

RIVER TERRACE DEVELOPMENTS LTD

Request for a Change to the Operative Central Otago District Plan

Evaluation under section 32 of the Resource Management Act 1991

1 March 2018


BROWN & COMPANY
P L A N N I N G G R O U P

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1. Introduction and strategic context

River Terrace Development Limited (RTDL) is requesting a change to the operative Central Otago District Plan (ODP) to enable the rezoning of rural land for residential purposes.

DOCUMENT 1 sets out the background to and reasons for this requested Change. The amendments requested, to Chapters 12.21, 12.22 and 15 of the ODP, are set out in **DOCUMENT 2**. The effects on the environment are assessed in **DOCUMENT 3**.

Any change to a plan needs to be evaluated in accordance with section 32 of the Resource Management 1991 (the Act). This document (**DOCUMENT 4**) sets out the evaluation for the RTRA.

Section 32 states:

32 Requirements for preparing and publishing evaluation reports

(1) An evaluation report required under this Act must—

- (a) examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and**
- (b) examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—**
 - (i) identifying other reasonably practicable options for achieving the objectives; and**
 - (ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and**
 - (iii) summarising the reasons for deciding on the provisions; and**
- (c) contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.**

(2) An assessment under subsection (1)(b)(ii) must—

- (a) identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—**
 - (i) economic growth that are anticipated to be provided or reduced; and**
 - (ii) employment that are anticipated to be provided or reduced; and**
- (b) if practicable, quantify the benefits and costs referred to in paragraph (a); and**
- (c) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.**

(3) If the proposal (an amending proposal) will amend a standard, statement, regulation, plan, or change that is already proposed or that already exists (an existing proposal), the examination under subsection (1)(b) must relate to—

- (a) the provisions and objectives of the amending proposal; and**
- (b) the objectives of the existing proposal to the extent that those objectives—**
 - (i) are relevant to the objectives of the amending proposal; and**
 - (ii) would remain if the amending proposal were to take effect ...**

The purpose of the Act is set out in Section 5 of the Act:

5 Purpose

- (1) The purpose of this Act is to promote the sustainable management of natural and physical resources.**
- (2) In this Act, sustainable management means 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.***

The National Environmental Standard on Urban Development Capacity 2016 states that urban planning should enable people and communities to provide for their social, economic, cultural and environmental wellbeing through development, while managing its effects. Well-functioning urban environments can grow and change in response to the changing needs of the communities, and future generations; and provide enough space for their populations to happily live and work. This can be both through intensifying existing urban areas and by releasing greenfield land for urban expansion¹.

The purpose of the Act is given effect to by the hierarchy of planning instruments. The operative Central Otago District Council provisions achieve relevant higher order planning instruments (including the regional and national planning instruments) and hence achieve the purpose of the Act.

This evaluation is structured as follows:

- Part 2: RTDL's goals for the Zone and identification of options to achieve those goals;
- Part 3: Evaluation of the costs and benefits of the options and selection of preferred option;
- Part 4: Evaluation of RTDL's objectives under section 32(1)(a);
- Part 5: Evaluation of RTDL's policies under sections 32(1)(b) and 32(2)(a);
- Part 6: Evaluation of RTDL's methods under sections 32(1)(b) and 32(2)(a);
- Part 7: Evaluation of the RTDL Change against the higher order district planning instruments including the operative and proposed plans;
- Part 8: Evaluation of the RTDL Change under the regional planning instruments including the operative and proposed regional policy statements and the regional plans;
- Part 9: Evaluation of the RTDL Change under the national planning instruments;
- Part 10: Summary and conclusions.

The evaluation relies on the description and other information provided in **DOCUMENT 1**, the various supporting technical reports (**DOCUMENTS 5 – 11**) and the assessment of effects on the environment (**DOCUMENT 3**).

2. Goals for the River Terrace Resource Area and identification of options to achieve the goals

RTDL's goals for the RTRA are, fundamentally:

- To rezone the subject land at Sandflat Road to enable urban expansion and assist with the foreseeable demand for new housing stock, including for retirement living;
- To provide for smaller sections sizes and smaller residential units, to enable more affordability in the housing market, while providing for a high level of residential amenity;

¹ Ministry for the Environment *National Environmental Standard on Urban Development Capacity 2016*, preamble, p3

- To provide walkability and cyclability to a neighbourhood centre; and
- To provide the opportunity for a school.

The projected growth in resident households and holiday homes translates to demand for approximately 108 additional dwellings per annum in the wider Cromwell area over the medium term (2016-2028) and approximately 86 additional dwellings per annum over the long term (2016-2043). This includes demand for more attached housing, compact homes and/or smaller sections. If all known and proposed residential development sites are approved and are developed, current dwelling capacity might satisfy demand through to 2028, with little to spare. Continued growth in demand between 2028 and 2033 indicates that additional zoned capacity will be required by then. In the long term (by 2043), a significant shortfall of urban capacity is anticipated – in the order of 950 – 1,100 dwellings. If any of the recently proposed developments were not approved, or did not progress for any other reason, then these capacity shortfalls would be correspondingly worse (and realised sooner)².

The plan change responds to demand for residential growth in urban Cromwell and helps address an estimated shortfall in long term capacity. It will enable greater choice (including affordable housing options) in the Cromwell housing market.

The location of land appropriate for urban expansion around Cromwell is relevant. Land that is appropriate for urban expansion should have the following attributes:

- be comparatively close to Cromwell to benefit from Cromwell's existing amenities (retail, employment, infrastructure, social services, etc.);
- be free of physical, cultural and environmental constraints to development; or if any potential constraints exist they must be able to be effectively overcome or managed;
- be of necessary scale for efficient, comprehensive, masterplanned development;
- be able to provide a range of housing product, to suit a diverse market, and to promote affordability;
- be able to be developed to promote high quality urban and architectural design to be sustainable – i.e. to provide a cohesive neighbourhood, ongoing amenity for residents, and longevity as a desirable place to live and visit.

The potentially developable land areas within a reasonable distance of Cromwell are discussed in the *River Terrace Design Report*, by Jasmox ([DOCUMENT 6](#)). Further to that analysis:

- topographical boundaries (the lake and river) inhibit expansion to the north and east of Cromwell;
- land to the north-west of Cromwell is already either built out or is proposed for redevelopment, and has been taken into account in the market assessment by M.E Consulting ([DOCUMENT 5](#));
- other land to the north-west and to the west has recognised high natural landscape values and is not suitable for urban development;
- much of the land to the west is either designated for a public purpose (such as the race course) or has high rural productive value; and
- land to the south is either conservation reserve, or used for a commercial recreational purpose (the Highlands Motorsport Park and the speedway), or is commercial, publicly owned forest.

Land to the south-west of Cromwell's main urban area is the only land that has the necessary attributes to accommodate growth, and is therefore better suited to urban expansion than other areas around Cromwell. In particular, it has far fewer constraints when compared with areas to the north, west, south and east of the main urban area, and any constraints can be overcome and managed.

² M.E Consulting *Economic Assessment* ([DOCUMENT 5](#))

There are a number of potential options to achieve the goals of the requested Change – these are listed and discussed in **Table 1** below.

Table 1: potential options to achieve goal of the requested Change

Potential option	Discussion
Do nothing: retain the current Rural and Rural-Residential Resource Area boundaries, objectives, policies and rules	<p>This option would require resource consents to achieve the goals. This creates the following costs:</p> <ul style="list-style-type: none"> (a) Most of the goals listed above would breach the operative provisions (minimum lot sizes) and would therefore require non-complying activity consent; (d) The greater number of consents required would create significant transaction costs, for all parties including the developer, purchasers within the development, the Council, neighbours and the local community. The transaction costs would be incurred repeatedly, in the long term, and this would be an extremely inefficient method for achieving RTDL's goals. (e) Uncertain outcomes from numerous (and likely public) processes. <p>Accordingly, this potential option is not reasonably practicable and is not considered further in this evaluation.</p>
Await the Council's review of the District Plan	<p>The Central Otago District Plan is due to be reviewed, and a potential option may be to await the review and submit requesting a suitable zoning for the land.</p> <p>This option relies on the Council to undertake the District Plan Review. The proposed plan may be notified in late 2018 and it may be another year or more before decisions are notified. Given the market circumstances and the pressure on the Cromwell housing market, RTDL wishes to proceed with the rezoning proposal now rather than wait for the Council's review.</p> <p>Accordingly, this potential option is not reasonably practicable and is not considered further in this evaluation.</p>
Promote a Private Plan Change to change the zoning of the land to an existing Resource Area or Areas within the Central Otago District Plan	<p>This option is potentially efficient as it utilises existing Resource Area(s) within the District Plan.</p> <p>This option is reasonably practicable and is considered further below.</p>
Promote a Private Plan change that seeks to change the zoning of the land to an existing Resource Area or Areas, and to modify the provisions of those Areas to enable site specific outcomes for the land	<p>This option is potentially efficient as it utilises and modifies existing Resource Area(s) within the District Plan.</p> <p>This option is reasonably practicable and is considered further below.</p>
Promote a Private Plan Change to create a new "River Terrace Resource Area" to enable development of the subject site (a bespoke zone)	<p>This option allows for a bespoke Resource Area for the land.</p>

Potential option	Discussion
	This option is reasonably practicable and is considered further below.

Based on the evaluation in Table 1 above, the potential options that are reasonably practicable and worth considering further are:

- Option 1** Promote a Private Plan Change to change the zoning of the land to an existing Resource Area or Areas;
- Option 2** Promote a Private Plan change that seeks to change the zoning of the land to an existing Resource Area or Areas, and to modify the provisions of those Areas to enable site specific outcomes for the land;
- Option 3** Promote a Private Plan Change to create a new bespoke Resource Area to enable development of the subject site.

These three options are evaluated further in Part 3 below.

3. Evaluation of the costs and benefits of the options

The costs and benefits of Options 1, 2 and 3 are addressed in [Table 2](#) below.

Table 2: costs and benefits of Options 1, 2 and 3 to achieve RTDL's goals for the RTRA

	Option 1: Rezone to the existing Residential Resource Area	Option 2: Rezone using the existing Residential Resource Area with modifications for site specific outcomes	Option 3: Rezone to a bespoke new Resource Area
Costs	<ul style="list-style-type: none"> This option does not efficiently allow for the activity mix and masterplanned layout designed to maximise both the development opportunities of the land and the amenity outcomes of high quality urban development. This option would require that the land be developed in accordance with one of the various existing residential resource areas, which would not be flexible enough (for example in relation to subdivision minimum lot sizes, or standards for buildings) to promote an innovative, masterplanned development bespoke to the values of the site and the environs. 	<ul style="list-style-type: none"> Modifying an existing Resource Area by inserting provisions that are specific to the site, and which do not have implications for other land in the District within the same Resource Area, presents problems because of the many insertions required and the unwieldy and complicated provisions that would result. Costs to RTDL for the drafting of the private plan change and supporting reports. Costs to RTDL of funding the Council-appointed independent consultants or internal planning staff to process the private plan change. Requirement for the Council to process a private plan change and potential need for staff and/or consultant 	<ul style="list-style-type: none"> Costs of creating a new masterplanned bespoke Resource Area Costs to RTDL for the drafting of the private plan change and supporting reports. Costs to RTDL of funding the Council-appointed independent consultants or internal planning staff to process the private plan change. Requirement for the Council to process a private plan change and potential need for staff and/or consultant resources. (However, this cost is mitigated by the ability to independently commission the processing of the plan change at RTDL's cost).

