

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of a hearing on submissions to Plan
Change 19 of the Central Otago District
Plan (Stage 2 – Zoning)

**STATEMENT OF EVIDENCE OF MR JAKE WOODWARD (PLANNING) ON BEHALF
OF JOHN ELLIOT (SUBMITTER 19/81)**

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1.0 Introduction

- 1.1 My name is Jake Woodward. I am an independent resource management planning consultant based in Cromwell, Central Otago. I have over 11 years resource management experience, with the previous seven years working as a consultant in the Central Otago and Southern Lakes Districts. Prior to this, I worked at both Auckland Council and Queenstown Lakes District Council in various resource management planning roles.
- 1.2 I hold the qualifications of a Bachelor of Social Sciences Majoring in Environmental Planning and a Post Graduate Diploma in Environmental Planning, both obtained from the University of Waikato. I am an associate member of the New Zealand Planning Institute.
- 1.3 Throughout my professional career, I have been involved in a range of resource consenting matters, particularly in relation to rural and urban land use consents and subdivisions, including large scale and contentious projects. I have made numerous appearances in front of various district Councils both as the Council reporting officer and as an independent planning witness.
- 1.4 I am generally familiar with the direction of growth and development in Central Otago more generally through my involvement in resource management matters over the past seven years practising in the District. This included providing planning evidence before independent commissioners on a range of high profile subdivisions including the subdivision of the Cromwell Top 10 Holiday Park (173 Lots) along with various rural and rural lifestyle subdivisions, and have been involved in extensive due diligence projects of varying scales.
- 1.5 I am very familiar with the Central Otago District Plan, including Proposed Plan Change 19 (PC19). I have advised and prepared submissions on behalf of a number of submitters, and have prepared and presented evidence in the Stage 1 (provisions) and now Stage 2 (rezonings) hearings.

Code of Conduct

- 1.6 Whilst this is not an Environment Court hearing I confirm that I have read and agree to comply with the Environment Court Consolidated Practice Note 2023 for expert

witnesses. I confirm that this statement is within my area of expertise except where stated otherwise. I have not omitted to consider material facts known to me that might alter or detract from the opinions I express in this statement of evidence.

Involvement in this project

1.7 In this matter, I have been engaged by John Elliot (Submitter 19/81) to prepare and file evidence in relation to Plan Change 19 of the Central Otago District Plan.

1.8 I am very familiar with the site in question having undertaken a number of site visits over the past few months. I am very familiar with the Ranfurly township and general surrounds having filed a number of resource consents in this area over the past several years, including infill subdivision within the township itself.

Documents Review

1.9 The documents I have reviewed in preparing this evidence are as follows:

- a. The notified Plan Change 19 documentation including the notified text, Council's Section 32 analysis and proposed amendments to the planning maps;
- b. The Cromwell Spatial Plan
- c. The Resource Management Act 1991
- d. The PORPS19 and the pORPS21.
- e. Relevant national policy statements including the National Policy Statement for Urban Development 2020 and the National Policy Statement Highly Productive 2022 (and associated implementation guide).
- f. The Council's section 42A report prepared by Ms Liz White and associated attachments for both Stage 1 and 2 (PC19).
- g. Submissions and further submissions.

Scope of evidence

1.10 My evidence is structured as follows:

- a. The background to the site, the submission and Council's subsequent recommendation
- b. I discuss the relevant Zoning "options"

- c. I set out the statutory tests for evaluating the options;
- d. I evaluate the options in accordance with the statutory tests; and
- e. I summarise my opinions with specific reference to Ms White's s42A recommendation.

2.0 Background

- 2.1 For the benefit of the commission, I have briefly described the site subject to this assessment, the submission in question, along with Council's recommendation in relation to that submission.

Site description

- 2.2 The submitter owns the majority of the land (the Site) bound by Caulfeild Street, Dungannon Street, and Northland Street, Ranfurly and comprised in Record of Title 616666. The total area of the Site is approximately 19 hectares. There are two unformed legal roads dissecting the site in an east to west fashion, being Welles Street and Knox Street.
- 2.3 As well as the Submitter's land, there are a number of other land parcels that are bound by Dungannon, Northland, Caulfield and Knox (unformed) Streets which collectively forms part of the immediate receiving environment. These are:
- a. 35 Caulfeild Street;
 - b. 39 Dungannon Street;
 - c. Lots 1 and 2 DP 301133; and
 - d. 32 Northland Street
- 2.4 The Site is largely characterised by gently undulating paddocks, fences, and shelterbelts. A single residential dwelling occupies a portion of the eastern end of the Site, with access for this dwelling achieved from Dungannon Street. A small water course dissects the site in a north-south fashion. The remainder of the Site is primarily used for low intensity grazing, lucern and hay.
- 2.5 The Site is located centrally within the relatively well-defined limits of the Ranfurly township. The extent of the Ranfurly township itself can be defined by Goff Road/State

Highway 85 to the north, Stuart Road/State Highway 85 to the west, and Tyrone Street to the east. Beyond the extent of these border roads is that of the Rural Resource Area.

- 2.6 The site is located within close proximity (walking distance) to the Maniototo Area School (ranges from new entrants to Year 13), within 350 metres from the Business Resource Area (Ranfurly town centre) and is approximately 450 metres from the Ranfurly Hospital/Rest Home.
- 2.7 Council services including water, wastewater and stormwater are located immediately in front of the Site along Northland Street, Caulfeild Street and Dungannon Street.
- 2.8 Aside from a small strip of land adjoining Caulfeild Street which is zoned “Residential Resource Area” under the operative Central Otago District Plan, the remainder of the Site as detailed above is zoned, “Rural Resource Area [Residential Notation]” (or Rural Residential as described in my evidence).

PC19 Overview

- 2.9 PC19 has been driven by, and is intended to implement the direction set out in, the Vincent and Cromwell Spatial Plans, in relation to the District’s residential areas. These plans have been prepared by the Council to respond to demand for residential land and housing affordability concerns in the District, and in order to plan for the anticipated growth over the next 30 years¹.
- 2.10 PC19 involves aligning the existing Residential Resource Areas with the National Planning Standards, identification of new residential areas, and Future Growth Areas. The proposed Zonings under PC19 are as follows:
 - a. Medium Density (MRZ) – 200m² minimum Lot Size
 - b. Low Density (LRZ) - 500m² minimum Lot Size
 - c. Large Lot (LLR) – 2,000m² minimum Lot size
 - d. Large Lot (Precinct 1) (LLR(P1)) – 1,000m² minimum Lot size
 - e. Large Lot (Precinct 2) (LLR(P2)) – 3,000m² minimum Lot size; and
 - f. Large Lot (Precinct 3) (LLR(P3)) – 6,000m² minimum Lot size.

¹ PC19 s32 Report [4].

- 2.11 PC19 does not identify any additional growth areas for residential activities in Ranfurly. The Growth Projections (April, 2022) prepared by Rationale which informs PC19 suggests only a small amount of growth in Ranfurly over the medium to long term with the average annual rate of increase in population being around 1.4%.
- 2.12 For Ranfurly, PC19 simply seeks to reclassify the current Residential Resource Area Zone with that of the LRZ Zone. Pending the outcome of the minimum density, PC19 would increase the minimum allotment size in the residential zone from what is currently 250m², to either 400m² or 500m².

The submission

- 2.13 The Submitter's original submission on Plan Change 19 sought the extension of the LRZ to encompass the entirety of the subject site. The submitter intends to develop the land from Caulfeild Street to Knox Street for residential purposes, and to provide for a retirement village on the land north of Knox Street. The submitter detailed in their submission their support to provide for retirement villages in the LRZ under proposed Rule LRZ-R12.

Section 42A Report

- 2.14 Council's consultant planner, Ms Liz White, has undertaken a review of all of the relevant submissions relating to PC19 and details her recommendations in the Section 42A report, dated 1 May 2023.
- 2.15 In reviewing Ms White's recommendation, Ms White concludes the following in relation to Submission 19/81:
- a. From an urban form perspective, Ms White agrees with the submission that the current boundary between the residential and rural area appears arbitrary, and the current boundary is further south than on the eastern and western sides. Ms White considers that there is merit in rezoning the full area north of Caulfield Street until at least the unformed portion of Welles Street as this results in a more consistent urban/rural boundary and allows for some opportunities for further residential development of the township in a location where this is consistent with the surrounding area.

- b. Ms White considers zoning the land north of Welles Street to Knox street, is “finely balanced” on the basis that this would extend the urban boundary slightly further north than the site to the west, and consider that while generally appropriate location for growth, it has not been demonstrated that this amount of land is required to meet demand.
- c. In terms of the land north of Knox Street, Ms White considers this land is not appropriate to re-zone at this time due to the proximity to the current Industrial Resource Area.
- d. Ms White notes that Council’s Three Waters Director, Ms Julie Muir has reviewed the submission and confirms that while the Ranfurly wastewater scheme has capacity to accommodate further growth, there are potential uncertainties with regard to water supply. Ms Muir confirms that water supply is available if the land was zoned LRZ from Caulfeild Street up to Welles Street, but beyond this was “uncertain”. Ms Muir in her evidence, confirms that Council is currently developing a business case to consider options for future supply and treatment of water for Ranfurly.

2.16 Ms White concludes by recommending the land between Caulfeild Street and Welles Street is re-zoned LRZ, while the land north of Welles Street is retained as per the current zone, being Rural Residential Resource Area.

3.0 The relevant Zoning options

3.1 In this matter, there are three options presented to the Commission for consideration. These are:

- a. Option A: The status quo being the current Central Otago District Plan zoning, being the **Rural Residential Resource Area**²; or
- b. Option B: The submitter’s requested Zoning, the **Low Density Residential Zone (LRZ)**;
- c. Option C: In response to Ms White’s assessment, a possible Option C is presented, which is premised on the basis of new information relating to

² Noting that there is presently a thin strip of land adjoining Caulfeild Street which is Zoned Residential Resource Area under the Operative Plan.

servicing constraints. Option C would be the adoption of the LRZ recommendation for the land between Caulfeild Street to Welles Street and a Future Growth Overlay (FGO) for the land from Welles Street to the north.

3.2 I briefly describe the available options in further detail as follows:

Option A – Status Quo - Rural Residential Resource Area

3.3 Under the current Central Otago District Plan, the Site is predominantly Zoned Rural Resource Area [Residential Notation] with a small area of the Site that adjoins the north side of Caulfeild Street being Zoned as Residential Resource Area.

3.4 The site is bound by the Residential Resource Area to the south, west and partially the east. The northern extent of the site is bound by the Industrial Resource Area. The remainder of the site is bound by the Rural Residential Notation (Refer to Figure 1 below):

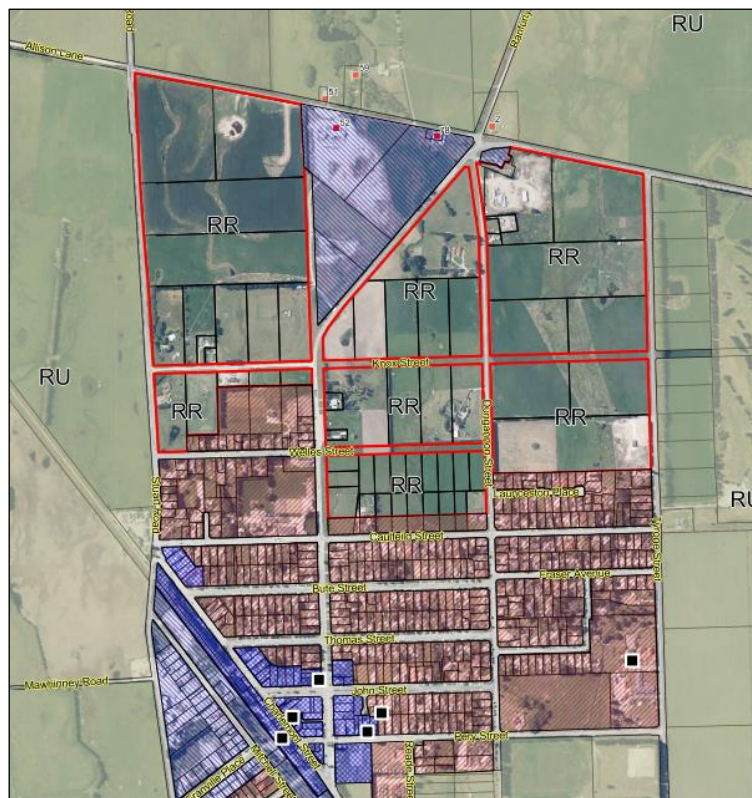


Figure 1: Extract of Planning Maps illustrating Zones.

