

Appendix B – Section 32 RMA Evaluation



The following Table 1 evaluates the three main land use options for the site; industrial, residential and a combination of the two.

Table No. 1

Costs and Benefits Evaluation for PC13 Land Use Options		
Alternative	Costs	Benefits
1 Industrial Land Use	<p><u>Environmental</u></p> <ul style="list-style-type: none"> Potential effects (i.e. noise, lighting, visual, odour, traffic) associated with industrial activities on nearby existing residential development to the south of the site and on the racecourse itself, including its facilities that are used for functions such as weddings. The racecourse is a regionally significant sporting and recreational facility that relies on providing an attractive setting for the sport, with much of that attraction being the outdoor experience of being entertained in a large open space area. Impacts of industrial traffic on residential streets designed for slow speeds and walking and cycling can be effectively avoided as there is no need for industrial traffic to enter the residential area. <p><u>Economic</u></p> <ul style="list-style-type: none"> Development yield of industrial activity on this site is low, i.e. industrial activities require large land areas. The industrial activities would need to have separation from the existing residential neighbours and from the racecourse itself limiting the developable area. The part of the site between the grandstand and the Metlife care retirement village is unlikely to be suitable for industrial use. Lost opportunity to leverage positive benefits of the integration of residential land 	<p><u>Environmental</u></p> <ul style="list-style-type: none"> No need to address potential reverse sensitivity effects on nearby industrial activities to the east and south. Industrial activities are present in parts of the surrounding locality and therefore the land use would be consistent with part of the existing established built environment and character of those areas. A stormwater treatment pond could be used to treat stormwater from the existing racecourse facilities, resulting in an improvement in stormwater discharge quality. <p><u>Economic</u></p> <ul style="list-style-type: none"> There would be economic benefits from additional industrial land becoming available in Te Rapa. <p><u>Social</u></p> <ul style="list-style-type: none"> Additional industrial land development capacity could lead to further employment potential which is a social benefit. <p><u>Cultural</u></p> <ul style="list-style-type: none"> There are no identifiable cultural benefits.



Alternative	Costs	Benefits
	<p>use with the Te Rapa Racecourse, such as shared use of open space.</p> <ul style="list-style-type: none"> • Cost of establishing an appropriate planning framework for industrial development to occur on the site, incorporating the necessary environmental controls. • Reduced attractiveness of the racecourse as an entertainment and sporting venue may reduce the number of attendees at the races and other functions, reducing the economic viability of the facility. <p><u>Social</u></p> <ul style="list-style-type: none"> • There are potential social costs due to a lost opportunity to provide needed housing in a suitable location close to services and employment and existing residential development. • There is a social cost in the continued difficulty providing housing supply at the time of a significant housing shortage. <p><u>Cultural</u></p> <ul style="list-style-type: none"> • There are no identifiable cultural costs. 	
2 Residential Land Use (including medium density residential land use)	<p><u>Environmental</u></p> <ul style="list-style-type: none"> • Reverse sensitivity effects could arise in relation to the existing industrial activities adjoining the site if the interface is not appropriately managed. <p><u>Economic</u></p> <ul style="list-style-type: none"> • Costs associated with the plan change process to give effect to an appropriate planning framework for residential land use, including managing reverse sensitivity effects. 	<p><u>Environmental</u></p> <ul style="list-style-type: none"> • Residential development is designed to be compatible with and enhance the Te Rapa Racecourse. It provides an attractive gateway to the racecourse and an activated interface between residential and racing activities. • The site integrates well with existing residential activities on its southern boundary. • The site is of a size which allows for a comprehensive residential design that relates appropriately to the surrounding environment



