

**Before the Far North District Council Hearings Committee**

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

**And**

**In the Matter** of the Proposed Far North District Plan.

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**Evidence of Brett Lewis Hood on behalf of Waitomo Papakainga Development Society  
Incorporated - S418)**

**Dated 5 May 2025**

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## **1. Introduction**

- 1.1 My name is Brett Lewis Hood. I am a planning consultant working for Reyburn and Bryant in Whangarei. I hold a Bachelor of Social Science (Geography) from the University of Waikato and a Master of Philosophy (Resources and Environmental Planning) from Massey University. I am a full member of the New Zealand Planning Institute (MNZPI).
- 1.2 I have 27 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 684 Kaitaia-Awaroa Road, Pukepoto (Lot 1 DP 434436), and the Māori Purpose Zone (MPZ) provisions in general.

## **4. Background**

- 4.1 As stated in the original submission, Waitomo Papakainga Development Society Incorporated (WP) is a Māori social service agency that use a Te Ao Māori approach to deliver services (including housing) that meet the diverse needs of their hāpori. They have been operating in Kaitāia for 30 years and are a registered Community Housing Provider<sup>1</sup> under Section 166(3) of the Public and Community Housing Management Act, 1992.<sup>2</sup>
- 4.2 WP kaimahi provide homeless whānau with emergency shelter and whānau experiencing financial hardship with food parcels, short term financial assistance and financial mentoring. They

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<sup>1</sup> **community housing provider** means a housing provider (other than Kāinga Ora—Homes and Communities) that has, as 1 of its objects, the provision of one or both of the following types of housing:

- (a) social rental housing:
- (b) affordable rental housing

<sup>2</sup> New Zealand Gazette RA109

also provide services and support for whānau and rangatahi who are engaged with the justice system and assist hapori with Government agencies such as Te Manatū Whakahiato Ora and Oranga Tamariki.

4.3 WP owns 684 Kaitaia-Awaroa Road, Pukepoto (“the site”). Relevant details are:

- (1) The site is held in a single certificate of title 530145.
- (2) The total area of the site is 7.6126ha.
- (3) The site is zoned in the Operative District Plan.
- (4) The site is proposed to be zoned ‘Rural Production Zone’ in the Proposed District Plan (PDP).
- (5) The site is classified as ‘General Land’.

4.4 The site is located in the small settlement of Pukepoto, located approximately 6km west of Kaitaia. Pukepoto contains two marae affiliated with the hapū of Ngāti Te Ao, Tahāwai and Te Uri o Hina (Te Rarawa iwi). Much of the land in Pukepoto is Māori Freehold Land.<sup>3</sup> This Māori Freehold Land is zoned Māori Purpose Zone – Rural (MPZ), including the adjoining property immediately to the west of the WP site.

4.5 Although not on the WP site, there are also multiple Sites of Significance to Māori being:

- MS05-01 - Te Wai a Mere - traditional cultivation place
- MS05-02 - Kiri Kiri - traditional cultivation place
- MS05-03 - Te-Uri-O-Hina Marae
- MS05-66 - Te Rangihaukaha - waahi tapu
- MS05-75 - Te Rarawa Marae
- MS05-79 - Dominion Marae

4.6 The PDP zoning configuration for Pukepoto is shown in **Figure 1** below.

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<sup>3</sup> **Māori freehold land** is land where Māori customary interests have been converted to freehold title by the Māori Land Court. This means that while the land is held in freehold, it's still subject to certain restrictions and protections under the Te Ture Whenua Māori Act 1993 that do not apply to privately owned general land.



**Figure 1: Proposed District Plan zoning configuration (Pukepoto)**

4.7 The WP submission seeks to rezone 684 Kaitaia-Awaroa Road, Pukepoto from ‘Rural Production Zone’ to Māori Purpose Zone – Rural (MPZ).

**5. Māori Purpose Zone – Fundamental Flaws that require correction**

5.1 In the course of preparing this evidence it became apparent that there are some fundamental flaws in the provisions relating to the MPZ.

5.2 Firstly, the MPZ description and its supporting policies refer to it being a zone applied to ‘Māori Land’ administered under the Te Ture Whenua Māori Act 1993. However, ‘Māori Land’ is defined differently in the PDP and Te Ture Whenua Māori Act 1993.