	Option 1: Rezone to the existing Residential Resource Area	Option 2: Rezone using the existing Residential Resource Area with modifications for site specific outcomes	Option 3: Rezone to a bespoke new Resource Area
	<ul style="list-style-type: none"> • Costs to RTDL for the drafting of the private plan change and supporting reports (although these costs arise with all of the options). • Costs to RTDL of funding the Council-appointed independent consultants or internal planning staff to process the private plan change (although these costs arise with all of the options). • Requirement for the Council to process a private plan change and potential need for staff and/or consultant resources. (However, this cost is mitigated by the ability to independently commission the processing of the plan change at RTDL's cost, and this cost arises with all of the options). 	<p>resources. (However, this cost is mitigated by the ability to independently commission the processing of the plan change at RTDL's cost).</p>	
Benefits	<ul style="list-style-type: none"> • Enables the changes to the Zone in a timely manner without waiting for the District Plan review process. • Would not require extensive background urban design / masterplanning processes to create a bespoke zone. • The existing zone is well known by its users and can be implemented easily. 	<ul style="list-style-type: none"> • Enables the changes to the Zone in a timely manner without waiting for the District Plan review process. • Would achieve RTDL's goals for the site, in terms of a masterplanned neighbourhood with a variety of activities, lot sizes and dwelling typologies, and taking into account constraints and opportunities. • Planning staff and the community are already familiar with operative resource areas of the District Plan (but would need to become familiar with new additional site-specific provisions). 	<ul style="list-style-type: none"> • Enables the changes to the Zone in a timely manner without waiting for the District Plan review process. • Would achieve RTDL's goals for the site, in terms of a masterplanned neighbourhood with a variety of activities, lot sizes and dwelling typologies, and taking into account constraints and opportunities. • Provides for an efficient "one-stop-shop" document of provisions that are easily navigated by users, including in respect of subdivision and development, and avoids working through large documents (the Residential Resource Area provisions, and the Business Resource Area provisions) to ascertain which rules apply and why.

	Option 1: Rezone to the existing Residential Resource Area	Option 2: Rezone using the existing Residential Resource Area with modifications for site specific outcomes	Option 3: Rezone to a bespoke new Resource Area
Ranking	3	2	1

The preferable option is therefore the private plan change process to apply a bespoke new set of provisions to the land (Option 3).

Option 3 is therefore evaluated in more detail, in Parts 4 – 9 below.

4. Evaluation of the RTRA objectives (section 32(1)(a))

Table 3 outlines the appropriateness of the objectives for the RTRA, as required by section 32(1)(a).

Table 3: appropriateness of the RTRA objectives in achieving the purpose of the Act

RTRA Objective	Appropriateness of the objective in achieving the purpose of the Act
<p>Objective 20.3.1 - Efficient, co-ordinated, integrated greenfields development <i>Efficient greenfields development that is co-ordinated by way of a Structure Plan to achieve an integrated, connected, high quality residential neighbourhood.</i></p>	<p>The objective requires development of the Zone to occur efficiently and in a co-ordinated and integrated manner - providing for a community and the social and economic wellbeing of residents within the Resource Area and the wider Cromwell community. This is achieved by the use of a Structure Plan for the Resource Area, to be included as part of the District Plan, to enable an internally connected urban neighbourhood that integrates with its wider environment. The objective is appropriate to achieve the Act's purpose.</p>
<p>Objective 20.3.2 - Diversity of housing product and housing affordability <i>Increased housing supply, variety and choice by creating a well-designed residential development comprising a range of housing densities and typologies to enable a range of price options.</i></p>	<p>The objective seeks a diversity of housing product which in turn should enable a range of housing typologies and a range of price options. This would likely not arise if all lot sizes were of a uniform size. This assists people and the wider community to provide for their wellbeing (economic, social and cultural). The objective is appropriate to achieve the Act's purpose.</p>
<p>Objective 20.3.3 - Well-designed built environment <i>A well-designed built environment that provides for and positively responds to streets and open spaces, provides high quality amenity for residents, and contributes to public safety.</i></p>	<p>The objective intends that development is well designed and contributes to the health and safety of residents. The Resource Area provides for a built environment that is spatially structured as the result of a diligent masterplanning process that has taken into account the natural features of the site and the surrounding physical resources and activities. The objective is appropriate to achieve the Act's purpose.</p>
<p>Objective 20.3.4 - Retirement living opportunities <i>A variety of residential opportunities for retirement-age people, along with related services and amenities.</i></p>	<p>It is appropriate to provide for residential growth for all sectors of the community. The spatial layout of activities provides for retirement living along with nearby shared amenities and services, and this will contribute to social and cultural wellbeing of older people. The objective is appropriate to achieve the Act's purpose.</p>
<p>Objective 20.3.5 - Parks and open space network <i>Parks and open spaces that cater for the recreation and amenity needs of residents, and a network of pedestrian and cycle connections and greenways that are safe and convenient and which, along with the street network, allow easy connections within and beyond the Resource Area.</i></p>	<p>The inclusion of a clear and easily visible and accessible network of parks and open spaces is necessary to achieve the social and cultural well-being of residents and visitors. The objective is appropriate to achieve the Act's purpose.</p>

RTRA Objective	Appropriateness of the objective in achieving the purpose of the Act
<p>Objective 20.3.6 - Street Network <i>A safe and efficient street network within the Resource Area that provides for all transport modes, including walking and cycling, while also integrating with the existing transport network and possible future development in surrounding areas.</i></p>	<p>The street network contributes to the efficient development and use of the Resource Area for traffic, cycling and walking. This supports social interaction and social and cultural wellbeing. Providing for other modes of transport other than vehicles promotes health and wellbeing of the community.</p> <p>The objective is appropriate to achieve the Act's purpose.</p>
<p>Objective 20.3.7 – Public Infrastructure <i>Adequate connections to public infrastructure and appropriate distribution of infrastructure through the Resource Area, and an appropriate total number of dwellings within the Resource Area in line with servicing capacities.</i></p>	<p>Suitable and efficient infrastructure is necessary to facilitate appropriate development of a new residential community and to avoid adverse effects on natural and physical resources, including on existing network services.</p> <p>The objective is appropriate to achieve the Act's purpose.</p>
<p>Objective 20.3.8 – Neighbourhood Centre <i>A neighbourhood centre in a convenient location to provide for day to day convenience needs of the residential neighbourhood, and to complement and not undermine the existing Cromwell retail and business centres.</i></p>	<p>A neighbourhood centre can provide for convenience for the new community and provide opportunities for increased social, economic and cultural wellbeing. It is essential that the centre is compatible with and does not undermine existing commercial centres while providing a convenient amenity for the neighbourhood.</p> <p>The objective is appropriate to achieve the Act's purpose.</p>
<p>Objective 20.3.9 – Education Precinct <i>Provide land for a school or other educational facility, to cater for the needs of the immediate and wider community.</i></p>	<p>Schools and other educational facilities in close proximity to their users help maintain the community's social and cultural wellbeing and provide a social community hub.</p> <p>The objective is appropriate to achieve the Act's purpose.</p>
<p>Objective 20.3.10 – Compatibility with surrounding activities <i>Development which is undertaken in a manner that is compatible with the surrounding land uses including State Highway 6, the Motorsport Park, orcharding and other rural activities.</i></p>	<p>The objective recognises that the site is located nearby to existing physical resources and activities which are important and which should not be compromised. The State Highway provides for important transport linkages with surrounding towns and its ongoing functioning is vital to the economic wellbeing of the community. The Motorsport Park, speedway, neighbouring orchards and other rural activities are also important contributors to wider economic wellbeing.</p> <p>The objective is appropriate to achieve the Act's purpose.</p>

In summary, in combination, the objectives enable peoples' and the community's social, economic and cultural wellbeing while addressing the matters in section 5(2)(a) – (c) of the Act, and are the most appropriate to achieve the purpose of the Act.

5. Evaluation of the RTRA policies under s32(1)(b) and 32(2)(a)

Table 4 sets out the evaluation required under section 32(1)(b) (appropriateness, efficiency and effectiveness of the provisions for achieving the objectives, and identifying other reasonably practicable options for achieving the objectives); and the evaluation required under section 32(2)(a) (costs and benefits of the provisions), in relation to the policies in the RTRA.

Table 4: Evaluation of the appropriateness, efficiency, effectiveness, costs and benefits of RTRA policies (s32(1)(b) and 32(2)(a), and other practical options considered, in achieving the RTRA objectives:

Proposed RTRA policy	RTRA objectives intended to be served by the policy	Appropriateness, efficiency and effectiveness of the policy in achieving the objective(s)	Costs	Benefits	Other Practical Options Considered
<p>Policy 20.4.1 – Masterplanned Development</p> <p>Policy 20.4.1A: Provide for the River Terrace Resource Area Structure Plan to manage the spatial layout of development in the Resource Area, including:</p> <p>(a) Roads, and the roading hierarchy;</p> <p>(b) Parks and open spaces;</p> <p>(c) Setback of built development from State Highway 6;</p> <p>(d) Two distinct residential Sub-Areas, based on residential density:</p> <p>(i) Residential Sub-Area A, located within the main core of the Resource</p>	<p>20.3.1</p> <p>20.3.2</p> <p>20.3.3</p> <p>20.3.4</p> <p>20.3.6</p>	<p>Policy 20.4.1 provides for the Structure Plan enables appropriate spatial layout of activities and the co-ordination of land uses within the RTRA area, to achieve an integrated, connected, high quality environment. The policy sets out the requirements for the Structure Plan and is effective in achieving the objectives, in particular Objective 20.3.1.</p> <p>Policy 20.4.1A lists the different activities and components of the overall development anticipated and is effective in achieving the objectives.</p> <p>Policy 20.4.1B ensures that subdivision and development accords with the Structure Plan, and encourages staging of the development in</p>	<p>Adhering to a structure plan potentially inhibits flexibility; to amend the structure plan requires a further plan change. (This potential cost is remedied by providing for some flexibility in the specific location of structure plan features, as part of the rules package).</p>	<p>Significant masterplanning and urban design input has contributed to the Structure Plan and the provisions to implement it effectively.</p> <p>The Structure Plan will enable an efficient and logical layout of activities throughout the Resource Area.</p> <p>The Structure Plan coordinates the development and removes the potential for ad hoc location of activities, roads and open spaces.</p> <p>The Structure Plan is easily implemented by a single development entity.</p>	<p>Requiring wider indicative roading and open space layout outcomes to be provided through the subdivision process. This option was discounted on the grounds that it may result in piecemeal, unintegrated development over the entire site.</p> <p>The Structure Plan method is the most practicable and beneficial to achieve the objectives.</p>

Proposed RTRA policy	RTRA objectives intended to be served by the policy	Appropriateness, efficiency and effectiveness of the policy in achieving the objective(s)	Costs	Benefits	Other Practical Options Considered
<p><i>Area, where higher residential density is appropriate;</i></p> <p><i>(ii) Residential Sub-Area B, located around much of the periphery of the Resource Area, with lower residential density;</i></p> <p><i>(e) A Retirement Living Overlay;</i></p> <p><i>(f) A Neighbourhood Centre Overlay;</i></p> <p><i>(g) An Education Overlay.</i></p> <p>Policy 20.4.1B: <i>Ensure that development gives effect to the River Terrace Resource Area Structure Plan by:</i></p> <p><i>(a) Requiring that subdivision and development proposals are generally consistent with the Structure Plan;</i></p> <p><i>(b) Requiring subdivision and development plans to be staged in one or more Development Parcels and to demonstrate the</i></p>		<p>accordance with the Development Plan layout. This is efficient as development can occur in a logical sequence in accordance with infrastructure rollout, and integration with future development.</p>			

Proposed RTRA policy	RTRA objectives intended to be served by the policy	Appropriateness, efficiency and effectiveness of the policy in achieving the objective(s)	Costs	Benefits	Other Practical Options Considered
<i>interrelationship and future integration with adjoining areas.</i>					
<p>Policy 20.4.2 – Built environment, density and diversity</p> <p><i>Require development to:</i></p> <p>(a) <i>provide for a high quality public realm that is coordinated throughout the Resource Area, including by way of consistent street cross-sections, landscaping, street lighting and paving.</i></p> <p>(b) <i>deliver sites that are an appropriate size and shape for residential development at a range of densities.</i></p>	<p>Objectives</p> <p>20.3.1</p> <p>20.3.2</p> <p>20.3.3</p>	<p>The policy will be effective in achieving the objectives, particularly Objectives 20.3.2 and 20.3.3, by ensuring a well-designed built environment that provides for and positively responds to streets and open spaces, and delivers a range of site sizes to suit different needs and price options, including for retired people, young families etc.</p>	<p>A potential cost is the lost opportunity to provide larger rural residential sections, but this cost is out-weighted by the need for more land for urban densities</p>	<p>Delivering a diversity of product enables a range of price options. This will benefit the Cromwell housing market.</p> <p>Consistency of street cross sections, paving and lighting in the public realm provides for a neighbourhood and community feel which will have positive attributes for residents and the community.</p>	<p>Not including provisions for consistent road cross-sections, landscaping, lighting and paving would potentially lead to ad hoc, inconsistent development that would likely be less appealing visually. This option was not considered further.</p>
<p>Policy 20.4.3 – Housing Affordability</p> <p><i>Enable a range of dwelling types and sizes to help meet the housing needs of households on moderate incomes, while maintaining a high quality of urban and building design.</i></p>	<p>Objectives</p> <p>20.3.2</p> <p>20.3.3</p>	<p>This policy promotes variety in dwelling types and sizes to achieve a range of price options, and is effective in achieving Objective 20.3.2 (in relation to affordability) and Objective 20.3.3 (in relation to the quality of design of the built environment).</p>	<p>There are no costs associated with this policy.</p>	<p>The policy has the following benefits:</p> <p>It provides for a range of users, to promote a diverse community;</p> <p>It enables a range of price options and this gives the best opportunity for</p>	<p>No other options were contemplated.</p>

