

**BEFORE THE INDEPENDENT HEARINGS COMMISSIONER AT NEW
PLYMOUTH**

IN THE MATTER of the Resource Management Act 1991
AND

IN THE MATTER of an application under s88 of the Act by
B, M R Sim to the New Plymouth District
Council to undertake a boundary change
and five-lot subdivision, at 6 & 42 Leith
Road, Okato (**SUB21/47781**)

AND

of an application under s88 of the Act by
B, M R Sim to the New Plymouth District
Council for a side boundary setback
breach for a proposed dwelling on Lot 5
of SUB21/47781 and earthworks within
200m of Site of Significance to Māori and
Archaeological Site ID 197 (under the
Proposed District Plan) (**LUC22/48312**)

STATEMENT OF EVIDENCE OF

KATHRYN LOUISE HOOPER - PLANNER

19 May 2023

INTRODUCTION

1. My name is Kathryn Louise Hooper.
2. My qualifications and experience are as detailed in my evidence dated 24 January 2023.
3. In preparing this evidence I have reviewed:
 - a. All original application details, including the land use consent application dated 23 August 2022;
 - b. The NPDC Planners 42A Report for SUB21/47781 dated 16 May 2022;
 - c. The planning evidence of my colleague Zenaida Gerente, specifically;
 - i. Her Evidence in Chief (EIC) dated 25 May 2022;
 - ii. The summary of highlights in her planning evidence, provided in the legal memorandum on 10 June 2022;
 - d. The supplementary evidence/JWS prepared by Ms Gerente dated 30 May 2022;
 - e. The supplementary evidence of Ms Buttimore, the NPDC's processing planner, dated 7 June 2022;
 - f. The EIC of Mr Richard Bain dated 23 May 2022;
 - g. The EIC of Ms Martha Dravitski dated 23 May 2022; and,
 - h. The 42A report for LUC22/48312 dated 6 December 2022; and,
 - i. The evidence of Mr Allen, AgFirst dated 24 January 2023 and 21 April 2023; the evidence of Mr Bain, Bluemarble dated 24 January 2023 and 21 April 2023 (and the evidence of Mr Juffermans, Juffermans Surveyors dated 24 January 2023).
 - j. The revised 42A report from Ms Buttimore dated 17 March 2023.
 - k. **The Proposed New Plymouth District Plan Decisions Version – 13 May 2023.**
4. Although this is a Council level hearing, I again confirm that I have read the Code of Conduct for Expert Witnesses as contained in the Environment Court Practice Note 2023, and I agree to comply with it in giving this evidence. I confirm that the issues addressed in this brief of evidence are within my area of expertise.
5. In Directions/Minute #11 from the commissioner, it has been requested that parties address the implications of the decision version of the Proposed Plan, if any, as to the application.

Proposed New Plymouth District Plan – Decisions Version

6. The Proposed New Plymouth District Plan (PNPDP) Decisions Version was notified on 13 May 2023.

SASM RULES

7. From the decisions version of the PNPDP, with my emphasis on the relevant part of this definition added in **bold**, a Site of Significance to Maori or SASM is now defined as follows:

[SASM] means a site or area of significance to Māori which is listed in Schedule 3 and includes:

- a. sites and areas of significance to Māori with a mapped extent (a "mapped site and area of significance to Māori" or a "mapped SASM"). The extent of a "mapped SASM" is anywhere within the mapped extent;
 - b. sites and areas of significance to Māori without a mapped extent that are identified on the planning maps with a koru symbol (an "identified site and area of significance to Māori" or "identified SASM". The extent of an "identified SASM" is:
 - i. anywhere within a 200m radius of the site's mapped koru symbol in the General Industrial, Open Space and Recreation, Special Purpose and Rural zones and anywhere within a 50m radius of the site's mapped koru symbol in the Commercial and Mixed Use and Residential zones; or
 - ii. **where the extent of the identified SASM within the 200m or 50m radius of the site's mapped koru symbol has been confirmed by mana whenua and made known in writing to the Council, within that extent;** and
 - c. sites and areas of significance to Māori which have silent file status that are identified on the planning maps with a grey koru symbol (a "silent site and area of significance to Māori" or "silent SASM"). These sites are accurate to the land parcel on which the koru symbol is mapped and the extent of the site is:
 - i. anywhere within the area comprising that land parcel; or
 - ii. where the extent of the silent SASM within the mapped land parcel has been confirmed by mana whenua and made known in writing to the Council, within that extent.
8. As with my previous evidence, I note for completeness that Puketi Paa is identified as both a SASM and an Archaeological Site (AS), and similar changes to the definition for archaeological sites are now reflected in the PNPDP. Accordingly, if it is confirmed by an archaeologist that the subject land is not within the extent of Puketi Paa, then rule HH-R31 does not apply.
9. If however the subject site is confirmed to be within the extent of Puketi Paa, the site will contain part of a SASM and Archaeological Site, and subdivision within the extent of Puketi Paa is discretionary under SASM-R17 and HH-R31.
10. I contacted mana whenua this week seeking comment in relation to the extents of Puketi Paa, however at the date of preparing this statement have received no response from them. Given the early stage of the plan and in this particular provision, I expect they will need time to determine a process for such enquiries.

OTHER RULES

11. The relevant rules are discussed below and the full text of the rules is attached as **Appendix A**:

a) SUB-R1 Boundary Adjustment

Proposed lot 5 is a boundary adjustment in the PNPDP decisions version (it did not meet the definition of minor boundary adjustment in the ONPDP). In its own right, this lot would comply with SUB-R1 as a CONTROLLED ACTIVITY.

Overall however, the subdivision as presented would remain discretionary.

b) SUB-R4 – Subdivision in the rural production zone

One title of not less than 4000m² can be created from the parent title. Therefore, one lot of not less than 4000m² could occur as a CONTROLLED ACTIVITY from this land.

Overall however, the subdivision as presented would remain discretionary as there are two lots to be subdivided from the parent title, one of which is less than 4000m².

c) NOISE-S3 Noise control Boundary – State Highway

The site is now affected by the noise control boundary for South Road/SH45. The eastern end of the existing dwelling on proposed lot 4 is on the extent of this noise boundary. As the dwelling is existing the rule does not apply until alterations are sought.

Key relevant rural subdivision performance standards

d) RPROZ-S3 Minimum setbacks

There are no changes to the minimum setbacks compared to the ONPDP that will affect the subdivision and land use consents sought (being 15m from a side boundary and 30m from a road boundary), noting land use consent for a reduced setback for the dwelling on proposed lot 5 has been sought and has been assessed.

e) RPROZ-S5 Maximum number of dwellings

Under the ONPDP, two dwellings are a permitted activity on lots greater than 40ha in size. Under the PNPDP, one dwelling and one minor dwelling are permitted. Regardless, the applicant has volunteered a condition restricting the number of dwellings on the balance to one.

On allotments less than 20ha, only one dwelling unit is permitted.

NPS-HPL and the PNPDP

12. The application and weighting of the NPS-HPL in the PNPDP decisions is pertinent to this discussion.

13. I have attached as **Appendix B** a list and links to the various parts of the decisions on the PNPD that relate to the NPS-HPL to assist in considering this matter.
14. As the NPS-HPL came in after the close of submissions, scope to change the PNPD in response to the NPS-HPL was limited. The decisions seemed largely focused on the implications of rezoning Rural Land to Residential. I have been unable to find any clear direction in the decision which considers whether the policies and objectives for the Rural Production Zone are consistent with the NPS-HPL, however they do appear to be aligned with the NPS-HPL. Ms Buttimore agrees with this, at paragraph 124 of her 42A reply report (17 March 2023).
15. Under the PNPD framework subdivision of one 4000m² block from the parent title, and boundary adjustment activities therefore appear to be supported by a planning framework that aligns with the NPS-HPL. The overlaying of a SASM/AS does not change this fundamental situation, though it does change the activity status to discretionary.