5.3 Specifically, in the Te Ture Whenua Māori Act 1993 ‘Māori Land’ is defined unequivocally as:

### **Māori Land**

*means Māori Customary land and Māori freehold land.*

5.4 However, in the PDP it is defined as:

### **Māori Land**

*means [land](#) defined in section 129 of the Te Ture Whenua Maori Act 1993 as:*

- a. *[land](#) that is held by Māori in accordance with [tikanga](#) Maori shall have the status of Māori customary [land](#);*
- b. *[land](#), the beneficial ownership of which has been determined by the Māori Land Court by freehold order, shall have the status of Māori freehold [land](#);*
- c. *[land](#) (other than Māori freehold [land](#)) that has been alienated from the Crown for a subsisting estate in fee simple shall, while that estate is beneficially owned by a Maori or by a group of persons of whom a majority are Māori, have the status of General [land](#) owned by Maori;*
- d. *[land](#) (other than Māori freehold [land](#) and General [land](#) owned by Māori) that has been alienated from the Crown for a subsisting estate in fee simple shall have the status of General [land](#);*
- e. *[land](#) (other than Māori customary [land](#) and Crown land reserved for Māori) that has not been alienated from the Crown for a subsisting estate in fee simple shall have the status of Crown land;*
- f. *[land](#) (other than Māori customary [land](#)) that has not been alienated from the Crown for a subsisting estate in fee simple but is set aside or reserved for the use or benefit of Māori shall have the status of Crown land reserved for Māori.*

5.5 The issue with the PDP definition is that it includes 'General Land' (see (d)). As I see it the purpose of Section 129 was not to define 'Māori Land' (there is a separate definition for that), and rather it was to identify all classifications of land referred to in the Act, including 'General Land'.

5.6 In summary, despite everything in the MPZ chapter pointing to it only applying to 'Māori Land' as defined under the Te Ture Whenua Māori Act 1993, the definition has inadvertently opened it up to all land (including general land) which, based on the other MPZ provisions, was presumably not the intention.

5.7 Notwithstanding the above, a question arises as to whether the MPZ should be confined to only 'Māori Land' as defined under the Te Ture Whenua Māori Act 1993. In my view the answer to that

question is no because the MPZ (as defined in the National Planning Standards) does not specifically refer to 'Māori Land' and nor does it exclude other land classifications (see below).

### ***Māori purpose zone***

*Areas used predominantly for a range of activities that specifically meet Māori cultural needs including but not limited to residential and commercial activities.*

- 5.8 In my view, it is a logical that the MPZ should include provisions to enable activities that are consistent with the purpose of the zone and not exclude them based on land classification. However, the issues with the definitions described above flow through to the rules, and most notably the papakāinga rule MPZ-R5. Specifically, the PDP defines Papakāinga as:

### ***Papakāinga***

*means an activity undertaken to support traditional Māori cultural living for tangata whenua residing in the Far North District on:*

- a. *Māori land;*
- b. *Treaty Settlement Land;*
- c. *Land which is the subject of proceedings before the Māori land court to convert the land to Māori land; or*
- d. *General land owned by Māori where it can be demonstrated that there is an ancestral link identified.*

*Papakāinga may include (but is not limited to) residential, social, cultural, economic, conservation and recreation activities, marae, wāhi tapu and urupā.*

- 5.9 The WP site does not fall within the classifications (a)-(d) which means it could not utilise MPZ-R5 for papakāinga development despite this being consistent with the MPZ definition in the National Planning Standards.
- 5.10 In my view the MPZ provisions should align with the definition in the National Planning Standards, necessitating an amendment to the 'Papakāinga' definition so that it does not exclude General Land being used in accordance with the purpose of the MPZ. Suggested amendments / relief are as follows:

### ***Papakāinga***

*means an activity undertaken to support traditional Māori cultural living for tangata whenua residing in the Far North District.*

Or

**Papakāinga**

means an activity undertaken to support traditional Māori cultural living for [tangata whenua](#) residing in the Far North District on:

- a. Māori [land](#);
- b. Treaty Settlement [Land](#);
- c. [Land](#) which is the subject of proceedings before the Māori [land](#) court to convert the [land](#) to Māori [land](#); or
- d. General [land](#) owned by Māori where it can be demonstrated that there is an ancestral link identified; or
- e. General land where it can be demonstrated that there is an ancestral link identified for those residing in and benefitting from the activity.