3.5 While residential activities are permitted in the Residential Resource Area that relates to the southern extent of the Site, the Zone³ pertaining to the remainder of the Site provides for residential living as a controlled activity⁴. Similarly, subdivision of the Site is provided for as a controlled activity⁵ so long as the average allotment area across the subdivision does not fall below 2 hectares. There are no minimum allotment sizes in the [Rural Residential] Area.

Option B – Low Density Residential Zone

3.6 Plan Change 19 seeks to update the existing residential resource areas in the District with new zonings in line with the National Planning Standards. For Ranfurly, PC19 seeks to amend the zoning from what is currently, Residential Resource Area, to Low Density Residential Zone.

3.7 Option B is the initial relief sought in that the Submitter seeks to extend the proposed LRZ to encompass the entire subject site.

3.8 The LRZ provides for residential activities as a permitted activity⁶. Under the notified PC19 provisions, the zone provides for a residential density with allotment sizes of no smaller than 500m². Ms White's recommendation in her s42A report for Stage 1 recommends a density of 400m². A subdivision that complies with the minimum density is assessed as a restricted discretionary activity⁷ while non-compliance with the density triggers consideration as a Non-complying activity⁸.

Option C – Combination of Low Density Residential Zone with a Future Growth Overlay

3.9 Option C is promoted in response to Ms White's assessment detailed in the s42A report. This option would be the adoption of the LRZ zoning for the land between Caulfeild Street to Welles Street, recognising that the servicing arrangements have been confirmed by Council.

3.10 Due to the uncertainties of water supply pertaining to the land between Welles Street and Knox Street, a Future Growth Overlay (FGO-LRZ) is promoted in this area in that

³ Rural Resource Area [Residential Notation]

⁴ Rule 4.7.2(i).

⁵ Rule 4.7.2(ii)(a)(a).

⁶ Rule LLRZ-R1

⁷ Rule SUB-R4

⁸ Rule SUB-S1

it signals the appropriateness of this area for residential development, subject to suitable servicing capacity being confirmed.

- 3.11 For the land north of Knox Street, the submitter intends to develop this land for a retirement village. Retirement villages are provided for in the LRZ via Rule LRZ-R12 for a restricted discretionary activity. Recognising the uncertainties pertaining to water supply, an FGO-LRZ could equally apply to this land. Consideration was had to the application of a Special Zone – Retirement Village for the land north of Knox Street, however recognising such activities are provided for in the LRZ, the LRZ zone was preferred.
- 3.12 In order to respond to potential reverse sensitivity issues, a 10 metre Building Line Restriction (**BLR**) is promoted along Northland Street as it relates to the northernmost portion of the site. This is a mechanism typically employed in the Central Otago District Plan⁹ (such as along McNulty Road, Cromwell where the Residential Resource Area adjoins the Industrial Resource Area) and primarily relates to (setbacks) road corridors. However, this mechanism can be used to exclude “buildings” within specific areas generally. I include an updated planning map illustrating the changes at the end of my evidence.

4.0 The Statutory Tests

- 4.1 Various statutory tests are to be applied when considering the most appropriate provisions for the District Plan. The tests are summarised as follows:
- a. whether the provisions accord and assist the Council in carrying out its functions and achieve the purpose of the Act (section 74(1) of the Act);
 - b. whether the provisions accord with Part 2 of the Act (section 74(1)(b));
 - c. whether the provisions give effect to the regional policy statement (section 75(3)(c);
 - d. whether the provisions give effect to a national policy statement (s75(3)(a));
 - e. whether the provisions have regard to the actual or potential effects on the environment, including, in particular, any adverse effect (s76(3);
 - f. the extent to which the objectives are the most appropriate way to achieve the purpose of the Act (s32(1)(a));

⁹ Rule 12.7.7 of the District Plan.

- g. whether the policies and methods are the most appropriate way to achieve the objectives, having regard to their efficiency and effectiveness (s32(1)(b)) and taking into account (under s32(2):
 - i. the benefits and costs of the proposed policies and methods; and
 - ii. the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules of other methods.

4.2 Where changes are proposed to a proposal after the first section 32 evaluation has been undertaken (where changes are proposed to a notified plan change for example), a further evaluation of the changes is required under section 32AA. This further evaluation is only required in relation to the changes that are proposed to be made since the first evaluation report was completed.¹⁰ The further evaluation is to be undertaken in accordance with section 32(1) to (4) of the Act.

4.3 The assessment contained in my evidence addresses the changes proposed to PC19 since it was notified, namely the proposed rezoning of the Submitters' Site from Rural Resource Area [Residential Notation] to LRZ, and effectively comprises a section 32AA evaluation.

4.4 I assess each of the relevant tests above in the assessment to follow however for the benefit of the Commission, I begin my evaluation with an assessment on the higher order national policy statements (s75(3)(a)) and the extent to which these apply to the proposal in question.

5.0 Whether the provisions give effect to a national policy statement (s75(3)(a))

- 5.1 There are two national policy statements that are of relevance to this proposal;
- a. The National Policy Statement for Urban Development 2020 (NPS-UD); and
 - b. The National Policy State for Highly Productive Land (NPS-HPL)

NPS-UD

5.2 The NPS-UD applies to all local authorities that have all or part of an "urban environment" within their district or region, that is, Tier 1, 2 and 3 authorities.

¹⁰ Section 32AA(1)(b)

5.3 The NPS-UD lists Tier 1 and 2 authorities in an Appendix. Central Otago District Council is not listed as a Tier 1 or 2 authority.

5.4 Tier 3 authorities are more broadly defined as being (my emphasis added):

*“a local authority that has all or part of an **urban environment** within its region or district, but is not a tier 1 or 2 local authority...”*

5.5 The NPS-UD defines an “urban environment” as (emphasis added):

“any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that:

- (a) is, or is intended to be, predominantly urban in character; and*
- (b) is, **or is intended to be,** part of a housing and labour market of at least 10,000 people”*

5.6 The NPS-UD contains directives for Tier 1 and 2 authorities in relation to providing for urban growth in their districts. For Tier 3 authorities, it ‘strongly encourages’ them to do the things that Tier 1 and 2 authorities are obligated to do, and also contains some directives for these authorities. Broadly speaking, these include (relevantly):

- a. Providing sufficient development capacity for housing;
- b. Development is “plan-enabled”, either by being appropriately zoned for housing in the short term¹¹, or identified for future urban development for housing in the medium to long term¹²;
- c. Local authorities to be satisfied infrastructure to service development capacity is likely to be available.

5.7 A purpose of PC19 is to provide for predicted growth. I understand that the plan change is premised on the basis of catering for predicted population growth over and beyond the life of the District Plan (30 years), but that it does not take express account of the NPS-UD because the Central Otago District Council considers the District does not contain an “urban environment” as defined in the NPS-UD¹³.

¹¹ The NPS-UD defines short term as within the next 3 years.

¹² The NPS-UD defines medium term as within 10 years, and long term as between 10 to 30 years.

¹³ Paragraph 24, s32 Report.

- 5.8 In her section 42A report for Stage 1 of PC19, Ms White also assumes that the NPS-UD does not apply, however, seemingly on the basis of the advice provided to her by CODC, as she does not herself assess the NPS-UD¹⁴.
- 5.9 I consider that the Central Otago District Council is a Tier 3 local authority and that the NPS-UD does apply to this inquiry. I set out my reasoning in the paragraphs that follow.
- 5.10 I have reviewed the April 2022 Growth Projections prepared by Rationale (the 'April 2022 Report') which expands on Rationale's Housing and Business Capacity Assessment 2018 which underpins PC19 (noting however, that I have not seen a copy of the 2018 report as this is not publicly available). The April 2022 Report indicates that the collective "usually resident population" of Cromwell, Pisa Moorings and Bannockburn in 2021 was 8,090¹⁵. The Report projects that in 2024, this population is likely to be around 8,962, and by 2034, around 11,444 people. The Report details that in the Cromwell Ward, in the period of 2013 to 2020, the average annual growth rate was 4.6%¹⁶. Applying this annual growth rate to the 2021 figures suggests that Cromwell, Pisa Moorings and Bannockburn would reach a combined "usually resident population" of 10,000 people by 2027. Or, if a lower growth were applied, namely the lower 2.4% "short term forecast" growth rate¹⁷ detailed in the April 2022 Report, a usually resident population of 10,000 would be reached by 2029 across these three settlements (combined).
- 5.11 On the basis of the growth projections contained in the April 2022 report (low and medium projections) it is highly likely, (if not inevitable), that Cromwell, Bannockburn and Pisa Moorings will collectively reach a population of 10,000 people within the next 4 – 6 years.
- 5.12 The NPS-UD defines an urban environment as one that is either accommodating 10,000 people, or is *intended to* accommodate 10,000 people. The NPS-UD does not further define or explain the meaning of the word "intended" as it is used in the definition, and I consider there is no reason to depart from the ordinary meaning, which

¹⁴ Paragraphs 25-30, s42A Report, Stage 1

¹⁵ When combining Tables 5, 7 and 9 of the 2022 Growth Projections

¹⁶ 3.1.1, paragraph 1, Growth Projections 2022.

¹⁷ Refer to Table 6, Growth Projections 2022.

is “*expected to be such in the future*”.¹⁸ The April 2022 report indicates that while not at the threshold of 10,000 persons currently, the combined population of Cromwell, Bannockburn and Pisa Moorings is expected to reach and exceed 10,000 people within the short-medium term¹⁹, and during the life of the District Plan.

5.13 Under the NPS-UD, an “urban environment” is not to be limited to “size” or “statistical boundaries”, but comprises a “housing and labour market” of at least 10,000 people. Bannockburn, Lowburn and Pisa Moorings are all inherently serviced by the Cromwell township itself in terms of employment, schooling, amenities, and infrastructure²⁰. They are not self-sustaining settlements of themselves, but are logically all part of the same “housing and labour market” as the Cromwell township. The physical separation of these satellite settlements from the Cromwell township is due to established, existing activities (including longstanding orchards and vineyards) and/or physical features (slope, rivers, the lake etc) that physically separate these areas from the township itself, much as is the case for the areas of Queenstown such as Arthurs Point, Quail Rise, Shotover Country and Lakes Hayes Estate, which are all physically separated from Queenstown proper by some distance, but are all part of the same housing and labour market and are one urban environment (and all within one urban growth boundary).

5.14 Accordingly, on this basis that:

- a. The combined residential population of Cromwell, Bannockburn and Pisa Moorings will exceed 10,00 people within the next 4-6 years, which is within the life of the District Plan; and
- b. These three areas are part of the same housing and/or labour market;

5.15 I consider that the NPS-UD definition for an “urban environment” is met and that the Central Otago District Council is a Tier 3 authority for the purposes of the NPS-UD.

