

**BEFORE HEARINGS COMMISSIONERS APPOINTED
BY THE FAR NORTH DISTRICT COUNCIL**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions on the Proposed
Far North District Plan

SUBMITTER Tapuaetahi Incorporation [S407.003, S407.004
and S407.005]

HEARING TOPIC: Hearing 15A – Rezoning General

STATEMENT OF PLANNING EVIDENCE OF STEVEN REMANA SANSON

24 June 2025

INTRODUCTION

1. My name is Steven Remana Sanson. I am a Director / Consultant Planner at Sanson and Associates Limited and Bay of Islands Planning [2022] Limited.
2. I have been engaged by Tapuaetahi Incorporation to provide evidence in support of submission points S407.003, S407.004, and S407.005 to the Proposed Far North District Plan [**PDP**].
3. I note that while the Environment Court Code of Conduct does not apply to a Council hearing, I am familiar with the principles of the code and have followed these in preparing this evidence.

QUALIFICATIONS AND EXPERIENCE

4. I hold the qualification of Bachelor of Planning [Hons] from The University of Auckland, graduating in 2013 and I am an Intermediate Member of the New Zealand Planning Institute.
5. I have over 11 years' experience and have previously held planning positions in the Far North District. In my current role I regularly advise and assist corporate and private individuals with the preparation of resource consent applications including subdivision and land use consents and relevant regional council consents. I have also processed resource consent applications for councils, prepared submissions on district plan changes, and processed plan changes.

SCOPE OF EVIDENCE

6. Submission point S407.003 relates to zoning of the landholdings and points S407.004 and S407.005 relate to rule exemptions for the landholdings.
7. The submitter has been granted leave to re-present these submission points at Hearing 15A.
8. Submission point S407.003 and its corresponding rationale highlights that it is difficult to impose a binary urban / rural zoning arrangement in context of the landholding.
9. In my view the site / landholding contains clear aspects which are both rural and urban and on the interface between the two areas. For example, there are allotments as small as 800m² present along the coastline and there is an area of Coastal Living land set aside as a buffer between the urban allotments and the wider farm landholding.
10. A large area of the landholding is rural in character.
11. The Context found within Chapter 10.8 of the Coastal Residential Zone in the Operative Far North District Plan [**ODP**] notes the following:

The Coastal Residential Zone provides for the most intensive development of all the zones in the coastal environment. It is applied in areas where an urban residential style and scale of development exists now. It enables the further development of these areas in a way which retains, as far as possible, the natural character of the coastal environment.

12. The Context found within Chapter 10.7 of the Coastal Living Zone in the ODP notes the following:

The zone provides an area of transition between residential settlement on the coast and the General Coastal Zone. The difference is expressed mainly in residential intensity and lot sizes.

The zone applies to those areas of the coastal environment which have already been developed but which still maintain a high level of amenity associated with the coast. These areas have been identified as having an ability to absorb further low density, mainly rural residential development, without detriment to their overall coastal character. The zone therefore allows rural residential development to occur and thereby reduces pressure for development in the General Coastal Zone whilst retaining, as far as possible, the character, features and landscapes of this part of the coastal environment.

13. It is my view that these overviews more accurately portray and recognise the existing use and development of the landholdings as opposed to the PDP proposal for the Maori Purpose Zone.

14. The Overview for the Maori Purpose Zone states that:

Māori land is categorised into either:

Māori Purpose zone - Urban, where the land adjoins the General Residential zone and is residential in character.

Māori Purpose zone - Rural, where the land adjoins Rural zones, is rural in character and surrounded by a working rural environment with a wide range of productive activities.

15. This approach is very simplistic when compared to that employed in the ODP.
16. Submission point S407.003 sought to broaden the scope of what could be considered as Maori Purpose Zone Urban by facilitating an 'and / or' statement. This was not agreed with in the Right of Reply for Hearing 10.

17. In my view, the Right of Reply appears to extend the Overview section of the Chapter by requiring Maori land that is adjacent / adjoining the General Residential Zone to also be ‘serviced’¹.
18. This aspect may be better explained at the hearing by the Reporting Officer as it is understood that as part of Hearing 1, the officers recommendation in that instance was to expand the scope of SD-UFD-03 to make provision for infrastructure that is not defined as ‘development infrastructure’².
19. If the position recommended in the S42A Report is accepted, then Coastal Residential sites that can provide onsite servicing of infrastructure are able to be considered in an urban context.
20. The approach recommended in the S42A Report allows development to continue in locations and at a density enabled previously in the ODP, until such time that Council has the resources to plan for growth in areas where three waters services are available.
21. Contrary to the S42A Report recommendation for the Strategic Direction chapter there appears to be three arms to be considered Maori Purpose Zone – Urban:

Does the landholding adjoin the General Residential Zone?

Is the landholding residential in character?

Is the landholding serviced with urban infrastructure?³

22. I accept that the landholdings do not adjoin the General Residential Zone and does not have ‘urban infrastructure’. However, the current Coastal Residential component of the landholding is residential in character and is ‘serviced’ to be developed to a higher density than the surrounding landholdings.
23. The Maori Purpose Zone Rural has three arms that, as written, must all be met. That is –

Does the landholding adjoin a Rural Zone?

Is the landholding rural in character?

Is the landholding surrounded by a working rural environment with a wide range of productive activities?
24. My view is that the second arm of the test is not met. Parts of the landholding are clearly not rural in character and are urban with a clear buffer area set aside for lifestyle development [residential in nature].

¹ Refer paragraph 9 of the Section 42A Report Officers Written Right of Reply, 30 May 2025.

² Refer s42A Appendix 1.4 – Officers Recommended Amendments to Strategic Direction Chapter

³ Inferred through paragraph 9 of the Section 42A Report Officers Written Right of Reply, 30 May 2025.

