMA. This change promotes sustainable management, supports housing supply and affordability, and ensures environmental and cultural values continue to be protected through existing overlay provisions.

7.2 The following relief is sought:

- (1) Rezone the submission area SETZ; or
- (2) Any other relief with similar effect.



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Joseph Henehan (Planner)

9 June 2025

ATTACHMENT 1

PLANS

ATTACHMENT 2

REAL ESTATE LETTERS

ATTACHMENT 3

GEOTECHNICAL REPORTS