

BEFORE THE INDEPENDENT HEARING PANEL

UNDER the Resource Management Act 1991 ("**RMA**")

IN THE MATTER OF Proposed Far North District Plan ("**PDP**")

**STATEMENT OF EVIDENCE OF ALVIN JUNG AND MAKARENA EVEYLN TE PAEA
DALTON ON BEHALF OF NGĀ KAINGAMAHA O NGĀTI HINE CHARITABLE TRUST**

PLANNING (HEARING 15C – REZONING SUBMISSIONS)

15 September 2025

1. SUMMARY OF EVIDENCE

- 1.1 This evidence has been prepared on behalf of the Ngā Kaingamaha o Ngāti Hine Charitable Trust ("**NKoNHCT**") as it relates to their submission (original submission S555 and further submission FS307) on the Far North District Council's ("**Council or FNDC**") Proposed District Plan ("**PDP**") with regard to Hearing Stream 15C.
- 1.2 This evidence has been prepared in accordance with the direction from the Hearing Panel as detailed in Final Minute 14 and in response to the Council's section 42A report for the rezoning topic.
- 1.3 NkoNHCT sought changes to the PDP to better enable their overarching goal to provide a comprehensive community focused development containing an aged care facility, a wellness centre, and residential housing adjacent to the Bay of Islands Hospital at 11 Greenacres Drive Kawakawa. The project is collectively named "Te Mataora" which translates to "the face of life" and symbolises being refreshed, revitalised, re-energised, and rejuvenated.
- 1.4 NkoNHCT's original submission relief sought to re-zone the rear of Section 22 SBRS of Kawakawa and Section 25 SBRS of Kawakawa at 11 Greenacres Drive, Kawakawa from proposed Rural Residential Zone ('**RRZ**') to General Residential Zone ('**GRZ**').¹

¹ Submission 555 (S555) on the FNDC PDP.

- 1.5 NKoNHCT acknowledge the relief sought by Health New Zealand – Te Whatu Ora, has been revised² and is recommended to be accepted by the Reporting Planner. NKoNHCT revise their relief sought seeking to re-zone only the area south of Section 25 SBRS of Kawakawa, from RRZ to GRZ.
- 1.6 In our opinion the proposed RRZ, is not the most appropriate mechanism to achieve the intended use for the site, nor does it fully align with the strategic direction objectives of the PDP, nor section 5 of the RMA for the following reasons:
- (a) The character and amenity of this area is consistent with the PDP zoned land GRZ within the immediately surrounding location. Notably neighbouring sites adjacent to the site are zoned for GRZ and is currently part of the wider Bay of Islands Hospital land holdings.
 - (b) The site is located adjacent to the Bay of Islands Hospital and within close proximity to the Kawakawa town centre. The recommended GRZ will enable more efficient and integrated urban subdivision than is possible under the more restrictive Rural Residential standards.
 - (c) The site can connect to the reticulated network (three waters) with sufficient capacity subject to minor infrastructure upgrades, which effectively urbanises the site making it suitable for the GRZ rather than the RRZ as proposed.
 - (d) The site has not been used for rural purpose (historically part of the wider Bay of Islands Hospital land holdings) and is classified as Land Use Capability Class 6. Therefore, does not affect highly productive soils and reflects the site's established urban context, making it suitable for the recommended GRZ.
 - (e) The RRZ does not accommodate the housing aspirations of NKoNHCT for the Kawakawa region or the wider Far North District.
- 1.7 Having undertaken a s32AA evaluation and assessment of the FNDC rezoning criteria, it is our opinion that zoning the site at 11 Greenacres Drive to GRZ is the most appropriate way to achieve objectives of the PDP, being more efficient and effective, with less costs and more benefits.

² Paragraph 4.5.(a), Planning Evidence of Mr David Badham to Hearing 15C

2. INTRODUCTION

- 2.1 This evidence has been co-authored by Alvin Jung and Makarena Dalton our qualifications and experience are detailed below.

Alvin Jung

- 2.2 My full name is Alvin Ki Chan Jung. I am an Associate with Barker & Associates ('B&A'), a planning and urban design consultancy with offices across New Zealand.

- 2.3 I am a qualified planner with a Bachelor of Planning (hons) from The University of Auckland and am an intermediate member of the New Zealand Planning Institute. I have over 10 years of experience as a planner. During this time, I have been employed in various resource management positions in local government and private companies including experience with:

- (a) Statutory resource consent planning in the Northland and Auckland regions, including an extensive range of work in the Auckland and Far North Districts. Of particular note, I processed resource consents for the Far North District Council as a consultant planner for 2 years, working with the operative Far North District Plan ('ODP').
- (b) Consideration of submissions on policy and policy advice for private clients throughout New Zealand including, Auckland Council and Waikato District Council.

Makarena Dalton

- 2.4 My full name is Makarena Evelyn Te Paea Dalton. I am a Consultant Planner (Senior Associate) at B&A, a planning and urban design consultancy with offices across Aotearoa New Zealand. I undertake planning work throughout the country, although primarily in Te Taitokerau Northland.

- 2.5 I whakapapa to Ngāpuhi-Nui-Tonu and Ngāti Kahu-ki-Whangaroa in the Far North, and to hapū including Te Hikutū, Ngāti Ueoneone, Ngāti Rangi, Ngātiringimatamamoe and Ngātiringimatakakaa in Hokianga, Kaikohe and Otangaroa.

- 2.6 I have a Bachelor of Arts with double majors in Māori Studies and Political Studies and a Master of Planning Practice from the University of Auckland. I am an Intermediate Member of the New Zealand Planning Institute.

- 2.7 I have 10 years' experience in planning. During this time, I have been employed in various resource management positions in local government and private companies within New Zealand. My experience includes statutory resource consent planning in the Northland and Auckland regions, including in the Far North, Whangārei and Kaipara districts. Of particular relevance, I worked for a number of years processing consents for the Council whilst I was employed by the resource consents department as well as processing as a consultant planner, and I have prepared resource consent applications under ODP. I have also been involved in preparation of plan changes, section 32 reporting and consideration of submissions for councils and private clients.

Code of Conduct

- 2.8 We have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023. We have complied with the Code of Conduct in preparing this statement of evidence. Unless we state otherwise, this evidence is within our sphere of expertise, and we have not omitted to consider material facts known to me that might alter or detract from the opinions we express.
- 2.9 B&A staff have previously provided assistance to FNDC on the PDP. This related to assistance with the formulation of section 32 evaluations for a number of topics prior to the notification of the PDP. That engagement did not carry forward post notification of the PDP. In regard to these matters, we confirm the following:
- (a) B&A is an independent planning consultancy providing planning and resource management advice and services. B&A act on behalf of a number of private and public clients throughout the country;
 - (b) We have had no involvement in the preparation of provisions, the section 32 evaluation or any advice following notification for the topics within this PDP hearing; and
- 2.10 Noting the above, we have no conflict of interest to declare with respect of the hearing of NKoNHCT's submission to the PDP.