5.16 The objective and policy framework of the NPS-UD is therefore a relevant consideration in this inquiry.

¹⁸ Merriam Webster online dictionary: <https://www.merriam-webster.com/dictionary/intended#:~:text=%3A%20expected%20to%20be%20such%20in,%3A%20intentional>

¹⁹ Short-medium term is defined in the NPS-UD as within the next 10 years.

²⁰ Paragraph 38, Ms Julie Muir’s evidence

5.17 I have undertaken an assessment of the relevant provisions of the NPS-UD attached in **Appendix [A]**. In summary, my findings are as follows:

- a. Objective 2 seeks to “improve” housing affordability which is further informed by Policy 1(a) which, “as a minimum”, requires territorial authorities to enable a variety of homes that meet the needs, in terms of type, price, and location that meets the demand of different households. PC19 seeks to respond to growth projected over the next 30 years²¹. Council’s Section 32 report recognises the extensive growth in the existing main centres (Cromwell and Alexandra) yet fails to identify suitable land in smaller townships which can accommodate additional growth. While PC19 seeks to increase density in some areas of the District as well as unlocking selected rural land for residential purposes, PC19 has the consequential effect of precluding infill development in smaller settlements (including Ranfurly) by amending the current density of the Residential Resource Area (currently one dwelling per 250m²) to one dwelling/allotment per 500m². The typical allotment sizes within Ranfurly range from around the high 900m² to 1,000m². The provision of a 1:500m² density would preclude infill development of these sites where the minimum allotment will unlikely be met where the provision of a rear-driveway would be required to gain access to a rear Lot. In effect, the proposed changes to density will preclude any additional residential growth within the existing residential areas of Ranfurly, impeding any potential to accommodate future residential growth. The consequence of such approach results in ad hoc consenting which in turn leads to increase costs to implement (consenting and subdivision costs) which can impact on affordability. I consider the re-zoning will provide for supply which in turn may positively affect affordability, demand and variety.
- b. Objective 4 seeks New Zealand’s urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations. I consider that the re-zoning (or FGO) will ensure that Ranfurly is ready to respond to any changes that may occur over the next 30 years and responds to the changing needs of the community. As such, I consider Options B and C are most appropriate.
- c. Policy 8 requires local authorities to be responsive to plan changes that would add “significant development capacity” even if the development capacity is

²¹ Paragraph 4, Plan Change 19 – Residential Chapter Provisions Section 32 Evaluation Report

unanticipated or out-of-sequence with the planned release of land. My interpretation of this Policy is that Council are encouraged to take advantage of the opportunities being presented to them where private landowners willingly offer their land for residential development that would otherwise remain under-utilised. I consider that by failing to re-zone the site in question, has the consequence of resulting in inferior developments through consenting processes where otherwise appropriate.

- 5.18 I consider the application of the NPS-UD, an obligation for Tier 3 authorities, is better achieved by the re-zoning of the subject site.

NPS-HPL

- 5.19 Since the close of the initial submission period, the NPS-HPL was gazetted on 19 September 2022 and has since been in effect from 17 October 2022. The objective of the NPS-HPL is stated in Section 2.1 as follows (my emphasis added):

*“**Highly productive land** is protected for use in land-based primary production, both now and for future generations.”*

- 5.20 Before regionwide mapping of the “highly productive land” (HPL) is notified by the relevant Regional authority, the transitional definition of HPL as detailed in Clause 3.5(7) applies. This definition reads:

“(a) is

(i) zoned general rural or rural production; and

(ii) LUC 1, 2, or 3 land; but

(b) is not:

(i) identified for future urban development; or

(ii) subject to a Council initiated, or an adopted, notified plan change to rezone it from general rural or rural production to urban or rural lifestyle.”

- 5.21 I agree with Ms White that due to the site being located in the Rural Residential Resource Area, which is more akin to a “rural lifestyle” zone under the NPS, the NPS-HPL is not considered to apply.

Summary of NPS

5.22 The statutory test is whether the provisions give effect to the national policy statement under section 75(3)(a). Based on my evaluation, I consider that Option B does give effect to the relevant provisions of the NPS-UD while the status quo does not.

5.23 In terms of the NPS-HPL, the site is not zoned equivalent to Rural General or Rural Production and therefore an evaluation of that document is not considered necessary.

6.0 Whether the provisions have regard to the actual and potential adverse effects on the environment, including, in particular, any adverse effect

6.1 The most relevant categories of effects on the environment are as follows:

- a. Effects on landscape values and rural amenity values
- b. Effects on productive capacity of the subject site
- c. Reverse sensitivity effects
- d. Traffic and transportation effects
- e. Infrastructure and servicing effects
- f. Positive effects

Effects on landscape values and amenity values

6.2 The site is not subject to any specific landscape classification.

6.3 In terms of amenity values, amenity values are defined in the Act as, “...*those natural or physical qualities and characteristics of an area that contribute to people’s appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes*”.

6.4 Option A maintains the status quo and is unlikely to result in any change to amenity values.

6.5 In terms of Option B, the current residential zone boundary is considered to be illogical in the sense that it has simply been applied to the extent of existing residential activities. The site is bound by residential activities along the southern, western and partially along the eastern boundaries. Industrial activities form the northern extent of the site. I consider that while the site is currently characterised by open space, the

extension of the LRZ will not result in any undue adverse effects on rural amenity values given the visual containment that is achieved by the prevailing surrounding activities. Rather, the Site and its eventual development will read as a logical extension to that of the existing residential environment of Ranfurly.

- 6.6 Option C would essentially achieve the same outcome as Option B, albeit in a delayed manner.

Effects on productive capacity of the subject site

- 6.7 The current Zone, while allows for rural activities, cannot be utilised in an efficient or economically viable manner in any meaningful capacity for rural or horticultural use given the lack of access to water, infrastructure and prevailing reverse sensitivity constraints attributed to the Site's location within the existing urban fabric of Ranfurly. Further, the averaging regime that currently applies to the site results in an inefficient and inferior use of the land through allowing "some" residential infill which has the consequence of reducing productive capacity. It is considered most efficient to enable infill of the Site rather than provide for a lower density when there is little to no value in retaining any land for productive purposes.

Reverse sensitivity effects

- 6.8 At present, the transition from residential to rurally zoned land is defined by an arbitrary cadastral boundary. Reverse sensitivity effects have not resulted to date recognising that the rurally zoned land has not been utilised in a manner that would otherwise result in adverse effects on nearby residential activities. The lack of any "rural" use of the subject site is largely attributed to the constraints to these activities I have detailed earlier.
- 6.9 The extension of the Zone boundary would extend the interface of the residential Zone further to the north and nearer the industrial zoned land which formalises the northern extent of the township. I consider a BLR is an adequate mechanism for responding to reverse sensitivity by imposing a 10 metre restriction along Northland Street. Such an approach is already in practice in the District and a method that is implemented in the District Plan currently under Rule 12.7.7. The drafting of Rule 12.7.7 (in terms of the matters of discretion) appears to relate primarily to road corridors to which a breach to Rule 12.7.7 (where a building is located in the BLR) requires a restricted discretionary

activity consent²². However, the mechanism of a BLR is considered equally appropriate in ensuring a suitable setback is provided so to minimise potential reverse sensitivity effects from industrial activities. To ensure the effectiveness of Rule 12.7.7 as it relates to the Industrial Resource Area, an additional matter of discretion relating to reverse sensitivity would enable Council scope to consider reverse sensitivity on adjacent land uses, and not just roads, should a building be sought inside the BLR. I recommend the addition of the following wording to the matters of discretion under Rule 12.7.7(ii):

Council shall restrict the exercise of its discretion to the following matters:

- 1. The effect on the natural character of water bodies and their margins.*
- 2. The effect on amenity values of the neighbourhood in particular the character of the streetscape.*
- 3. The effect on the safe and efficient operation of the roading network.*
- 4. The effect on infrastructure.*
- 5. The effect on the safety of neighbours.*
- 6. The effects of noise from the operation of the roading network and compliance with AS/NZS 2107:2000.*

7. Reverse sensitivity in relation to Sec 30 BLK II Town of Ranfurly

Traffic and transportation effects

- 6.10 Option A would likely not result in any additional transport effects. Should consent be sought to develop the site in line with the current Zoning provisions, transport matters would be considered at that time.
- 6.11 In terms of Options B and C, while redevelopment of the site will in turn result in a greater degree of traffic, the level of traffic is expected to be consistent with the character of the LRZ and appropriate in maintaining residential amenities.
- 6.12 Detailed design around access and ensuring compliance with Council's roading standards can occur at detailed design stage for subdivision²³.

Infrastructure and servicing effects

²² Rule 12.7.7(ii).

²³ Matter of discretion 4 under Rule SUB-R4.

- 6.13 The site is located within the urban limits of the Ranfurly township and is supported by existing services and infrastructure located within the road reserves surrounding the site.
- 6.14 All future subdivision will be required to demonstrate adequate servicing both under the current Section 16 (Subdivision Chapter) of the District Plan and proposed Rule SUB-R4. As such, a further opportunity to detail the exact servicing arrangement and its suitability is afforded. Similarly, all subdivision consents are conditional on the requirement to ensure the proposed allotments are suitably serviced. In some instances, upgrades may be required and typically forms a condition of consent.
- 6.15 Ms Muir confirms that the site can be fully serviced for wastewater.
- 6.16 In terms of water, Ms Muir notes that the Ranfurly water supply does not meet the NZDWS for protozoa treatment and has had resilience issues during rain events and drought conditions. Ms Muir advises that Council is currently developing a business case to consider options for future supply and treatment of water for Ranfurly. This means there is limited ability to provide water supply to more properties in Ranfurly. Ms Muir confirms that while the area between Caulfield and Welles Street could be supplied water, capacity to supply of water to the area beyond Welles Street is uncertain. What is not clear from Ms Muir's advice is whether the capacity issues takes account the "downzoning" of the current Residential Resource Area that applies to Ranfurly. Under the current framework, the anticipated density of development is 250m² and therefore an existing level of demand is to be expected. With the downzoning of the residential Zone, the proposed extension of the Zone should effectively off-set the loss of development potential, and therefore the demand generated should be no greater than the yield removed from the down-zoning.
- 6.17 Should capacity issues be determined, Option C represents a better option in terms of deferring development partially, until such time a reliable water supply can be secured.

National Environmental Standard for Managing and Assessing Contaminants in Soils to protect human health (NES-CS)

- 6.18 Following a review of District Council and Regional Council database, the site is not identified as a HAIL site. Accordingly, it is appropriate to conclude that the submitter's land is not a HAIL site and therefore the NES-CS is not applicable.

Positive Effects

- 6.19 Option A would have a minor public benefit in retaining the land as open space, although at some point it is likely that a dwelling or subdivision in line with the controlled activity framework of the Rural Residential Area would likely change the current open space outlook across the Site.
- 6.20 Options B and C contributes, more so than Option A, to residential housing supply along with affordability of LRZ style allotments compared with the larger, lifestyle blocks that would result under Option A. Economic benefits would result in terms of employment associated with construction and redevelopment. Benefits for the community includes additional housing in close proximity to essential services, education and amenities within walking distance.