Conclusion

16. On the face of it, the notification of decisions of the PNPD do not affect the status of the subdivision as currently presented. Under the new provisions it would remain discretionary on the basis of the size of proposed lot 4, and the presence of the SASM/AS (unless it is confirmed by mana whenua that the land is not within the extents of Puketi Paa).
17. The notified PNPD has introduced the opportunity to demonstrate the site is not within the extent of Puketi Paa, and in turn opened opportunity for controlled subdivision of this land to a greater extent than the ONPD and the notified version of the PNPD.

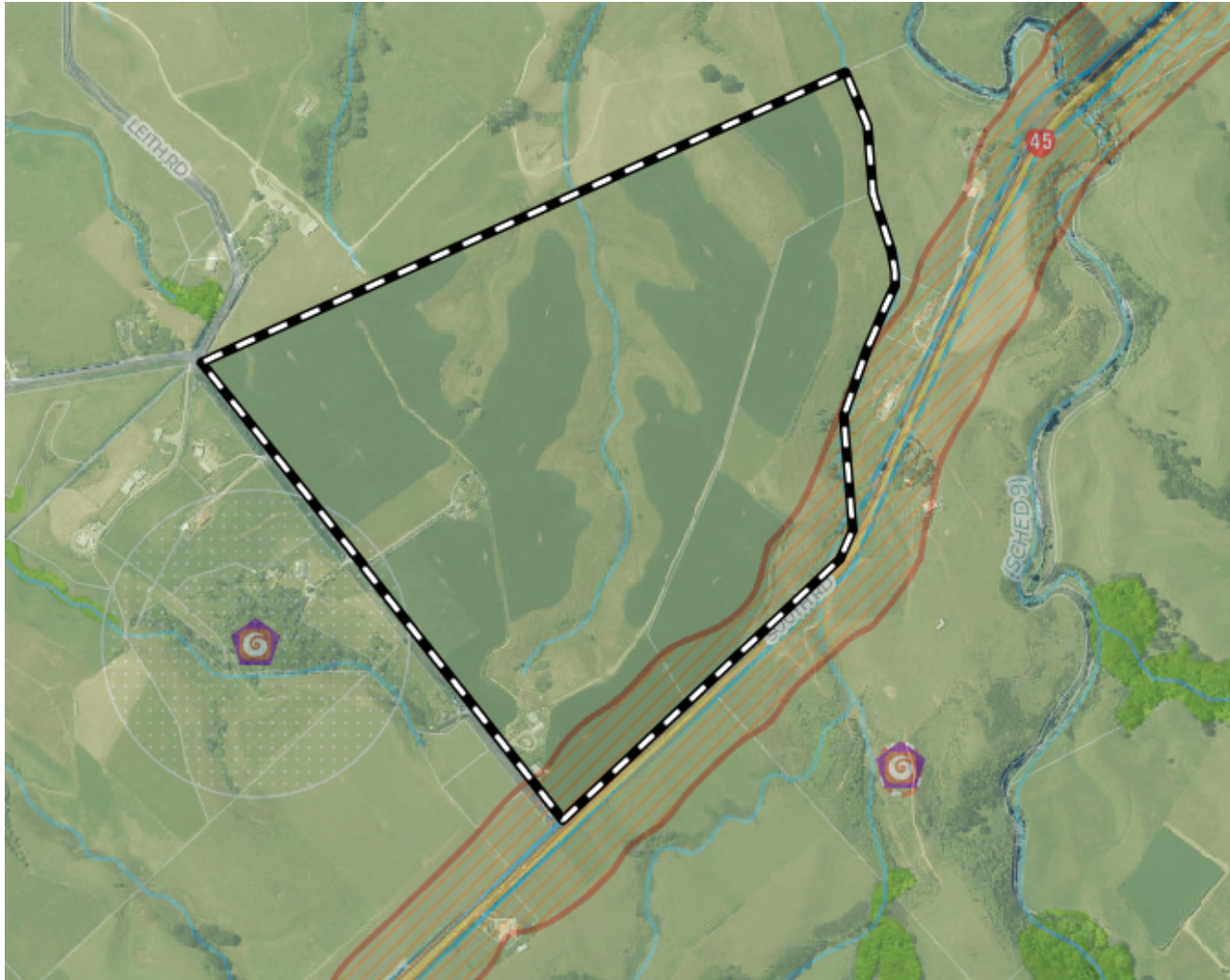
Signed this 19th day of May 2023



Kathryn Louise Hooper
MNZPI

APPENDIX A
FULL TEXT – PNPD RELEVANT RULES

Screen shot – NPDC Planning Map of subject site, all overlays on



SASM-R17– Earthworks within the extent of a scheduled site

SASM-R17

Earthworks within the extent of a scheduled site or area of significance to Māori, or within 50m of the extent of a mapped SASM

- The subdivision is able to occur without the need for earthworks within the extent of a SASM.

SASM-R18 – Subdivision of land containing any part of a scheduled site or SASM

SASM-R18

Subdivision of land that contains any part of a scheduled site or area of significance to Māori

- If mana whenua confirm the subject land is not within the extent of Pukeiti Paa, this rule does not apply.

Definition of Scheduled site or area of significance to Maori

SCHEDULED SITE OR AREA OF SIGNIFICANCE TO MĀORI

DEFINITION



means a site or area of significance to Māori which is listed in Schedule 3 and includes:

- a. sites and areas of significance to Māori with a mapped extent (a "mapped site and area of significance to Māori" or a "mapped SASM"). The extent of a "mapped SASM" is anywhere within the mapped extent;