Alternative	Costs	Benefits
	<p><u>Social</u></p> <ul style="list-style-type: none"> There is a social cost in not providing the additional employment associated with industrial development. <p><u>Cultural</u></p> <ul style="list-style-type: none"> There are no identifiable cultural costs. 	<p>and provides a high quality living environment.</p> <ul style="list-style-type: none"> The open space areas associated with the residential area can be shared with the racecourse. The stormwater treatment pond can be used to treat stormwater from the existing racecourse facilities, resulting in an improvement in stormwater discharge quality. The pond also provides an amenity for residents. <p><u>Economic</u></p> <ul style="list-style-type: none"> Utilisation of existing three water and transport infrastructure significantly reduces cost of establishing residential development, compared to extending new infrastructure into greenfield areas. To make a contribution to remedying the short to medium term shortfall in housing supply in Hamilton, supporting greater competition in the housing market, which should improve affordability of housing. Land areas of this size in the existing built up area close to amenities are a scarce resource. To support the WRCl's ongoing financial viability by establishing an alternative income stream through the residential development of part of the club's land that is underutilised. <p><u>Social</u></p> <ul style="list-style-type: none"> Further housing choice in a location close to major industrial employment and commercial centres, including the Central City. Opportunities for security of home availability/ownership and indirectly enhancing affordability by increasing supply.



Alternative	Costs	Benefits
		<u>Cultural</u> <ul style="list-style-type: none"> There are no identifiable cultural benefits.
3 Combined Industrial and Residential (industrial for a strip approximately 50m wide adjoining existing industrial-zoned land, residential for the balance)	<u>Environmental</u> <ul style="list-style-type: none"> Potential effects (i.e. noise, lighting, visual, odour, traffic) associated with industrial activities on nearby existing residential development to the south of the site and on the racecourse itself, including its facilities used for functions such as weddings. The racecourse is a regionally significant sporting and recreational facility that relies on providing an attractive setting for the sport, with much of that attraction being the outdoor experience of being entertained in a large open space area. Effects of the new residential development interfacing with new industrial development would also need to be addressed, probably through an open space buffer. Given the mixed use, industrial traffic would be mixed with residential traffic, including cyclists and pedestrians, creating safety and amenity concerns. <u>Economic</u> <ul style="list-style-type: none"> Development yield of industrial activity is likely to be low, i.e. industrial activities require a large land area and a narrow strip of land would be inefficient. A 50m wide strip of land for industrial use is economically inefficient as it would need roading of minimum 20m width to be designed to service it separately from the residential area, leaving only 30m depth for industrial lots. Generally 50m minimum depth is needed for industrial lots, suggesting a 	<u>Environmental</u> <ul style="list-style-type: none"> No need to address potential reverse sensitivity effects on nearby industrial activities to the east and south. Industrial activities are present in parts of the surrounding locality and therefore that land use would be consistent with the existing established built environment and character of those areas. <u>Economic</u> <ul style="list-style-type: none"> There would be economic benefits from additional industrial land and residential land becoming available, but the smaller areas of each and the need to service them would not be as efficient as a single land use. <u>Social</u> <ul style="list-style-type: none"> Additional industrial land development capacity and additional housing land could have social benefits, but the small size of each would limit benefits. <u>Cultural</u> <ul style="list-style-type: none"> There are no identifiable cultural benefits.



Alternative	Costs	Benefits
	<p>realistic depth for the industrial development would be 70m which would further reduce the residential area and yield.</p> <ul style="list-style-type: none"> Reduced area of residential land would also be inefficient as development and infrastructure costs would be spread across smaller area, and there would be less critical mass to support amenities such as walking and cycling links and the playground and create a vibrant community. There would be a cost in developing a planning framework to manage the interface between industrial and residential land uses. <p><u>Social</u></p> <ul style="list-style-type: none"> There are potential social costs in a lost opportunity to provide as much housing as for the residential alternative. There is a social cost in the residential area not being large enough to support important residential amenities. <p><u>Cultural</u></p> <ul style="list-style-type: none"> There are no identifiable cultural costs. 	