Summary of effects on the environment

- 6.21 The statutory test under section 76(3) is whether the provisions have regard to the actual or potential effects on the environment, including, in particular, any adverse effect.
- 6.22 The effects of the operative zoning (the status quo - Option A) are to be anticipated when taking account the range of activities that are anticipated in the Rural Resource Area. However, even permitted activities in the Rural Residential Resource Area can generate adverse effects on residential amenity values (reverse sensitivity).
- 6.23 Options B and C, although enabling more change, would have an acceptable level of effects when taking into account the assessment on the environment undertaken above. This effects assessment concludes that the adverse effects of re-zoning the land will be no more than minor, noting that Option B has more tangible positive effects than that of the status quo.
- 6.24 On balance, taking into account potential adverse and positive effects, I conclude that Option C is acceptable and is the most appropriate Option to adopt in this case.

7.0 Whether the provisions accord and assist the Council in carrying out its functions and achieve the purpose of the Act (section 74(1) of the Act)

- 7.1 The Council's functions are set out in section 31 of the Act and include, of relevance to this case, the establishment, implementation, and review of objectives, policies, and methods to achieve integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district²⁴; and the establishment, implementation, and review of objectives, policies, and methods to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district²⁵.
- 7.2 In relation to the integrated management of the use, development and protection of land and associated natural resources, it is considered that the location of the site within the urban limits of Ranfurly represents a logical solution to providing for growth. This is due to the site being able to efficiently utilise existing roading and infrastructure, maintains the amenity and character of the general urban form for Ranfurly and does not encroach beyond the town limits into rurally zoned farm land.
- 7.3 In relation to development capacity, Options B and C would contribute to the additional residential land supply in the District in a manner that does not result in an inappropriate degree of adverse effects on the environment. Option A being the retention of the Rural Residential Resource Area Zoning, does little in the way of contributing to development capacity due to the restrictions imposed on subdivision development generally within the Rural Residential Resource Area. Accordingly, Option B is considered superior in achieving Council's functions compared with the status quo.
- 7.4 For these reasons I consider that Option B and Option C generally accord and assist the Council in carrying out its functions under s31, in that it is more appropriate in relation to its contribution to housing supply.

8.0 Whether the provisions accord with Part 2 of the Act (section 74(1)(b))

Part 5

- 8.1 Part 5 of the Act states the purpose of the Act, being to promote the sustainable management of natural and physical resources. Sustainable management is further defined as:

²⁴ S31(1)(a)

²⁵ S31(1)(aa)

“...managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while—

- (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and
- (b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and
- (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.”

8.2 Retaining the status quo retains the Site as it appears today. As established, the land anticipates residential development albeit at a much reduced density. Coupled with the fragmentation created by the various paper roads that dissects the site, the site does not lend itself as a suitable farming unit.

8.3 The proposed re-zoning (Option B) on the other hand, represents a coherent and logical extension to an established residential environment such that the site represents an appropriate use of the land resource. The proposal accords to the Council’s obligations under the NPS-UD in terms of promoting sufficient development capacity. I note that PC19 as devised would largely preclude development in Ranfurly due to the downzoning promoted to the residential zone.

8.4 In my opinion, retaining a piece of land in its current state that offers no obvious or meaningful contribution to the wider primary production realm does not represent a sustainable use of a resource. I consider that the Site more appropriately lends itself to forming the logical extent of the existing Ranfurly township. Accordingly, I consider Option B more appropriately accords to Part 2 of the Act.

Part 6

8.5 Part 6 requires all persons exercising functions and powers under the Act, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for matters of national importance. There are no matters of national importance that are considered to apply.

Section 7

8.6 Section 7 requires all persons exercising functions and powers under the Act, to have particular regard to (where relevant):

(b) the efficient use and development of natural and physical resources:

(c) the maintenance and enhancement of amenity values:

(f) maintenance and enhancement of the quality of the environment:

(g) any finite characteristics of natural and physical resources

8.7 As I have described above in relation to Section 5 of the Act, the current Zoning for the site anticipates residential development albeit at a constrained and lower density. The site is fragmented generally due to the provision of internal legal (unformed) road reserves and is located generally within an urban context to represent a viable self-sustaining farming unit. As established, the site is appropriately located within the urban confines of the Ranfurly township that the re-zoning of the site to LRZ represents a logical outcome that is consistent with the immediate surrounding residential areas. I consider this represents a more efficient use of natural and physical resources in the context of s7(b).

8.8 Amenity values are defined in the Act as, *“those natural or physical qualities and characteristics of an area that contribute to people’s appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes”*. While the adoption of a residential Zone would result in a distinct change to the way the Site presently appears, such a change is not considered to be inherently adverse in terms of amenity values. One’s appreciation for a Site can have a significant degree of variability from person to person. In this instance, the Site does not represent any significant landscape or open space qualities that would otherwise warrant retention. The southern portion of the site represents a logical area for residential development recognising the centralised location of the site amongst the Ranfurly residential zone. The development of the site in accordance with the development standards for the LRZ Zone would remain sympathetic to the predominantly low density character that presently defines much of Ranfurly. As such, I consider Options B and C achieves Section 7(c) of the Act.

8.9 With respect to the maintenance and enhancement of the environment, the provision of residential development that can be suitably serviced and integrated into the receiving environment is not considered to be a degradation of the environment. All environmental effects can be suitably managed and are expected to do so by the various legislative requirements and standards that apply and imposed. Future

subdivision consents will equally require effects on the environment to be considered and suitably avoided, remedied or mitigated. Doing so would at the very least maintain environmental quality.

Section 8

8.10 In achieving the purpose of this Act, all persons exercising functions and powers under it, shall take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).

8.11 The public participatory process of Plan Change 19 seeks an opportunity for mana whenua to consider and submit on the process. No further submissions have been received in relation to this submission nor would such be expected in that the site is not known to hold any areas of wahi tapu or areas of cultural significant.

Summary of Part 2

8.12 The statutory test is whether the provisions accord with Part 2 of the Act, under s74(1)(b). From the foregoing evaluation I consider that Option B better achieves the purpose and principles of the Act because it can contribute to providing for public and private wellbeing, and can better sustain the potential of the land to accommodate residential growth while not generating any undue adverse effects on the environment.

9.0 Whether the provisions give effect to the regional policy statement (section 75(3)(c)) and have regard to any proposed regional policy statement (section 74(2)(a)(i))

9.1 There are two regional policy statements that are of relevance to this proposal:

- a. The Partially Operative Otago Regional Policy Statement 2019 (POORPS2019); and
- b. The Proposed Otago Regional Policy Statement 2021.

9.2 I have undertaken an analysis of the relevant provisions of each document in **Appendix [B]**. In brief, my findings are as follows:

- a. In terms of the elements of the RPS that relates to the soil resource, the site is not being used for any meaningful primary production other than low intensity grazing. The rezoning will not adversely affect the wider Rural

Resource Area that surrounds the township recognising that the site is firmly embedded within the urban limits of Ranfurly. As such, while urban development may result in the loss of productive use of the soil resources, the question then becomes whether the loss of the use of the soil resource in question outweighs the value to the wider economy of urban use. In my opinion, the loss of the productive capacity of the soil resources of this land is inconsequential in the wider issue of economic wellbeing of Ranfurly and the District. The site is currently subject to the Rural Residential Notation which affords a degree of residential development and subdivision as well as being fragmented by the unformed legal roads that dissect the site. For these reasons, I consider urban development of this site is more appropriate, in line with Options B and C.

- b. In terms of the RPS direction on considering economic and social wellbeing, Option A does not provide economic wellbeing to the same extent as Options B and C. Option B provides for economic and social wellbeing in the sense of providing residential capacity and is a more efficient use of the land resource, while adequately managing potential adverse effects on the environment. Option C is similar to Option B albeit deferred;
- c. With respect to the efficient and sustainable management of infrastructure and utilities, the LRZ and FGO-LRZ zoning would coordinate with infrastructure development such that infrastructure is provided in an efficient and effective way. Retention of the site as Rural Residential has the potential to result in inferior management and coordination of infrastructure through ad-hoc resource consenting development. In my opinion, Options B and C far outweigh Option A in terms of coordinating infrastructure and utilities.
- d. In terms of providing for urban growth, as I have detailed throughout, the site more appropriately lends itself to urban redevelopment as opposed to retaining as rural. The site forms a logical extension to the residential environment and promotes the various objectives and policies of the RPS in terms of the sustainable and efficient management of infrastructure, consideration of the most appropriate use of the land resource as well as considering effects on the environment. Both Options B and C better gives effect to providing for urban growth compared with Option A.

9.3 The statutory test is whether the provisions give effect to the RPS, under section 75(3)(c). The status quo provisions (Option A) in my view generally give effect to the relevant RPS provisions but do not address the RPS provisions to use resources sustainably to promote economic wellbeing by ensuring that there is sufficient housing land development capacity available. I consider that the extension of the LRZ (Option B) in the long term represents the appropriate use of the land in terms of the RPS, but recognise that a partial FGO to the areas that cannot be immediately service represents the most sensible outcome.

10.0 The extent to which the objectives are the most appropriate way to achieve the purpose of the Act (s32(1)(a))

10.1 The proposed objectives and policies as it relates to the LRZ has been assessed under s32(1)(a) in Council's s32 evaluation. I have reviewed this assessment and am generally in agreement in that the proposed policy framework are the most appropriate way to achieve the purpose of the Act.

10.2 I have assessed that Option B and C, extending the LRZ Zone to encompass the Submitter's land is more appropriate in achieving the purpose of the Act than that of the status quo.

11.0 Whether the policies and methods are the most appropriate method for achieving the objectives / efficiency and effectiveness / benefits and costs / risk of acting or not acting s32(1)(b))

11.1 I have evaluated the options in **Appendix [C]** in the context of the higher order (District Wide and Urban Areas Chapter of the District Plan). In terms of the objectives of PC19, for the purposes of my assessment, I consider it appropriate to assess the zoning options against the purpose of PC19 (refer section 32(6)), as an assessment against the LRZ objectives would be somewhat self-serving.

e. I consider that urban use of the land is a more sustainable use for the well-being of the Ranfurly township and provides for planned and managed growth within the urban limits of the township.

- f. Extending the Zone does not affect the character and amenity values found within the existing residential areas of Ranfurly which is consistent with Ms White's conclusions.
 - g. The land resources are not currently used, and have not been used for any meaningful productivity. While the redevelopment of the site for residential purposes would effectively remove any ability to utilise the land for primary production, I do not consider this to be of any particular consequence to the economic well-being of the District. The site is fragmented by existing paper roads and the Rural Residential Notation which anticipates residential activities.
 - h. The re-zoning would effectively change the landscape and visual amenities however this has been assessed as an appropriate change recognising that the site more appropriately responds to the residential environment.
- 11.2 With respect to the status quo (Option A), the costs include the unsustainable use of a land resource that serves no benefit to the community in terms of primary production and precludes housing. The benefits of Option A are considered limited to the retention of open space. The under-utilisation of the land resource is considered an inefficient outcome.
- 11.3 With respect to Options B and C, extending the LRZ Zone, there are no obvious costs in that the change in land use would not result in any greater loss of productive capacity than is presently the case and environmental effects can be mitigated. The benefits however are obvious in terms of providing additional residential capacity and better utilisation of the land resource. As detailed throughout, the residential use of the site is considered more efficient in the sense that the activity is a sustainable use of the land resources.
- 11.4 The statutory test under section 32 is whether the provisions are the most appropriate method for achieving the Plan's objectives, having regard to their efficiency and effectiveness and taking into account the benefits and costs of the proposed policies and methods; and the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules of other methods. Based on my evaluation above, I consider that Option C, incorporating the land into the LRZ with an FGO associated with servicing constrained areas, are appropriate and achieve the objectives of the Plan, and they better achieve this than Option A (retain the land as is) and Option B.