**9. How the rezoning request is consistent with the PDP strategic direction**

9.1 Alignment with the PDP strategic direction objectives is demonstrated in the following table.

Cultural prosperity	
Objectives	Alignment
<p><b>SD-CP-O1</b> Te Tiriti o Waitangi partnerships support iwi and hapū to deliver on the social, economic, environmental and cultural wellbeing outcomes for tangata whenua.</p> <p><b>SD-CP-O2</b> Te ao māori, tikanga māori and tangata whenua as kaitiaki, embedded in and integral to decision making.</p> <p><b>SD-CP-O3</b> The district's diverse cultures and communities are celebrated and cultural heritage recognised.</p>	<p><b>SD-CP-O1</b> The proposal gives practical effect to Te Tiriti o Waitangi by enabling iwi and hapū to use and develop their ancestral land in a way that supports the social, economic, environmental, and cultural wellbeing of tangata whenua. It promotes self-determination and intergenerational prosperity through papakāinga housing.</p> <p><b>SD-CP-O2</b> The MPZ embeds Māori values and decision-making in land development processes. It reflects te ao Māori and supports kaitiakitanga by allowing tangata whenua to</p>

<p><b>SD-CP-04</b> The district's historic heritage is identified and managed to ensure its long-term protection for current and future generations.</p> <p><b>SD-CP-05</b> 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.</p>	<p>determine appropriate land use based on tikanga and sustainable cultural practices.</p> <p><b>SD-CP-03</b> Papakāinga development acknowledges and celebrates Māori culture as an integral part of the district's identity. It provides a visible, living expression of cultural heritage through community design, housing, and connection to marae.</p> <p><b>SD-CP-04</b> The site does not contain identified heritage features.</p> <p><b>SD-CP-05</b> Development on the site is able to align with climate-resilient development principles by using low-impact infrastructure and through being located in an area that is not subject to natural hazards.</p>
<p><b>Social prosperity</b></p>	
<p><b>SD-SP-01</b> Community wellbeing is heightened by a sense of place.</p> <p><b>SD-SP-02</b> Development of initiatives that will support the wellbeing of Tangata Whenua, in partnership with Iwi and hapū.</p> <p><b>SD-SP-03</b> Encourage opportunities for fulfilment of the community's cultural, social, environmental, and economic wellbeing.</p> <p><b>SD-CP-04</b> Promotion of communities and places that will meet the needs for not only the present</p>	<p><b>SD-SP-01</b> Rezoning the WP site MPZ in an area where other land has the same zone will assist with fostering a strong sense of place through connection to ancestral land, enabling intergenerational living and cultural continuity. Ultimately this directly contributes to the social cohesion and wellbeing of the Māori community.</p> <p><b>SD-SP-02</b> The rezoning will further support the cultural, social and economic wellbeing of tangata whenua.</p>

<p>population but future generations which are adaptive to climate change.</p>	<p><b>SD-SP-03</b></p> <p>Papakāinga development integrates cultural expression with sustainable living, providing affordable housing and potential for small-scale economic activities, while maintaining environmental values.</p> <p><b>SD-CP-04</b></p> <p>The development supports long-term resilience and future-focused design. It provides for current housing needs while incorporating sustainable, adaptable infrastructure in an area that is free of natural hazards.</p>
<p><b>Economic prosperity</b></p>	
<p><b>SD-EP-01</b></p> <p>A high-earning diverse local economy which is sustainable and resilient to economic downturns, with the district's Māori economy making a significant contribution.</p> <p><b>SD-EP-02</b></p> <p>Existing industries and enterprises are supported and continue to prosper under volatile and changing economic conditions.</p> <p><b>SD-EP-03</b></p> <p>Development and retention of highly motivated, educated and skilled people in the district.</p> <p><b>SD-EP-04</b></p> <p>People, businesses and places are connected digitally and through integrated transport networks.</p> <p><b>SD-EP-05</b></p> <p>A district economy that is responsive,</p>	<p><b>SD-EP-01</b></p> <p>The proposal supports a more diverse and resilient local economy by unlocking under-utilised land for Māori housing and small-scale commercial activities. It contributes to the Māori economy by supporting self-sufficiency and enabling local enterprise.</p> <p><b>SD-EP-02</b></p> <p>Future papakāinga development on the land complements surrounding rural and Māori land uses without creating reverse sensitivity issues.</p> <p><b>SD-EP-03</b></p> <p>Papakāinga enables residents to remain in their communities and contribute to local social and economic development.</p> <p><b>SD-EP-04</b></p> <p>The site is accessible from a sealed Council road and future development is able to be</p>