Proposed RTRA policy	RTRA objectives intended to be served by the policy	Appropriateness, efficiency and effectiveness of the policy in achieving the objective(s)	Costs	Benefits	Other Practical Options Considered
				affordability and entry into the housing market	
<p>Policy 20.4.4 – Parks and Open Spaces <i>Require development to address the recreation and amenity needs of residents by:</i></p> <p>(a) <i>providing public open spaces;</i></p> <p>(b) <i>enabling passive surveillance of public open spaces by ensuring public open spaces are generally fronted with roads; and</i></p> <p>(c) <i>requiring pedestrian and/or cycle linkages (including cycle lanes within the street environment) to connect with the public open spaces, the neighbourhood centre, the school area, and the retirement living area.</i></p>	<p>Objectives 20.3.3 20.3.5</p>	<p>The policy supports the objectives by requiring the provision of parks and open space to meet the needs of the new population of this area. The policy ensures that the parks and open space provided are designed in such a way that passive surveillance can be easily undertaken. It is effective that the locations of open space are interspersed and form connections across and beyond the Resource Area.</p> <p>It is appropriate that at the time of the development (subdivision), the open space and recreation needs are assessed and provided for through the development.</p>	<p>There are no costs to providing for open space and recreation at the time of development at a scale that supports the higher density living environment.</p>	<p>The structure plan enables higher densities with smaller lot sizes. This requires that the social and built infrastructure be designed and provided up front in a development. This enables quality compact development.</p>	<p>Provide recreation and parks through the subdivision process – this option may not provide for a comprehensive quality development. Connections between stages may not be adequately provided for under this option.</p>
<p>Policy 20.4.5 – Form of development <i>Manage the height, bulk, location, form and appearance of buildings and</i></p>	<p>Objective 20.3.3</p>	<p>To enable a higher density environment to function well and give its community a quality living experience it is important to manage the</p>	<p>Owners may need to comply with design controls when building their dwellings which will add another layer of</p>	<p>Good quality urban design and design controls are important in a higher density living environment to enable</p>	<p>Pre designing all dwellings so owners need to choose from a set bundle of designs and plans. This was not</p>

Proposed RTRA policy	RTRA objectives intended to be served by the policy	Appropriateness, efficiency and effectiveness of the policy in achieving the objective(s)	Costs	Benefits	Other Practical Options Considered
<p><i>site landscaping and fencing, to:</i></p> <p>(a) <i>achieve a variety of residential densities and character.</i></p> <p>(b) <i>provide usable and accessible outdoor living space and privacy and to have access to daylight and sunlight.</i></p> <p>(c) <i>allow neighbouring properties to have a reasonable standard of sunlight access and privacy.</i></p>		<p>location of buildings to ensure the residents can enjoy amenity both within their own and as part of their community.</p> <p>The policy is effective as it requires that a variety of densities is achieved while requiring sunlight access and privacy.</p> <p>Fencing and site landscaping is controlled through the policy to contribute to public safety and passive surveillance.</p> <p>Private outdoor living space is seen as necessary in the kiwi way of life; a well-designed environment supports this aspiration while also providing for neighbourhood spaces to allow for increased amenity and community wellbeing.</p>	<p>consenting. It is also potentially limit owners in their design and dwelling options.</p>	<p>community wellbeing and health and safety.</p>	<p>considered further as it would unnecessarily limit individual choice.</p>
<p>Policy 20.4.6 – Transport</p> <p><i>Require development to be designed to provide a street and block pattern which:</i></p> <p>(a) <i>is easy and safe to use for motorists, pedestrians and cyclists;</i></p> <p>(b) <i>is safely and efficiently connected to State</i></p>	<p>Objective 20.3.6</p>	<p>The policy supports the objective by ensuring that the development supports street and block patterns to create a safe and efficient network.</p> <p>The policy provides for all types of transport modes.</p>	<p>There are no costs. Effective street design is integral to the design of a new greenfields development.</p>	<p>An efficient street network designed and built at the outset of the development forms a strong frame for quality development within.</p>	<p>Allowing for the development of the street network through subdivision. This was disregarded as it may not achieve the same level of comprehensive development and connections in appropriate locations.</p>

Proposed RTRA policy	RTRA objectives intended to be served by the policy	Appropriateness, efficiency and effectiveness of the policy in achieving the objective(s)	Costs	Benefits	Other Practical Options Considered
<p><i>Highway 6, Sandflat Road and any nearby public transport routes;</i></p> <p><i>(c) limits cul-de-sac roads where possible;</i></p> <p><i>(d) is public;</i></p> <p><i>(e) incorporates principles of crime prevention through environmental design.</i></p>					
<p>Policy 20.4.7 – Infrastructure</p> <p><i>Require development to provide servicing:</i></p> <p><i>(a) in a coordinated and integrated manner and in line with the capacity of the networks;</i></p> <p><i>(b) so that power and telecommunications services are reticulated underground to each site;</i></p> <p><i>(c) so that individual dwellings can be connected to the reticulated wastewater, and potable water networks.</i></p>	<p>Objective 20.3.7</p>	<p>Infrastructure is an important component of a development - the policy supports the objective effectively by ensuring that new lots are serviced with power and telecommunications, as well as 3 waters infrastructure.</p>	<p>There is a large financial cost up front to ensuring new development is fully serviced.</p>	<p>Provision of adequate infrastructure designed for the Resource Area is an integral part of the success of the development.</p>	<p>There are no other practical options as the sites are too small for onsite servicing.</p>

Proposed RTRA policy	RTRA objectives intended to be served by the policy	Appropriateness, efficiency and effectiveness of the policy in achieving the objective(s)	Costs	Benefits	Other Practical Options Considered
<p>Policy 20.4.8 – Retirement Living Overlay</p> <p><i>Provide adequate land for a retirement village within Residential Sub-Area A that:</i></p> <p>(a) <i>enables a range of residential options for retirement-age people, including standalone villas, terrace housing and apartment housing;</i></p> <p>(b) <i>provides for central services and amenities located to enable synergies with the neighbourhood centre and the open space and walkway network;</i></p> <p>(c) <i>integrates with the wider Resource Area.</i></p>	<p>Objectives</p> <p>20.3.1</p> <p>20.3.2</p> <p>20.3.4</p>	<p>The policy is effective in achieving Objective 20.3.2 in relation to a diversity of housing product, and Objective 20.3.4 in relation to a variety of residential opportunities and services for retirement age people. This is enabled through a variety of housing options within the Overlay, including standalone villas, terrace housing and apartment housing.</p> <p>The synergies of the Overlay with the Neighbourhood Centre Overlay, for co-location of services and amenities (including for example health care) is effective in achieving efficient, co-ordinated and integrated development, as sought by Objective 20.3.1. This will result in efficient use of land and reduce travel costs.</p>	<p>A potential cost associated with this policy is the loss of land that could be used for other purposes. This cost is outweighed by the benefits of directly providing for a growing sector of the housing market.</p>	<p>Benefits arise from providing living options for retirement age people in an appropriate location within the Resource Area, close to the amenities of the Neighbourhood Centre Overlay, for ease of access and to contribute to integrated the community.</p>	<p>Do not provide a retirement living overlay and let the market or user preference prevail. This option was discounted as it would not achieve the objective for providing for retirement age people.</p>
<p>Policy 20.4.9 – Neighbourhood Centre Overlay</p> <p>A. <i>Provide for a neighbourhood centre containing small scale</i></p>	<p>Objective</p> <p>20.3.1</p> <p>20.3.8</p>	<p>The policy is effective in achieving the objective for a neighbourhood centre in a convenient location to provide for day to day needs of the residents (Objective 20.3.8),</p>	<p>A potential cost associated with this policy is the loss of land that could be used for other purposes. This cost is outweighed by</p>	<p>Having access to a small neighbourhood centre within easy walking or cycling distance removes the need for people to travel</p>	<p>Do not provide for a centre and let the market provide (through resource consents) for small scale retail.</p>

Proposed RTRA policy	RTRA objectives intended to be served by the policy	Appropriateness, efficiency and effectiveness of the policy in achieving the objective(s)	Costs	Benefits	Other Practical Options Considered
<p><i>retail, professional services, care facilities, community facilities, and food and beverage premises of a scale and in a location to meet the local convenience needs of residents.</i></p> <p><i>B. Limit the extent of retail to avoid any significant adverse effects on:</i></p> <p><i>(a) the small-scale character of the neighbourhood centre,</i></p> <p><i>(b) residential amenity in the vicinity,</i></p> <p><i>(c) the vitality and viability of existing Cromwell commercial centres, and</i></p> <p><i>(d) the safe and efficient operation of the transport network.</i></p>		<p>and achieves the overall imperative of Objective 20.3.1 for co-ordination and integration.</p> <p>The policy has two parts, the first to provide for a Neighbourhood Centre within the development and the second to ensure that it does not undermine the existing centres in Cromwell and the residential amenity in the vicinity of the centre.</p> <p>The policy ensures that the any neighbourhood centre is in a convenient place and is does not interfere with the safe and efficient operation of the surrounding roading network.</p>	<p>the benefits of directly providing a neighbourhood centre for the residents of the Resource Area.</p>	<p>in their cars for convenience items.</p> <p>The centre will likely form a social hub for the community.</p>	<p>This option was discounted as there are risks that this option could result in ad hoc location and form of any commercial development.</p>
<p>Policy 20.4.10 – Education Overlay</p> <p><i>Provide for educational facilities and for open space(s) that suit both the</i></p>	<p>Objectives</p> <p>20.3.1</p> <p>20.3.9</p>	<p>The policy is effective in achieving the objective for an education precinct within the Resource Area to cater for the immediate and wider community (Objective 20.3.9),</p>	<p>A potential cost associated with this policy is the loss of land that could be used for other purposes. This cost is outweighed by</p>	<p>The policy provides the opportunity for a school or other educational facility in a location that is easily walkable /</p>	<p>No other options were considered.</p>

Proposed RTRA policy	RTRA objectives intended to be served by the policy	Appropriateness, efficiency and effectiveness of the policy in achieving the objective(s)	Costs	Benefits	Other Practical Options Considered
<i>needs of the school and the wider community.</i>		and achieves the overall imperative of Objective 20.3.1 for co-ordination and integration.	the benefits of directly providing for the opportunity for a school to serve the families of the Resource Area.	cyclable from all parts of the Resource Area.	
<p>Policy 20.4.11 – Compatibility with surrounding established land uses</p> <p>A <i>Provide for a wide, green setback from State Highway 6 to provide amenity for residents of the Resource Area and highway users.</i></p> <p>B <i>Ensure that sensitive activities (including residential and any childcare or other care activity) are adequately protected from spray drift from adjoining rural production activities.</i></p> <p>C <i>Ensure that potential reverse sensitivity effects on nearby activities, including the State Highway and the motorsport activities, are adequately</i></p>	<p>Objectives</p> <p>20.3.1</p> <p>20.3.10</p>	<p>The policy is effective in achieving compatibility of development in the Resource Area with other existing activities and physical resources in the surrounding area (Objective 20.3.10), including the highway, the motorsport activities, and rural productive activities.</p> <p>This in turn achieves the overall imperative of Objective 20.3.1 for co-ordination and integration.</p>	There are no costs associated with this policy.	The benefits of the policy include the ability to utilise the land for residential and related activities while avoiding any potential adverse effects from sensitivities and reverse sensitivities.	No other options were considered.

Proposed RTRA policy	RTRA objectives intended to be served by the policy	Appropriateness, efficiency and effectiveness of the policy in achieving the objective(s)	Costs	Benefits	Other Practical Options Considered
<i>managed.</i>					

6. Evaluation of the RTRA methods (rules) under s32(1)(b) and 32(2)(a)

Table 5 evaluates the proposed rules of the RTRA to achieve the objectives of the zone.