25. Therefore, parts of the landholding are neither Maori Purpose Rural nor Maori Purpose Urban.
26. The Right of Reply assesses the costs / benefits of the changes sought in my evidence in Hearing 10.
27. What hasn't been assessed is the costs to the submitter, having to apply rural standards to allotments that are as small as 800m² in size. These lots are clearly not rural.
28. For example, this would require those sites currently zoned Coastal Residential to comply with the following rules:
 - MPZ-R2 Impermeable Surfaces – Maximum of 25% per site.
 - MPZ-S1 Maximum Height – 12m.
 - MPZ-S3 Setbacks – 10m from all boundaries generally. These sites mostly adjoin a road so don't get the allowance under Clause iii.
 - MPZ-S5 Building or Structure Coverage – 50%. This is at odds with the above for impervious surface, and total coverage would be limited to 25%.
 - MPZ-S6 Servicing. Any new building or structure, relocated building or extensions or alterations to buildings or structures would need to provide a site suitability report as per MPZ-R1.
29. Development would be further compounded by the Coastal Environment overlay. These rules are premised on rural sized allotments and resource consents would be needed.
30. Whilst consents cannot be avoided in all cases, the 10m setback from all boundaries given the allotment dimensions on the Coastal Residential sites would require consents in most cases and would make reasonable use of the land in this instance difficult to achieve.
31. The remaining submission points S407.004 and S407.005 aren't likely to completely ameliorate the zoning issues because the exemptions are related to density only and not the full suite of rules / overlays that apply to the site. Therefore, the Councils concerns about needing some oversight for a consent are catered for, albeit for differing purposes.
32. The exemptions in my view are of a similar nature to that sought for Matauri X, which have been accepted. I note that Matauri X do not have an exemptions form MPZ-R4 Residential Activity.
33. The sites are both Coastal Residential in nature and are largely or mostly developed with associated residential services. A papakainga plan for the Tapuaetahi landholding

are now provided for areas not developed. It is not abundantly clear why the exemption could not apply to the Tapuaetahi landholding as sought when similar conditions exist to Matauri X.

34. In terms of MPZR4- Residential Activity, it is not clear how this differs from MPZ-R5. The reporting officer I believe needs to clarify what the difference is between the rules in practical terms. In my view the Papakainga activity is a residential activity and vice versa. Hence why the Tapuaeatahi submission is to be exempt from both rules.
35. As alternative or consequential relief considering the above, it may be more prudent that the exemptions sought apply to specific parts of the landholding. This would be the Coastal Residential and Coastal Living aspects as outlined in Figure 1 below.
36. I note that the imminent National Environmental Standard for Papakainga may trump this process with respect to Papakainga development. However, this cannot be relied upon until enacted and in operation.
37. I also note that the make-up of the rules in the Maori Purpose Zone is to differentiate between Residential Activity [MPZ-R4] and Papakainga [MPZ-R5]. Residential Activity is not defined in the National Environmental Standard, however a Papakainga is. Therefore, there may be subtle differences between the NES and the PDP.



Figure 1: Proposed Exempted Land (Source: Far North Maps)

38. In summary this evidence therefore seeks the following relief:
 - Rezone the Coastal Residential part of the site to Maori Purpose – Urban and / or allow for this part of the landholding to be exempt from provisions as requested in the submission, and;
 - Allow the Coastal Living part of the landholding to be exempt from provisions as requested in the submission. As an alternative, the portion of land zoned Coastal Living in the ODP could be zoned Rural Lifestyle which is

commensurate with Coastal Living. I note there is precedent in Paihia where Maori owned land is not zoned either Maori Purpose Urban or Maori Purpose Rural, but is zoned Mixed Use⁴.

39. Details of the site / landholdings are provided in the figures and descriptions below.



Figure 2: Landholdings (Source: Prover)



Figure 3: PDP Zoning Layout (Source: Far North Maps)

⁴ FNDC S32 Report Tangata Whenua: Page 36 May 2022 – 9 Puketona Rd

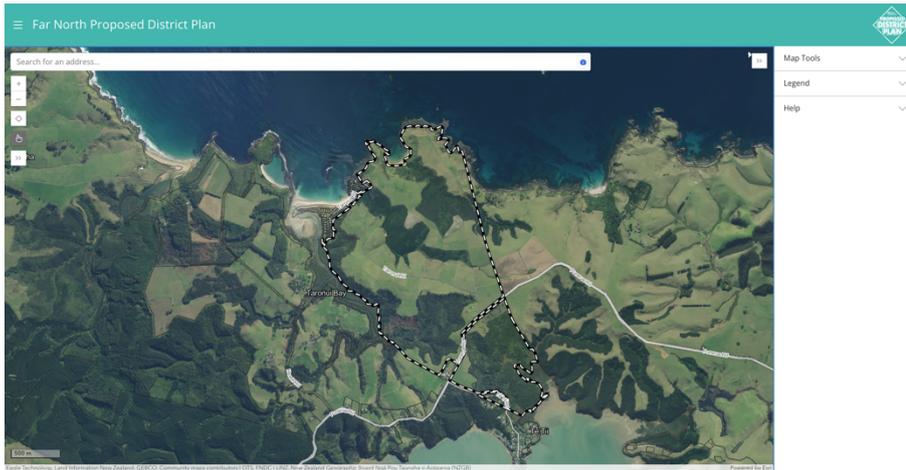


Figure 4: PDP Aerial (Source: Far North Maps)