<p>resilient and adaptive to the financial costs of a changing climate.</p>	<p>provided with support digital connectivity for residents, enabling remote work, education and e-commerce consistent with modern infrastructure expectations.</p> <p><b>SD-EP-05</b></p> <p>Future papakāinga development on the land can utilise onsite servicing and low-impact design, reducing infrastructure costs and exposure to future climate-related expenses. It supports local economic resilience through climate-conscious land use and housing development.</p>
<p><b>Urban form and development</b></p>	
<p><b>SD-UFD-01</b></p> <p>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.</p> <p><b>SD-UFD-02</b></p> <p>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.</p> <p><b>SD-UFD-03</b></p> <p>Adequate development infrastructure in place or planned to meet the anticipated demands for housing and business activities.</p> <p><b>SD-UFD-04</b></p> <p>Urban growth and development is resilient and adaptive to the impacts from natural hazards or climate change.</p>	<p><b>SD-UFD-01</b></p> <p>The proposal places community wellbeing at the forefront by enabling much-needed housing for Māori communities in a culturally appropriate form. Papakāinga supports intergenerational living, safety, and connection to place, enhancing social outcomes for current and future residents.</p> <p><b>SD-UFD-02</b></p> <p>While not located within a town centre, the proposed MPZ complements urban growth by delivering affordable housing in a location that is adjacent to existing MPZ land and marae. It contributes to housing diversity in the district and addresses urgent social housing needs.</p> <p><b>SD-UFD-03</b></p> <p>The site is capable of being supported by onsite water, wastewater and stormwater infrastructure, and is accessed from a sealed Council road.</p>

	<p><b>SD-UFD-04</b></p> <p>The site is not subject to natural hazards and will incorporate low-impact, resilient infrastructure solutions.</p>
<p><b>Rural development</b></p>	
<p><b>SD-RE-01</b></p> <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><b>SD-RE-02</b></p> <p>Protection of highly productive land from inappropriate development to ensure its production potential for generations to come.</p>	<p><b>SD-RE-01</b></p> <p>The subject land is marginal for productive farming and too small to be economically viable. Rezoning the site will not affect the operation of primary production activities in the surrounding area – noting the existing MPZ on adjoining and nearby sites.</p> <p><b>SD-RE-02</b></p> <p>The land is not classified as highly productive land and has limited agricultural value. Therefore, the proposed rezoning does not undermine the intent of this objective.</p>

**10. Alignment with the objectives, policies and intended outcomes for the MPZ**

10.1 Alignment with the objectives, policies and intended outcomes for the MPZ is demonstrated in the following table.

Objective	Assessment
MPZ-O1	The proposal directly supports long-term viability by enabling intergenerational living arrangements and cultural reconnection on ancestral land.
MPZ-O2	Enabling papakāinga development on the land inherently supports this objective by providing housing, supporting whānau cohesion, and enabling ancillary economic and cultural uses.
MPZ-O3	Future papakāinga development on the land can be designed to reflect the natural constraints and capacities of the land, with development

	layouts, density, and infrastructure tailored to local conditions and cultural values.
<b>Policy</b>	<b>Assessment</b>
MPZ-P1	N/A - This policy only relates to Māori Land administered under the Te Ture Whenua Māori Act 1993.
MPZ-P2	N/A - This policy relates to Māori Land only. However, future development on the land can be designed with minimal adverse effects, using culturally responsive layouts, maintaining open space, and incorporating landscaping, all of which support the intent of the policy.
MPZ-P3	The proposed development will be modest in scale, and overall consistent with the character of the surrounding area.
MPZ-P4	Adverse effects can be suitably managed through the provision of infrastructure and alignment with tikanga.

10.2 Overall, applying the proposed MPZ to the land is consistent with the objectives and policies of the zone. It recognises and reinforces the cultural, spiritual, social, and economic relationship tangata whenua have with their land, while ensuring development occurs in a sustainable and respectful manner. The proposed MPZ supports the aspirations of Māori landowners, and to enable meaningful use and development of Māori land.

## 11. Alignment with the Regional Policy Statement

11.1 The RPS provisions are relatively high level and are more relevant to implementation of the MPZ in general rather than on specific properties. Notwithstanding this, changing the zoning of the land from RPZ to MPZ to enable papakāinga development aligns positively with several objectives and policies of the Regional Policy Statement (RPS) for Northland. Specifically:

### *Recognition of Māori Values and Interests*

11.2 The RPS emphasises the importance of recognising and providing for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga. Zoning the land MPZ will facilitate papakāinga development, which supports the cultural and spiritual connection of tangata whenua to their land.