Table 5: Evaluation of methods

Plan Provisions/Method		Discussion Appropriateness, Effectiveness and Efficiency, Costs and Benefits
20.7.1	<u>PERMITTED ACTIVITIES</u>	
(ii)	<p><u>Residential activities and buildings within Residential Sub-Areas A and B</u> Residential activities and buildings within Residential Sub-Areas A and B as shown on the River Terrace Resource Area Structure Plan, excluding buildings and activities within the Retirement Living Overlay for retirement living purposes, are permitted activities provided they meet the following standards:</p> <p>(a) <u>Building Height</u> The maximum height of any building shall not exceed 9m.</p> <p>(b) <u>Height in relation to boundary</u> Buildings shall not project beyond a 45-degree recession plane measured from a point 4.5m vertically above ground level along rear and side boundaries.</p> <p>(c) <u>Building coverage and impermeable surfacing</u> The maximum coverage shall be:</p>	<p>The zone is to provide for residential activities to meet growing demand in the Cromwell community. It is appropriate therefore that buildings and residential activities are permitted to ensure that there is minimal regulatory barriers and transaction costs to their implementation.</p> <p>It is appropriate that common parameters of the buildings for residential activities are included in the rules (height, height to boundary, building coverage etc.) as these enable residents as high degree of certainty about what they are their neighbours can build.</p> <p>The Jasmax (DOCUMENT 6) design process has formulated the design parameters for the permitted dwellings, with lot layout, sunshine hours and roading as important overall considerations. The provisions ensure the suitability of the lots for the residential dwellings anticipated.</p> <p>The permitted activity rules also ensure that there is sufficient space between dwellings, access to sunlight and outdoor areas, outdoor living space, and restrictions on fence heights to enable passive surveillance of streets and open spaces.</p>

Plan Provisions/Method	Discussion				
<table border="1" data-bbox="416 331 1120 459"> <tr> <td data-bbox="416 331 922 395">Maximum building coverage for all buildings on any site</td> <td data-bbox="922 331 1120 395">45%</td> </tr> <tr> <td data-bbox="416 395 922 459">Maximum coverage for all impermeable surfacing (including building coverage)</td> <td data-bbox="922 395 1120 459">65%</td> </tr> </table> <p data-bbox="331 491 1151 609">(d) <u>Setback from boundaries</u> The minimum set-back from all boundaries of any building on a site shall be 1m except that, where any units share a common wall, no setback is required from the common boundary between the units.</p> <p data-bbox="331 641 1151 759">(e) <u>Outlook from principal living rooms and bedrooms</u> One outlook space must be provided from external windows of a habitable room (being a living room or a bedroom), in accordance with the following:</p> <p data-bbox="416 791 1151 880">(i) Where the room has two or more external faces with windows the outlook space must be provided from the face with the largest area of windows.</p> <p data-bbox="416 880 1151 1222">(ii) The minimum dimensions for a required outlook space are as follows:</p> <ul data-bbox="519 951 1151 1222" style="list-style-type: none"> • the principal living room must have an outlook space with a minimum dimension of 4m in width and 4m in depth, all located within the site; • the principal bedroom must have an outlook space with a minimum dimension of 3m in depth and 3m in width, all located within the site; and • any secondary bedroom must have an outlook space with a minimum dimension of 1m in depth and 2m in width, all located within the site. <p data-bbox="416 1222 1151 1286">(iii) The depth of the outlook space is measured at right angles to and horizontal from the window to which it applies.</p> <p data-bbox="416 1286 1151 1366">(iv) The width of the outlook space is measured parallel to the window to which it applies.</p>	Maximum building coverage for all buildings on any site	45%	Maximum coverage for all impermeable surfacing (including building coverage)	65%	<p data-bbox="1160 210 1939 274">Appropriateness, Effectiveness and Efficiency, Costs and Benefits</p> <p data-bbox="1160 306 1939 360">An overall separation distance from the Resource Area boundary is applied, to enable some setback from neighbouring properties.</p> <p data-bbox="1160 376 1939 440">The driveway length rule ensure that parked cars do not impede the adjacent footpath.</p> <p data-bbox="1160 456 1939 545">Costs of this option are that development may potentially have some sense of uniformity (although this is more likely to be perceived as a definition of community identity and character).</p> <p data-bbox="1160 561 1939 651">Benefits are that dwellings can be built without the need for a resource consent saving time and costs (to the landowner and the Council) provided that the permitted activity rules are met.</p> <p data-bbox="1160 667 1939 699">These benefits outweigh the costs.</p> <p data-bbox="1160 715 1939 778">This in turn provides for efficiency in housing construction and timeliness of housing being provided to the market.</p>
Maximum building coverage for all buildings on any site	45%				
Maximum coverage for all impermeable surfacing (including building coverage)	65%				

Plan Provisions/Method	Discussion Appropriateness, Effectiveness and Efficiency, Costs and Benefits
<p>(v) Outlook spaces required from different rooms within the same building may overlap.</p> <p>(vi) Outlook spaces may overlap where they are on the same building face plane.</p> <p>(vii) Outlook spaces must:</p> <ul style="list-style-type: none"> • be clear and unobstructed by buildings; • not extend over adjacent sites, except where the outlook space is over a public or common space; • not extend over an outlook space or outdoor living space required by another dwelling. <p>(f) <u>Outdoor living space</u> An outdoor amenity area of minimum dimensions 4m x 4m that opens directly from the primary living area of the dwelling must be provided.</p> <p>(g) <u>Boundary fences and walls</u> The maximum height of boundary fences and walls shall be:</p> <ul style="list-style-type: none"> • On front boundaries: 0.9m • On side boundaries in front gardens (in front of the principal front building line): 0.9m • On side boundaries (behind the principal front building line) when adjoining another private property: 1.8m • On rear boundaries when adjoining another private property: 1.8m • On side or rear boundaries when adjoining a lane, accessway, greenway or other public or common space: 1.2m <p>For the purposes of this rule and rule 20.7.1(e) above:</p> <ul style="list-style-type: none"> • Any fence or wall located within 1m of a boundary is deemed to be on the boundary; • The principal front building line is a line drawn along the largest building face which faces an adjoining road and 	

Plan Provisions/Method	Discussion Appropriateness, Effectiveness and Efficiency, Costs and Benefits
<p>extending to the side boundaries;</p> <ul style="list-style-type: none"> Any private land legally accessible to or by more than one individual property is a common space. <p>(h) <u>Driveways</u> Driveways shall be a minimum of 5m in length or a maximum of 1.5m in length (but not between 1.5 – 5m).</p> <p>(i) <u>Set-back from Resource Area boundary</u> The minimum setback of buildings from the Resource Area boundary shall be 5m.</p> <p>(j) <u>Carparking</u> A minimum of 1 carpark space per dwelling shall be provided on site, provided that an additional carpark shall be provided in association with a home occupation.</p>	
<p>(iii) <u>Activities within the Retirement Living Overlay</u> The following activities are permitted activities within the Retirement Living Overlay:</p> <p>(a) Residential activities including Living Accommodation.</p> <p>(b) Centralised activities including food preparation and related activities, Care Centre activities, and medical activities limited to the premises of doctors and other health care professionals.</p>	<p>The retirement Living Overlay is to provide for retirement and residential activities to meet growing demand for this demographic in the Cromwell community. It is appropriate that residential and centralised activities for retirement services are permitted to ensure that there is minimal regulatory barriers to their implementation, and in recognition of the minimal effects the activities have on the environment.</p> <p>There are no particular costs arising from these activities being permitted. Any environmental issues arise from the buildings the activities are housed within (the external appearance of buildings is dealt through other rules, below).</p> <p>The benefits are that the activities can be undertaken without the need for a resource consent, provided that any other permitted activity rules are met, saving time and transaction costs for all parties.</p> <p>This in turn provides for efficiency and effectiveness in meeting demand for retirement related activities.</p>

Plan Provisions/Method		Discussion Appropriateness, Effectiveness and Efficiency, Costs and Benefits
(iv)	<p><u>Activities within the Neighbourhood Centre Overlay</u> The following activities are permitted activities within the Neighbourhood Centre Overlay:</p> <ul style="list-style-type: none"> (a) Retail activities. (b) Cafés, restaurants. (c) Care Centre activities. (d) Community activities. (e) Medical activities, limited to the premises of doctors and other health care professionals. (f) Residential activities. (g) Recreational activities. (h) Travellers' Accommodation. 	<p>The Neighbourhood Centre has been located to provide for the day to day needs of those living in the Resource Area. This includes specialist activities such as doctors and other health care professionals to support the community but particularly the Retirement Overlay.</p> <p>The Neighbourhood Centre Overlay restricts other activities (thereby encouraging location of central activities in the overlay) and provides an appropriate area (in size and scale) for these activities while not having adverse effects on other areas including the Cromwell Town Centre.</p> <p>The inclusion of activities such as retail, café and restaurants and community activities supports the creation of a community hub, over time, which will contribute to the health and wellbeing of the residents of the RTRA and the community that will establish there.</p> <p>Buildings to accommodate the activities permitted in the Overlay require resource consent in relation to external appearance – this is addressed below.</p>
(v)	<p><u>Activities within the Education Overlay</u> The following activities are permitted activities within the Education Overlay:</p> <ul style="list-style-type: none"> (i) Community activities, limited to school and pre-school care activities. 	<p>The Education Overlay is a suitable location for education activities to support the zone and it is appropriate that they are provided for as a permitted activity.</p> <p>There are no costs to this method as it is appropriate that those interested in land in the vicinity are aware of the purpose of the Overlay and that it provides for these activities as of right.</p> <p>Buildings to accommodate the activities permitted in the Overlay require resource consent in relation to external appearance – this is addressed below.</p>
20.7.2	<u>CONTROLLED ACTIVITIES</u>	
(i)	<p><u>Subdivision</u> Subdivision for the following purposes shall be a controlled activity:</p> <ul style="list-style-type: none"> (a) Network and public utilities. 	<p>There are instances where subdivision is required where no new lots for residential purposes are being created. A controlled activity status gives</p>

Plan Provisions/Method		Discussion Appropriateness, Effectiveness and Efficiency, Costs and Benefits
	<p>(b) Reserves. (c) Boundary adjustments.</p> <p>The Council shall exercise its control in respect of the following matters:</p> <ol style="list-style-type: none"> 1. The area of the proposed allotment taking into consideration the proposed use of the allotment. 2. The location, design and construction of access, and its adequacy for the intended purpose of the subdivision. 3. The amenities of neighbouring properties. 4. Public access requirements. 5. The provision of services and their adequacy for the intended purpose of the subdivision. 6. Any amalgamations and easements that are appropriate. 7. Any financial contributions necessary for the purposes set out in Section 15 of the Plan. 8. Any other matters provided for in section 220 of the Act. <p>Any application made under this rule will generally not be notified or require the written consent of affected persons.</p>	<p>security to the applicant that consent will be granted subject to the matters of control.</p> <p>Controlled activity status is effective in that subdivision to create network and public utilities, reserves and boundary adjustments can be enabled in an efficient manner.</p> <p>The matters of control are those for other zones with the same rule.</p> <p>Costs of this option include the need to still apply for consent (through necessary as subdivision always requires consent). There may be circumstances where the Council would like to decline a consent but as the consent is controlled then this option is not available.</p> <p>A benefit is that the subdivisions of this nature need not to be notified or require the written consent of affected persons, the matters of the control can be considered fully by the Council when accessing the Controlled activity consent.</p>
20.7.3	<u>DISCRETIONARY (RESTRICTED) ACTIVITIES</u>	
	<p>(i) <u>Breach of Standards for Permitted or Controlled Activities</u> Any activity or building listed in Rules 20.7.1 and 20.7.2 that does not meet the relevant standards listed with that activity or building is a restricted discretionary activity, with the Council's discretion restricted to:</p> <ol style="list-style-type: none"> 1. The purpose of the standard; 2. The effects of the infringement of the standard; 3. The effects on the amenity of neighbouring sites; 4. The effects of any special or unusual characteristic of the site which is relevant to the standard; 5. The characteristics of the development proposed; and 	<p>This rule is an appropriate “catch all” to provide the Council to provide the ability to assess activities or buildings on their merits according to a number of matters of discretion.</p> <p>The matters of discretion are to enable the Council to address any effects that arise from development that does not meet the standards for permitted or controlled activities.</p> <p>It is efficient to require assessment in this manner, in these circumstances. The matters of discretion allow for a range of relevant effects to be addressed in the assessment.</p>