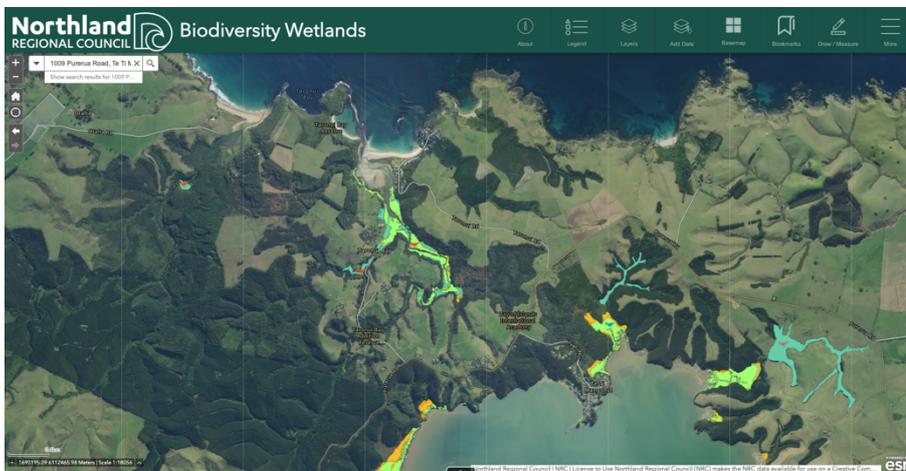


Figure 5: Biodiversity Wetlands Present (Source: NRC Local Maps)

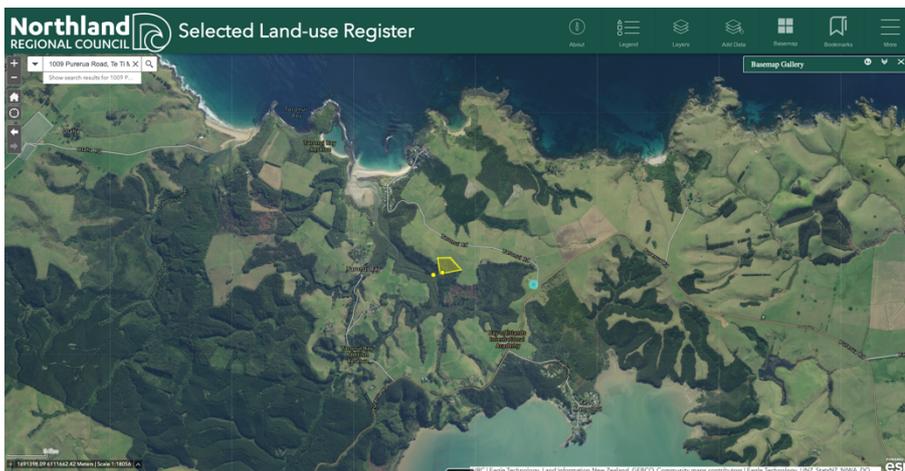


Figure 6: SLU Register (Source: NRC Local Maps)

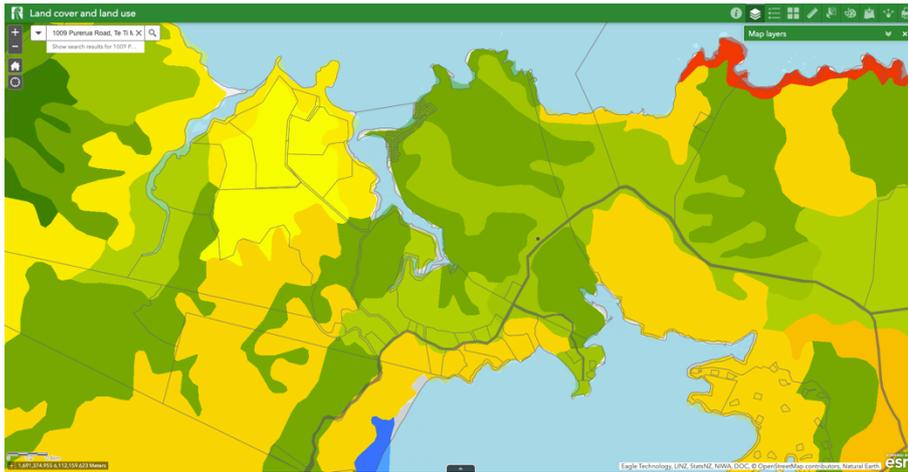


Figure 7: NZLRI Maps (Source: Far North Maps)

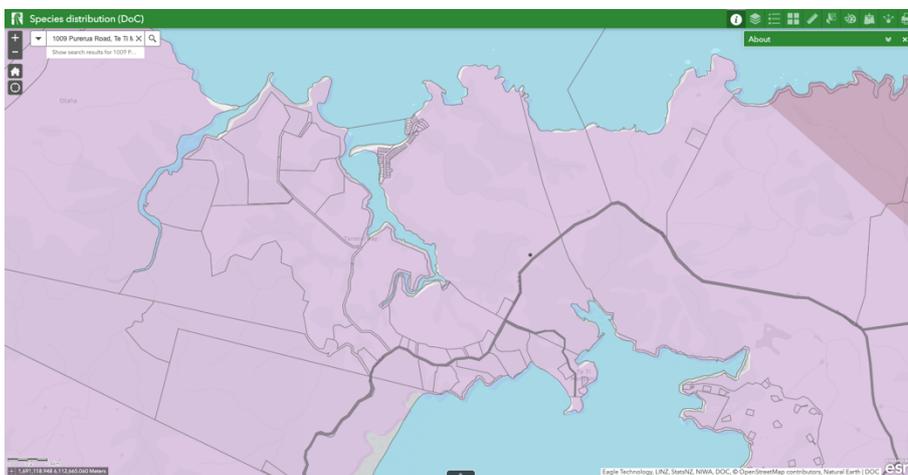


Figure 8: Species Distribution (Source: Far North Maps)



