

BEFORE THE HEARINGS PANEL

In the Matter of: The Resource Management Act 1991

And Proposed Plan Change 47:
Māori Purpose Zone

Application By: Taupō District Council

SECTION 42A (ADDENDUM 1) OF THE RMA REPORT BY ROWAN SAPSFORD

Dated: 19 June 2026

1. PURPOSE AND SCOPE OF THIS ADDENDUM.

1. This addendum to the Section 42A Report for Taupō District Plan Change 47 – Māori Purpose Zones has been prepared to respond to the following matters:
 - a. Specific matters raised in submitters tabled evidence,
 - b. The implications of the recently gazetted National Environmental Standards for Papakāinga,
 - c. Contextual questions raised by the Hearing Panel via email on 27 May 2026, and
 - d. Additional amendment proposed to MPZ-R3 S6

2. MATTERS RAISED IN EVIDENCE

2. I have only addressed that evidence where I consider additional comment is required. My opinion on matters that are not detailed in this addendum report has not changed in response to written evidence and are suitably addressed in the Section 42A report.
3. All recommended changes to PC47 in this addendum are set out within and should be considered as changes in addition to the running text in Appendix 2 of the Section 42A report.

2.1 EVIDENCE OF TREDEGAR HALL AS IT RELATES TO IMPLEMENTATION OF MPZ

4. In his evidence, Mr Hall raises concerns regarding the implementation of the proposed Māori Purpose Zone provisions and refers to the potential role of hapū planning documents and cultural design processes. I acknowledge the importance of the role of iwi and hapu planning documents and the guidance which they provide to landowners and Council in guiding development design and decision making.
5. I will reiterate the matters raised under key Issue 2 of the Section 42A report that PC47 has been developed specifically to provide a tailored planning framework for Māori-owned land where the landowners themselves have sought inclusion within the Māori Purpose Zone through the Schedule 1 process. A key objective of PC47 is to better enable the use and development of those lands in a manner that reflects the aspirations of their owners while reducing unnecessary planning barriers and consenting complexity. PC47 has been developed to provide a more enabling and efficient planning framework than would otherwise apply under Rural or Residential Zones.
6. In my view, the introduction of additional procedural or assessment requirements of the type discussed by Mr Hall would risk increasing the complexity, cost and uncertainty associated with development proposals on Māori-owned land by their owners. This could undermine one of the fundamental purposes of PC47, which is to support rather than constrain the aspirations of Māori landowners.
7. The cultural values that underpin the Māori Purpose Zone are already embedded within the objectives and policies of PC47 and the wider TDP. The direction within iwi planning documents

etc were considered through the Section 32 process for PC47. PC47 provides an appropriate framework for recognising and responding to cultural considerations relevant to the development of land within the zone. In my opinion, this framework is sufficiently broad to allow consideration of relevant direction contained within hapū, marae, whenua trust or other planning documents where those documents are relevant to the proposal being considered.

8. However, I am cautious about introducing provisions that would require decision-makers to consider additional planning documents in all circumstances. Such documents may not always be relevant to the aspirations of the owners of the land subject to the development proposal, particularly where ownership structures, governance arrangements, or cultural affiliations differ. Requiring consideration of such documents in every case could create unnecessary complexity and potential uncertainty for landowners seeking to utilise the zone.
9. I also note that the evidence does not clearly identify specific amendments sought to address these concerns. In the absence of clear drafting or specific relief, it is difficult to assess how the concerns raised would be implemented through the District Plan framework or whether any amendments are necessary. Furthermore, because no specific amendments have been proposed, no other submitters have had an opportunity to view or place a further submission on these amendments.
10. Overall, it remains my view that the provisions of PC47 appropriately provide for a design and development process led by the Māori owners of the land concerned, while ensuring that relevant cultural values can be recognised through the objectives, policies and assessment matters already proposed. Accordingly, I do not recommend any amendments to PC47 in response to this evidence.

2.2 EVIDENCE OF JADE WIKAIRA AS IT RELATES TO MPZ-P6

11. I agree with the intent of the changes proposed to MPZ-P6 by Ms Wikaira. The proposed changes better reflect the intent of the policy by focussing on the positive effects of enhancement activities that may be undertaken on the site. I have recommended additional amendments to what has been proposed to further clarify that the focus of the policy is to recognise landowner initiatives and their positive benefits to the environment. Referencing back to the MPS rather than the zone generally also focusses the activities to the relevant site.
12. I recommend that MPZ-P6 be amended as follows:

Recognise and provide for the positive effects of any landowner initiated ~~those~~ activities in ~~Māori Purpose Zones~~ a MPS to ~~which will result in an~~ enhancement of the natural environment including freshwater quality.