The following Table 2 evaluates the four principal RMA process alternatives for achieving the preferred residential land use on the site under s32.

Table No. 2

Costs and Benefits Evaluation for PC13 Process Options		
Alternative	Costs	Benefits
1. Do nothing, i.e. retain Major Facilities Zone and develop the land for purposes anticipated under the zone	<p><u>Environmental</u></p> <ul style="list-style-type: none"> Current urban land which is readily serviced will continue to be under utilised resulting in a waste of available land resource in the City. Existing stormwater management remains in place, with no on-site treatment. 	<p><u>Environmental</u></p> <ul style="list-style-type: none"> Less need to address potential reverse sensitivity effects of nearby industry, although some potential development of the site in accordance with the Major Facilities zone (eg. Visitor accommodation, ancillary



Alternative	Costs	Benefits
	<p><u>Economic</u></p> <ul style="list-style-type: none"> The current zone provides for activities related to the racing industry and racecourse. The area of land proposed to be rezoned is not needed for these purposes now or in the future and represents a surplus of land for the Waikato Racing Club. Retaining the current zoning represents an economic cost to the Racing Club in that they would miss out on income generation that would assist in the continued operation of the club and its potential expansion. In wider economic efficiency terms there is an economic cost to the community in having serviced urban land lying vacant, rather than being utilized to meet a need for additional urban development. Vacant land of this scale in the city is a scarce resource. <p><u>Social</u></p> <ul style="list-style-type: none"> There are potential social costs in a lost opportunity to provide needed housing in a location close to services and employment. <p><u>Cultural</u></p> <ul style="list-style-type: none"> There are no identifiable cultural costs. 	<p>residential) may generate some reverse sensitivity effects.</p> <ul style="list-style-type: none"> No change to current character and amenity of the site as experienced by neighbours. <p><u>Economic</u></p> <ul style="list-style-type: none"> No costs associated with the plan change or resource consent process. No costs associated with construction of infrastructure and roading. <p><u>Social</u></p> <ul style="list-style-type: none"> Maintenance of the status quo, and therefore maintenance of the existing expectations of land use and associated effects for neighbours and wider community. <p><u>Cultural</u></p> <ul style="list-style-type: none"> There are no identifiable cultural benefits.
2. Lodge Non-Complying Activity Consents for residential activities	<p><u>Environmental</u></p> <ul style="list-style-type: none"> There is a need to address possible reverse sensitivity effects, particularly around noise. This will add to consenting and building costs on the perimeter of the site adjacent to the industrial zone. With individual resource consents for development, there is risk of 'piecemeal' development layouts that can detract from the overall intention and comprehensive 	<p><u>Environmental</u></p> <ul style="list-style-type: none"> Higher specificity and certainty of effects as a result of more detailed development outcome required in a resource consent. <p><u>Economic</u></p> <ul style="list-style-type: none"> If granted, consent would enable further housing for the Hamilton market to be built, providing a development opportunity for the Racecourse. <p><u>Social</u></p>



Alternative	Costs	Benefits
	<p>design approach through a Precinct Plan in the District Plan.</p> <ul style="list-style-type: none"> Potential inconsistent approach to reverse sensitivity effects on neighbours as a result of piecemeal consenting. <p><u>Economic</u></p> <ul style="list-style-type: none"> The risk of a Non-Complying Activity being declined are high, making it unlikely to be attractive as an investment proposition. Therefore, the cost of the application process may not be recoverable. Because a Non-Complying Activity requires a higher level of design than a plan change there are additional upfront design and consenting costs. As a Non-Complying Activity consent is restricted by a specific design and a consent lapse period it is highly likely that design rework and subsequent consent changes will be needed, adding compliance costs. In addition, as a substantial development of at least 200 units the consent could lapse before it is given effect to, leading to inefficiency of uncompleted development. Future regulatory changes may also result in materially higher costs to consenting. <p><u>Social</u></p> <ul style="list-style-type: none"> The social benefits of a coordinated approach to provision of community infrastructure such as open space and transport networks, would be lost. <p><u>Cultural</u></p> <ul style="list-style-type: none"> There are no identifiable cultural costs. 	<ul style="list-style-type: none"> The development of housing would provide additional housing supply for Hamilton providing a social benefit. <p><u>Cultural</u></p> <ul style="list-style-type: none"> There are no identifiable cultural benefits.