Figure 9: Reserves and Protected Areas (Source: Far North Maps)



Figure 10: Natural Hazards - Tsunami (Source: NRC Local Maps)



Figure 11: Natural Hazards – Flooding / Coastal Erosion (Source: NRC Local Maps)

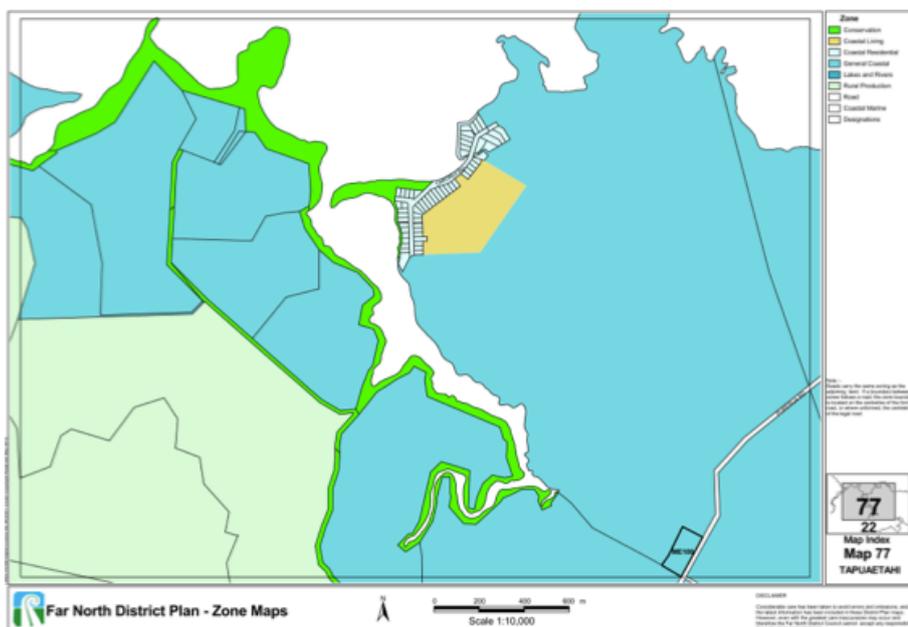


Figure 12: Operative District Plan Maps (Source: Far North Maps)

40. The landholdings include the following:

Parcels	Zone	Area
1	Conservation	2.7439ha
63	Coastal Residential	8.57ha
1 [Split Zone with General Coastal]	Coastal Living	11.5ha
3	General Coastal	318.1124ha

41. This is proposed to be changed to Maori Purpose Zone – Rural in its entirety.
42. The landholdings contains areas considered to have High Natural Character referenced HNC 237, HNC 240, HNC 245, HNC 246, HNC 248, HNC 250, and HNC 252. Part of the site is also subject to ONL 2887. Parts of these areas intersect previous mapping by the Department of Conservations Protected Natural Area study.
43. Wetlands are located near the site and along its margins. They do not have a role to play in terms of the existing Coastal Residential or Coastal Living areas.
44. The landholdings are within the Coastal Environment and parts are subject to flooding. Soils are Class 4.
45. My evidence addresses the rezoning request against the criteria set out in Minute 14 from the Independent Hearings Panel (**Minute 14**), which include:
 - How the request is consistent with the PDP strategic direction;
 - How the requested zoning better aligns with the outcomes anticipated by the General Residential zone;
 - How the request gives effect to higher order documents;
 - The reasons for the request;
 - An assessment of site suitability and potential effects;
 - Further submissions; and
 - A Section 32AA evaluation.
46. My evidence concludes that the current zoning arrangement across the site as proposed in the PDP is not appropriate.

STRATEGIC DIRECTION

47. An assessment of how the rezoning request is consistent with the PDP strategic direction is provided in **Annexure 1**. In summary, the proposed rezoning request is considered to be consistent with the Strategic Direction as notified.

ALIGNMENT OF OUTCOMES

48. An assessment of how the rezoning request aligns with the objectives, policies and intended outcomes of the relevant PDP Zones are provided in **Annexure 2**.

HIGHER ORDER DIRECTION

49. An assessment of how the rezoning request aligns with higher order direction is provided in **Annexure 3**. In summary, the proposal is considered to align with all of the relevant higher order directions applicable.

REASON FOR THE REZONING REQUEST

50. The reasons for the rezoning request are already identified in the submission. They are not repeated here.

ASSESSMENT OF SITE SUITABILITY AND POTENTIAL EFFECTS

Natural Hazards

51. The landholdings are subject to flooding overlays. Parts of the site are clear of, or within, tsunami threat areas. These aspects are not considered to be relevant to rezoning in this instance because they apply currently, and the sites are already zoned in a residential / urban capacity. These aspects do not affect the area currently zoned as Coastal Living.
52. There are no known effects arising from volcanic or geothermal activity, landslips or subsidence. Mitigation measures are promoted with respect to the Coastal Living area in terms of engineering.
53. The Hazardous Substances Chapter is relevant insofar as the existing HAIL site on the landholdings is concerned. These rules will apply as well as the relevant National Environmental Standard at time of development. This area is not near the development already undertaken / proposed.

Natural Environment Values

54. The submission points do not change indigenous vegetation clearance rights. The Ecosystems and Biodiversity Chapter would apply as notified. No exemptions are being sought in this respect.

55. Natural character would be considered at time of development through the provisions of the Coastal Environment overlay. No exemptions are being sought in this respect.
56. Whilst Council officers may have some reservations with the exemptions sought, the consideration of natural character on the landholding at time of development will provide a site specific density that is defensible on the landholdings. In other words, it will not be a 'free for all' in terms of density.
57. Natural features and landscapes will also be considered at time of development, where they intersect development aspirations. At this stage they do not.
58. The Public Access Chapter is relevant as the site as the site is adjacent to the coastal marine area and there are rivers / stream on the landholding. This chapter can be considered at time of development.