Plan Provisions/Method		Discussion				
		Appropriateness, Effectiveness and Efficiency, Costs and Benefits				
	<p>6. Where more than one standard will be infringed, the effects of all infringements.</p> <p>Any application made under this rule will generally not be notified where the written approval of affected persons is provided.</p>					
(ii)	<p><u>Buildings for residential activities within the Retirement Living Overlay</u> Buildings for residential activities within the Retirement Living Overlay used for retirement living purposes (including single unit, duplex or multiple unit buildings) are a restricted discretionary activity provided that any building meets the following standards:</p> <p>(a) <u>Building Height</u> The maximum height of any building shall not exceed 9m.</p> <p>(b) <u>Height in relation to boundary</u> Buildings shall not project beyond a 45-degree recession plane measured from a point 4.5m vertically above ground level along rear and side boundaries.</p> <p>(c) <u>Building coverage and impermeable surfacing</u> The maximum coverage shall be:</p> <table border="1"> <tbody> <tr> <td>Maximum building coverage for all buildings on any site</td> <td>45%</td> </tr> <tr> <td>Maximum coverage for all impermeable surfacing (including building coverage)</td> <td>65%</td> </tr> </tbody> </table> <p>(d) <u>Set-back from Resource Area boundary</u> The minimum setback of buildings from the Resource Area boundary shall be 5m.</p> <p>(e) <u>Carparking</u> A minimum of 0.7 carpark spaces per independent residential unit shall be provided on site. For central facilities or Care Centre activities, one carpark for every 40m² GFA of the central facilities or Care Centre and in addition one carpark for every 100m² GFA for</p>	Maximum building coverage for all buildings on any site	45%	Maximum coverage for all impermeable surfacing (including building coverage)	65%	<p>The Retirement Living Overlay provides a separate layer of planning methods to enable retirement living. Retirement living can be established in a variety of forms (single units, duplex, multiple units, multi-story). There is no prescription as to the external appearance of these forms; rather, each proposal can be assessed on its merits on a restricted discretionary consent basis, to ensure that the design is appropriate.</p> <p>There are development standards ensure that the bulk and location of buildings is appropriate in the context. The standards include building height, building coverage and setbacks. If these are breached then buildings require discretionary consent.</p> <p>The discretion is reserved over external appearance and design of buildings, vehicle access, earthworks, landscaping, and integration between the proposed buildings and other consented development in the overlay.</p> <p>This method is effective and efficient as it allows for a variety of building forms for providing retirement living and imaginative architectural and site design.</p> <p>A restricted discretionary consenting regime leads to greater transaction costs however these costs are outweighed by the benefits from providing the mechanism for the Council to reject any inappropriate proposals.</p>
Maximum building coverage for all buildings on any site	45%					
Maximum coverage for all impermeable surfacing (including building coverage)	65%					

Plan Provisions/Method		Discussion Appropriateness, Effectiveness and Efficiency, Costs and Benefits
	<p>visitors shall be provided.</p> <p>The Council's discretion is restricted to:</p> <ol style="list-style-type: none"> 1. The external appearance and design of buildings; 2. Associated earthworks and landscaping; 3. Vehicle access; 4. Relationship with and accessibility to outdoor living space and outlook space for each residential unit; 5. The location and layout of vehicle parking; 6. Integration between the proposed building(s) and other consented development within the Overlay. 	
(iii)	<p><u>Buildings for centralised activities within the Retirement Living Overlay</u> Buildings for centralised activities, including food preparation and related activities, residential care and communal facilities, within the Retirement Living Overlay are a restricted discretionary activity provided that any building meets the following standards:</p> <p>(a) <u>The standards in Rule 20.7.1(ii)(a) – (j), except that the following standard applies:</u></p> <p>(i) The maximum height of any building shall not exceed 12m.</p> <p>(b) <u>Carparking</u> A minimum of 0.7 carpark spaces per independent residential unit shall be provided on site, in a shared configuration. For central facilities or Care Centre, one carpark for every 40m² GFA of the central facilities or Care Centre and in addition one carpark for every 100m² GFA for visitors shall be provided.</p> <p>The Council shall exercise its discretion in respect of the matters in 20.7.3(vi) below.</p>	<p>A retirement living operation requires social infrastructure and these are commonly located in centralised activities, including dining and food preparation areas, other communal areas, offices, gym, pool and other recreational facilities. The buildings providing for these functions are given additional height (12m as opposed to 9m) to enable effective use of this area and for the buildings to gain additional visual attraction.</p> <p>It is effective and efficient to provide for these activities as restricted discretionary to enable appropriate consideration of their environmental effects and their design.</p> <p>This method is effective and efficient as it allows for a variety of building forms for providing retirement living and imaginative architectural and site design.</p> <p>A restricted discretionary consenting regime leads to greater transaction costs however these costs are outweighed by the benefits from providing the mechanism for the Council to reject any inappropriate proposals.</p>
(iv)	<p><u>Buildings within the Neighbourhood Centre Overlay</u> Buildings within the Neighbourhood Centre Overlay are a restricted</p>	<p>The neighbourhood centre overlay provides for a centralised area for increased intensity for small scale commercial activities.</p>

Plan Provisions/Method	Discussion								
<p>discretionary activity provided that any building meets the following standards:</p> <p>(a) <u>Building Height</u> The maximum height of any building shall not exceed 12m;</p> <p>(b) <u>Building coverage and impermeable surfacing</u> The maximum coverage shall be: 75%</p> <p>(c) <u>Setback from boundaries</u> No set-back of any building from road boundaries is required. Buildings shall be set back a minimum of 1.5m from all other boundaries.</p> <p>(e) <u>Maximum Floor Area per premise</u> The maximum gross floor area of any retail or service premise shall be 200m² except that any medical centre / general practitioner facility shall have a maximum gross floor area of 400m².</p> <p>(f) <u>Maximum Total Floor Area</u> The total combined gross floor area of all retail premises shall be 1000m².</p> <p>(g) <u>Carparking</u> Minimum on-site carparking shall be provided as follows:</p> <table border="1" data-bbox="416 995 1133 1337"> <tr> <td>Retail and café/restaurant activities</td> <td>1 carpark per 30m² GFA for staff and visitors</td> </tr> <tr> <td>Childcare facilities</td> <td>0.10 carparks per child or other person other than employees, plus 0.5 carparks per FTE employee</td> </tr> <tr> <td>Community facilities (including medical facilities)</td> <td>1 carpark per 10m² public floor area of the facility</td> </tr> <tr> <td>Residential</td> <td>1 carpark per residential unit and one additional carpark shall be provided in association with a home occupation.</td> </tr> </table> <p>The Council shall exercise its control in respect of the matters in Rule</p>	Retail and café/restaurant activities	1 carpark per 30m ² GFA for staff and visitors	Childcare facilities	0.10 carparks per child or other person other than employees, plus 0.5 carparks per FTE employee	Community facilities (including medical facilities)	1 carpark per 10m ² public floor area of the facility	Residential	1 carpark per residential unit and one additional carpark shall be provided in association with a home occupation.	<p>Appropriateness, Effectiveness and Efficiency, Costs and Benefits</p> <p>Buildings in the overlay are a restricted discretionary activity provided that certain standards are met. The standards relate to bulk and location parameters such as height, building coverage and setbacks and if these are breached then buildings for retirement purposes require Discretionary consent.</p> <p>There are increased transaction costs and uncertainty arising from a restricted discretionary process, but these costs are outweighed by the benefits of encouraging architectural building and site design. The matters of assessment (applicable over a number of activities) ensure that effects on the environment are avoided, remedied or mitigated. If a proposal is not appropriate then Council can decline it.</p> <p>It is effective and efficient to provide for these activities as restricted discretionary to enable appropriate consideration of their environmental effects and their design.</p> <p>This method is effective and efficient as it allows for a variety of building forms for providing retirement living and imaginative architectural and site design.</p> <p>A restricted discretionary consenting regime leads to greater transaction costs however these costs are outweighed by the benefits from providing the mechanism for the Council to reject any inappropriate proposals.</p> <p>The retail floor area limits in the overlay are necessary to signal, and to discourage, larger floor area tenancies, to ensure that the overlay is for the purpose for which it is intended and protects the amenity and vitality of the Cromwell Town Centre. The thresholds set are based on thorough economic effects assessment (see DOCUMENT 5).</p> <p>The benefits of this frameworks are for the protection of the existing Cromwell Town Centre and for residents in the RTRA.</p>
Retail and café/restaurant activities	1 carpark per 30m ² GFA for staff and visitors								
Childcare facilities	0.10 carparks per child or other person other than employees, plus 0.5 carparks per FTE employee								
Community facilities (including medical facilities)	1 carpark per 10m ² public floor area of the facility								
Residential	1 carpark per residential unit and one additional carpark shall be provided in association with a home occupation.								

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	20.7.3(vi) below.	
(v)	<p><u>Buildings within the Education Overlay</u> Buildings within the Education Overlay are a restricted discretionary activity provided they meet the following standards:</p> <p>(d) <u>Building Height</u> The maximum height of any building shall not exceed 15m.</p> <p>(b) <u>Height in relation to boundary</u> Buildings shall not project beyond a 45-degree recession plane measured from a point 4.5m vertically above ground level along rear and side boundaries of the Overlay.</p> <p>(c) <u>Building coverage and impermeable surfacing</u> The maximum coverage shall be 50%</p> <p>(d) <u>Setback from road boundary</u> The minimum set-back from road boundaries of any building shall be 1.5m.</p> <p>(e) <u>Carparking</u> Minimum on-site carparking shall be provided as follows: 0.5 carparks per FTE employee plus 1 visitor carpark per classroom.</p> <p>The Council shall exercise its discretion in respect of the matters in Rule 20.7.3(vi) below.</p>	<p>The education overlay provides a central area for educational activities, that is easily accessible from the RTRA and surrounding areas.</p> <p>Buildings are restricted discretionary provided that certain standards are met. The standards relate to bulk and location parameters such as height, building coverage and setbacks and if these are area breached then buildings for retirement purposes require discretionary consent.</p> <p>It is effective and efficient to provide for these activities as restricted discretionary to enable appropriate consideration of their environmental effects and their design.</p> <p>This method is effective and efficient as it allows for a variety of building forms for providing retirement living and imaginative architectural and site design.</p> <p>A restricted discretionary consenting regime leads to greater transaction costs however these costs are outweighed by the benefits from providing the mechanism for the Council to reject any inappropriate proposals.</p>
(vi)	<p><u>Matters over which discretion is restricted</u> For buildings within the Retirement Living Overlay, the Neighbourhood Centre Overlay and the Education Overlay, the Council's discretion is restricted to the following matters:</p> <ol style="list-style-type: none"> 1. The external appearance and design of buildings; 2. Associated earthworks and landscaping; 3. Access; 	<p>For all restricted discretionary buildings in the overlay areas matters of discretion are necessary for the assessment of proposals so that all of the building and site design elements of the proposal can be focused on, contemplated, and determined as to their appropriateness.</p> <p>This is efficient for the same matters to apply to all of the overlay areas as it saves repetition within the District Plan and ensures consistent assessment across the overlay areas.</p>

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	<ol style="list-style-type: none"> 4. The location and layout of vehicle parking; 5. Hours of operation; 6. Noise; 7. Signage; 8. Integration between the proposed building and other consented development within the Overlay. 	<p>The matters themselves are effective as they cover the categories of effects that are relevant to buildings and their context in the neighbourhood.</p>
(vii)	<p><u>Assessment matters for the external appearance and design of buildings</u></p> <ol style="list-style-type: none"> (a) The extent to which designs contribute to a coherent neighbourhood theme; (b) That the building integrates appropriately with the neighbourhood including with the street, open space and pedestrian connections, and existing buildings; (c) That orientation of buildings takes into account views, sun exposure and relationship with open space; (d) That building façades help define and give character to open spaces, streets, paths, greenways and parks. 	<p>Assessing the external appearance of buildings can involve subjective judgement. Including a set of assessment matters to narrow and better guide the value judgements by Council planners, as well as those providing advice to those developing buildings, are effective and leads to more efficient decision-making.</p> <p>There are no particular costs arising from this approach.</p> <p>The benefits are the more robust assessment of design, which is likely to yield better individual designs.</p>
(viii)	<p><u>Subdivision</u> Except as provided by Rule 20.7.2(i), subdivision is a restricted discretionary activity provided that the subdivision complies with the following standards:</p> <ol style="list-style-type: none"> (a) <u>Adherence to the River Terrace Resource Area Structure Plan and Movement Plan</u> All subdivision must be in general accordance with the River Terrace Resource Area Structure Plan at Rule 20.7.8 and the Movement Plan at Rule 20.7.9, in respect of the location of sub-area boundaries, roads, overlay boundaries, and greenway locations. A location variation of up to 50m shall be considered to be in general accordance with the Structure Plan and Movement Plan. (b) <u>Roading</u> 	<p>It is appropriate that subdivision for saleable lots in the RTRA is a restricted discretionary activity. The zone is anticipated for development, including saleable lots, roads, infrastructure, open space, and reserves. Accordingly it is necessary for the Council to have sufficient control over important infrastructure and design matters particularly where the Council will take over the ownership and management responsibilities of the infrastructure assets.</p> <p>The list of standards is comprehensive and includes the design parameters that have been assessed and included as part of the Urban Design analysis for the RTRA.</p> <p>Costs include costs to developer of having an uncertain consenting process where there is a potential for a consent to be declined. However, the rule also provides that any subdivision will not generally be</p>