Involvement with PDP on behalf of NKoNHCT

- 2.11 We have been engaged by NKoNHCT to provide independent planning evidence for Hearing Topic 15C Rezoning, being initially engaged in September 2022 to provide planning input into the original submission.

- 2.12 NKoNHCT made a submission (S555.001) in relation to zoning in the PDP.
- 2.13 NKoNHCT made a further submission (FS307) in support of Health NZ – Te Whatu Ora (S42) and Kainga Ora Homes and Communities (S561) original submissions.
- 2.14 NKoNHCT “opted in” to the voluntary rezoning process detailed in Hearing Minute 14, however, due to time and resourcing constraints was not able to submit evidence by 9 June 2025.
- 2.15 We confirm that we are familiar with the Far North District, having processed statutory resource consents as a consultant planner for Far North District Council between 2020 and 2022. We have visited the site and surrounding area of Kawakawa which is the focus of NKoNHCT submission on numerous occasions, the most recent being in September 2025.
- 2.16 In preparing this evidence we have relied upon the corporate evidence of Peter Hemi White on Behalf of NKoNHCT enclosed as **Attachment 1**, and the corporate statement of Tamati Shepherd – Wipiiti of Ngati Hine Health Trust enclosed as **Attachment 2**.

Scope of Evidence

- 2.17 The matters addressed in our evidence are within the scope of the submission and further submissions made by NKoNHCT.
- 2.18 Our evidence will address the following topics:
- (a) Background (section 3);
 - (b) Relief sought (section 4);
 - (c) Rezoning and spatial extent of GRZ (section 5);
 - (d) FNDC Rezoning Criteria (section 6)
 - (e) Section 32AA evaluation (section 7); and
 - (f) Conclusion (section 8).

3. BACKGROUND

- 3.1 NKoNHCT intend to develop the site at 11 Greenacres Drive into *Te Mataora*, a 182-dwelling community comprising iwi homes, apartments, aged care units, and a

wellness centre. The project is collectively known as Te Mataora meaning “the face of life,” which reflects its focus on revitalisation and wellbeing. NKoNHCT have undertaken a preliminary master planning process, supported by high-level Three Waters Infrastructure Assessment by CIVIX enclosed as **Attachment 3** and the Traffic Impact Assessment by Traffic Planning Consultants (TPC) enclosed as **Attachment 4**, that investigated the feasibility of accommodating urban development on the site.

3.2 Three Waters Infrastructure Assessment concluded that

- (a) *Stormwater servicing may be available via an extension of the existing public network and establishment of a new outfall.*
- (b) *Wastewater servicing may be available via an extension of the existing public network.*
- (c) *Water supply may be available from the existing public watermain in Greenacres Dr depending on the result of a hydrant test to confirm potential number of new lots.³*

3.3 The traffic impact assessment concluded that

- (a) *The traffic generated by the proposal can be accommodated on the road network with little or no effect.*
- (b) *The roads and intersections are designed to an appropriate standard and in a manner that ensures the residential environment sought for the development can be achieved.⁴*

3.4 It is our opinion the Three Water Infrastructure Assessment and Traffic Impact Assessment establish that the site can be adequately serviced with infrastructure appropriate to support urban development consistent with the GRZ.

3.5 The Reporting Planner, Sarah Trinder, for the Section 42A Report Hearing 15C Urban: Rezoning Submissions states that “*Ngā Kaingamaha o Ngāti Hine Charitable Trust opted into the Minute 14 hearings process. However, while I have exchanged several emails with the site’s representative, no further information has been provided. It is*

³ Page 10 of the High Level Three Waters Infrastructure Assessment

⁴ Paragraph 6, page 17 of the Traffic Impact Assessment.

acknowledged that significant infrastructure investment is required to enable development of this site. The submitter has indicated that the Infrastructure Acceleration Fund may support servicing of the lots. Until there is greater certainty around infrastructure provision, alongside other relevant criteria, I am unable to support the proposed rezoning of this site.”⁵

- 3.6 NKoNHCT’s primary submission was supported by technical reports, which in our opinion, has not been considered by the Reporting Planner. The technical reports demonstrate that site can be serviced from both a three waters through connection to the public reticulated system and local transport infrastructure perspective. From a planning perspective we consider that sufficient information has been provided to confirm the suitability and capacity of servicing, and funding of future upgrades is not determinative of the appropriateness of rezoning the site to GRZ.

4. RELIEF SOUGHT

- 4.1 The focus of NKoNHCT’s primary submission sought to rezone both Section 22 SBRS of Kawakawa and Section 25 SBRS of Kawakawa at 11 Greenacres Drive from RRZ to GRZ.
- 4.2 Health NZ – Te Whatu Ora originally opposed the rezoning of both Section 22 SBRS of Kawakawa and Section 25 SBRS of Kawakawa, to GRZ. However, Health NZ – Te Whatu Ora have revised their relief sought to only seek a spatial extension of the Hospital Special Purpose Zone across the northern portion of Section 25 Suburbs of Kawakawa⁶
- 4.3 **Revised Relief**
- 4.4 As such NKoNHCT seek to revise their relief sought to only re-zone part of Section 25 SBRS of Kawakawa, to GRZ. The spatial extent of the proposed GRZ is shown in Figure 1 below.

⁵ Paragraph 284, page 78 of the s42A.

⁶ Paragraph 194, page 56 of the s42A.