Historic Heritage

59. There are no mapped features on the site.

Coastal Environment

60. This aspect is not proposed to be changed through the submissions and can be considered at time of development. The consideration of natural character as a matter of national importance is not sought to be changed and can be considered appropriately in the areas sought to be exempt from density provisions.

Effects on Surrounding Sites

61. The effects from the rezoning from Maori Purpose Rural to Urban does not affect surrounding sites as this portion of land is situated along the coastline and is insulated by the balance of the landholding. This is similarly true for the Coastal Living portion of the land which is also insulated by the General Coastal portion of the landholding.

INFRASTRUCTURE [THREE WATERS]

62. The landholdings where developed have their own three water services, which function as intended. Future development would be provided with services as required.
63. The site has no access to urban services.

TRANSPORT INFRASTRUCTURE

64. The landowner provides an all-weather surface through the site to Purerua Road [known as Taronui Road] to service the activities on the site. The development proposed in the Coastal Living part of the site does not require a traffic impact assessment according to feedback from the Councils Consent Department.

CONSULTATION & FURTHER SUBMISSIONS

65. There are no known key stakeholders or tangata whenua in relation to the rezoning request. It is a discrete rezoning request.
66. There are no further submissions.

SECTION 32AA EVALUATION

67. The evaluation below is with respect to the change of zoning sought and the consideration of the exemptions either in combination or separately.

Efficiency and Effectiveness

68. The rezoning sought through the submission better reflects the existing situation, without causing undue impacts to surrounding properties, infrastructure, or the wider surrounds.
69. The rezoning would allow parts of the site which are clearly urban / residential to rely on urban / residential standards. It is not efficient for small sites such as that seen in the Coastal Residential portion of the landholding to be subject to consents because it is now deemed to be 'rural'.
70. The exemptions allow for development to be undertaken without the need to consider density requirements for the Coastal Residential and Coastal Living portions of the site.
71. The area is a defensible one which is currently zoned for more intensive purposes, which more appropriately matches the carrying capacity of these parts of the site. The exemptions/changes represent an efficient and effective means to facilitate and support development on the land which is currently understood while retaining a buffer and balance for production purposes, which was the ultimate intent of the ODP.

Costs/Benefits

72. Benefits of the submission include:
- Provisions which match what has already been considered as part of the ODP and reflects what is on the ground, or what could be developed under the ODP on the site in the Coastal Residential and Coastal Living Areas. These provisions may be more enabling when the exemptions are included, but the exemptions on their own are unlikely to promote an outcome where no consents are required.
73. Costs of the submission include:
- It is stated that these are 'high risk of impacts on rural character and amenity, result in isolated pockets of urban zoning across the district and district wide implications and unintended consequences'⁵. Whilst tabulated, these costs are not quantified or understood in context. For example, the Council officers may

⁵ Hearing 10 Right of Reply, Page 4.

further outline to the panel how many other instances where this may occur, where these isolated pockets may be, and what the exact district wide implications and unintended consequences might be.

Risk of Acting or not Acting

74. The risk of not acting is that the PDP as presented represents an environmental outcome for the site that does not consider realities on the ground or the surrounding environs.
75. There is a risk of acting as outlined in the costs above which Council has assessed. They should provide further information about these costs so that these can be fleshed out in more detail as they are generic in nature.

CONCLUSION

76. For the various reasons above, I consider that the submission points above be accepted.

ANNEXURE 2 – ASSESSMENT OF STRATEGIC DIRECTION¹

Table 1: Strategic Direction – Cultural Prosperity

Matter	Assessment
Te Tiriti o Waitangi partnerships support iwi and hapū to deliver on the social, economic, environmental and cultural wellbeing outcomes for tangata whenua .	The submitter [who is tangata whenua] seeks an outcome for their landholding that is not currently being supported by Council and is not the most appropriate means to meet their wellbeing.
Te ao māori, tikanga māori and tangata whenua as kaitiaki, embedded in and integral to decision making.	It is not clear where this is provided in relation to the Schedule 1 process.
The district's diverse cultures and communities are celebrated and cultural heritage recognised.	The site is not implicated by any mapped site of significance to maori [although the land itself is a taonga to the submitter].
The district's historic heritage is identified and managed to ensure its long-term protection for current and future generations.	The site has no mapped historic heritage features.
A district wide approach to the impacts of climate change and natural hazards , which includes a te ao māori decision making framework, developed with iwi and hapū .	The submission is not responsible for district wide matters nor does it seek to alter or change them. It is not clear where the decision making framework sits in relation to the Schedule 1 process.

Table 2: Strategic Direction – Social Prosperity

Matter	Assessment
Community wellbeing is heightened by a sense of place.	The rezoning / exemptions sought seek to ensure that the sense of place of the landholdings match their current and proposed built development profile. The PDP approach is to apply something that does not neatly fit across the landholding.

¹ As notified.

Development of initiatives that will support the wellbeing of Tangata Whenua , in partnership with Iwi and hapū .	The submission is not responsible for these 'initiatives'.
Encourage opportunities for fulfilment of the community's cultural, social, environmental, and economic wellbeing.	It is expected that the remainder of the PDP framework outlines these 'opportunities' as they relate to each zone. The relevant zones are considered in Annexure 3 .
Promotion of communities and places that will meet the needs for not only the present population but future generations which are adaptive to climate change.	The submitters seeks a more appropriate zone and exemptions that can meet the needs of current and future generations. The Coastal Living Zone proposed for development is elevated away from coastal hazards which can be implicated by climate change.