- b. sites and areas of significance to Māori without a mapped extent that are identified on the planning maps with a koru symbol (an "identified site and area of significance to Māori" or "identified SASM"). The extent of an "identified SASM" is:
 - i. anywhere within a 200m radius of the site's mapped koru symbol in the General Industrial, Open Space and Recreation, Special Purpose and Rural zones and anywhere within a 50m radius of the site's mapped koru symbol in the Commercial and Mixed Use and Residential zones; or
 - ii. where the extent of the identified SASM within the 200m or 50m radius of the site's mapped koru symbol has been confirmed by mana whenua and made known in writing to the Council, within that extent; and
- c. sites and areas of significance to Māori which have silent file status that are identified on the planning maps with a grey koru symbol (a "silent site and area of significance to Māori" or "silent SASM"). These sites are accurate to the land parcel on which the koru symbol is mapped and the extent of the site is:
 - i. anywhere within the area comprising that land parcel; or
 - ii. where the extent of the silent SASM within the mapped land parcel has been confirmed by mana whenua and made known in writing to the Council, within that extent.

Definition of Mapped SASM

MAPPED SASM
DEFINITION
has the same meaning as is given for the term in the definition of SCHEDULED SITE OR AREA OF SIGNIFICANCE TO MĀORI.

HH-R30

HH-R30 **Earthworks** within the extent of a **scheduled archaeological site**, or within 50m of the extent of a **mapped archaeological site**

- The subdivision is able to occur without the need for earthworks within the extent of a scheduled archaeological site.

HH-R31

HH-R31 **Subdivision** of land containing any part of a **scheduled archaeological site**

- If an archaeologist confirms the site is not within the extents of the AS, this rule would not apply.