12.0 Summary and Conclusions

12.1 In summary, Ms White and I are in agreement that the site represents a logical expansion to the current zone boundary and that the rezoning of the land would be consistent with the urban form and character of the township²⁶. Where I disagree with Ms White is as follows:

- a. Ms White recommends that the area between the unformed legal roads of Welles Street and Knox Street as well as the area to the north of Knox Street remain as Rural Residential Resource Area at this time²⁷. The reasoning for this recommendation is understood to be due to:
 - i. This would result in the urban boundary being further north than it is to the west or east and therefore would not assist in better rationalising the current urban/rural boundary;
 - ii. would result in a much more intensive form of residential development being located near an area zoned industrial; and
 - iii. While Ms Muir confirms there is capacity to service the area for wastewater, water supply is currently uncertain.
- b. Recognising that the only physical constraint at this point in time from suggesting an extension to the Zone beyond Welles Street appears to relate to water supply, it is considered appropriate to apply a Future Growth Overlay to the balance of the site, providing certainty for future growth and facilitates the future planning of infrastructure and resources. It is understood from Ms Muir that Council is currently developing a business case to consider options for future supply and treatment of water for Ranfurly and therefore the identification of a Future Growth Overlay will inform these investigations and ensuring a suitable and resilient supply can be accounted for.
- c. Matters around reverse sensitivity can be managed through the provision of a BLR however this would require the implementation of an additional matter of

²⁶ Paragraph 273, s42A Report.

²⁷ Paragraph 276, s42A Report.

discretion under Rule 12.7.7 to ensure reverse sensitivity is adequately captured. I recommend the amendment to those matters as follows:

Council shall restrict the exercise of its discretion to the following matters:

- 1. The effect on the natural character of water bodies and their margins.*
- 2. The effect on amenity values of the neighbourhood in particular the character of the streetscape.*
- 3. The effect on the safe and efficient operation of the roading network.*
- 4. The effect on infrastructure.*
- 5. The effect on the safety of neighbours.*
- 6. The effects of noise from the operation of the roading network and compliance with AS/NZS 2107:2000.*

7. Reverse sensitivity in relation to Sec 30 BLK II Town of Ranfurly

- d. Accordingly, I consider Option C is the most appropriate use of the site at this time and I recommend that the planning maps are updated as follows (the blue represents a 10 metre BLR along Northland Street):



J Woodward
16 May 2023

Appendix [A]

Assessment of the relevant provisions of the National Policy Statements

National Policy Statement for Urban Development 2020

Provision Number	Provision Description	Option A	Option B	Option C
Part 2.1: Objectives				
Objective 1	New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The retention of the land as Rural does not give effect to this objective.	The location of the site forms a logical extension to the existing residential/urban environment in which it sits. I therefore consider the re-zoning better responds to Objective 1 compared with the status quo.	
Objective 2	Planning decisions improve housing affordability by supporting competitive land and development markets.	The retention of the land as Rural does not give effect to this objective.	<p>While Council may consider they are providing for development capacity through the up-zoning of existing residential sites throughout the District, PC19 has the consequential effect of “down-zoning” Ranfurly and precluding opportunities for future growth over the next 30 years.</p> <p>The consequence of such approach results in ad hoc consenting which in turn leads to increase costs to implement (consenting and subdivision costs) which can impact on affordability and availability. The current zone framework results in an inefficient use of the land by anticipating housing/subdivision, but at a density averaging 2 hectares per Lot. This results in under utilised land within the urban limits of Ranfurly.</p> <p>I consider the re-zoning will provide for supply on land which is otherwise underutilised. The supply and availability may potentially contribute to affordability.</p> <p>I consider that Options B and C better responds to this Objective compared with the status quo (Option A).</p>	

Objective 3	<p>Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:</p> <ul style="list-style-type: none"> (a) the area is in or near a centre zone or other area with many employment opportunities (b) the area is well-served by existing or planned public transport (c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment. 	The retention of the land as Rural does not give effect to this objective.	<p>A comprehensive analysis of the RPS and District Plan is included in the wider evaluation of this Plan Change.</p> <p>In terms of point (a), the subject site represents a logical and more efficient use of the land compared to the status quo recognising the site's location within and on the periphery of existing urban areas.</p> <p>In terms of item (b), the site can be efficiently serviced to Council's infrastructure given the proximity to the existing network. Option C has the added benefit of deferring growth until such time water resilience is achieved.</p> <p>In terms of item (c), there has been no evaluation on the growth of Ranfurly and therefore it is not possible to determine the "high demand" aspect. What can be concluded however, is that PC19 has the (potentially unintended) consequence of precluding future growth through the "down-zoning" of the residential areas and failing to identify additional growth areas. The site in question has been evaluated as an appropriate location in which to concentrate and direct future growth without generating any inappropriate degree of effects on the environment. The re-zoning is also assessed as being an efficient use of the land, more so than the current Zoning which is at present, under utilised or otherwise constrained.</p> <p>I consider these two Options are superior than that of Option A.</p>
Objective 4	New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.	The retention of the land as Rural does not give effect to this objective.	<p>Both Options B and C would result in a change to the site that would reflect the current density, amenity and character of the Ranfurly township as it appears today. These options have the added benefit of ensuring land is made available to respond to the diverse and changing needs of the community and future generations.</p> <p>I consider these two Options are superior than that of Option A which effectively precludes any ability to respond to the changing needs of the community, over time.</p>
Objective 5	Planning decisions relating to urban environments, and FDSs, take into account the principles	PC19 in terms of the public participatory process, enables engagement with Iwi to consider the submission raised. No submission has been received in relation to the relief sought.	

	of the Treaty of Waitangi (Te Tiriti o Waitangi).	All development on the site irrespective of the Zone that applies will require consideration of effects on the environment which would equally be of relevant in considering Kāi Tahu values and interests		
Objective 6	Local authority decisions on urban development that affect urban environments are: (a) integrated with infrastructure planning and funding decisions; and (b) strategic over the medium term and long term; and (c) responsive, particularly in relation to proposals that would supply significant development capacity.	Retention of the site may lead to ad-hoc growth through resource consents. Such an approach has the risk of disrupting the sustainable management of infrastructure.	The site is located within the general urban limits of Ranfurly and represents a logical expansion of the residential environment, facilitating efficient development of utilities. I consider Option B better gives effect to this Objective compared to the status quo as it facilitates considered and planned growth.	As with Option B although the provision of an FGO provides the benefit of directing and concentrating future infrastructure planning without putting unnecessary pressure on the network. This Option better responds to the strategic consideration of infrastructure over the medium and long term. I consider Option C is superior in this regard to the alternatives.
Objective 7	Local authorities have robust and frequently updated information about their urban environments and use it to inform planning decisions.	Not particularly pertinent to this application.		
Objective 8	New Zealand's urban environments: (a) support reductions in greenhouse gas emissions; and (b) are resilient to the current and future effects of climate change	I am not convinced that either option would effectively "support" the reduction in greenhouse gas emissions. However, re-zoning the site would consolidate urban growth within the confines of the Ranfurly township, and within walking distances to local amenities. This can in effect contribute, in a very small way, to reducing emissions.		
Part 2.2: Policies				
Policy 1	Planning decisions contribute to well-functioning urban environments, which are urban	While Council may consider they are providing for development capacity through the up-zoning of existing residential sites throughout the District, PC19 has the consequential effect of "down-zoning" Ranfurly and precluding opportunities for future growth over the next 30 years.		

	<p>environments that, as a minimum:</p> <ul style="list-style-type: none"> (a) have or enable a variety of homes that: <ul style="list-style-type: none"> (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms; and (b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and (d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and (e) support reductions in greenhouse gas emissions; and (f) are resilient to the likely current and future effects of climate change. 	<p>The consequence of such approach results in ad hoc consenting which in turn leads to increase costs to implement (consenting and subdivision costs) which can impact on affordability and availability. The current zone framework results in an inefficient use of the land by anticipating housing/subdivision, but at a density averaging 2 hectares per Lot. This results in under utilised land within the urban limits of Ranfurly.</p> <p>I consider the re-zoning will provide for supply on land which is otherwise underutilised. The supply and availability may potentially contribute to affordability.</p> <p>I consider that Options B and C better responds to this Policy compared with the status quo (Option A).</p>
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Policy 2	Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The retention of the land as Rural does not give effect to this objective.	As I have evaluated above, PC19 has the consequential effect of precluding growth in Ranfurly. In my opinion, the suggested re-zoning, achieves the intent of this Policy by ensuring that there is, "at least sufficient development capacity to meet expected demand". The intent of PC19 is to respond to growth over the next 30 years and while the demand may not be as significant in Ranfurly as other areas, it is prudent for Council to ensure they are in a position to provide for any growth that may occur. I consider Options B and C responds to this policy.
Policy 3	Only applies to tier 1	n/a	
Policy 4	Only applies to tier 1		
Policy 5	Regional policy statements and district plans applying to tier 2 and 3 urban environments enable heights and density of urban form commensurate with the greater of: the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or relative demand for housing and business use in that location.	The retention of the land as Rural does not give effect to this policy.	The LRZ zone which is promoted for the site is commensurate to the current character and amenity for Ranfurly. It maintains the predominantly low density and modest township character and is therefore the most appropriate zone in this regard. I consider Options B and C responds to this policy.
Policy 6	When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters: the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement that the planned urban built form in those RMA planning documents may involve significant changes	While the current land use and zone affords some amenity, this does not outweigh the benefits of urban development. I consider Options B and C are superior alternatives in this regard.	As above, the LRZ zone which is promoted for the site is commensurate to the current character and amenity for Ranfurly. It maintains the predominantly low density and modest township character and is therefore the most appropriate zone in this regard. This in turn will not detract from amenity values. Adverse effects associated with urban redevelopment can be appropriately mitigated through provisions of the LRZ zone and will not outweigh the benefits associated with the re-zone generally.

	<p>to an area, and those changes: (i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and (ii) are not, of themselves, an adverse effect the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity the likely current and future effects of climate change.</p>		
Policy 7	n/a	n/a	
Policy 8	<p>Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well functioning urban environments, even if the development capacity is:</p> <ul style="list-style-type: none"> (a) unanticipated by RMA planning documents; or (b) out-of-sequence with planned land release. 	<p>This is a critical policy that requires Council to be receptive to plan changes that are “unanticipated” and “out-of-sequence” with planned releases.</p> <p>Council have not identified any additional growth areas in Ranfurly.</p> <p>PC19 seeks to respond to growth projected over the next 30 years. Council's Section 32 report recognises the extensive growth in the existing main centres (Cromwell and Alexandra) yet fails to identify suitable land in smaller townships which can accommodate additional growth.</p> <p>While PC19 seeks to increase density in some areas of the District as well as unlocking selected rural land for residential purposes, PC19 has the consequential effect of precluding infill development in smaller settlements (including Ranfurly) by amending the current density of the Residential Resource Area (currently one dwelling per 250m²) to one dwelling/allotment per 500m².</p> <p>The typical allotment sizes within Ranfurly range from around the high 900m² to 1,000m². The provision of a 1:500m² density would preclude infill development of these sites where the minimum allotment will unlikely be met where the provision of a rear-driveway would be required to gain access</p>	