Table 3: Strategic Direction – Economic Prosperity

Matter	Assessment
A high-earning diverse local economy which is sustainable and resilient to economic downturns, with the district's Māori economy making a significant contribution.	The exemptions sought would allow the submitter to enhance the Maori economy through the provision of land for housing.
Existing industries and enterprises are supported and continue to prosper under volatile and changing economic conditions.	The existing coastal residential development does not appear to be supported through the PDP nor the coastal living aspect.
Development and retention of highly motivated, educated and skilled people in the district.	These people need places to live and the proposal seeks to increase this.
People, businesses and places are connected digitally and through integrated transport networks.	Digital services can be provided and are already at the landholding. The site is connected to a wider transport network.
A district economy that is responsive, resilient and adaptive to the financial costs of a changing climate.	It is not clear which provisions relate to this objective. The proposal does not appear to impact this.

Table 4: Strategic Direction – Urban Form and Development

Matter	Assessment
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.	The site is not considered to be ‘urban’, however there is clearly urban / residential development on the site.
<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.	As above.
Adequate <u>development infrastructure</u> in place or planned to meet the anticipated demands for housing and business activities.	As above.
<u>Urban</u> growth and development is resilient and adaptive to the impacts from <u>natural hazards</u> or climate change.	As above. Climate change can be managed at time of development and through the use of the most up to date information to consider natural hazards.

Table 5: Strategic Direction – Infrastructure and Electricity

Matter	Assessment
The benefits of <u>infrastructure</u> and <u>renewable electricity generation activities</u> across the district are recognised and provided for, while ensuring their adverse <u>effects</u> are well managed.	These benefits are not altered through the relief sought in the submission.
<u>Infrastructure</u> and <u>renewable electricity generation activities</u> are protected from incompatible land use, <u>subdivision</u> and development that may compromise their effective operation, <u>maintenance</u> and upgrading.	These activities are assumed to remain protected through provisions in the Plan

Table 6: Strategic Direction – Rural Environment

Matter	Assessment
<p>Primary production activities are able to operate efficiently and effectively and the contribution they make to the economic and social well-being and prosperity of the district is recognised.</p>	<p>Primary production activities can occur on the truly rural part of the site.</p>
<p>Protection of highly productive land from inappropriate development to ensure its production potential for generations to come.</p>	<p>There is no highly productive land on the site.</p>

Table 7: Strategic Direction – Environmental Prosperity

Matter	Assessment
<p>A culture of stewardship in the community that increases the district's biodiversity and environmental sustainability.</p>	<p>The culture of stewardship is well known to the submitter who has their own Environmental Management Plan.</p>
<p>Collaborative relationships with iwi and hapū in order to support tangata whenua to carry out their obligation and responsibility as kaitiaki.</p>	<p>The proposal would be from a hapu to carry out their own obligations on their own land. The objective is met.</p>
<p>Active management of ecosystems to protect, maintain and increase indigenous biodiversity for future generations.</p>	<p>Active management can be a voluntary measure or can be applied to development as part of a condition of consent.</p>
<p>Land use practices reverse climate change by enabling carbon storage and reducing carbon emissions.</p>	<p>It is not clear what provisions enable this objective to be met. It does not appear relevant to the rezoning and exemptions sought.</p>
<p>The natural character of the coastal environment and outstanding natural features and landscapes are managed to ensure their long-term protection for future generations.</p>	<p>These remain protected through the PDP.</p>

Areas of significant indigenous vegetation and significant habitats of indigenous fauna and protected for current and future generations.

These remain protected through the PDP.

ANNEXURE 3 – ALIGNMENT WITH OUTCOMES

Table 1: Assessment of the Maori Purpose Zone

Matter	Assessment
MPZ-O1 The viability of the Māori Purpose zone is ensured for future generations.	The Maori Purpose Zone would be more viable for the submitter if it reflected the submitters relief.
MPZ-O2 The Māori Purpose zone enables a range of social, cultural and economic development opportunities that support the occupation, use, development and ongoing relationship with ancestral land .	The objective is not met by the PDP which seeks to call areas which are urban / residential in nature, rural and prescribe them rural rules that are not appropriate.
MPS-O3 Use and development in the Māori Purpose zone reflects the sustainable carrying capacity of the land and surrounding environment .	The exemptions proposed would better reflect the intent of the objective. Council hasn't done a study on carrying capacity on each portion of Maori land and are applying density figures which are the same or similar to the Rural Production Zone, despite the many challenges that tangata whenua face when developing land.
MPZ-P1 Provide for the use and development of ancestral Māori land administered under Te Ture Whenua Māori Act 1993.	The use and development of Maori Land that the submitter has control over would be better served through the relief sought.
MPZ-P2 Enable a range of activities on Māori land in the Māori Purpose zone including marae , papakāinga , customary use, cultural and small-scale commercial activities where the adverse effects can be avoided, remedied or mitigated.	The Coastal Residential and Coastal Living portions of the landholding are not enabled to the level of the ODP through the PDP provisions and zoning.
MPZ-P3 Provide for development on Māori land where it is demonstrated: <ul style="list-style-type: none"> a. it is compatible with surrounding activities; b. it will not compromise occupation, development and use of Māori land; c. it will not compromise use of adjacent land or other zones to be efficiently and effectively used for their intended purpose; d. it maintains character and amenity of surrounding area; e. it provides for community wellbeing, health and safety; f. it can be serviced by onsite infrastructure or reticulated infrastructure where this is available; and g. that any adverse effects can be avoided, remedied or mitigated 	<p>The works on the landholding if approved would be compatible with surrounding activities because they are located insular to the site and away from surrounding site. The surrounding sites are the submitters own beef farming operations.</p> <p>The occupation and development of Maori land would not be compromised. The proposed zoning compromises this more.</p> <p>The character and amenity of the surrounds are managed through the Coastal Environment chapter. This is not proposed to be altered.</p> <p>The changes will enhance community wellbeing. Health and safety will be provided for through adherence to relevant provisions.</p> <p>The site can be serviced internally.</p>