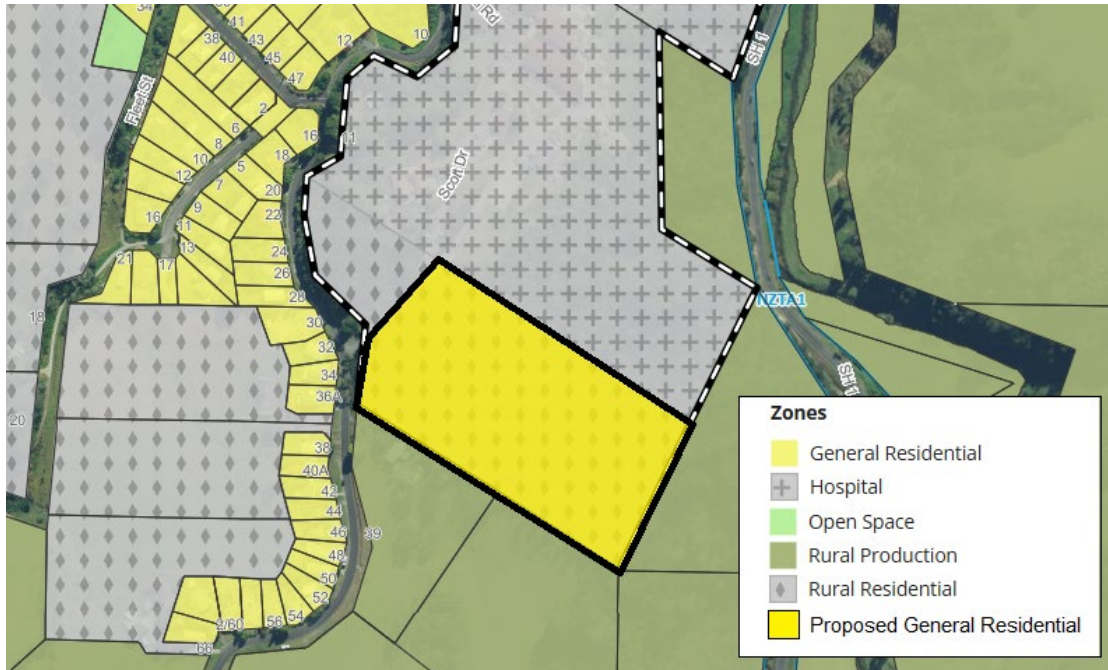


Figure 1. Proposed area (the site) to be rezoned to GRZ.

5. REZONING RECOMMENDED AND SPATIAL EXTENT OF GENERAL RESIDENTIAL ZONE.

5.1 The s42A report sets out a new urban evaluation framework and the following provides an assessment against the evaluation criterion.⁷

Location

5.2 The site is approximately 4.0 hectares in area and is located on the southern edge of Kawakawa township. It is bounded by Greenacres Drive to the west and State Highway 1 to the east, with the Bay of Islands Hospital directly north. The site is roughly rectangular in shape with undulating topography.

5.3 Rezoning the site to GRZ will consolidate urban development on the southern edge of Kawakawa, supporting compact residential expansion rather than dispersed rural patterns. Its integration with established residential and community activities ensures a logical extension to Kawakawa's urban footprint, avoiding fragmented or sprawling growth and creating a more consolidated and well-defined urban edge.

⁷ Paragraphs 35-38

- 5.4 Applying the GRZ will enable more compact and diverse housing forms at a location close to key services, including the Bay of Islands Hospital being directly adjacent to the site and the Kawakawa town centre (approximately 1 km away).

Land Use

- 5.5 Existing development within Section 25 SBRS of Kawakawa includes hospital-related buildings, sealed accessways, and carparking areas associated with the hospital. Surrounding land use is characterised by established residential development along Greenacres Drive (proposed GRZ), the Bay of Island Hospital complex to the north (proposed Hospital Special Purpose Zone), and a mix of rural/ rural lifestyle uses to the south and east (Rural Production Zone). The site is directly adjacent to the Bay of Islands Hospital, which has historically formed part of the hospital's wider landholding and is not used for rural land uses. Unlike fragmented rural lifestyle blocks created under the legacy subdivision rules of the Operative District Plan (OPD), this site has not been used for rural production or rural lifestyle purposes.
- 5.6 Retaining the RRZ would not reflect the actual or anticipated use of the land, nor would it align with the strategic direction of the PDP, in particular SD-UFD-O1-4, to consolidate Kawakawa's growth in a compact and well-serviced form. In contrast, rezoning the site to GRZ provides certainty for future residential outcomes, and ensures that subdivision and land use opportunities are consistent with Kawakawa's growth needs rather than rural production or lifestyle patterns.
- 5.7 The proposed RRZ provides for only one dwelling per 4,000m² as a permitted activity (RRZ-R3), reflecting its rural residential character and servicing limitations. The RRZ's low-density controls are premised on on-site servicing requirements. However, evidence in the Three Waters Infrastructure Assessment (**Attachment 3**) and Traffic Impact Assessment (**Attachment 4**) demonstrates that this site can be fully connected to reticulated infrastructure. As such, the land no longer fits the servicing assumptions of the RRZ and in our view aligns with the outcomes sought by the GRZ.
- 5.8 The Councils pre-notification Section 32 Evaluation Report: Special Purpose Zone - Hospital Zone noted that Ngāti Hine have been developing a community health and housing proposal south of the hospital site acknowledging the existing opportunities

within the site confirming it's urban context. It has now been demonstrated that the site can be fully serviced, confirming its urban context and supporting its rezoning to GRZ.⁸

Site Suitability

- 5.9 The site does not contain any identified areas of natural hazard. We note that any natural hazards will have be assessed and managed as part of any future resource consent application, under the PDP provisions for the natural hazards chapter, as well as S106 of the RMA ensuring development occurs in a safe, suitable and sustainable manner.
- 5.10 The site is not located on highly productive soils, being classified as Land Use Capability Class 6.⁹ Therefore, rezoning does not compromise the protection of rural resources. In addition, the land has not been used for rural production but has historically been part of the Bay of Islands Hospital landholding.

Infrastructure

- 5.11 High-level Three Waters Infrastructure Assessment (**Attachments 3**) and the Traffic Impact Assessment (**Attachments 4**) confirm there are no significant infrastructure constraints to urbanising the site. While some infrastructure investment will be required, the site can be feasibly serviced, as stated in paragraph 3.2 and 3.3, the reports demonstrate that the land is suitable for GRZ, moving it beyond the limitations of the proposed RRZ.
- 5.12 Further under the GRZ, multi-unit development rule GRZ-R9 requires consent for more than three dwellings on a site as a discretionary activity. As a discretionary activity, Council have the ability to consider the full range of possible effects, ensuring that servicing demands are assessed and managed at the time of consent.

Growth Demand

- 5.13 The National Policy Statement on Urban Development (**'NPS-UD'**) requires councils to enable sufficient development capacity to meet the diverse housing needs of

⁸ Paragraph 4.2.2, Page 13 of the S32 Report Evaluation Report: Special Purpose Zone - Hospital Zone.

⁹ Land Use Capability Classes 1 – 3 within Rural Production Zone under the definition of Highly Productive Land in the National Policy Statement for Highly Productive Land.

communities and to support well-functioning urban environments. Although FNDC is a Tier 3 authority and the Council consider that Kawakawa is not defined as an “urban environment” under the NPS-UD, policy 2 still directs councils to be responsive to opportunities that provide additional housing supply. Kawakawa is a key service hub for the Bay of Islands and wider Far North, with health, education, and commercial services that support surrounding rural communities. Rezoning the site to GRZ directly addresses growth demand by enabling a range of housing typologies and affordability options beyond the current supply of standalone dwellings on large sections provided by the proposed RRZ. The proposed rezoning therefore responds to both local housing pressures and the strategic growth direction of the PDP, in particular SD-UFD-O1-4, aligning with the intent of the NPS-UD.