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<p>All roads shall comply with the minimum overall width and minimum carriageway widths of the Indicative Road Cross Section Plans in Rule 20.7.10 below; and shall be in general accordance with the other features of those cross-sections.</p> <p>(c) <u>Development Parcels</u> An application to subdivide any Development Parcel shown on the Development Parcel Plan at Rule 20.7.10 within Residential Sub-Area A shall include an access lane that:</p> <ul style="list-style-type: none"> (i) Serves all lots within the Development Parcel, except any lots that have access direct from an adjoining road; (ii) Have a width of 5m – 6m (for two-way access) or 3m (for a subsidiary one-way access or pedestrian only access); (iii) Integrates with the adjoining road(s); (iv) Integrates with the adjoining Development Parcel(s) where it is logical to connect the access lane to access lanes in the adjoining Development Parcels. <p>(d) <u>Minimum and maximum lot sizes</u> The minimum and maximum lot sizes shall be:</p> <table border="1" data-bbox="416 943 1133 1193"> <thead> <tr> <th>Sub-Area</th> <th>Minimum lot size</th> <th>Maximum lot size</th> </tr> </thead> <tbody> <tr> <td>Residential Sub-Area A</td> <td>160m²</td> <td>500m²</td> </tr> <tr> <td>Retirement Living Overlay</td> <td>No minimum</td> <td>No maximum</td> </tr> <tr> <td>Residential Sub-Area B</td> <td>400m²</td> <td>1000m²</td> </tr> <tr> <td>Neighbourhood Centre Overlay</td> <td>No minimum</td> <td>No maximum</td> </tr> <tr> <td>Education Overlay</td> <td>No minimum</td> <td>No maximum</td> </tr> </tbody> </table> <p>(e) <u>Open Space Sub-Areas and Greenways</u> The Open Space Sub-Areas and Greenways shown on the Structure Plan at Rule 20.7.8 and the Movement Plan at Rule 20.7.9 shall be designed and implemented in stages, as part of the development of the adjacent Development Parcels, in accordance with the following:</p>	Sub-Area	Minimum lot size	Maximum lot size	Residential Sub-Area A	160m ²	500m ²	Retirement Living Overlay	No minimum	No maximum	Residential Sub-Area B	400m ²	1000m ²	Neighbourhood Centre Overlay	No minimum	No maximum	Education Overlay	No minimum	No maximum	<p>Appropriateness, Effectiveness and Efficiency, Costs and Benefits</p> <p>notified or require written approval, which will allow efficiency of resource consent processing.</p> <p>The costs impose a necessity for the developer to ensure that all design and infrastructural matters are addressed properly, to avoid breaching standards.</p> <p>The benefits of the standards are that the individual subdivision proposals will, overall, yield development across the RTRA that is consistent with the Structure Plan and the Movement Plan, which themselves reflect the high-quality design methodology adopted during the formulation of the RTRA.</p> <p>The Development Parcel planning method provides for comprehensive subdivision of individual parcels of land within the RTRA, as shown on the Development Parcel Plan. The subdivision of an individual Development Parcel will allow for a variety of lot sizes, to meet market demand, and in an efficient way in relation to common access, relationship of individual properties to one another, and relationship with surrounding open space.</p> <p>The minimum and maximum lot size table reflects the masterplanners' research into how Development Parcels can be developed to provide variety of lot sizes, taking into account building parameters, and providing for affordable housing product for the market.</p> <p>The open space sub-areas and greenways are fundamental and critical components of the Structure Plan, and the rules necessitate their creation, in stages as the development proceeds.</p> <p>Periphery treatment in the form of a vegetation row is provided for at the western and southern boundaries of the Resource Area to avoid or mitigate any potential effects from, or reverse sensitivity effects on, rural activities (particularly horticulture) on the neighbouring properties.</p>
Sub-Area	Minimum lot size	Maximum lot size																	
Residential Sub-Area A	160m ²	500m ²																	
Retirement Living Overlay	No minimum	No maximum																	
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<p>(i) An application for subdivision of any Development Parcel that adjoins an Open Space Sub-Area and/or Greenway shall include the adjoining Open Space Sub-Area and/or Greenway (unless that Open Space Sub-Area and/or Greenway has been previously consented);</p> <p>(ii) The application for subdivision of the Development Parcel shall be accompanied by a design plan(s) for the adjacent part of the Open Space Sub-Area and/or Greenway;</p> <p>(iii) The design plan(s) shall show the layout of the open space and outdoor recreational purpose of the relevant part of the Open Space Sub-Area and/or Greenway, including walkways, cycleways, and associated landscaping, and shall show how these integrate with any adjoining sections of the Open Space Sub-Area and/or Greenway;</p> <p>(iv) The approved design plan(s) shall be implemented as part of the works required to achieve s224(c) approval for the subdivision of the relevant Development Parcel.</p> <p>(f) <u>Periphery treatment at boundaries of the Resource Area</u> At the time of subdivision, every lot within Residential Sub-Areas A or B with a boundary adjoining the western or southern boundary of the River Terrace Resource Area shall be planted in vegetation to provide a suitable buffer from the potential effects of rural activities on the opposite side of the boundary. The planting shall:</p> <p>(a) Be a width of 2m parallel with the Resource Area boundary.</p> <p>(b) Be evergreen, and have a minimum height at planting of 2m and planted at a density of not less than 1m centres;</p> <p>(c) Be retained and maintained in perpetuity, and this shall be ensured by the imposition of a consent notice on the title of each affected lot.</p> <p>This rule, and mechanisms to implement it, shall cease to apply when, and to the extent that, the adjoining land is not zoned Rural.</p>	<p>The greenways on the Structure Plan are to be of sufficient width to ensure their open space and movement function are fulfilled, and a minimum 15m width is therefore promoted for this.</p> <p>Subdivision necessarily involves earthworks. Protocols for accidental discovery of any archaeological items are appropriate and necessary in fulfilling duties under the Act for heritage protection.</p>

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	<p>(g) <u>Greenways</u> The width of the Greenways as shown on the Movement Plan at Rule 20.7.9 shall be at least 15m.</p> <p>(h) <u>Infrastructure</u> All lots (other than any lot created for the purpose of roads, utilities, or reserves) shall be connected to reticulated services for potable water, wastewater, and power.</p> <p>(i) <u>Accidental archaeological discovery protocol</u> Any subdivision consent shall include a condition requiring that, if during site works pre-European (Māori) material is discovered, Kai Tahu ki Otago and Heritage New Zealand must be consulted, and all work is to cease immediately with a 20m exclusion zone established around the find with damage to any material minimised or avoided, until Kai Tahu ki Otago and/or Heritage New Zealand have finished assessing the find.</p> <p>(j) <u>The matters set out in [1 – 8] of [Rule 20.7.2(i)] for controlled activity subdivision</u></p>	
(x)	<p>For subdivision, the Council shall restrict the exercise of its discretion to the following:</p> <ol style="list-style-type: none"> 1. The provision of adequate network utility services and in particular the location, design and construction of these services. 2. The location, design and construction of access to public roads. 3. Earthworks necessary to prepare the site for development and/or use. 4. Subdivision design including the shape and arrangement of allotments to: <ul style="list-style-type: none"> • Facilitate convenient, safe and efficient access to all lots. • Facilitate the safe and efficient operation and the 	<p>The list of matters that the Council exercises discretion over is necessary for efficient administration of the subdivision rules. The Council is in the best position to assess an application's suitability particularly as the Council will own and administer the public assets.</p> <p>The matters assist in ensuring appropriate and intended subdivision outcomes. The items direct assessment to important factors for subdivision including access, lot arrangement, street widths, and amenities such as street trees and car parks, and provision for pedestrian movement.</p> <p>It is appropriate that restricted discretionary consents for subdivision do not need notification (unless there are special circumstances) or written</p>

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<p>economic provision of roading and network utility services to secure an appropriate and coordinated ultimate pattern of development.</p> <ul style="list-style-type: none"> • Maintain and enhance amenity values. • Facilitate adequate access to any rear lots. <p>6. The design of the Open Space Sub-Areas and Greenways, to provide for the open space and recreational needs of the community.</p> <p>7. The design of street amenities including the species and spacing of street trees to provide a coherent streetscape throughout the Resource Area.</p> <p>8. Provision for pedestrian movement, including the provision of walkways and cycleways.</p> <p>9. Any financial contributions necessary for the purposes set out in Section 15 of this Plan.</p> <p>10. Any amalgamations and easements that are appropriate.</p> <p>Note: see Section 16.7 General Standards (page 16:14) for the standards that are likely to be imposed as conditions of consent.</p> <p>Any application made under this rule will generally not be notified or require the written approval of affected parties.</p>	<p>approvals as once zoned, the subdivision and subsequent use of the land is anticipated.</p> <p>There are no costs arising from this approach. The benefits arise from the quality of information and assessment, which leads to better decision-making and physical outcomes.</p>
<p>(ix) <u>Visitor Accommodation in Residential Sub-Areas A and B</u> Visitor accommodation in Residential Sub-Areas A and B is a restricted discretionary activity. The Council’s discretion is restricted to the effects of</p> <ol style="list-style-type: none"> 1. Compatibility with surrounding landuse, character and amenity values; 2. Noise, lighting and loss of privacy; 3. Traffic generation, vehicle access and parking; 4. The nature and scale of the buildings and activities; 5. Hours of operation. 	<p>Visitor accommodation tends to have larger buildings and potentially different effects than normal residential uses, and it is appropriate that the Council retains the ability to assess and impose conditions, or potentially refuse an application if there is potential for effects on amenity values enjoyed by full time residents of an area.</p> <p>This is efficient and effective, conditions can be put on consents (such as the use of outdoor areas for entertaining needs to be cease at 10pm) to ensure adverse effects are mitigated.</p> <p>The additional transaction costs of consenting are outweighed by the benefits of requiring consent and for the resulting assessment.</p>

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20.7.4	<u>DISCRETIONARY ACTIVITIES</u>	
(i)	<u>Breach of General Standards in Rule 20.7.7</u> Any proposal that does not meet the general standards at Rule 20.7.7.	It is appropriate for any breaches of general development standards to be assessed and for the Council to have the power to impose conditions or to refuse consent. The default rule (Discretionary) allows this. Costs include higher transaction costs for applications and the uncertainty of the process, but these are outweighed by the benefits (for all parties) arising from the full assessment of potential effects.
(ii)	<u>Breach of subdivision standards in Rule 20.7.3(viii)</u> Any subdivision that does not meet the standards for discretionary (restricted) subdivision in Rule 20.7.3(viii).	It is appropriate for any breaches of subdivision standards to be assessed and for the Council to have the power to impose conditions or to refuse consent. The default rule (Discretionary) allows this. Costs include higher transaction costs for applications and the uncertainty of the process, but these are outweighed by the benefits (for all parties) arising from the full assessment of potential effects.
(iii)	<u>Breach of standards for buildings in Overlay areas</u> Any proposal that does not meet the standards for buildings in the Overlay areas at Rules 20.7.3(ii) – 20.7.3(v)	It is appropriate for any breaches of development standards to be assessed and for the Council to have the power to impose conditions or to refuse consent. The default rule (Discretionary) allows this. Costs include higher transaction costs for applications and the uncertainty of the process, but these are outweighed by the benefits (for all parties) arising from the full assessment of potential effects.
20.7.5	<u>NON-COMPLYING ACTIVITIES</u>	
(i)	<u>Noxious effects</u> Rule 7.3.5(i) of the Residential Resource Area (Noxious Effects) applies in the River Terrace Resource Area.	Noxious effects have the potential to adversely affect the amenity, health and safety enjoyed by residents of the zone. It is therefore efficient and effective for noxious activities to be discouraged in the RTRA and imposing the non-complying consent. Any proposal would require full scrutiny and assessment to ensure any activities do not create adverse effects.