Definition of scheduled archaeological site

SCHEDULED ARCHAEOLOGICAL SITE



DEFINITION

means an archaeological site which is listed in Schedule 3 and includes:

- a. Archaeological sites with a mapped extent (a "mapped archaeological site"). The extent of a "mapped archaeological site" is anywhere within the mapped extent;
- b. Archaeological sites without a mapped extent that are identified on the planning maps with a purple "A" symbol (an "identified archaeological site"). The extent of an "identified archaeological site" is:
 - i. anywhere within a 200m radius of the site's purple "A" symbol in the General Industrial, Open Space and Recreation, Special Purpose and Rural zones, and anywhere within a 50m radius of the site's purple "A" symbol in the Commercial and Mixed Use and Residential Zones; or
 - ii. where the extent of the identified archaeological site within the 200m or 50m radius has been confirmed by a qualified archaeologist and made known in writing to the Council, within that extent; and
- c. Archaeological sites which have silent file status are identified on the planning maps with a purple "A" symbol and are next to a grey "koru symbol". These sites are accurate to the land parcel on which the purple "A" symbol is mapped and the extent of the site is:
 - i. anywhere within the area comprising that land parcel; or
 - ii. where the extent of the silent archaeological site within the land parcel has been confirmed by mana whenua and made known in writing to the Council, within that extent.

But excludes archaeological sites listed in Schedule 3 that are described in the 'Site Description' column as pre-1900 buildings ("Scheduled pre-1900 building").

Definition of Mapped Archaeological Site

MAPPED ARCHAEOLOGICAL SITE

DEFINITION

has the same meaning as is given for the term in the definition of SCHEDULED ARCHAEOLOGICAL SITE.

SUB R1 – BOUNDARY ADJUSTMENT

All zones

Activity status: CON

Where:

1. the [boundary adjustment](#) does not:
 - a. alter the permitted activity status of any existing permitted activities occurring on the [allotments](#) or the ability of an existing permitted activity to continue to comply as a permitted activity under the rules and effects standards in this Plan; or
 - b. increase the extent or degree to which any consented or otherwise lawfully established [activity](#) occurring on the [allotments](#) does not comply with a rule or effects standard in this Plan; and
2. in the Rural Production Zone, the [boundary adjustment](#) does not result in additional potential for [residential units](#) as a permitted activity; and
3. all [Subdivision Effects Standards](#) are complied with.

Matters over which control is reserved:

1. The size, design and layout of lots that would exist after the [boundary adjustment](#), including the effects of any additional permitted activity development potential resulting from the reconfigured layout.
2. Legal and physical access to and from lots affected by the [boundary adjustment](#).
3. Protection, maintenance or enhancement of scheduled features.
4. Where relevant, provision of appropriate [infrastructure](#) and services, including [water](#) supply (including firefighting water supply), wastewater systems, stormwater control and disposal, telecommunications and electricity.

Activity status where compliance not achieved: RDIS

Matters over which discretion is restricted:

1. The effects of non-compliance with any rule or effects standard and any relevant matters of discretion in the infringed rules or effects standards.
2. The size, design and layout of lots that would exist after the [boundary adjustment](#), including the effects of any additional permitted activity development potential resulting from the reconfigured layout.
3. Legal and physical access to and from lots affected by the [boundary adjustment](#)
4. The extent to which the [boundary adjustment](#) will ensure that scheduled features are protected, maintained or enhanced.
5. Where relevant, provision of appropriate [infrastructure](#) and services, including [water](#) supply (including firefighting water supply), wastewater systems, stormwater control and disposal, telecommunications and electricity.

Definition – Boundary Adjustment**BOUNDARY ADJUSTMENT**

DEFINITION NATIONAL STANDARDS

has the same meaning prescribed in the National Planning Standards (as set out below).

means a subdivision that alters the existing boundaries between adjoining allotments, without altering the number of allotments.

- Proposed lot 5 of the subdivision would meet the definition of a boundary adjustment, and would comply with the controlled standards.