6. FNDC CRITERIA FOR REZONING

- 6.1 We have carefully considered the FNDC criteria for rezoning (Hearing Panel Minute 14) and we make the following comments with respect to the criteria applied.

Strategic Direction

- 6.2 The following provides an analysis of the recommended zoning GRZ of the site against the proposed Strategic Direction objectives as notified:

Strategic Direction Objective Summary:	Comment:
<p>Historic and cultural wellbeing – Cultural prosperity</p> <p>SD-CP-O1 – SD-SP-O5</p> <ul style="list-style-type: none"> - Support iwi and hapū to deliver on the social, economic, environmental and cultural wellbeing outcomes for tangata whenua. - Celebrate diverse cultures and recognise cultural heritage. - Identify and manage historic heritage to ensure its long term protection. - Include te ao Māori in decision making. 	<p>These objectives assist iwi and hapū to deliver on the social, economic, environmental and cultural wellbeing outcomes for Tangata Whenua.</p> <p>In this instance, the recommended GRZ will enable NKoNHCT’s overarching ambitions to provide housing within the site and the wider Kawakawa region and making decisions through te ao Maori for future growth of the region. The rezoning of the site to recommended GRZ supports the wellbeing for Tangata Whenua through the provision of additional housing in Kawakawa, contributing to economic stimulation through the construction works, and fosters social</p>

	<p>and cultural wellbeing through expanding communities and creating a sense of space.</p> <p>The site is not considered a site/ or area of significance to Māori, have historic heritage sites or areas, or contain known archaeological artifacts, and therefore, the proposed district wide objectives and policies of the Historic Heritage, Heritage Area Overlays, Notable Trees, Sites and Areas of Significance to Māori Chapters would not apply to future development under the GRZ. However, taking a holistic approach to future development of the site, any historic and cultural heritage will be carefully considered to ensure long term protection where necessary.</p> <p>The site is not Maori land and is not subject to the proposed Treaty Settlement Land Overlay. District wide Earthworks Chapter and EW-S3 applies an accidental discovery protocol which will effectively manage potential effects should sensitive material be discovered during works.</p>
<p>Economic and social wellbeing – Social Prosperity</p> <p>SD-SP-O1 – SD-SP-O4</p> <ul style="list-style-type: none"> - Community wellbeing is heightened by a sense of place. - Development of initiatives that support the wellbeing of Tangata Whenua, in partnership with iwi and hapū. - Encourage opportunities to fulfil the communities cultural social, environmental and economic wellbeing. 	<p>The recommended GRZ will enable an increased presence of people living in close proximity to the centre of Kawakawa and will increase the daily use and presence of people within the centre.</p> <p>The recommended GRZ provides for a greater range of activities which will encourage opportunities within this location to fulfil cultural, social, environmental and economic wellbeing.</p> <p>The location is not subject to any identified natural hazard risks as per the Northland Regional Council Natural Hazard Maps.</p>

<ul style="list-style-type: none"> - Promote communities and places to meet the needs for present and future population, which are adaptive to climate change. 	
<p>Economic and social wellbeing – Economic Prosperity</p> <p>SD-EP-O1 – SD-EP-O5</p> <ul style="list-style-type: none"> - High earning diverse local economy that is sustainable, resilient. - Māori economy making a significant contribution. - Support existing industries and enterprises to prosper. - Develop and maintain highly motivated, educated and skilled people - People, business and places are connected digitally and with integrated transport networks - Economy is responsive, resilient and adaptive to financial costs of climate change. 	<p>The recommended GRZ provides for a greater range of residential activities, along with some non residential activities, which will encourage opportunities within this location to fulfil cultural, social, environmental and economic wellbeing.</p> <p>The additional residential intensity provided by the GRZ compared to the RRZ will contribute to local economy so that it can remain sustainable and resilient. Specifically, the GRZ enables the establishment of additional housing stock enabling people to reside in Kawakawa and stay in Far North. It is noted that site is within 1km of the centre of Kawakawa, with excellent connectivity.</p> <p>Further, NKoNHCT are able to directly contribute to the Maori economy by enabling increased residential development through the GRZ and any associated construction activities.</p> <p>The location is not subject to any identified natural hazard risks as per the Northland Regional Council Natural Hazard Maps.</p>
<p>Urban Form and Development</p> <p>SD-UFD-O1 – SD-UFD-O4</p> <ul style="list-style-type: none"> - Wellbeing Is considered first when planning places and spaces - Urban growth and development is consolidated around existing reticulated networks within town centres, supporting 	<p>The GRZ enables the establishment of residential housing considering people's wellbeing.</p> <p>The site is directly adjacent to the existing Residential Zone in the ODP and the GRZ in the PDP. It is noted that the site also directly abuts the Bay of Islands Hospital (being an existing land holding of Health NZ) and has not been used for rural purposes. The</p>

<p>a more compact <u>urban</u> form, affordability and providing for a mix of housing typologies.</p> <ul style="list-style-type: none"> - Adequate <u>development infrastructure</u> in place or planned to meet the anticipated demands for housing and business activities. - <u>Urban</u> growth and development is resilient and adaptive to the impacts from <u>natural hazards</u> or climate change. 	<p>rezoning of the site will consolidate residential and urban growth around the edge of Kawakawa Township.</p> <p>Through the recommended GRZ for the site, the opportunity is provided for more compact and mixture of housing typologies, that can be more affordable than the traditional standalone dwelling, being close to services, notably the Bay of Island Hospital and the Kawakawa town centre being somewhat 1km from the site.</p> <p>As concluded by the high level three waters infrastructure and the traffic impact assessment (Attachments 3 and 4), the site can connect into the reticulated network, and it is anticipated there will be sufficient capacity with infrastructure upgrades. This effectively enabling the site to be urbanized and is suitable for the GRZ.</p> <p>The location is not subject to any identified natural hazard risks as per the Northland Regional Council Natural Hazard Maps.</p>
<p>Infrastructure and Electricity</p> <p>SD-IE-O1 and SD-IE-O2</p> <ul style="list-style-type: none"> - Benefits are recognised. - Protected from incompatible and use and subdivision. 	<p>Provisions of the District Wide Infrastructure chapter apply and will give effect to these objectives.</p>
<p>Rural Environment</p> <p>SD-RE-O1 and SD-RE-O2</p> <ul style="list-style-type: none"> - Rural production activities operate effectively and efficiently. 	<p>While the site has been zoned for Rural Production under the ODP, and RRZ under the PDP, the site has been part of the wider land holdings for the Bay of Islands Hospital and has not intended to be used for rural land uses.</p>