Alternative	Costs	Benefits
3. Pursue rezoning through District Plan Review	<p><u>Environmental</u></p> <ul style="list-style-type: none"> Less certainty of precise effects than consenting, noting that consenting is still an outcome required with this option, prior to development commencing. <p><u>Economic</u></p> <ul style="list-style-type: none"> The next District Plan review is likely to be approximately 10 years away. Therefore, this alternative carries additional holding costs and lost opportunity costs of being unable to develop the land for at least 10 years. There is an economic cost in delaying development when the need for additional housing is in the short-medium term. There is a need to address possible reverse sensitivity effects, particularly around noise. This will add to the building cost on the perimeter of the site adjacent to the industrial zone. <p><u>Social</u></p> <ul style="list-style-type: none"> There is a social cost in delaying development, particularly the provision of additional housing when it is needed in the short-medium term. <p><u>Cultural</u></p> <ul style="list-style-type: none"> There are no identifiable cultural costs. 	<p><u>Environmental</u></p> <ul style="list-style-type: none"> Including the proposed change in the District Plan Review would provide the opportunity to holistically consider the site and set objectives and policies that will guide future development with the other considerations of the future review. This would ensure any effects on the environment can be appropriately managed. This process would allow the future development outcome on the site to align with the new Medium Density Residential Standards that HCC are currently adopting to give effect to the Enabling Housing Act. They would have been in place for some years by the time of the next review. <p><u>Economic</u></p> <ul style="list-style-type: none"> Including the proposal in the next District Plan Review would likely lead to a larger proportion of the costs being shared with HCC providing an economic benefit to the applicant. If included in the District Plan Review, it would allow the area to be developed according to the proposed provisions. This would allow the Racing Club to realise the development potential of the land. However, the benefit would be significantly delayed. <p><u>Social</u></p> <ul style="list-style-type: none"> The development of housing would provide additional housing supply for Hamilton providing a social benefit, although the delay reduces the certainty of this outcome. <p><u>Cultural</u></p> <ul style="list-style-type: none"> There are no identifiable cultural benefits



Alternative	Costs	Benefits
4. Rezone through private plan change	<p><u>Environmental</u></p> <ul style="list-style-type: none"> There are potential reverse sensitivity effects, particularly in relation to noise, that could create environmental costs. The potential noise sources are mainly the nearby industrial activities and the effects can be adequately mitigated through design of the development and imposition of specific rules, including setbacks, building orientation and acoustic treatment. The houses around the perimeter of the site will be required to be constructed to a standard that ensures the internal acoustic living environment is suitable. There is less certainty of precise effects than consenting, noting that consenting is still an outcome required with this option, prior to development commencing. <p><u>Economic</u></p> <ul style="list-style-type: none"> There are significant application costs associated with a private plan change that do not arise with the do nothing alternative and are more than for the District Plan review alternative. <p><u>Social</u></p> <ul style="list-style-type: none"> There are no identifiable social costs. <p><u>Cultural</u></p> <ul style="list-style-type: none"> There are no identifiable cultural costs. 	<p><u>Environmental</u></p> <ul style="list-style-type: none"> The private plan change provides the opportunity to holistically consider the site and set objectives, policies and rules that will guide future development. This will ensure any effects on the environment can be appropriately managed, but at the same time provide some flexibility for different development outcomes and timing, particularly when compared to the resource consent option. Applying for a private plan change will allow the WRCI to align the future development outcome on the site with the new Medium Density Residential Standards that HCC has recently notified to give effect to the Enabling Housing Act. This coordinated approach ensures a consistent approach across the city. Improvements in stormwater management and treatment can be achieved in the short term. <p><u>Economic</u></p> <ul style="list-style-type: none"> The benefits of increasing the supply and choice of housing, therefore contributing to a more competitive housing market in the city which can contribute to improved affordability. The benefits of efficient use of investment in existing water and wastewater infrastructure. The proposed plan change will allow the area to be developed according to the proposed provisions. This will allow the Racing Club to realise the economic benefits of the land development in the short term. Economic benefits are realized much earlier than Option 3.