SUB-R4 – Subdivision in the rural production zone

SUB-R4 Subdivision of land to create allotment(s) within the Rural Production Zone

Rural Production Zone Activity status: CON

Where the record of title for the land being subdivided is:

1. dated 5 March 1999 or earlier; or
2. dated later than 5 March 1999 but was created as a result of a subdivision pursuant to ECO-R5 or its equivalent rule OL59 in the New Plymouth District Plan (2005), and no other subdivision of the parent title has been undertaken;

one additional record of title may be created, provided that:

- a. there is a balance lot remaining from the record of title being subdivided that has an area of at least 20 ha; and
- b. all Subdivision Effects Standards are complied with.

Matters over which control is reserved:

1. The size, design, shape, location and layout of lots.
2. Efficient use of land and compatibility with rural character and the role, function and predominant character of the Rural Production Zone.
3. The protection, maintenance or enhancement of scheduled features and indigenous biodiversity.
4. The measures to avoid, remedy, or mitigate adverse effects on any cultural, spiritual or historic values of importance to tangata whenua that are associated with the land being subdivided.
5. The subdivision design and layout, and the design and location of building platforms and access to minimise earthworks and land disturbance, and integrate built form into the natural landform.
6. Provision of appropriate infrastructure and services, including water supply (including firefighting water supply), wastewater systems, stormwater control and disposal, telecommunications and electricity.
7. Use of sustainable stormwater management and water sensitive (low impact) design principles.
8. Effects on the stability of land and buildings, and potential to create new or exacerbate existing natural hazards.
9. Management of construction effects, including traffic movements, hours of operation, noise, earthworks and erosion and sediment control.
10. Management of potential reverse sensitivity effects on existing land uses, including network utilities, rural activities, significant hazardous facilities or highly productive land.

Activity status where compliance not achieved: DIS

Where any of the following applies:

1. the subdivision complies with SUB-R4 CON except for clause (b).
2. the record of title for the land being subdivided is dated 5 March 1999 or earlier, no more than three additional records of title are created, and there is a balance lot remaining from the record of title being subdivided that has an area of 20 ha or more.
3. the record of title for the land being subdivided is dated later than 5 March 1999, either of 3(a), 3(b) or 3(c) below applies, and in each case there is a balance lot remaining from the record of title being subdivided that has an area of 20 ha or more.
 - a. no subdivision of the parent title, other than pursuant to ECO-R5 or its equivalent rule OL59 in the New Plymouth District Plan (2005) has been undertaken since 5 March 1999, and no more than three additional records of title are created.
 - b. no subdivision of the parent title, other than pursuant to ECO-R5 or its equivalent rule OL59 in the New Plymouth District Plan (2005) and SUB-R4 CON or as a controlled activity under its equivalent rule RUR78 in the New Plymouth District Plan (2005) has been undertaken since 5 March 1999, and no more than two additional records of title are created.
 - c. no subdivision of the parent title, other than pursuant to SUB-R4 CON or as a controlled activity under its equivalent rule RUR78 in the New Plymouth District Plan (2005) has been undertaken since 5 March 1999, and no more than two additional records of title are created.