<ul style="list-style-type: none"> - Recognise the contribution rural production activities to the economic and social wellbeing. - Protection of HPL from inappropriate development to ensure its productive potential for generations to come. 	<p>The recommended GRZ will not affect existing rural production activities within the site, nor hinder rural production activities to the south from contributing to the economic or social wellbeing because:</p> <ul style="list-style-type: none"> (a) As discussed in paragraph 5.9, the subject site is not identified as Land Use Capability Classes 1, 2 or 3 and therefore is not HPL, and the NPS-HPL does not apply to the site. (b) Reverse sensitivity effects are managed through height, setback, and screening standards at the zone interface, providing adequate buffers between residential and rural activities. The PDP also requires rural production activities such as stock housing to be located at least 100 m from residential zones, further reducing potential conflict. <p>The recommended GRZ for the site does not hinder protection of HPL from inappropriate development.</p>
<p>Natural Environment</p> <p>SD-EP-O1 – SD-EP-O6</p> <ul style="list-style-type: none"> - Culture of stewardship. - Collaborative relationships with iwi and hapū. - Active management of ecosystems to protect, maintain and increase indigenous biodiversity. - Land use practices reverse climate change. 	<p>The location does not contain identified:</p> <ul style="list-style-type: none"> - Coastal Environment. - Outstanding Natural Landscape ('ONL'). - Outstanding Natural Feature ('ONF'). - Significant Natural Area ('SNA'). <p>The location contains a mixture of both exotic and indigenous vegetation. Indigenous vegetation would be subject to the PDP's District Wide Ecosystems and Indigenous Biodiversity provisions.</p>

<ul style="list-style-type: none"> - Natural character of the coastal environment, ONL and ONF are managed. - Areas of significant indigenous vegetation and habitats of significant fauna are protected. 	The location is within 1km distance of the centre of Kawakawa, with good connectivity, reducing reliance upon vehicle transportation and reducing carbon emissions.
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6.3 Based on the assessment above, we are of the opinion that the recommended rezoning of the site to GRZ will give effect to the proposed Strategic Direction objectives.

Alignment with Zone Outcomes

6.4 The following provides an analysis of the recommended GRZ:

General Residential Zone Objective:		Comment:
GRZ-O1	<p>The General Residential zone provides a variety of densities, housing types and lot sizes that respond to:</p> <ul style="list-style-type: none"> (c) housing needs and demand; (d) the adequacy and capacity of available or programmed development infrastructure; (e) the amenity and character of the receiving residential environment; and (f) historic heritage. 	<p>Rezoning the site GRZ will give effect to this objective as it will increase land supply for residential purposes in proximity to Kawakawa Township, which functions as a satellite hub for surrounding rural settlements and communities in the Bay of Islands area.</p> <p>The GRZ provides an opportunity for more compact housing typologies, including more affordable options than traditional standalone dwellings, and provide a consistent urban built form to the area. The surrounding area contains residential uses and is close to services, notably the Bay of Island Hospital and the Kawakawa town centre being somewhat 1km from the site. Therefore, the recommended GRZ is compatible with the amenity and character of the receiving residential environment.</p>

		High-level three waters infrastructure and the traffic impact assessment (Attachments 3 and 4) confirm that the site can connect to the reticulated network, with sufficient capacity anticipated subject to infrastructure upgrades. The site is not considered to contain historic heritage sites or areas, or contain known archaeological artifacts.
GRZ-02	The General Residential zone consolidates urban residential development around available or programmed development infrastructure to improve the function and resilience of the receiving residential environment while reducing urban sprawl.	<p>Rezoning the site will give effect to this objective because:</p> <ul style="list-style-type: none"> (a) The site is directly adjacent to the existing Residential Zone in the ODP and the GRZ and Hospital Special Purpose Zone in the PDP. (b) High-level three waters infrastructure and the traffic impact assessment (Attachments 3 and 4) confirm the site can connect to the existing reticulated network, with sufficient capacity anticipated subject to infrastructure upgrades. (c) The rezoning of the site will consolidate residential and urban growth around the edge of Kawakawa Township without contributing to urban sprawl
GRZ-03	Non-residential activities contribute to the well-being of the community while complementing the scale, character and amenity of the General Residential zone.	The portion of the site recommended for rezoning does not contain existing non-residential activities. The provisions of the GRZ will appropriately manage non-residential activities giving effect to this objective.
GRZ-04	Land use and subdivision in the General Residential zone is supported where there is adequacy and capacity of available or	The high-level three waters and the traffic impact assessment (Attachments 3 and 4) confirm the site can connect to the reticulated network, with sufficient

	programmed development infrastructure.	capacity anticipated subject to infrastructure upgrades to service future residential development under the proposed GRZ giving effect to this objective.
GRZ-O5	Land use and subdivision in the General Residential zone provides communities with functional and high amenity living environments.	The recommended GRZ for the site allows for comprehensive development through GRZ-R9 that delivers a high-amenity, well-designed living environment near existing commercial centres.
GRZ-O6	Residential communities are resilient to changes in climate and are responsive to changes in sustainable development techniques.	The site is not located within any identified natural hazards and specifically in any flood plains. As such the recommended GRZ for the site can provide residential communities that resilient to climate change giving effect to this objective.
General Residential Zone Policy:		Comment
GRZ-P1	<p>Enable land use and subdivision in the General Residential zone where:</p> <p>(a) there is adequacy and capacity of available or programmed development infrastructure to support it; and</p> <p>(b) it is consistent with the scale, character and amenity anticipated in the residential environment.</p>	<p>Future development of the site in accordance with the proposed GRZ will give effect to this policy because:</p> <p>(a) High-level three waters infrastructure and the traffic impact assessment confirm the site can connect to the reticulated network, with sufficient capacity anticipated following planned infrastructure upgrades.</p> <p>(b) Future development in accordance with the GRZ rules will enable more compact housing typologies, including options that are more affordable than traditional standalone dwellings, while ensuring future development maintains the</p>