		<p>to a rear Lot. In effect, the proposed changes to density will preclude any additional residential growth within the existing residential areas of Ranfurly, impeding any potential to accommodate future residential growth.</p> <p>I consider that the proposed re-zoning offered under Options B and C are consistent with the intent of Policy 8 in that Council are afforded an opportunity to consider the merits of re-zoning the site in line with s32 of the Act and consider the most appropriate use of the site to meet future residential demand.</p>
Policy 10	<p>Tier 1, 2, and 3 local authorities:</p> <ul style="list-style-type: none"> (a) that share jurisdiction over urban environments work together when implementing this National Policy Statement; and (b) engage with providers of development infrastructure and additional infrastructure to achieve integrated land use and infrastructure planning; and (c) engage with the development sector to identify significant opportunities for urban development. 	<p>Pertinent insofar as requiring Council to engage with developers (item (c)) that have identified significant opportunities for urban development.</p>
Policy 11	<p>In relation to car parking:</p> <ul style="list-style-type: none"> (a) the district plans of tier 1, 2, and 3 territorial authorities do not set minimum car parking rate requirements, other than for accessible car parks; and 	<p>As a tier 3 authority, Central Otago District Council are not to set minimum carparks.</p>

	<p>(b) tier 1, 2, and 3 local authorities are strongly encouraged to manage effects associated with the supply and demand of car parking through comprehensive parking management plans.</p>	
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Appendix [B]

Assessment of the relevant provisions of the Otago Regional Policy Statements

Partially Operative Regional Policy Statement 2019

Provision Number	Provision Description	Option A	Option B	Option C
Chapter 1 – Resource management in Otago is integrated				
Objective 1.1	Otago's resources are used sustainably to promote economic, social, and cultural wellbeing for its people and communities	The land is currently under-utilised; it is not used for a productive purpose and has not been used for any meaningful production for many years. Given the location close to the existing urban boundary of Ranfurly, urban activities are a more sustainable use of the land for economic, social and cultural well-being. Given the existence of Option B, I consider that Option A does not achieve the objective.	I consider that the use of the land for residential development consistent with the adjoining residential environment, is a more appropriate use of the land resource and promotes the economic, social, and cultural wellbeing of the District more so than Option A.	As with Option B albeit deferred until such time the FGO is enacted.
Policy 1.1.1	Economic wellbeing - Provide for the economic wellbeing of Otago's people and communities by enabling the resilient and sustainable use and development of natural and physical resources.	The site in its current form does not contribute to the economic wellbeing of the community.	Option B would unlock the subject site, which is currently under-utilised, for residential purposes which in effect, contributes to the economic wellbeing of the District.	As with Option B albeit deferred until such time the FGO is enacted.
Objective 1.2	Recognise and provide for the integrated management of natural and physical resources to support the wellbeing of people and communities in Otago	The site in its current form would not support the wellbeing of the community.	Option B would unlock the subject site, which is currently under-utilised, for residential purposes which in effect, contributes to the wellbeing of the community through additional housing in an area considered most appropriate.	As with Option B albeit deferred until such time the FGO is enacted.

Chapter 2 – Kai Tahu values and interests are recognised and kaitiakitaka is expressed				
Objective 2.1	The principles of Te Tiriti o Waitangi are taken into account in resource management processes and decisions	PC19 in terms of the public participatory process, enables engagement with Iwi to consider the submission raised. No submission has been received in relation to the relief sought.		
Objective 2.2	Kāi Tahu values, interests and customary resources are recognised and provided for	All development on the site irrespective of the Zone that applies will require consideration of effects on the environment which would equally be of relevant in considering Kāi Tahu values and interests		
Chapter 3 – Otago has high quality natural resources and ecosystems				
Objective 3.1	The values (including intrinsic values) of ecosystems and natural resources are recognised and maintained, or enhanced where degraded	<p>The Rural Resource Area permits the land to be modified in any number of ways. Such development can have both positive and negative effects on ecosystems, depending on the specifics of the proposal. This site in particular has a Rural Residential Notation which anticipates residential activities and therefore rural use could be compromised further under the current framework.</p> <p>The site at present is not currently utilised for any specific purpose other than low intensity grazing. The site is fragmented in terms of the unformed legal roads that dissects the site.</p> <p>I consider that Option A can theoretically give effect to this Objective though active management of the land however the land is considered to be better utilised for residential purposes for the reasons</p>	<p>The site is modified and located within the urban limits of Ranfurly. The site is subject to low intensity grazing but otherwise does not contribute in any meaningful way to the overall economy of the District.</p> <p>The location of the site within the urban limits of Ranfurly represents a logical location in which to consolidate growth without sprawling into the surrounding rural areas. As such, it is my opinion that the residential zoning to the site represents an appropriate use of the land resource.</p>	As with Option B albeit deferred until such time the FGO is enacted.

		detailed throughout such that alternative Options B and C would on balance, be a better outcome.		
Chapter 4 – Communities in Otago are resilient, safe and healthy				
Objective 4.3	Infrastructure is managed and developed in a sustainable way	Retention of the site may lead to ad-hoc growth through resource consents. Such an approach has the risk of disrupting the sustainable management of infrastructure.	The site is located within the general urban limits of Ranfurly and represents a logical expansion of the residential environment, facilitating efficient development of utilities. I consider Option B better gives effect to this Objective compared to the status quo as it facilitates considered and planned growth.	As with Option B albeit deferred until such time the FGO is enacted.
Objective 4.5	Urban growth and development is well designed, occurs in a strategic and coordinated way, and integrates effectively with adjoining urban and rural environments	Retention of the site may lead to ad-hoc growth through resource consents. This has the consequence of resulting in potentially inferior development that has not be planned accordingly (such as infrastructure).	The site is located within the general urban limits of Ranfurly and represents a logical expansion of the residential environment, facilitating efficient development of utilities. I consider Option B better gives effect to this Objective and policy compared to the status quo as it facilitates considered and planned growth.	As with Option B albeit deferred until such time the FGO is enacted.
Policy 4.5.1	Providing for urban growth and development - Provide for urban growth and development in a strategic and co-ordinated way, including by: a) Ensuring future urban growth areas are in accordance with any future development strategy for that district. b) Monitoring supply and demand of residential, commercial and industrial zoned land; c) Ensuring that there is sufficient housing and business land development capacity available in Otago;	I consider Option A does not give effect to this Objective and associated policy.		

	<p>d) Setting minimum targets for sufficient, feasible capacity for housing in high growth urban areas in Schedule 6</p> <p>e) Coordinating the development and the extension of urban areas with infrastructure development programmes, to provide infrastructure in an efficient and effective way.</p> <p>f) Having particular regard to:</p> <ul style="list-style-type: none">i. Providing for rural production activities by minimising adverse effects on significant soils and activities which sustain food production;ii. Minimising competing demands for natural resources;iii. Maintaining high and outstanding natural character in the coastal environment; outstanding natural features, landscapes, and seascapes; and areas of significant indigenous vegetation and significant habitats of indigenous fauna;iv. Maintaining important cultural or historic heritage values;v. Avoiding land with significant risk from natural hazards; <p>g) Ensuring efficient use of land;</p> <p>h) Restricting urban growth and development to areas that avoid reverse sensitivity effects unless those effects can be adequately managed;</p>			
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	<p>i) Requiring the use of low or no emission heating systems where ambient air quality is:</p> <ul style="list-style-type: none"> i. Below standards for human health; or ii. Vulnerable to degradation given the local climatic and geographical context; <p>j) Consolidating existing coastal settlements and coastal urban areas where this will contribute to avoiding or mitigating sprawling or sporadic patterns of settlement and urban growth.</p>			
Policy 4.5.2	<p>Integrating infrastructure with land use - Achieve the strategic integration of infrastructure with land use, by undertaking all of the following:</p> <ul style="list-style-type: none"> a) Recognising and providing for the functional needs of infrastructure; b) Locating and designing infrastructure to take into account all of the following: <ul style="list-style-type: none"> i. Actual and reasonably foreseeable land use change; ii. The current population and projected demographic changes; iii. Actual and reasonably foreseeable change in supply of, and demand for, infrastructure services; iv. Natural and physical resource constraints; v. Effects on the values of natural and physical resources; vi. Co-dependence with other infrastructure; 	<p>Retention of the site may lead to ad-hoc growth through resource consents. This has the consequence of resulting in potentially inferior development that has not be planned accordingly (such as infrastructure).</p> <p>I consider Option A does not give effect to this Objective and associated policy.</p>	<p>The site is located within the general urban limits of Ranfurly and represents a logical expansion of the residential environment, facilitating efficient development of utilities.</p> <p>I consider Option B better gives effect to this policy compared to the status quo as it facilitates considered and planned growth. It assists the Council in being able to concentrate future development and planning efforts to areas that could accommodate future growth and therefore Option B is considered to give effect to this policy.</p>	<p>As with Option B although the provision of an FGO provides the benefit of directing and concentrating future infrastructure planning without putting unnecessary pressure on the network.</p> <p>I consider Option C is superior in this regard to the alternatives.</p>

	<p>vii. The effects of climate change on the long-term viability of that infrastructure;</p> <p>viii. Natural hazard risk.</p> <p>c) Coordinating the design and development of infrastructure with land use change in growth and redevelopment planning.</p>			
Policy 4.5.3	<p>Urban design - Design new urban development with regard to:</p> <p>a) A resilient, safe and healthy community;</p> <p>b) A built form that relates well to its surrounding environment;</p> <p>c) Reducing risk from natural hazards;</p> <p>d) Good access and connectivity within and between communities;</p> <p>e) A sense of cohesion and recognition of community values;</p> <p>f) Recognition and celebration of physical and cultural identity, and the historic heritage values of a place;</p> <p>g) Areas where people can live, work and play;</p> <p>h) A diverse range of housing, commercial, industrial and service activities;</p> <p>i) A diverse range of social and cultural opportunities.</p>	<p>The status quo does not enable a character of living consistent with the surrounding residential environment.</p> <p>I consider Option A does not particularly give effect to this policy but largely on the basis that the current Zone does not afford an urban level of density.</p>	<p>The rezoning would facilitate an extension to the existing residential environment of Ranfurly which will maintain character and amenity values through the application of the LRZ development standards. This will result in a sense of cohesion and consistency with the prevailing character and identity of Ranfurly.</p> <p>I consider Option B is superior to that of Option A.</p>	<p>As with Option B albeit deferred until such time the FGO is enacted.</p>
Chapter 5 – People are able to use and enjoy Otago’s natural and built environment				
Objective 5.3	Sufficient land is managed and protected for economic production	The site is not used for primary production other than low intensity grazing. The site does not contribute in any meaningful capacity to the District’s primary production economy base. The	As described throughout, the site is better suited, in my opinion, as the logical location in which to consolidate residential growth within the defined urban limits of Ranfurly. While the land would	As with Option B.

		<p>land is constrained in its ability to be utilise efficiently through the fragmentation afforded by the unformed legal roads and its proximity to the existing urban fabric of Ranfurly.</p> <p>I consider that Option A at least maintains the land for economic production but in taking an overall broad judgement approach, maintaining the land for primary production does not appear to be particularly sustainable for this purpose.</p>	<p>be removed from economic production, such a loss is considered immaterial in the context of its contribution to date, and recognising that the underlying zoning could be compromise as is under the current framework.</p> <p>I consider on balance, the land is better suited for residential.</p>	
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Proposed Otago Regional Policy Statement 2021

Provision Number	Provision Description	Option A	Option B	Option C
LF-LS – Land and soil				
LF-LS-O11 – Land and soil	The life-supporting capacity of Otago’s soil resources is safeguarded and the availability and productive capacity of highly productive land for primary production is maintained now and for future generations.	Retaining the land as Rural Resource Area would maintain the ability to undertake “permitted” farming activities. However, the site has to date, not functioned in any meaningful capacity to the primary production sector.	As described throughout, the site is better suited, in my opinion, as the logical location in which to consolidate residential growth within the defined urban limits of Ranfurly. While the land would be removed from economic production, such a loss is considered immaterial in the context of its contribution to date, and recognising that the underlying zoning could be compromise as is under the current framework.	As with Option B.
LF-LS-O12 – Use of land	The use of land in Otago maintains soil quality and contributes to achieving environmental outcomes for fresh water.	The current zoning anticipates residential development however the density criteria that applies to the Rural Residential Area impedes efficient redevelopment and can result in undesirable fragmentation of the land. This fragmentation is already somewhat prevalent due to the unformed legal roads that dissects the site.		
LF-LS-P19 – Highly productive land	<p>Maintain the availability and productive capacity of highly productive land by:</p> <p>(1) identifying highly productive land based on the following criteria:</p> <p>(a) the capability and versatility of the land to support primary production based on the Land Use Capability classification system,</p> <p>(b) the suitability of the climate for primary production, particularly crop production, and</p> <p>(c) the size and cohesiveness of the area of land for use for primary production, and</p>	The land is not defined as highly productive land.	I consider on balance, the land is better suited for residential.	