NOISE-S3 NOISE CONTROL BOUNDARY

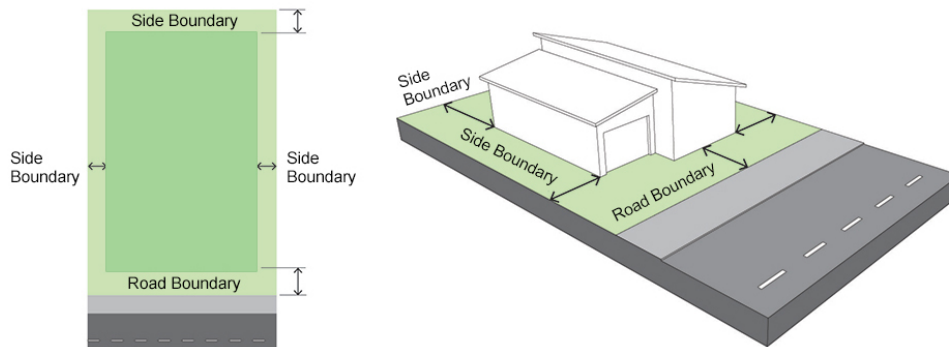
NOISE-S3	Noise insulation standards for noise sensitive activities - zone specific	
(1) All Zones except Commercial Zones and General Industrial Zone	<ol style="list-style-type: none"> 1. Any noise sensitive activity with a noise sensitive room in a new building or alteration or addition to an existing building that is located within the State Highway Noise Control Boundary shown on the planning maps, shall be designed, constructed, and maintained to meet an internal noise level of: <ol style="list-style-type: none"> a. 40 dB L_{Aeq} (24 hour) inside all noise sensitive rooms with ventilating windows open. 2. Compliance with (1) above shall be achieved if, prior to the construction of any building containing a noise sensitive room, an acoustic design certificate from a suitably qualified and experienced acoustic consultant is provided to the Council which certifies that the proposed design and construction of the building, alterations or additions will achieve the internal sound levels. The building shall be designed, constructed, and maintained in accordance with the design certificate. 3. Where the noise level specified in (1) above cannot be met with ventilating windows open, a ventilation system shall be installed in the noise sensitive room(s). 	<p>Matters of discretion if compliance not achieved:</p> <ol style="list-style-type: none"> 1. Management of sensitivity to noise with regard to the matters set out in NOISE-P4. 2. The provision of a report from a suitably qualified and experienced acoustic consultant which provides evidence that the level of acoustic insulation is appropriate to ensure the amenity of present and future residents of the site. 3. The impact of any sensitive activity that does not provide the required noise insulation of the ability of existing or future permitted business activities to operate or establish without undue constraint. 4. Any natural or built features of the site or surrounding area which will mitigate noise effects.

- The dwelling on proposed lot 4 is existing, so this rule does not apply until any owner wishes to undertake alterations. All other dwelling locations are outside of the noise control boundary.

RPROZ-S3 – minimum structure setbacks

RPROZ-S2	Minimum structure setbacks
	<p>1. From any <u>road boundary</u> (including <u>state highways</u>):</p> <ol style="list-style-type: none"> <u>residential unit</u>: 30m; artificial crop protection <u>structures</u> and crop support <u>structures</u>: 5m; all other <u>structures</u>: 20m. <p>2. From a <u>side boundary</u>:</p> <ol style="list-style-type: none"> agricultural, pastoral and horticultural <u>activity structures</u> (excluding <u>rural industry</u> activities): 10m; artificial crop protection <u>structures</u> and crop support <u>structures</u>: 3m; all other <u>structures</u> (including <u>rural industry</u> activities): 15m. <p>3. From established <u>intensive indoor primary production structures</u>:</p> <ol style="list-style-type: none"> <u>sensitive activities on any other site</u>: 400m. <p>4. From the <u>boundary</u> of a <u>site</u> zoned as Future Urban:</p> <ol style="list-style-type: none"> artificial crop protection <u>structures</u> and crop support <u>structures</u>: 5m; all other <u>structures</u>: 100m. <p>5. From a mineral extraction <u>activity</u> (either legally operating or consented for future use):</p> <ol style="list-style-type: none"> <u>sensitive activities on any other site</u>: 500m.
	<p>Matters of discretion if compliance not achieved:</p> <ol style="list-style-type: none"> The extent to which <u>structure</u> design, siting and external appearance adversely impacts on <u>rural character</u> and amenity. <u>Site</u> topography and orientation and whether the <u>structure</u> can be more appropriately located to minimise adverse visual amenity effects or maintain, enhance or restore indigenous biodiversity values. Effect on nearby properties, including outlook, privacy, shading and sense of enclosure. The extent to which the reduction in the setback is necessary due to the shape or natural and physical features of the <u>site</u>. The ability to mitigate adverse effects through the use of screening, planting, <u>landscaping</u> and alternative design. The extent to which the reduction in setback would impact on the future ability for <u>road</u> widening requirements.
	<p>This standard does not apply to:</p> <ol style="list-style-type: none"> Stock loading races or stock loading <u>yards</u> associated with an agricultural, pastoral and horticultural <u>activity on site</u>. Stock fences (excluding solid or close boarded fences).