2.3 Evidence of George Asher as it relates to Te Kaupapa Kaitiaki

- 1 Mr Asher seeks the insertion of a new objective requiring the Māori Purpose Zone to recognise and provide for the vision, objectives, values and desired outcomes of Te Kaupapa Kaitiaki in accordance with section 181 of the Ngāti Tūwharetoa Claims Settlement Act 2018.

- 2 I acknowledge the importance of Te Kaupapa Kaitiaki and note that it is already recognised within the Strategic Directions chapter of the District Plan. The relationship between Te Kaupapa Kaitiaki and the proposed Māori Purpose Zone was also considered through the Section 32 evaluation undertaken for PC47.
- 3 In my view, the relief sought is not necessary to achieve the purpose of the Māori Purpose Zone. The Māori Purpose Zone has been developed to enable landowners of MPS to use and develop their land for a range of cultural, social, economic and traditional purposes in a manner that reflects their aspirations as Māori landowners. It is not intended to operate as a catchment management framework or to replicate broader strategic provisions already contained elsewhere in the District Plan.
- 4 Te Kaupapa Kaitiaki is a comprehensive catchment-wide planning framework that addresses a broad range of matters including integrated catchment management, water quality, biodiversity, natural hazards, climate resilience and community wellbeing. These matters extend well beyond the purpose and scope of the Māori Purpose Zone and are more appropriately addressed through the District Plan's Strategic Directions and other plan provisions. As noted in the purpose of Section 6 – Matters of Strategic Direction:

For the purposes of preparing, changing, interpreting and implementing the District Plan, all other objectives and policies in all other parts of this Plan are to be read and achieved in a manner consistent with the objectives and policies that form these strategic directions.

The policies contained within this chapter have a dual purpose. The policies must deliver the Strategic Objectives and can also be applied directly in the consideration of resource consent applications where there is a requirement to consider District Plan policy.

The provisions within Section 6 have statutory weight and can be applied in the application of the wider plan provisions.

- 5 I am also concerned that introducing a broad objective requiring decision-makers to recognise and provide for all aspects of Te Kaupapa Kaitiaki within the Māori Purpose Zone could create uncertainty regarding the matters to be considered during resource consent processes. This may have the unintended consequence of increasing the complexity and cost of obtaining approvals within the zone, which would be inconsistent with one of the key purposes of PC47, namely, to provide a more enabling and efficient planning framework for Māori land development.
- 6 For these reasons, I do not support the addition of the proposed objective.

3. NATIONAL ENVIRONMENTAL STANDARDS FOR PAPAKAINGA

13. Since the completion of the Section 42A Report, the Resource Management (National Environmental Standards for Papakāinga) Regulations 2026 (NES-P) have been gazetted and will come into force on 2 July 2026. The Hearing Panel is therefore required to have regard to the implications of the NES-P when considering PC47.

14. Having reviewed the NES-P and associated guidance material, it is my view that the NES-P is generally consistent with the overall intent and direction of PC47. Both instruments seek to reduce planning barriers associated with the use and development of Māori ancestral land, provide greater opportunities for papakāinga development, and better enable Māori communities to provide for their social, cultural and economic wellbeing.
15. The NES-P establishes a nationally consistent framework for papakāinga development on Māori ancestral land. It provides for papakāinga developments of up to 10 residential units as a permitted activity within Māori Purpose Zones, rural zones and residential zones, subject to specified standards and other applicable district and regional plan provisions. Larger developments are generally provided for as restricted discretionary activities up to 30 residential units, with developments exceeding 30 residential units requiring discretionary activity consent.
16. In my opinion, the proposed Māori Purpose Zone remains both relevant and appropriate notwithstanding the introduction of the NES-P. While the NES-P provides a nationally consistent baseline for papakāinga development, PC47 performs a broader function by establishing a dedicated zoning framework that provides for a wider range of Māori purpose activities, including community, educational, cultural, commercial and economic development activities. The zone also recognises the specific aspirations of those Māori landowners who sought inclusion within the Māori Purpose Zone through the Schedule 1 process.
17. I also note that the NES-P specifically recognises Māori Purpose Zones and generally relies upon district plan standards relating to matters such as building height, setbacks, earthworks, natural hazards, infrastructure, transport, noise and other district-wide controls. Consequently, most of the provisions proposed through PC47 will continue to operate alongside the NES-P.
18. Based on my review, I do not consider that the introduction of the NES-P requires any fundamental reconsideration of the objectives, policies or overall structure of PC47. The proposed Māori Purpose Zone remains an appropriate and effective planning framework for the identified sites.
19. However, there are aspects of the proposed rule framework that may now be more restrictive than the nationally enabled development outcomes provided through the NES-P. For example, the NES-P provides for papakāinga developments of up to 10 residential units as a permitted activity on eligible Māori ancestral land within Māori Purpose Zones, rural zones and residential zones, whereas PC47 proposes a limit of 15 dwellings per Māori Purpose Site where the site has a nominal allotment of less than 2 hectares, with any exceedance requiring resource consent. Similarly, the NES-P establishes a nationally consistent restricted discretionary activity pathway for papakāinga developments containing between 11 and 30 residential units, whereas PC47 relies on a more general restricted discretionary framework triggered by non-compliance with the zone standards. The NES-P also limits the range of district plan provisions that may apply to papakāinga developments and specifically identifies the matters that