Alternative	Costs	Benefits
		<u>Social</u> <ul style="list-style-type: none"> • The development of housing would provide additional housing supply for Hamilton, supporting a competitive market, affordability and providing a social benefit. • Provides certain signal to the market of forthcoming dwellings in the area <u>Cultural</u> <ul style="list-style-type: none"> • There are no identifiable cultural benefits.

The following Table 3 evaluates the main options available for the key District Plan provisions.



Table No. 3

Costs and Benefits Evaluation for PC13 District Plan provisions

Alternative	Costs	Benefits
1. Include site-specific objective and policies (Objective 4.2.16 and the associated Policies 4.2.16 a-e).	<p><u>Environmental</u></p> <ul style="list-style-type: none"> There are no identifiable environmental costs. <p><u>Economic</u></p> <ul style="list-style-type: none"> There are some economic costs associated with development needing to be consistent with the objectives and policies, but these are not out of scale with the expectations for new residential development within the city. <p><u>Social</u></p> <ul style="list-style-type: none"> There are no identifiable social costs. <p><u>Cultural</u></p> <ul style="list-style-type: none"> There are no identifiable cultural costs. 	<p><u>Environmental</u></p> <ul style="list-style-type: none"> The site-specific objectives and policies provide support for the rules that are needed to manage environmental effects, particularly to manage reverse sensitivity effects on adjacent industrial activities and to manage traffic and infrastructure effects. <p><u>Economic</u></p> <ul style="list-style-type: none"> The inclusion of objectives and policies will provide greater certainty of outcomes for future building and consenting, minimizing the costs and risks of consenting. Consistency with other Medium Density Residential zones in the ODP will support certainty and efficiency of future consenting. <p><u>Social</u></p> <ul style="list-style-type: none"> Policies supporting a Medium Density Residential zone and a variety of housing types also support additional housing supply that can contribute to competitive land markets and affordability. <p><u>Cultural</u></p> <ul style="list-style-type: none"> There are no identifiable cultural benefits.
2. Zone as Medium Density Residential instead of General Residential	<p><u>Environmental</u></p> <ul style="list-style-type: none"> There are no identifiable environmental costs. <p><u>Economic</u></p> <ul style="list-style-type: none"> There are additional costs associated with developing and implementing site-specific Medium Density Residential zone provisions to be consistent with other Medium Density Residential zone provisions in the ODP. 	<p><u>Environmental</u></p> <ul style="list-style-type: none"> Benefits of higher density include reducing the need for urban expansion on the outskirts of the city, supporting a more compact urban form and supporting the use of public transport and consequently reducing the need to use private cars, consequently reducing greenhouse gas emissions. Higher density provides critical mass to support provision of