	Effects can be avoided, remedied or mitigated.
<p>MPZ-P4 Manage land use and subdivision to address the effects of the activity requiring resource consent, including (but not limited to) consideration of the following matters where relevant to the application:</p> <ol style="list-style-type: none"> a. consistency with the scale, density, design and character of the environment and purpose of the zone; b. the location, scale and design of buildings and structures; c. the positive effects resulting from the economic, social and cultural wellbeing provided by the proposed activity. d. at zone interfaces: <ol style="list-style-type: none"> i. any setbacks, fencing, screening or landscaping required to address potential conflicts; ii. managing reverse sensitivity effects on adjacent land uses, including the ability of surrounding properties to undertake primary production activities in a rural environment; e. the adequacy and capacity of available or programmed development infrastructure to accommodate the proposed activity; or the capacity of the site to cater for on-site infrastructure associated with the proposed activity; f. the adequacy of roading infrastructure to service the proposed activity; g. managing natural hazards; h. any loss of highly productive land; i. adverse effects on areas with historic heritage and cultural values, natural features and landscapes, natural character or indigenous biodiversity values; and j. any historical, spiritual, or cultural association held by tangata whenua, 	These can be considered at time of development, if undertaken.

with regard to the matters set out in Policy TW-P6.	
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Table 2: Assessment of the Rural Lifestyle Zone

Matter	Assessment
RLZ-O1 The Rural Lifestyle zone is used predominantly for low density residential activities and small scale farming activities that are compatible with the rural character and amenity of the zone.	The part of the site that would be used as Rural Lifestyle would be commensurate with the current Coastal Living zone in the ODP and would be used for that intended purpose.
RLZ-O2 The predominant character and amenity of the Rural Lifestyle zone is characterised by: <ul style="list-style-type: none"> a. low density residential activities; b. small scale farming activities with limited buildings and structures; c. smaller lot sizes than anticipated in the Rural Production Zone; d. a general absence of urban infrastructure; e. rural roads with low traffic volumes; f. areas of vegetation, natural features and open space. 	As the submitter seeks the same outcomes as the Coastal Living Zone and the Rural Lifestyle Zone appears to be of a similar ilk, these matters would be met.
RLZ-O3 The role, function and predominant character and amenity of the Rural Lifestyle zone is not compromised by incompatible activities.	There are no incompatible activities in the surrounds and the use of the zone allows for a buffer from residential and rural uses.
RLZ-O4 Land use and subdivision in the Rural Lifestyle zone does not compromise the effective and efficient operation of primary production activities in the adjacent Rural Production Zones.	These activities would not be compromised as the Rural Lifestyle would act as a buffer area.
RLZ-P1 Enable activities that will not compromise the role, function and predominant character and amenity of the Rural Lifestyle zone, while ensuring their design, scale and intensity is appropriate to manage adverse effects in the zone, including: <ul style="list-style-type: none"> a. low density residential activities; b. small scale farming activities; c. home business activities; d. visitor accommodation; and e. small scale education facilities. 	These are generally consistent with the activities provided for in the Maori Purpose zone.
RLZ-P2 Avoid activities that are incompatible with the role, function and predominant character and amenity of the Rural Lifestyle zone because they are:	These activities can be avoided.

<ul style="list-style-type: none"> a. contrary to the density anticipated for the Rural Lifestyle zone; b. predominately of an urban form or character; c. primary production activities, such as intensive indoor primary production, that generate adverse amenity effects that are incompatible with rural lifestyle living; or d. commercial, rural industry or industrial activities that are more appropriately located in a Settlement zone or an urban zone 	
<p>RLZ-P3 Avoid where possible, or otherwise mitigate, reverse sensitivity effects from sensitive and other non-productive activities on primary production activities in the adjacent Rural Production zone.</p>	<p>Residential uses that are existing / proposed are not considered to be incompatible with the existing beef farming operation on the site.</p>
<p>RLZ-P4 Manage land use and subdivision to address the effects of the activity requiring resource consent, including (but not limited to) consideration of the following matters where relevant to the application:</p> <ul style="list-style-type: none"> a. consistency with the scale and character of the rural lifestyle environment; b. location, scale and design of buildings or structures; c. at zone interfaces: <ul style="list-style-type: none"> i. any setbacks, fencing, screening or landscaping required to address potential conflicts; ii. the extent to which adverse effects on adjoining or surrounding sites are mitigated and internalised within the site as far as practicable; d. the capacity of the site to cater for on-site infrastructure associated with the proposed activity; e. the adequacy of roading infrastructure to service the proposed activity; f. managing natural hazards; g. any adverse effects on historic heritage and cultural values, natural features and landscapes or indigenous biodiversity; and 	<p>These effects can be considered at time of development.</p>

h. any historical, spiritual, or cultural association held by tangata whenua , with regard to the matters set out in Policy TW-P6.	
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ANNEXURE 4 – HIGHER ORDER DIRECTION