continue to be regulated through district plans. In contrast, PC47 applies the full suite of Māori Purpose Zone provisions in addition to a range of district-wide standards and controls.

20. Notwithstanding these differences, I do not consider that they warrant substantive amendments to PC47 through the current hearing process. The NES-P has only recently been gazetted and its practical implementation within the Taupō District planning framework has not yet been tested. Furthermore, where any inconsistency exists between the NES-P and the District Plan, the provisions of the NES-P will prevail. Any detailed review of the interaction between the NES-P and the District Plan would be more appropriately undertaken through a future district plan update once implementation experience has been gained and any consequential amendments required by the NES-P can be considered comprehensively across the District Plan.
21. Accordingly, while the introduction of the NES-P reinforces the need for a planning framework that supports Māori development, it does not alter my overall recommendations on PC47. The proposed Māori Purpose Zone continues to provide a locally tailored framework that complements and sits alongside the nationally consistent direction now established through the NES-P.

4. QUESTIONS FROM THE HEARING PANEL

22. After the publication of the S42A report, three questions were received from the hearing panel by email with the suggestion that they are addressed in the opening of the hearing. I have set out each of these questions and my response below:

4.1 Question 1: Why was a Māori Purpose Zone used rather than precincts?

23. The use of precincts was considered during the early development of PC47. However, the preferred approach was to establish a Special Purpose Zone rather than apply precinct provisions to existing zones.
24. The rationale for this approach was that the purpose of the proposal was not simply to modify or refine the outcomes anticipated within existing zones, but rather to provide a distinct planning framework that recognises the unique cultural, social and economic aspirations associated with Māori land and Māori communities. In this respect, the proposal sought to establish a separate zone with its own purpose, objectives, policies and development framework.
25. The National Planning Standards contemplate both precincts and Māori Purpose Zones. The Planning Standards identify precincts as:

A precinct spatially identifies and manages an area where additional place-based provisions apply to modify or refine aspects of the policy approach or outcomes anticipated in the underlying zone(s).

Importantly the precincts are still subject to the objectives and policies of the underlying zone, the majority of which are not relevant or may seek an outcome that may not support Māori

cultural needs. By contrast, the Māori Purpose Zone is identified as a Special Purpose Zone intended for areas used predominantly for activities that specifically meet Māori cultural needs.

26. In my view, the reference to activities that “specifically meet Māori cultural needs” reflects a distinct land use purpose that is fundamentally different from the purposes of the underlying residential, rural or other zones that would otherwise apply to the sites. While precincts can provide for place-specific outcomes through additional provisions, they are generally applied where the underlying purpose and anticipated outcomes of the base zone remain appropriate. In this case, the purpose of the land is not simply a variation of the underlying zone framework, but rather to provide for a unique range of activities and development outcomes that support Māori cultural, social and economic aspirations. A standalone Māori Purpose Zone more appropriately recognises and gives effect to that distinct purpose and clearly signals the intended function of the land. Accordingly, the objectives of PC47 are better achieved using a Special Purpose Zone rather than a precinct overlay applied to existing zones.
27. The approach adopted is also consistent with other district plans that have implemented Māori Purpose provisions following the National Planning Standards, including the New Plymouth and Porirua district plans, both of which utilise a Māori Purpose Zone rather than precinct-based provisions.
28. While this assessment was undertaken during development of the proposal, I acknowledge that the consideration of precincts as an alternative planning mechanism was not explicitly recorded within the section 32 evaluation.