Alternative	Costs	Benefits
	<p><u>Social</u></p> <ul style="list-style-type: none"> There are no identifiable social costs. <p><u>Cultural</u></p> <ul style="list-style-type: none"> There are no identifiable cultural costs. 	<p>amenities such as a playground and walking and cycling links.</p> <p><u>Economic</u></p> <ul style="list-style-type: none"> The more efficient use of existing infrastructure reduces the need to invest in new infrastructure. The Medium Density Residential zone includes the MDRS which allows up to 3 units as permitted activities reducing consenting and compliance costs. Medium density development in this location provides good accessibility to jobs, community services and recreational areas which is efficient. <p><u>Social</u></p> <ul style="list-style-type: none"> Higher densities contribute to lower unit costs of housing, in turn contributing to improved affordability. Proximity to jobs, public transport, community services and other amenities supports social cohesion of the community. <p><u>Cultural</u></p> <ul style="list-style-type: none"> There are no identifiable cultural benefits
3. Include a Precinct Plan in the ODP (Figure 4.5-1)	<p><u>Environmental</u></p> <ul style="list-style-type: none"> There are no identifiable environmental costs. <p><u>Economic</u></p> <ul style="list-style-type: none"> Adds complexity to plan provisions and future resource consents, potentially adding compliance costs. <p><u>Social</u></p> <ul style="list-style-type: none"> There are no identifiable social costs. <p><u>Cultural</u></p> <ul style="list-style-type: none"> There are no identifiable cultural costs. 	<p><u>Environmental</u></p> <ul style="list-style-type: none"> The Precinct Plan provides greater certainty that site-specific environmental effects are identified and can be managed through bespoke plan rules and spatial planning. The rule requiring compliance with the Precinct Plan will ensure that the key design, environmental and infrastructure outcomes will be achieved. <p><u>Economic</u></p> <ul style="list-style-type: none"> The certainty provided by the Precinct Plan reduces the risk of unsuccessful resource consent applications and their associated costs.



Alternative	Costs	Benefits
		<ul style="list-style-type: none"> • The certainty provided by the Precinct Plan will increase certainty of viable development outcomes. • The flexibility provided through discretionary activity applications to depart from the layout of the Precinct Plan recognizes that it is based on conceptual design only, and that there may be a need for some variations to the layout. A discretionary activity application is an efficient approach to minimizing compliance costs. • The Precinct Plan approach is consistent with other Medium Density Residential zones in the ODP such as Te Awa Lakes and Ruakura so it is efficient to apply the same approach. <p><u>Social</u></p> <ul style="list-style-type: none"> • There are no identifiable social benefits. <p><u>Cultural</u></p> <ul style="list-style-type: none"> • There are no identifiable cultural benefits.
<p>4. Include 30m setback from Industrial zone boundaries (Rule 4.8.2 viii) and related provisions on orientation of outdoor living spaces and acoustic treatment of houses (Rule 4.8.5 d and Rule 25.8.3.10. 1.a)</p>	<p><u>Environmental</u></p> <ul style="list-style-type: none"> • There are no identifiable environmental costs. <p><u>Economic</u></p> <ul style="list-style-type: none"> • There is an economic cost to the development by reducing the developable land area. • There is an economic cost of requiring acoustic treatment of some houses. • There are some additional compliance costs by adding resource consent requirements to control the orientation of outdoor living spaces and ensuring acoustic treatment of some of the houses. <p><u>Social</u></p> <ul style="list-style-type: none"> • There are no identifiable social costs. 	<p><u>Environmental</u></p> <ul style="list-style-type: none"> • The 30m setback is a geographic area defined by reference to other reverse sensitivity setback provisions in the ODP and advice in the Acoustic Assessment in Appendix G. The provisions have the benefit of minimizing the risk of reverse sensitivity effects associated with industrial activities on the adjacent land. The risk of reverse sensitivity effects is a site-specific environmental effect for PC13. • Environmental effects of industrial activities of noise, visual and glare on the residential area are reduced. The 30m setback also addresses this site-specific matter.