		amenity and character of the surrounding environment.
GRZ-P1	<p>Require all subdivision in the General Residential zone to provide the following reticulated services to the boundary of each lot:</p> <p>(a) telecommunications:</p> <p>(i) fibre where it is available; or</p> <p>(ii) copper where fibre is not available;</p> <p>(b) local electricity distribution network; and</p> <p>(c) wastewater, potable water and stormwater where they are available.</p>	<p>High-level three waters infrastructure and the traffic impact assessment confirm that future development in accordance with the GRZ rules can connect to the reticulated network, with sufficient capacity anticipated following planned infrastructure upgrades.</p> <p>Telecoms and electricity are available to the site and can be provided any future development of the site.</p> <p>It is considered that rezoning the site GRZ will give effect to this policy.</p>
GRZ-P2	<p>Enable multi-unit developments within the General Residential zone, including terraced housing and apartments, where there is adequacy and capacity of available or programmed development infrastructure.</p>	<p>High-level three waters infrastructure assessment confirms the site can connect to the reticulated network, with sufficient capacity anticipated following infrastructure upgrades. Therefore, multi-unit developments as provided for within the GRZ can be accommodated as a result of the recommended rezoning.</p>
GRZ-P3	<p>Enable non-residential activities that:</p> <p>(a) do not detract from the vitality and viability of the Mixed Use zone;</p>	<p>The recommended GRZ for the site will continue to provide for non-residential activities in accordance with the GRZ rules, enabling contributions to community wellbeing at a scale,</p>

	<ul style="list-style-type: none"> (b) support the social and economic well-being of the community; (c) are of a residential scale; and (d) are consistent with the scale, character and amenity of the General Residential zone. 	character, and amenity that complement the surrounding residential area.
GRZ-P4	<p>Provide for retirement villages where they:</p> <ul style="list-style-type: none"> (a) compliment the character and amenity values of the surrounding area; (b) contribute to the diverse needs of the community; (c) do not adversely affect road safety or the efficiency of the transport network; and (d) can be serviced by adequate development infrastructure. 	<p>The recommended GRZ for the site will give effect to this policy because:</p> <ul style="list-style-type: none"> (a) The site is located directly adjacent to the Bay of island Hospital being a complementary activity to a retirement village. The site also offers good access to Kawakawa Town Centre being somewhat 1km away and State Highway 1. (b) The roading network can accommodate future urban development onsite with no adverse effects according to the Traffic Impact Assessment (Attachment 4). Potential retirement village development could be accommodated within the transport network, subject to compliance with the relevant Transport Chapter rules.¹⁰ (c) The site can be connected to the reticulated three waters network, with sufficient capacity anticipated subject to upgrades, ensuring the development can be adequately serviced.

¹⁰ Section 3.2 of the traffic impact assessment.

		(d) Any retirement village can be designed to complement the character and amenity of the surrounding residential area, while also providing housing options that address the diverse needs of the community, particularly an ageing population.
GRZ-P5	Encourage and support the use of on-site water storage to enable sustainable and efficient use of water resources.	Any development of the site will have to be undertaken in accordance with the GRZ provisions giving effect to this policy. .
GRZ-P7	Encourage energy efficient design and the use of small-scale renewable electricity generation in the construction of residential development.	Any development of the site will have to be undertaken in accordance with the GRZ provisions giving effect to this policy.
GRZ-P8	<p>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, design, amenity and character of the residential environment; (b) the location, scale and design of buildings or structures, potential for shadowing and visual dominance; (c) for residential activities: <ul style="list-style-type: none"> (i) provision for outdoor living space; (ii) privacy for adjoining sites; 	<p>This policy applies to the assessment of future resource consent applications. It is considered that the site is of a sufficient site and appropriate location to enable future development in accordance with the provisions of the GRZ.</p> <p>Overall, the recommended GRZ for the site is capable of being managed to address these matters comprehensively, supporting a functional, well-designed, and resilient residential environment.</p>

	<ul style="list-style-type: none"> (iii) access to sunlight; (d) for non-residential activities: <ul style="list-style-type: none"> (i) scale and compatibility with residential activities (ii) hours of operation (e) at zone interfaces, any setbacks, fencing, screening or landscaping required to address potential conflicts; (f) the adequacy and capacity of available or programmed development infrastructure to accommodate the proposed activity, including: <ul style="list-style-type: none"> (i) opportunities for low impact design principles (ii) ability of the site to address stormwater and soakage; (g) managing natural hazards; and (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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6.5 Based on the assessment above, we are of the opinion that the re-zoning the site to GRZ is consistent with the outcomes sought by the zone and gives effect to those objectives.

Higher Order Direction

6.6 The following provides an evaluation of the recommended GRZ against the relevant higher order policies which are:

- a) National Policy Statement on Urban Development ('**NPS-UD**')
- b) National Policy Statement for Highly Productive Land ('**NPS-HPL**')

- c) National Policy Statement for Indigenous Biodiversity (**'NPS-IB'**)
- d) National Policy Statement for Freshwater Management (**'NPS-FM'**)
- e) Northland Regional Policy Statement (**'RPS'**)

National Policy Statement on Urban Development 2020

- 6.7 The NPS-UD sets out the objectives and policies for planning for well-functioning urban environments under the Resource Management Act 1991 and seeks the provision of sufficient development capacity to meet the different needs of people and communities. It contributes to the Urban Growth Agenda (UGA) which aims to remove barriers to the supply of land and infrastructure to make room for cities to grow up and out.
- 6.8 Although FNDC is a tier 3 local authority under the NPS-UD, tier 3 councils are strongly encouraged to adopt, as far as practicable, the same approaches that tier 1 and 2 councils are obliged to implement under Parts 2 and 3 of the NPS-UD.¹¹ While it is acknowledged that Kawakawa does not meet the definition of an “urban environment” under the NPS-UD, in this context, enabling additional residential capacity in Kawakawa aligns with the intent of the policy by supporting a well-functioning urban form and reinforcing the township’s role as a consolidated service centre.
- 6.9 The clear direction for increased intensity in appropriate locations is further advocated under Policy 5(b) which, for tier 2 and 3 urban environments, seeks to create “*urban environments enable heights and density of urban form commensurate with the greater of relative demand for housing and business use*”.¹² In this case, Kawakawa is recognised as a key service hub in the Bay of Islands and wider Far North, with an important cluster of residents, employment opportunities, health services at the Bay of Islands Hospital directly adjacent to the site, educational facilities, commercial activity, and visitor services that support surrounding rural communities. Therefore, the rezoning of the site to GRZ is highly responsive to the provision of a variety of options for different levels of affordability and dwelling occupancy, noting that currently the area is dominated by single detached dwelling on large sections.

¹¹ Section 1.5 of the NPS-UD.

¹²Policy 5 of the NPS-UD.

- 6.10 Overall, in our opinion the recommended GRZ for the site aligns strongly with the outcomes anticipated under the NPS-UD.