4.2 Question 2: How does the proposal satisfy clause 8.3 of the National Planning Standards?

29. Clause 8.3 of the National Planning Standards provides that an additional Special Purpose Zone should only be created where the proposed land use activities or anticipated outcomes are significant to the district, region or country, and where they are impractical to manage through another zone or through a combination of spatial layers.
30. In my opinion, those tests are satisfied in this instance.
31. Firstly, enabling the use and development of Māori land in a manner that supports Māori cultural, social and economic wellbeing is a matter of significance within the Taupō District. This is reflected through the district’s significant Māori land ownership patterns, the importance of Māori land to tangata whenua, and the direction contained within the Operative District Plan strategic framework Specifically TW-O4 which states:

Support development on Māori land that meet the needs of those landowners and respects the exercise of kaitiakitanga, self-determination and the relationship of tangata whenua with their land, water, significant sites and wāhi tapu.
32. Secondly, I do not consider that the outcomes sought through PC47 could be effectively achieved through the application of existing zones. Existing residential, rural and commercial

zones are designed to achieve different land use outcomes and do not provide an appropriate policy framework for recognising the specific cultural purpose of these sites.

33. Thirdly, for the reasons outlined in response to Question 1, I do not consider that the use of precincts or other spatial layers would have adequately achieved the intended outcomes. Precincts are generally used to modify or refine the outcomes anticipated by an underlying zone, whereas PC47 seeks to establish a distinct planning framework centred on the use and development of Māori land.
34. The rationale for establishing a separate Māori Purpose Zone is also discussed in Key Issue 2 of the section 42A report, although I acknowledge that the assessment against the specific criteria in clause 8.3 of the National Planning Standards was not expressly set out in the section 32 evaluation.

4.3 Question 3: Why was the plan change publicly notified rather than limited notified under clause 5A of Schedule 1?

35. The option of limited notification under clause 5A of Schedule 1 was considered. However, public notification was considered the more appropriate process in this instance.
36. While PC47 includes the rezoning of several specific sites, the plan change is broader than a site-specific rezoning exercise. The primary purpose of PC47 is to establish a new Māori Purpose Zone framework within the District Plan, including a suite of objectives, policies, rules and assessment criteria that will apply to Māori Purpose Zones across the district.
37. Accordingly, the plan change introduces a new planning framework of district-wide relevance rather than simply making changes affecting a discrete group of landowners. The Council considered that public notification would provide the most appropriate opportunity for all interested parties, including tangata whenua, landowners, submitters and the wider community, to understand and comment on the proposed framework.
38. Public notification also aligned with the collaborative approach adopted during development of the plan change. Through the notification process, additional information, perspectives and site-specific matters were able to be raised and considered through submissions and further submissions, contributing to a more robust assessment of the proposed provisions. At the time of notification there was active engagement with hapu who were considering MPZ. A full notification process allowed them the opportunity to submit sites through that process.
39. While some submissions indicate there may have been confusion regarding the purpose and scope of the plan change, I remain of the view that public notification was appropriate given that PC47 establishes a new district-wide planning framework and associated zone provisions, rather than solely addressing matters affecting a limited number of identified properties.

5. ADDITIONAL CHANGES PROPOSED TO MPZ-R3 S6

40. Through the review of the NES-P and feedback from Taupō District Council planning staff, it has been identified that S6 refers to 'dwellings' which is not a term defined in the Taupō District

Plan (TPD). The TPD instead uses 'Residential Unit' which is defined in Section 3.1 Interpretation of the TDP. This term is also used in the NES-P, specifically and relevantly in Section 5 (2) as it relates to papakāinga development.

41. The proposed change is as follows:

S6 Number of ~~Dwellings~~ residential units per MPS

42. This change does not change the intent, scope or meaning of the standard and will support its clear application by referring to a defined term. Section 3.1 defines Residential Unit as follows:

means a building(s) or part of a building that is used for a residential activity exclusively by one household, and must include sleeping, cooking, bathing and toilet facilities.

The term is used elsewhere in the plan, including within the General Rural Zone to manage the density of residential development in that zone.

43. There is scope for this amendment from those submissions which requested changes to the standard generally. These submissions are referenced in the running text.

6. OVERALL CONCLUSION

44. Having considered the submissions, further submissions, evidence filed by submitters, the recently gazetted National Environmental Standards for Papakāinga and the matters raised by the Hearing Panel, my overall recommendation remains unchanged. Subject to the amendments recommended in the Section 42A Report and this Addendum, I consider that PC47 represents an appropriate and effective planning framework to provide for the use and development of the identified Māori Purpose Sites.