RPROZ - Figure 33 - Minimum structure setbacks



- There are no changes to the minimum setbacks that will affect the subdivision and land use consents sought, noting land use consent for a reduced setback for the dwelling on proposed lot 5 has been sought and has been assessed.

RPROZ-S5 – maximum number of residential units

RPROZ-S5	Maximum number of residential units
<p>1. For sites that comprise less than 20 hectares:</p> <ol style="list-style-type: none"> one residential unit per site; or one residential unit and one sleep out per site. <p>2. For sites that comprise 20 hectares or more:</p> <ol style="list-style-type: none"> one residential unit per site; or one residential unit and one sleep out per site; or one residential unit and one minor residential unit per site, provided the minor residential unit: <ol style="list-style-type: none"> is located within 25m of the primary residential unit on site; and shares a single driveway access with the primary residential unit. <p>This standard does not apply to:</p> <ol style="list-style-type: none"> Papakāinga. 	<p>Matters of discretion if compliance not achieved:</p> <ol style="list-style-type: none"> Whether it can be demonstrated that the residential unit(s) provides ancillary accommodation for landowners or workers involved with primary production on sites over 20 ha. Whether the residential unit(s) have been designed to share a single vehicle access point and driveway. The extent to which the residential unit(s) and vehicle access point design, siting and external appearance adversely affects rural character and amenity. Site topography and orientation and whether the residential unit(s) and vehicle access point can be more appropriately located to minimise adverse visual amenity effects. Effect on nearby properties, including outlook and privacy. Whether the residential unit(s) and the vehicle access point can be more appropriately located to maintain, enhance or restore indigenous biodiversity values. The ability to mitigate adverse effects through the use of screening, planting, landscaping and alternative design.

- One residential unit only is permitted on lots 1, 4 and 5. This has no impact on the subdivision.
- One residential unit and one minor residential unit would be permitted on the balance. It is proposed, and volunteered as a condition, to restrict the number of dwellings on the balance to one only, so there is no affect from this rule.

APPENDIX B

NPS-HPL inclusion in the PNPDP

1. Paragraph 3.16 in recommendation report 1 highlights the NPS-HPL issue as follows:

3.16 Despite this moving regulatory landscape over the course of considering the PNPDP and the submissions thereon, the obligation in s75(3) of the RMA remains and we are obliged to consider and give effect to these NPSs in their current form even though they were not in existence when the Proposed Plan was notified. We discuss the extent of that obligation and how it has been fulfilled in relation to these three new NPS's in Recommendation Report 3 relating to the Strategic Direction objectives to which they each have relevance to varying degrees.¹

2. Decision Report 3² - Paragraphs 2.26 - 2.33 discuss rezoning of rural land in relation to policy 6 of the NPS HPL.
3. Decision Report 26A³ - Paragraph 4.20 page 15 accepts the submission by Hort NZ to add the definition of Highly Productive Land to the PNPDP.
4. Decision report 26A⁴ - Paragraphs 14.5 – 14.13 appear to duplicate paragraphs 2.26-2.33 from decision report 3.

¹ <https://proposeddistrictplan.npdc.govt.nz/media/dgnbynkx/recommendation-report-1-index-report.pdf>

² <https://proposeddistrictplan.npdc.govt.nz/media/oynflc5/recommendation-report-3-sd.pdf>

³ <https://proposeddistrictplan.npdc.govt.nz/media/ny2lm1th/recommendation-report-26a-rproz.pdf>