	<p>(2) prioritising the use of highly productive land for primary production ahead of other land uses, and</p> <p>(3) managing urban development in rural areas, including rural lifestyle and rural residential areas, in accordance with UFD–P4, UFD–P7 and UFD–P8</p>			
EIT – Energy, infrastructure and transport				
EIT-INF-P17	<p>Provide for development infrastructure and additional infrastructure required to service existing, planned and expected urban growth demands in the short, medium and long term, taking in account UFD–P1 to UFD–P10.</p>	<p>Retention of the site may lead to ad-hoc growth through resource consents. This has the consequence of resulting in potentially inferior development that has not been planned accordingly (such as infrastructure).</p> <p>I consider Option A does not give effect to this Objective and associated policy.</p>	<p>The site is located within proximity to existing urban infrastructure and transport links which can be upgraded where necessary to accommodate the growth generated by the proposed re-zone in order to achieve the demand generated.</p>	<p>As with Option B albeit deferred until such time the FGO is enacted.</p>
UFD – Urban form and development				
UFD-O2 – Development of urban areas	<p>The development and change of Otago’s urban areas:</p> <p>(1) improves housing choice, quality, and affordability,</p> <p>(2) allows business and other non-residential activities to meet the needs of communities in appropriate locations,</p>	<p>The retention of the status quo does not contribute to any of these matters.</p>	<p>The proposed re-zone facilitates the provision of housing choice and quality. The availability of sufficient supply can also contribute to general housing affordability through ensuring supply to meet demand.</p> <p>The extension of the Ranfurly residential area has been assessed as appearing as a logical and coherent association with the residential environment. I consider</p>	<p>As with Option B albeit deferred until such time the FGO is enacted.</p>

	<p>(3) respects and wherever possible enhances the area's history, setting, and natural and built environment,</p> <p>(4) delivers good urban design outcomes, and improves liveability,</p> <p>(5) improves connectivity within urban areas, particularly by active transport and public transport,</p> <p>(6) minimises conflict between incompatible activities,</p> <p>(7) manages the exposure of risk from natural hazards in accordance with the HAZ-NH – Natural hazards section of this RPS,</p> <p>(8) results in sustainable and efficient use of water, energy, land, and infrastructure,</p> <p>(9) achieves integration of land use with existing and planned development infrastructure and additional infrastructure and facilitates the safe and efficient ongoing use of regionally significant infrastructure,</p> <p>(10) achieves consolidated, well designed and located, and sustainable development in and around existing urban areas as the primary focus for accommodating the region's urban growth and change, and</p>		<p>this “respects the area’s history, setting, and natural and built environment” by extending the degree of development accordingly. I consider Option B will give effect to Objective UFD-O2(3).</p> <p>Good urban design outcomes can be achieved by ensuring appropriate design parameters that relate to the densities are promoted. The extension would provide for densities which are already demonstrated as appropriate. I consider Option B will give effect to Objective UFD-O2(4).</p> <p>The location of the site forms the extent of an urban network and within proximity to key transport links. While the District lacks public transport amenities, any introduction of these services within Ranfurly would equally serve the subject site. I consider Option B will give effect to Objective UFD-O2(5).</p> <p>The site currently forms an arbitrary termination point for the residential zone. It is considered most appropriate to define the extent of the residential environment to at least in line with the adjacent residential zone or by the unformed roading network.</p> <p>Residential use of the site will not be incompatible with the adjacent residential zone. Accordingly, it is unlikely the zone extension of the subject site will be incompatible with the surrounding environment. I</p>	
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	(11) is guided by the input and involvement of mana whenua.		<p>consider Option B will give effect to Objective UFD-O2(6).</p> <p>The extension of the Zone takes advantage of the existing services and infrastructure in the area which in turn gives effect to Objective UFD-O2(8) being the efficient use of infrastructure, UFD-O(9), integration of infrastructure.</p> <p>The proposal aligns entirely with Objective UFD-O2(10) in achieving consolidated and well-located development around existing urban areas.</p> <p>In analysing Objective UFD-O2 holistically, it is clear that Option B broadly aligns with the outcomes sought (by this objective). Accordingly, I consider Option B gives effect to UFD-O2.</p>	
UFD-P2 – Sufficiency of development capacity	<p>Sufficient urban area housing and business development capacity in urban areas, including any required competitiveness margin, is provided in the short, medium and long term by:</p> <p>(1) undertaking strategic planning in accordance with UFD-P1</p> <p>(2) identifying areas for urban intensification in accordance with UFD-P3,</p> <p>(3) identifying areas for urban expansion in accordance with UFD-P4,</p>	Retaining the status quo will not contribute to development capacity and does not give effect to UFD-P2.	<p>PC19 seeks to respond to growth projected over the next 30 years . Council's Section 32 report recognises the extensive growth in the existing main centres (Cromwell and Alexandra) yet fails to identify suitable land in smaller townships which can accommodate additional growth. While PC19 seeks to increase density in some areas of the District as well as unlocking selected rural land for residential purposes, PC19 has the consequential effect of precluding infill development in smaller settlements (including Ranfurly) by amending the current density of the Residential Resource Area</p>	As with Option B albeit deferred until such time the FGO is enacted.

	<p>(4) providing for commercial and industrial activities in accordance with UFD-P5 and UFD-P6</p> <p>(5) responding to any demonstrated insufficiency in housing or business development capacity by increasing development capacity or providing more development infrastructure as required, as soon as practicable, and</p> <p>(6) requiring Tier 2 urban environments to meet, at least, the relevant housing bottom lines in APP10.</p>		<p>(currently one dwelling per 250m²) to one dwelling/allotment per 500m².</p> <p>The typical allotment sizes within Ranfurly range from around the high 900m² to 1,000m². The provision of a 1:500m² density would preclude infill development of these sites where the minimum allotment will unlikely be met where the provision of a rear-driveway would be required to gain access to a rear Lot.</p> <p>In effect, the proposed changes to density will preclude any additional residential growth within the existing residential areas of Ranfurly, impeding any potential to accommodate future residential growth. The consequence of such approach results in ad hoc consenting which in turn leads to increase costs to implement (consenting and subdivision costs) which can impact on affordability. I consider the re-zoning will provide for supply which in turn may positively affect affordability, demand and variety.</p> <p>As such, I consider that the provision of extending the Zone (Option B) better aligns to the requirements of UFD-P2.</p>	
<p>UFD – P4 – Urban Expansion</p>	<p>Expansion of existing urban areas is facilitated where the expansion:</p>	<p>The status quo represents an arbitrary transition from the current Residential Resource Area and Rural Residential Resource Area. The interface</p>	<p>Option B is considered to give effect to Policy UFD-P4 by:</p> <p>(1) Subject to detailed design at the time of resource</p>	<p>As with Option B albeit deferred until such time the FGO is enacted.</p>

	<p>(1) contributes to establishing or maintaining the qualities of a well-functioning urban environment,</p> <p>(2) will not result in inefficient or sporadic patterns of settlement and residential growth,</p> <p>(3) is integrated efficiently and effectively with development infrastructure and additional infrastructure in a strategic, timely and co-ordinated way,</p> <p>(4) addresses issues of concern to iwi and hapū, including those identified in any relevant iwi planning documents,</p> <p>(5) manages adverse effects on other values or resources identified by this RPS that require specific management or protection,</p> <p>(6) avoids, as the first priority, highly productive land identified in accordance with LF-LS-P19,</p> <p>(7) locates the new urban/rural zone boundary interface by considering:</p> <p style="padding-left: 40px;">(a) adverse effects, particularly reverse sensitivity, on rural areas and existing or potential productive rural activities beyond the new boundary, and</p> <p style="padding-left: 40px;">(b) key natural or built barriers or physical features,</p>	<p>between the Zone is largely cadastral based compared with Option B which is more consistent with the prevailing residential areas.</p> <p>Retaining the status quo does not facilitate urban expansion and does not give effect to this policy.</p>	<p>consent, the provision of a subdivision comprised of a density consistent with the LRZ zone as illustrated by the wider Ranfurly township is considered to represent a well-functioning urban environment.</p> <p>(2) I do not consider the location of the site results in an inefficient or sporadic pattern of growth. Rather, the proposal represents a logical and coherent extension and will read in direct association with the existing residential environment.</p> <p>(3) The site is located at the extent of existing urban infrastructure which can be suitably upgraded and extended to accommodate the proposed development. I consider this supports the intent to efficiently utilise existing infrastructure to facilitate existing development capacity.</p> <p>(4) Iwi have been involved in the PC19 process to date.</p> <p>(5) The effects assessment herein considers effects on the environment associated with Option B can be suitably managed.</p>	
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	<p>significant values or features identified in this RPS, or cadastral boundaries that will result in a permanent, logical and defensible long-term limit beyond which further urban expansion is demonstrably inappropriate and unlikely, such that provision for future development infrastructure expansion and connectivity beyond the new boundary does not need to be provided for, or</p> <p>(c) reflects a short or medium term, intermediate or temporary zoning or infrastructure servicing boundary where provision for future development infrastructure expansion and connectivity should not be foreclosed, even if further expansion is not currently anticipated.</p>		<p>(6) The land is not “highly productive”.</p> <p>(7) The extent of the proposed Zone is considered to terminate at a logical and coherent point defined by a distinct topographical feature, compared with the existing zone interface which is largely arbitrary and cadastral.</p> <p>Policy UFD-P4 is key in recognising the fundamental resource management matters to take into account when considering urban expansion. I consider that the analysis above sufficiently demonstrates the appropriateness of the extension and therefore Option B is considered to give effect to these policies.</p>	
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Appendix [C]

Assessment of the options in relation to the relevant provisions of the “higher order” objectives and policies of the Central Otago District Plan

Table A

Provision Number	Provision Description	Option A	Option B	Option C
Section 12 – District Wide				
Objective 12.3.1	Safe and Efficient Roading Network - To promote the safe and efficient operation of the District's roading network.	No change.	The site is bound by a sufficient road corridor on all boundaries including existing unformed road corridors dissecting the site. This enables all roads to be designed and upgraded to Council's standards pending the level of densities proposed, promoting the safe and efficient operation of the road network.	As with Option B albeit deferred until such time the FGO is enacted.
Objective 12.3.4	Avoidance, Remediying or Mitigation of Nuisances - To ensure that activities avoid, remedy or mitigate nuisance to adjoining properties from odour, dust, lightspill, glare and electrical interference.	Retention of the site as Rural Resource Area maintains the risk of reverse sensitivity albeit farming of the site is already constrained and therefore reverse sensitivity unlikely to result.	Residential use of the site is consistent with the prevailing character of the surrounding residential environment. Option B achieves this Objective	As with Option B albeit deferred until such time the FGO is enacted.
Policy 12.4.1	Parking, Loading and Manoeuvring - To avoid, remedy or mitigate adverse effects on the safe and efficient operation of the roading network by requiring: (a) Safe and efficient access points to the roading network, and (b) Off-road loading and manoeuvring space and facilities, and (c) Off-street	Compliance with Council's standards for parking, access and loading will achieve this Policy.	Compliance with Council's standards for parking, access and loading will achieve this Policy.	Compliance with Council's standards for parking, access and loading will achieve this Policy.