### *Enabling Economic and Social Well-being*

11.3 The RPS includes objectives aimed at enabling economic and social well-being, particularly through the sustainable use of natural and physical resources. Papakāinga developments

provide opportunities for affordable housing, economic development, and the strengthening of social structures within Māori communities.

#### *Efficient Use of Land Resources*

- 11.4 The RPS promotes the efficient use and development of land resources to meet the needs of present and future generations. By enabling papakāinga on ancestral land, the MPZ supports the efficient use of land in a manner consistent with Māori values and aspirations.

#### *Integration with Regional and District Planning*

- 11.5 The RPS seeks integrated management of natural and physical resources. The MPZ aligns with this objective by integrating Māori land development into the broader planning framework, ensuring consistency and coordination across planning documents.

#### *Conclusion*

- 11.6 Rezoning the WP site MPZ to facilitate papakāinga development is consistent with the objectives and policies of the RPS. It supports the recognition of Māori cultural values, promotes social and economic well-being, encourages efficient land use, and aligns with integrated regional and district planning efforts.

## **12. Site suitability**

- 12.1 The site is suitable for development in accordance with the MPZ for the following reasons:

- (1) It is large enough to accommodate on-site infrastructure.
- (2) It is not subject to any identified natural hazards.
- (3) There are no landscape or ecological overlays affecting the property.
- (4) It is compatible with MPZ land on adjoining properties.

## **13. Consultation**

- 13.1 While no direct consultation has been undertaken with surrounding landowners as part of the preparation of this planning evidence, it is noted that the original submission requesting the rezoning has been publicly notified in accordance with the First Schedule of the Resource Management Act 1991. Importantly, following this notification, no further submissions were received in opposition. This outcome indicates a level of acceptance—or at least absence of objection—among the wider community, including nearby landowners.

13.2 Moreover, the proposal relates to papakāinga development, which by its nature is intended to benefit and provide for the social, cultural, and economic wellbeing of tangata whenua, particularly those who have whakapapa connections to the area. The primary beneficiaries of the rezoning and any subsequent development will be local Māori who either currently reside in the area or who seek to return and establish a presence on their ancestral land. In this context, the development aligns with broader planning objectives around enabling Māori housing and self-determination, and it reflects a locally rooted response to housing need.

13.3 Accordingly, while formal consultation has not occurred with adjacent landowners, the notified process has provided opportunity for input, and the absence of opposition, combined with the localised and community-focused nature of the proposal, supports the conclusion that the proposed rezoning is appropriate and acceptable within the local context.

#### 14. Section 32AA evaluation

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

**Table 1: Efficiency and effectiveness**

Matter	Assessment
Efficiency	Rezoning the land from RPZ to MPZ provides a more efficient use of the land by enabling papakāinga housing, which meets a clear social need in the area. Given that the land is not viable for commercial farming, its use for intergenerational Māori housing and associated development better reflects its highest and best use. The site can be serviced independently with wastewater, water, and stormwater infrastructure.
Effectiveness	The proposal will effectively implement the relevant MPZ objectives and policies by supporting the use, occupation and development of ancestral land. It enables cultural, social and economic development outcomes for tangata whenua while maintaining environmental integrity (no adverse landscape, ecological, or coastal effects). The proximity to marae further strengthens cultural connectivity.

**Table 2: Appropriateness in achieving the purpose of the Act**

Section	Alignment
Section 5 – Purpose of the Act	<p>Section 5(1) sets out the purpose of the RMA being to promote the sustainable management of natural and physical resources.</p> <p>The proposal enables the sustainable use of underutilised land in a manner that meets the present and future needs of tangata whenua for housing, cultural expression, and social wellbeing.</p> <p>The land is not economically viable for farming and is not subject to natural or physical constraints, meaning its development for papakāinga will create positive outcomes without compromising the life-supporting capacity of land, water, or ecosystems. On-site servicing and low-impact housing designs will ensure any environmental effects are avoided, remedied, or mitigated.</p>
Section 6 – Matters of National Importance	<p>Relevant provision: 6(e) – The relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga.</p> <p>The rezoning directly enables tangata whenua to reconnect with, occupy, and develop ancestral land consistent with tikanga Māori.</p> <p>The use of the land for papakāinga strengthens the cultural relationship with whenua.</p>
Section 7 – Other Matters	<p>Relevant provisions:</p> <ul style="list-style-type: none"> <li>- 7(a) Kaitiakitanga</li> <li>- 7(aa) The ethic of stewardship</li> <li>- 7(b) The efficient use and development of natural and physical resources</li> <li>- 7(c) The maintenance and enhancement of amenity values</li> <li>- 7(f) Maintenance and enhancement of the quality of the environment</li> </ul> <p>The proposal gives effect to kaitiakitanga and stewardship by placing decisions about land use back in the hands of tangata whenua and enabling them to plan for culturally and environmentally appropriate development. It represents an efficient use of land that is not economically viable for farming but</p>