Table 1: Assessment of National Policy Statements

Matter	Assessment
National Policy Statement for Freshwater Management	Not relevant.
National Policy Statement for Greenhouse Gas Emissions from Industrial Process Heat	Not relevant.
National Policy Statement for Highly Productive Land	Not relevant [Class 4 soils]
National Policy Statement for Indigenous Biodiversity	Relevant if vegetation clearance is undertaken.
National Policy Statement for Renewable Electricity Generation	Not relevant
National Policy Statement on Electricity Transmission	Not relevant
National Policy Statement on Urban Development	Purerua is not urban.
<p data-bbox="204 902 703 936">New Zealand Coastal Policy Statement</p> <p data-bbox="204 969 344 1003">Objectives</p>	<p data-bbox="809 902 954 936"><u>Objective 1</u></p> <p data-bbox="809 969 1366 1070">The rezoning application does little to affect the integrity, form, function or resilience of the coastal environment.</p> <p data-bbox="809 1115 954 1149"><u>Objective 2</u></p> <p data-bbox="809 1182 1380 1429">The site is has ONL areas and there is HNC areas present. The specific characteristics and qualities of the coastal environment relevant to the site is best considered at time of development. They will have a role to play in determining the carrying capacity of the site.</p> <p data-bbox="809 1473 954 1507"><u>Objective 3</u></p> <p data-bbox="809 1541 1329 1574">This was considered as part of Hearing 4.</p> <p data-bbox="809 1619 954 1653"><u>Objective 4</u></p> <p data-bbox="809 1686 1380 1787">Public access is not specifically a matter of concern in this instance unless development is proposed near the CMA or waterways.</p> <p data-bbox="809 1832 954 1865"><u>Objective 5</u></p> <p data-bbox="809 1899 1374 2000">Coastal hazard risks are present on parts of the site and are managed through provisions in the PDP.</p>

	<p><u>Objective 6</u> If development is undertaken in the future, it can balance the requirements within this objective.</p> <p><u>Objective 7</u> The rezoning submission does not impact New Zealand’s international obligations.</p>
<p>New Zealand Coastal Policy Statement</p> <p>Policies</p>	<p><u>Policy 1</u> The extent of the Coastal Environment has been mapped. This is not in contention.</p> <p><u>Policy 2</u> Refer Objective 3 above.</p> <p><u>Policy 3</u> A precautionary approach is required in terms of activities and for the use and management of resources subject to climate change. Rezoning is not an activity.</p> <p><u>Policy 4</u> Not relevant.</p> <p><u>Policy 5</u> Not relevant.</p> <p><u>Policy 6</u> These matters are best considered at time of development.</p> <p><u>Policy 7</u> Not relevant.</p> <p><u>Policy 8</u> Not relevant.</p> <p><u>Policy 9</u> Not relevant.</p> <p><u>Policy 10</u></p>

	<p>Not relevant.</p> <p><u>Policy 11</u></p> <p>The site has minimal flora and fauna.</p> <p><u>Policy 12</u></p> <p>Not relevant.</p> <p><u>Policy 13</u></p> <p>This can be considered at time of development.</p> <p><u>Policy 14</u></p> <p>This can be considered at time of development.</p> <p><u>Policy 15</u></p> <p>Not relevant.</p> <p><u>Policy 16</u></p> <p>Not relevant.</p> <p><u>Policy 17</u></p> <p>There is no known heritage items, resources, features.</p> <p><u>Policy 18</u></p> <p>Not relevant.</p> <p><u>Policy 19</u></p> <p>Not relevant.</p> <p><u>Policy 20</u></p> <p>Not relevant.</p> <p><u>Policy 21</u></p> <p>Not relevant</p> <p><u>Policy 22</u></p>
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	<p>This can be considered at time of development.</p> <p><u>Policy 23</u></p> <p>Not relevant.</p> <p><u>Policy 24</u></p> <p>Not relevant.</p> <p><u>Policy 25</u></p> <p>Not relevant.</p> <p><u>Policy 26</u></p> <p>Not relevant.</p> <p><u>Policy 27</u></p> <p>Not relevant.</p> <p><u>Policy 28</u></p> <p>Not relevant.</p> <p><u>Policy 29</u></p> <p>Not relevant.</p>
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Table 2: Assessment of National Environment Standards

Matter	Assessment
National Environmental Standards for Commercial Forestry	Not relevant.
National Environmental Standards for Air Quality	Not relevant.
National Environmental Standards for Sources of Drinking Water	Not relevant.
National Environmental Standards for Telecommunications Facilities	Not relevant.
National Environmental Standards for Electricity Transmission Activities	Not relevant.
National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health	Relevant at time of development if located next to the existing HAIL site.
National Environmental Standards for Freshwater	Relevant at time of development as there are wetlands on the margins.

National Environmental Standards for Marine Aquaculture	Not relevant.
National Environmental Standard for Storing Tyres Outdoors	Not relevant.
National Environmental Standards for Greenhouse Gas Emissions from Industrial Process Heat	Not relevant.

Table 3: Assessment of Regional Policy Statement

Objective / Policy	Comment
Integrated Catchment Management	Not relevant
Region Wide Water Quality	Not relevant
Ecological Flows and Water Quality	Not relevant
Indigenous Ecosystems & Biodiversity	There are no PNA's on the site. They need to be considered as part of any development.
Enabling Economic Wellbeing	The proposal would allow for increased economic wellbeing on the site by way of providing housing.
Economic Activities – Reverse Sensitivity And Sterilization	The proposal does not result in any reverse sensitivity or sterilization effects. The development areas are all insular to the site.
Regionally Significant Infrastructure	The proposal does not impact any regionally significant infrastructure.
Efficient and Effective Infrastructure	The proposal seeks to use existing FNDC infrastructure where available i.e Purerua Road.
Security of Energy Supply	Power is existing to the site.
Use and Allocation of Common Resources	Not relevant.
Regional Form	The proposal does not affect regional form because the regional form sought would match the ODP.
Tangata Whenua Role in Decision Making	The submitter acknowledges the role of tangata whenua in decision making for consents.
Natural Hazard Risk	Refer primary evidence.
Natural Character, Outstanding Natural Features, Outstanding Natural Landscapes And Historic Heritage	Not relevant.