National Policy Statement for Highly Productive Land

- 6.11 The objectives and policies of the NPS-HPL seek to protect Highly Productive Land (“**HPL**”) for use in land-based primary production, policies 1, 2, 3 relate to recognition, identification and protection of HPL as a resource.
- 6.12 As discussed in paragraph 5.9, the subject site is not identified as Land Use Capability Classes 1, 2 or 3 and therefore is not HPL, and the NPS-HPL does not apply to the site.

National Policy Statement for Indigenous Biodiversity (NPS-IB)

- 6.13 The site is currently vegetated and contains a mix of indigenous and exotic vegetation. Objectives and policies of the NPS-IB do not directly relate to zoning of land, instead focus upon maintenance and protection of indigenous vegetation and habitats within and outside of Significant Natural Areas (“**SNA**”).
- 6.14 The District Wide Ecosystems and Indigenous Biodiversity Chapter of the PDP will establish provisions to give effect to the NPS-IB. Any vegetation removal proposed will be assessed under the Ecosystems and Indigenous Biodiversity Chapter, where the SNA’s are notified in Schedule 4 of the District Plan as an area of significant indigenous vegetation or significant habitat of indigenous fauna; or assessed by a suitably qualified and experienced ecologist.¹³ The site is not identified as SNA, and an ecologist assessment can be undertaken at the time of resource consent.
- 6.15 Overall, in combination with the District Wide provisions, it is considered that the recommended GRZ will give effect to the NPS-IB.

National Policy Statement for Freshwater Management (NPS-IB)

- 6.16 NPS-FM is largely managed by Regional Council, with District Council required to take a role in integrated management. The site is not known to contain any natural wetland as defined by the NPS-FM, however it is noted that the eastern boundary of the site is

¹³ Part 1 – Introduction And General Provisions Interpretation Definitions of the PDP.

located within 130m of outer edge of the unnamed stream running along the east of State Highway 1

- 6.17 Future development under the GRZ would require consideration against the proposed Natural Character chapter, the Proposed Northland Regional Plan and the National Environmental Standards for Freshwater where relevant and this is considered to give effect the NPS-FM.

Northland Regional Policy Statement

- 6.18 The RPS establishes a range of policy direction for the Northland Region, many of which are implemented via the Proposed Regional Plan for Northland Operative in Part February 2024 ('**PRP**') and proposed District Wide chapters of the PDP. No areas of SNA, High or Outstanding Natural Character, Coastal Environment, Outstanding Natural Features or Landscapes are identified within this location, as such any RPS policy on these matters would not apply. The site is not subject to identified natural hazards, therefore RPS natural hazard policy also does not apply.
- 6.19 The RPS includes policy direction to give effect Objectives 3.5-3.8 seeking 'planned and coordinated development', Policy 5.1.1 is particularly relevant. Development is to be guided by the "Regional Form and Development Guidelines" and the "Regional Urban Design Guidelines"; and the recommended GRZ zoning of this site will be consistent with these guidelines given the existing presence of residential development around the site, proximity to Kawakawa Township and lack of sensitive environmental features. Policy 5.1.1(a-c) provides an opportunity to manage land use and subdivision in a way that addresses potential effects while supporting a high-quality living environment. Future development will be required to demonstrate consistency with the scale, design, amenity, and character anticipated within the residential environment, with the location, scale, and design of buildings managed to avoid adverse effects. Further the recommend GRZ of the site provides Māori urban design principles to be incorporated into any development being an Iwi led development.
- 6.20 Infrastructure servicing is a key consideration, with any subdivision and development required to connect to available or planned three waters networks. The high-level three waters assessment confirms sufficient capacity to accommodate GRZ-level intensity.
- 6.21 The remaining clauses of this policy refer to cumulative effects, integrated development, avoidance of potential for reverse sensitivity and enhancement of sense

of place and character. For reasons already discussed in the bulk of this evaluation, GRZ will give effect to all of these matters.

- 6.22 Policy 5.1.3 requires adverse effects to be managed, including reverse sensitivity effects, particularly from residential development on primary production activities in primary production zones. Reverse sensitivity effects can occur when sensitive activities are established within close proximity to established activities. Within the wider environment there is a number of rural activities such as farming and intensive farming operation, as well as existing GRZ notably across the site along Greenacres Drive.
- 6.23 It is not unusual for different zones to interface where potential reverse sensitivity effects could arise, and the interface of Kawakawa's urban and rural environments is no different. In our view, the PDP anticipates this with appropriate bulk and location controls designed to manage these potential incompatibility issues. Both the proposed RRZ and GRZ require compliance with height, setback, and screening standards at the zone interface, creating a buffer between residential activities and rural activities particularly to the south of the site managing reverse sensitivity effects.¹⁴ The RPZ also requires a 10m setback from the site boundary for any building¹⁵, which creates a minimum 11.2m setback when abutting the recommended GRZ and minimum 13m setback when abutting the proposed RRZ. This is reinforced that RPROZ-S6.1.b, which buildings or structures used to house, milk or feed stock, to be located at least 100m from boundary of land zoned GRZ or RRZ.
- 6.24 Future development enabled by the GRZ for more than three dwellings per site (GRZ-R9) is a discretionary activity where Council have the ability to consider the full range of possible effects, ensuring that reverse sensitivity effects are assessed and managed at the time of resource consent.
- 6.25 On this basis we consider that rezoning the site to GRZ will ensure that adverse effects are managed and will give effect to the outcomes sought by the Northland Regional Policy.

¹⁴ GRZ S1-5 and RRZ-S14

¹⁵ RPROZ-S3

Reasons for Request

6.26 GRZ is the most appropriate zoning for the site for the following reasons:

- (a) NKoNHCT have clear development aspirations for the land, as set out in their preliminary masterplan Te Mataora which includes residential, aged care and other community activities that are considered to compliment the existing Bay of Islands hospital activities, as well as those existing residential activities already established within the existing environment and anticipated by the notified PDP GRZ extent. In this regard, the RRZ does not anticipate the level of development sought by Te Mataora and in our view would be at odds with the objectives and policies of the RRZ.
- (b) As set out in the primary evidence statement of Mr White¹⁶, there has been considerable work and consultation undertaken by NKoNHCT with Health NZ (formally Te Whatu Ora) and Kāinga Ora to both return the land and enable its development with a funding agreement in place as part of the wider Infrastructure Acceleration Fund ('IAF').
- (c) The character and amenity of this area is consistent with the PDP zoned land GRZ within the immediately surrounding location. Notably neighbouring sites adjacent to the site are zoned for GRZ.
- (d) The site is located adjacent to the Bay of Islands Hospital and within close proximity to the Kawakawa town centre and recommended GRZ will enable more efficient and integrated urban subdivision than is possible under the more restrictive RRZ.
- (e) The site can connect to the reticulated network (three waters) with sufficient capacity subject to infrastructure upgrades, which effectively urbanises the site making it suitable for the GRZ.