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		The cost of this options is an uncertain consenting process, but this is outweighed by the benefits to future residents of the Zone from discouraging activities with potential for any noxious effects.
(ii)	<u>Direct Access onto Sandflat Road</u> Any direct vehicle access from a private property onto Sandflat Road.	<p>The structure plan includes provisions for connections through the development. The proliferation of private accesses onto Sandflat Road would affect the safety and efficiency of the use of that road and is therefore discouraged by the non-complying status.</p> <p>The cost is that potentially more land is required within the RTRA for access to lots at the eastern boundary, but these are outweighed by the benefits to the safety and efficiency of traffic on Sandflat Road.</p>
(iii)	<u>Any proposal that infringes Rule 20.7.3(vi) (e) or (f)</u> (for retail floor areas in the Neighbourhood Centre Overlay).	<p>Non complying status for breach of the retail floor area limits in the Neighbourhood Centre Overlay is necessary to discourage over-expansion of the overlay and larger floor area tenancies, to ensure that this overlay is for the purpose for which it is intended and protects amenity and vitality of the Cromwell Town Centre.</p> <p>The benefits of this frameworks are for the protection of the existing Cromwell Town Centre and for residents in the RTRA.</p> <p>These outweigh the costs arising from the transaction costs of applications.</p> <p>The rules are effective and efficient in ensuring the overlay's purpose is defined and that it does not have adverse effects on existing centres.</p>
(iv)	<u>In Residential Sub-Area A, any subdivision that creates an individual residential lot that is not part of a comprehensive subdivision of all of a Development Parcel.</u>	<p>The framework for the RTRA includes a Structure Plan and the need to undertake comprehensive subdivision, through Development Plans, to give effect to the Structure Plan.</p> <p>The non-complying status signals the intention of the RTRA to be developed comprehensively and in accordance with the Structure Plan.</p>

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		It is effective and efficient to ensure that residential development is provided for in a comprehensive manner and is not ad hoc and piecemeal. The benefits of this approach outweigh any potential costs.
(v)	<u>Activities not listed as permitted, controlled, discretionary (restricted) or discretionary activities in Rules 20.7.1 – 20.7.4 and not listed as prohibited activities in Rule 20.7.6</u>	It is appropriate for a default status of non-complying for activities that are not listed and therefore not anticipated by the RTRA provisions. The non-complying status allows the stringent assessment of an activity that is not covered by the permitted, controlled, discretionary (restricted) or discretionary activities in the Zone. Costs include higher costs associated with an uncertain consenting regime, the benefits outweigh this by ensuring the assessment of adverse effects.
(vi)	<u>Horn's Shaft setback area</u> Within the area marked on the Structure Plan: (a) No buildings shall be constructed; and (b) There shall be no stormwater discharge to ground.	The geotechnical report identifies the potential hazard associated with development near Horns Shaft, even though that shaft is on a neighbouring property and has been filled in. The non-complying status discourages any development close to the shaft and if there is such development it would be assessed thoroughly. This method is efficient and effective in managing any potential risk.
20.7.6	<u>PROHIBITED ACTIVITIES</u>	
(i)	<u>Any road or direct vehicle access from the River Terrace Resource Area onto State Highway 6.</u>	Direct access onto the State Highway is prohibited to prevent any adverse effects on the safety and efficiency of the highway. This is effective and efficient in that it removes the possibility of any person contemplating direct access. The benefits of this outweigh the costs of any process and the potential risk of allowing direct access.
20.7.7	<u>GENERAL STANDARDS</u> Except as set out in Rules 20.7.1 – 20.7.3 above, the following standards shall apply in the River Terrace Resource Area:	The Operative District Plan already contains a number of standards for the District. These standards have existed for some time and are known to both plan administrators and plan users. It is beneficial and efficient

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		<p>for them to be referred to as part of the RTRA provisions rather than creating new, identical or near-identical standards in the RTRA.</p> <p>There are no costs of this option.</p>
(i)	<p><u>Traffic generation and characteristics of activities</u> Rule 7.3.6(i) in the Residential Resource Area.</p>	<p>The RTRA promotes development that is very similar, with respect to traffic generation and characteristics, to the Residential Resource Area. It is therefore beneficial and efficient to cross reference Rule 7.3.6 (i) in the Residential Resource Area rather than repeating the rule in the RTRA.</p> <p>There are no costs to the option.</p>
(ii)	<p><u>State Highway 6 / Sandflat Road intersection upgrade</u></p> <p>(a) No more than 40 residential lots shall be created within the Resource Area until a left-turn deceleration lane is constructed at the State Highway 6 / Sandflat Road intersection in accordance with Austroads <i>Guide to Road Design Part 4A ("Unsignalised and Signalised Intersections")</i>.</p> <p>(b) No more than 300 residential lots shall be created within the Resource Area until a left-turn acceleration lane is constructed at the State Highway 6 / Sandflat Road intersection in accordance with Austroads <i>Guide to Road Design Part 4A ("Unsignalised and Signalised Intersections")</i>.</p> <p>The Council's discretion is limited to the safety and efficiency effects at the intersection.</p>	<p>It is appropriate that thresholds are provided to ensure that any amendments to the roading network at the state highway are made in a timely manner in association with development of the RTRA.</p> <p>This is effective and efficient as it allows for roading infrastructure investment at a similar time that the RTRA develops.</p>
(iii)	<p><u>Signs in the Residential Sub-Areas</u> Rule 7.3.6(vii) in the Residential Resource Area applies in the Residential Sub-Areas A and B.</p>	<p>The RTRA and the Residential Resource Area have similar characteristics and it is efficient to cross reference Rule 7.3.6 (vii) in the Residential Resource Area for signage.</p> <p>There are no costs to the option.</p>

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(iv)	<p><u>Signs in the Neighbourhood Centre Overlay</u> Rule 8.3.6(iv) in the Business Resource Area applies in the Neighbourhood Centre Overlay.</p>	<p>The RTRA's Neighbourhood Centre Overlay has similar characteristics to the Business Resource Area and it is efficient to cross reference Rule 7.3.6 (iv) in the Residential Resource Area for signage in the overlay.</p> <p>There are no costs to the option.</p>
(v)	<p><u>Keeping of animals</u> Rule 7.3.6(viii) in the Residential Resource Area.</p>	<p>The RTRA and the Residential Resource Area have similar characteristics and it is efficient to cross reference Rule 7.3.6 (viii) in the Residential Resource Area for the keeping of animals.</p> <p>There are no costs to the method.</p>
(vi)	<p><u>Total number of residential units within the Resource Area</u> The maximum number of residential units (including retirement living units) in the River Terrace Resource Area shall be 900.</p>	<p>Significant urban design analysis has been undertaken to support areas for development and their possible subdivision potential, and their impact on infrastructure networks. It is effective to impose an overall limitation on the number of dwellings in the RTRA to ensure that the RTRA when built out is consistent with the urban design intent of the RTRA and the wider infrastructure capabilities.</p>
(vii)	<p><u>Acoustic insulation of dwellings near State Highway 6</u> Any new residential buildings, or buildings containing activities sensitive to road noise, located within 80m of the boundary with State Highway 6 shall be designed, constructed and maintained to ensure that the internal noise levels do not exceed 35 dB LAeq(1 hr) inside bedrooms or 40 dB LAeq(1 hr) inside other habitable spaces in accordance with AS/NZ2107:2000.</p> <p>The titles affected shall be encumbered with a consent notice requiring ongoing compliance with this standard in perpetuity.</p>	<p>This rule is a standard rule requested by NZTA when development adjoins a state highway. It therefore anticipates a submission by NZTA to that effect.</p> <p>Inclusion of this requirement on a consent notice then alerts potential buyers to this increased level of building requirement as part of their due diligence in purchasing a property.</p> <p>The costs include the cost of the insulation but these are outweighed by the benefit of mitigating direct effects from highway noise and avoiding any potential reverse sensitivity effects.</p>
(viii)	<p><u>Reverse sensitivity – Motorsports Activities</u> (a) Activities enabled under Rules 20.7.1, 20.7.3 and 20.7.4 must be subject to a restrictive no-complaint covenant in favour of: (i) Cromwell Motorsport Park Trust Limited in respect of Lot 400</p>	<p>The surrounding area contains the Motorsports Park and the Speedway. Given the proximity of the RTRA to these activities there is the potential for reverse sensitivity effects whereby residents complain about the noise from the motorsports activities.</p>

Plan Provisions/Method		Discussion Appropriateness, Effectiveness and Efficiency, Costs and Benefits
	<p>DP466637 as the benefitting land;</p> <p>(ii) Central Otago District Council in respect of Lot 1 DP 403966 as the benefitting land.</p> <p>(b) For the purposes of this rule a “restrictive no-complaint covenant” is a restrictive covenant which:</p> <p>(i) is registered against the title(s) to the servient land on which the activities will take place in favour of the benefitting land;</p> <p>(ii) in the case of Lot 400 DP466637, prevents any owner or occupier of the servient land from complaining about or taking any steps to prevent motorsports and related activities lawfully carried out as authorised by the terms and conditions of resource consent number 070149 (as finally confirmed by Environment Court decision C132(2009)) including any variations effective prior to [date RTRA notified];</p> <p>(iii) in the case of Lot 1 DP 403966, prevents any owner or occupier of the servient land from complaining about or taking any steps to prevent speedway and stock car track and related activities lawfully carried out as authorised by the terms and conditions of the planning consent for those activities issued by the (former) Vincent County Council dated 29 September 1980 including any variations effective prior to [insert date RTRA notified];</p> <p>(iv) is binding on successors in title.</p> <p>(c) This rule does not apply if the owner of the benefitting land does not allow registration of the restrictive covenant.</p>	<p>It is essential that the new residents are cognisant of and accept the potential for noise effects, and that they do not take measures to limit the lawful activities allowed on the motorsports lands. The restrictive covenants recognise and enshrine this restriction.</p> <p>The method is effective, having been used successfully in other circumstances where a new sensitive activity locates nearby an established activity that generates noise effects that go beyond the site boundaries.</p> <p>The cost to the residents is the inability to complain about any lawful noise effects from the motorsports activities. This cost is outweighed by the benefits from ensuring that the two activities can occur nearby each other, in the Cromwell circumstances where land resources are otherwise finite and their efficient use is important.</p>
20.7.8	<u>STRUCTURE PLAN</u>	<p>These plans are the product of a comprehensive urban design process which identified, evaluated and tested various options for the spatial layout of activities, roading and open spaces through the RTRA site. The chosen plans are the most efficient and effective in delivering a resource are that will fulfil the demand for more housing for the Cromwell market, with a variety of options for market choice and in a range of affordability. The retirement area, neighbourhood centre and education overlays are located for best and most convenient and efficient access to residents of the resource area. The open space areas and greenways provide for the amenity of residents and enable a</p>
20.7.9	<u>MOVEMENT PLAN</u>	
20.7.10	<u>DEVELOPMENT PARCEL PLAN</u>	
20.7.11	<u>INDICATIVE ROAD TYPE CROSS-SECTIONS</u>	

Plan Provisions/Method		Discussion Appropriateness, Effectiveness and Efficiency, Costs and Benefits
		<p>strong identity and sense of place. The road cross sections provide for consistency across the resource area and will assist in establishing a sense of place. The Development Parcel plan works alongside the Development Parcel provisions to ensure comprehensive and integrated subdivision across the resource area.</p>

7. The risk of acting or not acting – section 32(2)(c)

7.1 Risk of acting

There is no significant risk of acting (i.e. proceeding with this plan change). Any environmental risk has been addressed in the provisions of the proposed RTRA. There are no other risks.

7.2 Risk of not acting

The risks of not acting are:

- Under-provision of residential zoned land for the future needs may result in adverse housing supply and cost consequences within the Cromwell area;
- There is a risk that in not rezoning this land for urban activities the land could be subdivided into rural residential sized or small rural lots (in line with much of the operative zoning), therefore missing the opportunity to utilise a finite land resource efficiently in a way this will better meet market needs for residential capacity in the District;
- Overall, there is a risk of failing to achieve a potentially important component of enabling housing to contribute to the social, economic and cultural well-being in the Cromwell area in a timely and efficient manner.