	parking, where these are appropriate.			
Section 6 – Urban Areas				
Objective 6.3.1	Needs of People and Communities - To promote the sustainable management of the urban areas in order to: (a) Enable the people and communities of the district to provide for their social, economic and cultural wellbeing and their health and safety; and (b) Meet the present and reasonably foreseeable needs of these people and communities	While residential activities are anticipated, development is constrained due to the restrictive nature of subdivision. This precludes enabling the community to provide for their wellbeing and does not contribute to the foreseeable needs to the District. Option A does not give effect to this provision.	The re-zoning would facilitate residential growth in an area that is currently bound by existing residential activities. The site represents a logical location in which to consolidate and direct growth in a manner that is consistent with the prevailing character or Ranfurly while taking advantage of existing services and roading infrastructure. As such, I consider the re-zoning enables the community to provide for their wellbeing and does contribute to the foreseeable needs to the District. Option B gives effect to this policy.	As with Option B albeit deferred until such time the FGO is enacted.
Objective 6.3.2	Amenity Values - To manage urban growth and development so as to promote the maintenance and enhancement of the environmental quality and amenity values of the particular environments found within the District's urban areas.	Option A does not give effect to this policy as the retention of the Zone is likely to result in ad-hoc and unplanned development. In saying this, I note that ad hoc (resource consents) development would generally respond to matters around amenity values.	The re-zoning would facilitate residential growth in an area that is currently bound by existing residential activities. The site represents a logical location in which to consolidate and direct growth in a manner that is consistent with the prevailing character or Ranfurly I consider Option B maintains the quality and amenity of the environment.	As with Option B albeit deferred until such time the FGO is enacted.

Objective 6.3.3	Adverse Effects on Natural and Physical Resources - To avoid, remedy or mitigate the adverse effects of urban areas on the natural and physical resources of the District.	Retention of the site as Rural Resource Area maintains the risk of reverse sensitivity albeit farming of the site is already constrained and therefore reverse sensitivity unlikely to result. Notwithstanding, this Option does not give effect to this objective as efficiently as the alternative options.	Adverse effects associated with residential development are considered to be immaterial in the context of what is already the inner limits of the township. Residential use of the site is unlikely to generate adverse effects not anticipated by the Plan on the prevailing urban environment. Option B better gives effect to this option than the status quo.	As with Option B albeit deferred until such time the FGO is enacted.
Objective 6.3.4	Urban Infrastructure - To promote the sustainable management of the District's urban infrastructure to meet the present and reasonably foreseeable needs of the District's communities.	Retention of the site may lead to ad-hoc growth through resource consents. Such an approach has the risk of disrupting the sustainable management of infrastructure.	Wastewater has been confirmed as being capable to accommodate growth. Water is determined as being available for the southern portion of the site however is uncertain for the remainder. Promoting residential growth within the reticulated limits of the township gives effect to sustainable management of urban infrastructure by concentrating growth efforts to these areas. Option B gives effect to this objective	Recognising the water constraints, an FGO would defer development until such time capacity was confirmed. At the same time, the FGO directs a concentrated effort to the site and facilitates the sustainable management and planning of future infrastructure. Option C is considered to best give effect to this Objective.
Policy 6.4.1	Maintenance of Quality of Life within Urban Areas - To maintain and, where practicable, enhance the quality of life for people and communities within the District's urban areas through:	Retention of the site as Rural Resource Area maintains the risk of reverse sensitivity albeit farming of the site is already constrained and therefore reverse sensitivity unlikely to result.	Adverse effects associated with residential development are considered to be immaterial in the context of what is already the inner limits of the township. Residential use of the site is unlikely to generate adverse effects not anticipated by the	As with Option B albeit deferred until such time the FGO is enacted.

	<p>(a) Identifying and providing for a level of amenity which is acceptable to the community; and</p> <p>(b) Avoiding, remedying or mitigating the adverse effects on the community's social, economic and cultural wellbeing and health and safety which may result from the use, development and protection of natural and physical resources, and</p> <p>(c) Recognising that change is inevitable in the use of land to enable the community to provide for its wellbeing.</p>	<p>I consider the status quo does not give effect to this policy as well as the other Options.</p>	<p>Plan on the prevailing urban environment.</p> <p>Option B better gives effect to this option than the status quo.</p>	
<p>Policy 6.4.2</p>	<p>Expansion of Urban Areas - To enable the expansion of urban areas or urban infrastructure in a manner that avoids, remedies or mitigates adverse effects on:</p> <p>(a) Adjoining rural areas.</p> <p>(b) Outstanding landscape values.</p> <p>(c) The natural character of water bodies and their margins.</p> <p>(d) Heritage values.</p> <p>(e) Sites of cultural importance to Kai Tahu ki Otago.</p> <p>(f) The integrity of existing network utilities and infrastructure, including their safe and efficient operation.</p> <p>(g) The life supporting capacity of land resources.</p> <p>(h) The intrinsic values of areas of significant</p>	<p>Retention of the land as rural does not enable expansion of urban areas.</p> <p>On item (g), the land resources are not currently used, and have not been used for any meaningful productivity for many years. The foreclosure of the ability of the land to be used productively is of no particular consequence to the economic well-being of the District.</p>	<p>The re-zoning would facilitate residential growth in an area that is currently bound by existing residential activities. The site represents a logical location in which to consolidate and direct growth in a manner that is consistent with the prevailing character or Ranfurly while taking advantage of existing services and roading infrastructure.</p> <p>As such I consider the re-zone wholly gives effect to this policy.</p>	<p>As with Option B albeit deferred until such time the FGO is enacted.</p>

	indigenous vegetation and habitats of significant indigenous fauna.			
Section 13 – Infrastructure, Energy and Utilities				
Objective 13.3.1	Transportation Network – To enable the safe and efficient operation and development of the transportation network while ensuring that amenity values and environmental quality is maintained or enhanced.	Retention of the site may lead to ad-hoc growth through resource consents. Such an approach has the risk of disrupting the sustainable management of infrastructure.	The site is bound by a sufficient road corridor on all boundaries including existing unformed road corridors dissecting the site. This enables all roads to be designed and upgraded to Council’s standards pending the level of densities proposed, promoting the safe and efficient operation of the road network.	As with Option B albeit deferred until such time the FGO is enacted.
Objective 13.3.2	Utilities - To enable the efficient operation and development of utilities including the transmission network while ensuring that effects on amenity, heritage, landscape values and public safety are avoided, remedied or mitigated.	Retention of the site may lead to ad-hoc growth through resource consents. Such an approach has the risk of disrupting the sustainable management of infrastructure.	The site is located within the general urban limits of Ranfurly and represents a logical expansion of the residential environment, facilitating efficient development of utilities. I consider Option B better gives effect to this Objective compared to the status quo as it facilitates considered and planned growth.	As with Option B albeit deferred until such time the FGO is enacted.
Objective 13.3.5	Landscape and Amenity Values - To maintain and where practicable enhance rural amenity values created by the open space, landscape, natural character and built environment values of the District’s rural environment.	Option A would maintain the amenity values somewhat however through anticipated residential development, the landscape and visual effects can change and would not be consistent with the current low density character of the surrounding area.	While residential development would change the present visual amenities of the site, such a change is consistent with the prevailing character of the surrounding area. Option B better gives effect to this objective.	As with Option B albeit deferred until such time the FGO is enacted.

Objective 13.4.1	<p>Positive Contribution of Infrastructure - To recognise the essential and positive contribution that infrastructure and it's ongoing development makes to the social, economic, and cultural wellbeing, and to the health and safety of the District's people and communities.</p>	Retention of the site may lead to ad-hoc growth through resource consents. Such an approach has the risk of disrupting the sustainable management of infrastructure	<p>Planned growth in the form of re-zoning will result in better coordinated management of infrastructure and services.</p> <p>I consider Option B better achieves this Objective.</p>	As with Option B albeit deferred until such time the FGO is enacted.
Policy 13.4.2	<p>Managing the Development of the Transportation Network – To ensure that the design, location and operation of the transportation network recognises and provides for the following matters:</p> <ul style="list-style-type: none"> (a) The avoidance, remedying or mitigation of any significant adverse effects on the environment resulting from the generation of noise, vibration, glare, lightspill and dust emissions. (b) The avoidance, remedying or mitigation of adverse effects on the on-going operation of activities that are permitted on adjacent land in terms of the plans provisions. (c) The avoidance, remedying or mitigation of adverse effects on the landscape. (d) The protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna and statutorily 	Retention of the site may lead to ad-hoc growth through resource consents. Such an approach has the risk of disrupting the sustainable management of infrastructure	<p>Planned growth in the form of re-zoning will result in better coordinated management of infrastructure and services.</p> <p>I consider Option B better achieves this Objective.</p>	As with Option B albeit deferred until such time the FGO is enacted.

	<p>managed sports fish and game, water bodies and their margins.</p> <p>(e) The protection of the integrity of significant heritage and cultural values.</p> <p>(f) The protection of the integrity of values of importance to Kai Tahu ki Otago,</p> <p>(g) Public safety,</p> <p>(h) The potential for material damage from erosion, subsidence, slippage, inundation or other natural hazard events and the likelihood that the exacerbation of any of these processes, is avoided, remedies or mitigated.</p> <p>(i) The intended level and type of traffic usage, and any foreseeable future demands.</p> <p>(j) The promotion of efficient energy use.</p> <p>(k) The maintenance of the safe and efficient operation of the existing infrastructure and utilities including integration with existing transportation network.</p>			
Policy 13.4.4	<p>Development of Utilities - To ensure that the design, location and operation of utilities including the transmission network, having regard to</p>			

	<p>specific locational and operational efficiency requirements, recognises and provides for the following matters, where relevant:</p> <ul style="list-style-type: none"> (a) The avoidance, remedying or mitigation of the adverse effects of noise, vibration, lightspill and glare on the environment. (b) The avoidance, remedying or mitigation of adverse effects on landscape values. (c) The protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna and statutorily managed sports fish and game, water bodies and their margins. (d) The avoidance, remedying or mitigation of any significant increase in risk to the safety of the public. (e) The maintenance of the efficient operation of other utilities and infrastructure. (f) The protection of the integrity of significant heritage values. (g) The protection of the integrity of sites of importance to Kai Tahu ki Otago. 			
Policy 13.4.11	<p>Reverse Sensitivity - To recognise that some established activities may generate noise and other effects that can disturb</p>	<p>Retention of the site as Rural Resource Area maintains the risk of reverse sensitivity albeit farming of the site is already constrained and therefore</p>	<p>Adverse effects associated with residential development are considered to be immaterial in the context of what is already the inner limits of the township.</p>	<p>As with Option B albeit deferred until such time the FGO is enacted.</p>

	<p>neighbours, by ensuring that new developments locating near such activities recognise and accept the prevailing environmental characteristics.</p>	<p>reverse sensitivity unlikely to result.</p> <p>I consider the status quo does not give effect to this policy as well as the other Options.</p>	<p>Residential use of the site is unlikely to generate adverse effects not anticipated by the Plan on the prevailing urban environment.</p> <p>In terms of the Industrial Resource Area interface, a BLR would assist in managing effects.</p> <p>Option B better gives effect to this option than the status quo.</p>	
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