Assessment of Site Suitability and Potential Effects of Rezoning

6.27 FNDC Criteria requires assessment of the suitability of the land for rezoning, including an assessment of the following matters. We consider that the site suitability and

¹⁶ Section 7.1 – 7.3 of Mr White's primary evidence on behalf of NKoNHCT.

potential effects of RRZ have been well traversed throughout this evidence. The specific matters listed in the FNDC Criteria are discussed as follows:

(a) *The risks from natural hazards (refer Part 2 – District Wide Matters and the Northland Regional Policy Statement):* The site is not subject to any identified natural hazard risks as per the Northland Regional Council Natural Hazard Maps. It is our opinion that any stability or flooding issues can and should be assessed at the time of development as part of any resource consent or building consent application.

(b) *Effects on any natural environment values, historic heritage, coastal environment, or other PDP overlay (refer Part 2 – District Wide Matters):*

Nil - the site is not considered a site/ or area of significance to Māori, have historic heritage sites or areas, or contain known archaeological artifacts, and therefore, the proposed district wide objectives and policies of the Historic Heritage, Heritage Area Overlays, Notable Trees, Sites and Areas of Significance to Māori Chapters.

(c) *Effects on surrounding sites, including compatibility of the rezoning with surrounding land-uses and potential reverse sensitivity effects:* As set out in the preceding sections of this evidence, we consider that potential land use compatibility and reverse sensitivity effects with surrounding land uses will be adequately managed by the GRZ and RPZ provisions. In our opinion, this is already anticipated, with the notified PDP already proposing to GRZ and RPZ to be spatially interfaced. In our opinion, the recommended GRZ for the site is compatible with surrounding land use, with sites directly across Greenacres Drive already zoned GRZ under the notified PDP. This reinforces the appropriateness of extending the zone across the road, creating a logical and contiguous urban pattern. Future development will be required to demonstrate consistency with anticipated residential scale, design, and amenity, with building form and layout managed to avoid adverse effects.

The rezoning will not give rise to reverse sensitivity effects as stated in para 6.24-6.27. While rural activities occur in the wider environment, the site's relationship to established residential land supports its suitability for urban development.

- 6.28 Overall, recommended GRZ for the site will ensure potential adverse effects are avoided and will deliver a well-integrated, resilient residential environment for Kawakawa.

Infrastructure (three waters) servicing

- 6.29 As detailed above in paragraphs 3.1-3.4 above, the Three Waters Infrastructure Assessment enclosed as **Attachment 3** demonstrates the site is suitable for development, with feasible servicing solutions for access, stormwater, wastewater, and water supply. While detailed design and investigations will be required, existing public networks provide a realistic servicing pathway to enable residential development.
- 6.30 While we acknowledge that the three waters solutions outlined by Civix require infrastructure upgrades, it is our understanding that a funding agreement is in place in the order of \$25.6m should this rezoning request be accepted and recommended by the Panel.
- 6.31 Therefore, for the reasons outlined above and due to the comprehensive consultation and work carried out by NKoNHCT, it is our opinion that the site can be adequately serviced by infrastructure suitable for development that would be consistent with the GRZ.

Transport infrastructure

- 6.32 Overall, as stated in the Traffic Impact Assessment enclosed as **Attachment 4**, the road network has sufficient capacity to absorb additional dwellings and access, parking, and pedestrian arrangements can be designed so any traffic safety effects are managed. Therefore, the recommended GRZ for the site is appropriate for the location.

Consultation and Further Submissions

- 6.33 No consultation has been undertaken in the preparation of this evidence statement, however, comprehensive engagement with Council and central government has been undertaken by NKoNHCT. The details of this are described in section 7 of Mr White's primary evidence, which in our opinion, demonstrates a long standing commitment by NKoNHCT to develop the land for activities that are consistent with the outcomes sought by the GRZ.

- 6.34 No further submissions were made on the proposed rezoning submission (s555) and therefore no discussion with other submitters has been undertaken.

7. SECTION 32AA EVALUATION

- 7.1 Section 32AA of the RMA requires that a further evaluation must be undertaken for any changes to a proposed plan that are proposed since the original s 32 evaluation was completed. The further evaluation must be undertaken in accordance with s 32(1)-(4) and to a level of detail that corresponds to the scale and significance of the change.
- 7.2 Section 32(1)-(4) require consideration of a proposal's efficiency, effectiveness, costs and benefits, relative to other reasonably practicable options, and must also consider the risks of acting or not acting.
- 7.3 Zoning is a tool, a method, and by definition a provision, which must be evaluated as the most appropriate way to achieve the objectives. When considering the spatial distribution of a zone, the Council must consider the appropriateness of the zone relative to the land in question.
- 7.4 In this instance, we have identified several reasonably practicable zone options for each location and provide a detailed s32AA evaluation in **Attachment 5** to this evidence.
- 7.5 Overall, it is our opinion that the GRZ zoning is the most appropriate way to achieve objectives of the PDP, being more efficient and effective, with less costs and more benefits, than the proposed RRZ.

8. CONCLUSION

- 8.1 In conclusion, this evidence was focused on the narrowed relief sought by NKoNHCT that sought that the GRZ be applied to the site. In our opinion, it is clearly demonstrated that the RRZ that is proposed by the notified PDP is inappropriate when taking account of the conclusions set out in the technical reports provided with NKoNHCT's original submission in combination with funding agreements that are in place to facilitate development of the site. This, in our view, would not deliver the sustainable management purpose of the RMA. In our opinion, the changes sought by NKoNHCT give effect to higher order policy direction, promote the sustainable management of natural and physical resources, and provide a framework that would enable residential activities that are align with the objectives of the GRZ.

8.2 For the reasons set out in this statement of evidence and attachments, we consider that the site should be rezoned as GRZ.

Alvin Jung and Makarena Dalton

Date: 15 September 2025

LIST OF ABBREVIATIONS USED IN THIS STATEMENT OF EVIDENCE:

Council	Far North District Council
RPS	Northland Regional Policy Statement
RMA	Resource Management Act 1991
S32	Section 32 of the RMA / Council's Section 32 Evaluation Report
S42A	Section 42A of the RMA / Council's Section 42A Report
PDP	Far North Proposed District Plan
GRZ	General Residential Zone
RRZ	Rural Residential Zone
NPS-FM	National Policy Statement for Freshwater Management
NPS-HPL	National Policy Statement for Highly Productive Land
NPS-UD	National Policy Statement on Urban Development
NRC	Northland Regional Council