8. Evaluation of the RTRA Change under the higher order District Plan provisions – s32(3)

The Central Otago District Plan was made operative in 2008 and has been updated progressively through Council-initiated Plan Changes and Private Plan Changes.

The relevant Significant Issues of the ODP are set out in Section 2 are as follows:

- *Central Otago's Unique and Distinctive Landscape*
- *Soil Resources*
- *Management of the District's town and Associated Services*
- *Transportation Network*
- *Increasing Building Numbers*

The significant issues are then developed through the remaining chapters of the District Plan.

Chapter 6 of the District Plan has a number of objectives and supporting policies that are relevant to the proposed Change:

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 welling and for their health and safety; and*
- (b) Meet the present and reasonably foreseeable needs of these people and communities*

6.3.1 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.

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.

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

The objectives and their policies are supported by the Proposed RTRA in the following manner:

- The increased residential capacity will provide for the needs of the growth of Cromwell;
- The masterplanned development which includes reserves and open space will ensure that needs of residents' passive and active recreational needs are met;
- The proposed neighbourhood centre area will enable people to provide for their economic wellbeing and enable residents to not need to travel far for essential services;
- The proposed plan change enables the provision of a retirement village;
- The proposed provisions enables lot sizes of a mix of lower, medium and higher density lots for members of the community to access residential property relative to their needs, and provides affordable options.
- The provision for a school enables the future community's education and wellbeing within the site;
- Proposed landscaping and planted areas will enhance the environment and provide for amenity for those living in and visiting the Resource Area.
- Provision of infrastructure upgrades necessary to support urban activities in this location.

8.1.3 **Summary – the Operative District Plan**

The Change to the OPD will ensure that the RTRA implements the higher order issues set out in Chapter 2 and the objectives and supporting general policies of the ODP. The Change is likely to better enable use of land to contribute positively to the District's growth in a high quality manner that also provides increased housing stock.

9. **Evaluation of the RTRA Change under the regional planning instruments – s32(3)**

The District Plan must give effect to the operative Regional Policy Statement and must have regard to any proposed Regional Policy Statement.

instruments are addressed as follows.

9.1 **The Operative Otago Regional Policy Statement**

The operative Regional Policy Statement contains objectives that are relevant to this proposal, including:

- 4.4.1 to 4.4.5 (Manawhenua Perspective)
- 5.4.1 to 5.4.5 (Land)
- 6.4.2 to 6.4.7, 6.57 (Water)
- 7.4.1 (Air)
- 9.4.1 to 9.4.3 (Built Environment)
- 10.4.1 (Biota)

Each objective has related policies which have also been considered. The plan change provisions for the RTRA are consistent with, and give effect to, the relevant operative RPS provisions, as addressed in [Table 6](#) below.

Table 6: Assessment of the RTRA under the Operative Regional Policy Statement

Objectives and policies	Discussion
4.4.1 to 4.4.5 (Manawhenua Perspective)	<p>The RTRA objectives ensure recognition of the special significance of the culture of Kai Tahu. This is reflected by the protocol for the accidental discovery of koiwi, waahi taoka, waahu tapu or other artefacts.</p> <p>The site is not in close proximity to a waterbody.</p>
5.4.1 to 5.4.5 (Land)	<p>The RTRA supports these objectives (and related policies) by using a structure plan to ensure development, open space and connections are appropriately located. The RTRA promotes diversification of, and sustainable, land use, provides for suitable access, and provides for additional residential capacity.</p> <p>Rezoning land in this location close to the existing Cromwell township enables use of appropriate and developable land, therefore reducing pressure on inappropriate areas (such as outstanding natural landscapes).</p> <p>The RTRA achieves diversification, providing for a range of housing typologies and retirement living and a mix of uses. It represents a sustainable use of the land resource.</p>
6.4.2 to 6.4.7, 6.57 (Water)	<p>The objectives and allied policies provide for the protection and enhancement of Otago's generally high standard of water.</p> <p>The site is not adjacent to any waterbody.</p> <p>As indicated in the report by Paterson Pitts Partners (DOCUMENT 8) domestic and firefighting will be provided by the preferred option of a 300mm pipe duplication along Bannockburn Road. Water for irrigation of the proposed reserves will be provided for by an independent bore from the Cromwell terrace aquifer.</p>
7.4.1 (Air)	<p>Discharges to air resulting from the development will adhere to relevant regional rules.</p>
9.4.1 to 9.4.3 (Built Environment)	<p>The objectives recognise that urban development and settlement can impact on the quality of the built environment. It is proposed to rezone to enable increased density in this area to meet future needs. Care has been taken to ensure that the proposed development achieves a high quality of urban design and appearance, through the structure plan, design controls for buildings, and design guidelines for subdivision and development.</p> <p>The increased density will be able to be serviced by infrastructure (as outlined in the supporting documents) and provides for growth without adverse environmental impacts.</p> <p>Setbacks from adjoining properties and the road provide for the minimising of reserve sensitivity.</p>
10.4.1 (Biota)	<p>Plant and animal pests threaten the diversity and productivity of the Otago's natural eco-systems and the indigenous vegetation and habitats. It is proposed to plant the new reserve and access ways in mostly native planting in order to contribute to local biodiversity.</p>

Accordingly, the amended RTRA provisions are consistent with, and give effect to, the relevant operative RPS provisions.

9.2 The Proposed Regional Policy Statement (Decisions Version) (Proposed RPS-DV)

The operative RPS is currently under review. Decisions on submissions to the Proposed Regional Policy Statement have been issued and the appeal period has closed. A number of appeals have been received and are being progressed through the Environment Court at present.

The Proposed RPS-DV contains various objectives that are relevant to this proposal. These are addressed in [Table 7](#) below.

Table 7: Assessment under the Proposed RPS-DV

Objectives and Policies	Discussion
2.1 to 2.2 (Kai Tahu values and interests)	<p>The RPS requires that Kai Tahu Ki Otago values and interests are recognised and kaitiakitaka is expressed. In particular this requires the ability to participate in resource management process and implementation.</p> <p>Kai Tahu Ki Otago will be notified of the Plan Change and will have the opportunity make a submission. Given that the site is not in proximity to any water body, is not within an outstanding landscape, and will be connected to reticulated services, pre notification consultation was not deemed to be necessary.</p>
3.1 to 3.2 (Otago has high quality natural resources and ecosystems)	Fresh water, air quality, soil values, ecosystems and indigenous biodiversity are managed to the extent necessary by the Change.
4.1 (communities are resilient, safe and healthy)	The RTRA is not subject to or will exacerbate any significant risk from natural hazards.
4.3 (infrastructure managed in a safe way)	<p>Water and wastewater infrastructure will be provided to service the RTRA.</p> <p>The effects from traffic to, from and within the zone can be accommodated on the adjacent roading network. The development will comply with up to date standards which aims to reduce vehicles speeds and promote road safety.</p>
4.5 (urban growth and development is well designed, reflects local character and integrates effectivity with adjoining urban and rural environments)	The development is shaped by a structure plan which provides for suitable development areas, green spaces, and walkway linkages in the most appropriate locations. Design and appearance of built form is managed through specific design guidelines for the RTRA.
5.1 to 5.4 (public access, historic heritage, economic production, adverse effects of using and enjoying Otago's natural and physical resources are minimised)	A public walkway, linear park, suburban park and greenways are provided through the RTRA.

The amended RTRA provisions are therefore consistent with, and give effect to, the relevant Proposed RPS-DV provisions.

9.3 Regional Plans

A District Plan must not be inconsistent with a Regional Plan. There are two relevant regional plans: the *Regional Plan: Water*, and the *Regional Plan: Air*.

The development relies on consents that will be applied for under the *Regional Plan: Water* in relation to water supply and wastewater disposal both by the applicant and as part of the Council's consents. Stormwater disposal will be possible without consent under this regional plan. The proposed Change is therefore consistent with the *Regional Plan: Water* and no further analysis is necessary.

10. Evaluation of the National planning instruments

10.1 Introduction

The following national policy statements (**NPS**) have very limited applicability to this requested Change:

- The *National Policy Statement for Freshwater Management*
- The *National Policy Statement for Renewable Electricity Generation*
- The *National Policy Statement on Electricity Transmission*

To the extent that these statements are relevant, the requested Change will be consistent with them.

10.2 Assessment under the *National Policy Statement on Urban Development Capacity 2016*

The *National Policy Statement on Urban Development Capacity 2016* is relevant to this Change. It came into effect on 1 December 2016. It recognises the national significance of:

- (a) urban environments and the need to enable such environments to develop and change; and
- (b) providing sufficient development capacity to meet the needs of people and communities and future generations in urban environments.

The following objectives apply to all decision makers when making a planning decision that affects an urban environment.

Objective Group A – Outcomes for planning decisions

OA1: Effective and efficient urban environments that enable people and communities and future generations to provide for their social, economic, cultural and environmental wellbeing.

OA2: Urban environments that have sufficient opportunities for the development of housing and business land to meet demand, and which provide choices that will meet the needs of people and communities and future generations for a range of dwelling types and locations, working environments and places to locate businesses.

OA3: Urban environments that, over time, develop and change in response to the changing needs of people and communities and future generations.

Objective Group B – Evidence and monitoring to support planning decisions

OB1: A robustly developed, comprehensive and frequently updated evidence base to inform planning decisions in urban environments.

Objective Group C – Responsive planning

OC1: Planning decisions, practices and methods that enable urban development which provides for the social, economic, cultural and environmental wellbeing of people and communities and future generations in the short, medium and long-term.

OC2: Local authorities adapt and respond to evidence about urban development, market activity and the social, economic, cultural and environmental wellbeing of people and communities and future generations, in a timely way.

Objective Group D – Coordinated planning evidence and decision-making

OD1: Urban environments where land use, development, development infrastructure and other infrastructure are integrated with each other.

OD2: Coordinated and aligned planning decisions within and across local authority boundaries.

All of these objectives are relevant to the RTRA Change and they are assessed generally as follows:

- (a) The urban environment facilitated by the new Structure Plan and provisions is effective and efficient because it co-locates and consolidates the core commercial functions (retirement area, small scale commercial area) in a single village centre with walkable neighbourhoods and gradation of

residential densities around the core. This will enable the residents and visitors to provide for their social, economic, cultural and environmental wellbeing.

- (b) The urban environment facilitated by the new Structure Plan and provisions has sufficient opportunities for the development of housing and adequate open space areas and provides choices that will meet the needs of people and communities and future generations for a range of dwelling types and locations, retirement and places to locate businesses.
- (c) The urban environment will, over time, develop and change in response to the changing needs of people and communities and future generations; the provisions are sufficiently flexible to allow such evolution.
- (d) The RTRA Change is based on sound economic evidence that supports the Change and which has informed the planning decisions made in respect of this Change.
- (e) This Change represents an opportunity for the local authority to allow the RTRA to provide for urban development, market activity and the social, economic, cultural and environmental wellbeing of people and communities and future generations, in a timely way.
- (f) Development within, and the infrastructure necessary for, the RTRA will be integrated with each other.

The key objectives of the *National Policy Statement on Urban Development Capacity 2016* are therefore achieved by this Change.

11. Conclusions

The above evaluation has examined the RTRA plan change under section 32 of the Act. The broad conclusions from that evaluation are that:

- (a) Under section 32(1)(a), the objectives of the RTRA are necessary and the most appropriate way to achieve the purpose of the Act, taking into account the existing higher order provisions of the District Plan and the Regional Policy Statement;
- (b) The policies and methods are the most appropriate way to achieve the RTRA objectives, taking into account the locational context, the background reports, the design methodology and resulting masterplan and Structure Plan for the Resource Area;
- (c) The RTRA provisions will be efficient and effective in achieving the objectives, taking into account their costs and benefits including the environmental, social and economic costs and benefits, and the opportunities for economic growth and employment anticipated;
- (d) There is no risk of acting given that the provisions manage effects of the activities on the wider environment; there is no uncertainty in or insufficiency of the information about the subject matter of the provisions. There is risk of not acting as the finite land resource could be lost to inefficient land uses.

Overall, for the reasons expressed above, and in the supporting reports including the assessment of effects on the environment, the RTRA will achieve the higher order objectives of the District plan and the purpose and principles of the Act.