	highly suited for community living. Use of the land in accordance with the MPZ provisions is consistent with the existing amenity of the surrounding MPZ zone land and will enhance local housing supply. The use of onsite servicing and culturally informed design will contribute to environmental quality and resilience.
Section 8 Treaty of Waitangi	<p>Section 8 requires decision-makers to take into account the principles of the Treaty of Waitangi.</p> <p>The proposed MPZ is consistent with Section 8 as it:</p> <ul style="list-style-type: none"> <li>- Supports partnership and participation by Māori in land use and planning processes.</li> <li>- Enables active protection of Māori interests in land, culture, and housing.</li> <li>- Provides for the expression of Māori values, tikanga and governance over ancestral land.</li> <li>- It enables the implementation of Te Ture Whenua Māori Act 1993 intentions through land occupation and development consistent with Māori aspirations.</li> </ul> <p>The proposal supports the principles of partnership, active protection, and rangatiratanga under Section 8.</p>

14.2 The proposed rezoning from RPZ to MPZ to enable papakāinga development on the WP site strongly aligns with the purpose and principles of Part 2 of the Resource Management Act. It promotes sustainable management, recognises Māori relationships with land, enables efficient and appropriate development, and gives effect to Treaty principles.

**Table 3: Costs and benefits**

Category	Benefits	Costs
Environmental	No significant effects – the land is flat, pastoral, and without sensitive overlays. On-site infrastructure avoids pressure on public networks.	None identified.
Social and Cultural	Supports papakāinga development, responds to	None identified.

	housing need, strengthens cultural connections, and supports wellbeing.	
Economic	Supports local economic participation (e.g., construction, home-based enterprise), unlocks under-utilised land.	Minor administrative costs of plan change process. Loss of low-productivity rural land is not considered significant.

*Risk of Acting or Not Acting*

- 14.3 There is sufficient information to determine the potential effects of the rezoning. Not acting may result in the continued underutilisation of the land, and a missed opportunity to provide housing and cultural benefits to tangata whenua. The risk of acting is low, given the site's capacity, accessibility, and the consistency of the proposal with planning objectives.

*Overall conclusion*

- 14.4 Relative to the RPZ, the MPZ better reflects the landowners' aspirations and aligns with strategic planning directions for enabling Māori housing.
- 14.5 Rezoning the site from RPZ to MPZ is an efficient, effective, and appropriate planning response under Section 32AA of the RMA. The proposal enables the land to meet its highest potential use while supporting tangata whenua aspirations for papakāinga. It is consistent with the surrounding environment, does not generate adverse environmental effects, and responds to an identified housing need in the area.

**15. Key conclusions / summary**

- (1) The PDP MPZ provisions and the papakāinga definition are contradictory, and do not reflect the definition of the MPZ in the NPS.
- (2) The MPZ provisions, including rules and associated definitions, should be amended to be consistent with the NPS.
- (3) Rezoning the land MPZ and aligning the MPZ provisions with the NPS will enable papakāinga development on the site which is consistent with Part 2 of the RMA, the RPS, and the Strategic Direction chapter of the PDP. It is also the most appropriate zone in the context of Section 32 of the RMA.

## 16. Relief sought

16.1 The following relief is sought:

- (1) Rezone 684 Kaitaia-Awaroa Road, Pukepoto (Lot 1 DP 434436) Special Purposes Zone – Rural.
- (2) Amend the 'Māori Purpose Zone' provisions to better align them with the definition in the National Planning Standards.
- (3) Amend the 'Papakāinga' definition so that it does not exclude General Land being used in accordance with the purpose of the MPZ.
- (4) Alternative relief with similar effect, including potential alternative zonings, a precinct overlay, or additional / amended rules in the MPZ.



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Brett Hood (Planner)

5 May 2025