Alternative	Costs	Benefits
	<p><u>Cultural</u></p> <ul style="list-style-type: none"> There are no identifiable cultural costs. 	<p><u>Economic</u></p> <ul style="list-style-type: none"> By minimizing the risk of reverse sensitivity effects any economic impacts of complaints on neighbouring businesses will be minimized. Adopting the same setback and similar acoustic treatment provisions addressing reverse sensitivity as applied elsewhere in the ODP is efficient as it demonstrates broad acceptability, based on experience. The rules are efficient to administer given they are in place elsewhere. <p><u>Social</u></p> <ul style="list-style-type: none"> There are no identifiable social benefits. <p><u>Cultural</u></p> <ul style="list-style-type: none"> There are no identifiable cultural benefits.
<p>5. Show low flood hazard area and overland flow path and identify where required as open space and roading, and control development in these areas (Figure 4.5-1, Rule 23.7.9 a and b, Table 23.3e. p, Rule 4.5.4 vv.)</p>	<p><u>Environmental</u></p> <ul style="list-style-type: none"> There are no identifiable environmental costs. <p><u>Economic</u></p> <ul style="list-style-type: none"> There is an economic cost to the development by reducing the area of developable land. <p><u>Social</u></p> <ul style="list-style-type: none"> There are no identifiable social costs. <p><u>Cultural</u></p> <ul style="list-style-type: none"> There are no identifiable cultural costs. 	<p><u>Environmental</u></p> <ul style="list-style-type: none"> There are environmental benefits of additional open space areas for amenity and recreation. There are benefits of ensuring health and safety of residents by controlling the location of houses in areas that are not within the overland flow path. The flood hazard area and the overland flow path are site-specific matters identified in the Subcatchment ICMP in Appendix E as areas where development needs to be excluded or managed for health and safety purposes. <p><u>Economic</u></p> <ul style="list-style-type: none"> There are economic benefits by ensuring houses are located away from areas where they may be damaged by flooding. Flexibility provided through discretionary activity applications to depart from the open space/overland flow path layout



Alternative	Costs	Benefits
		<p>recognizes that it is based on conceptual design only, and that more detailed design may lead to some variations to the area of the overland flow path. A discretionary activity application is an efficient approach to minimizing compliance costs.</p> <ul style="list-style-type: none"> • There are economic efficiencies in using the overland flow path areas for roading and stormwater wetlands, which are not susceptible to damage from flooding. <p><u>Social</u></p> <ul style="list-style-type: none"> • There is social benefit by controlling the location of houses and thereby ensuring the health and safety of residents from flood risks. • There are social benefits of providing additional open space for the community. <p><u>Cultural</u></p> <ul style="list-style-type: none"> • There are no identifiable cultural benefits.
<p>6. Plan provisions requiring upgrading of transport infrastructure, including preventing right turns out of Sir Tristram Avenue and connecting pedestrian facilities to public transport and other services (Rule 4.8.12)</p>	<p><u>Environmental</u></p> <ul style="list-style-type: none"> • There are no identifiable environmental costs. <p><u>Economic</u></p> <ul style="list-style-type: none"> • There is an economic cost to the development by upgrading transport infrastructure outside the site. <p><u>Social</u></p> <ul style="list-style-type: none"> • There are no identifiable social costs. <p><u>Cultural</u></p> <ul style="list-style-type: none"> • There are no identifiable cultural costs. 	<p><u>Environmental</u></p> <ul style="list-style-type: none"> • There are environmental benefits by improving the safety of the Sir Tristram Avenue/Te Rapa Road intersection. • There are environmental benefits in connecting pedestrian facilities to public transport and other services by providing transport choice, supporting walking and cycling and public transport use. These contribute to wider benefits of a compact city including reducing greenhouse gas emissions. <p><u>Economic</u></p> <ul style="list-style-type: none"> • There are economic benefits by making the development more attractive to purchasers through good connections to the nearby community and services.



Alternative	Costs	Benefits
		<p><u>Social</u></p> <ul style="list-style-type: none"> There are social benefits by ensuring there are good walking and cycling connections to the surrounding community including shops, schools and recreational areas. <p><u>Cultural</u></p> <ul style="list-style-type: none"> There are no identifiable cultural benefits.

The plan provisions assessed in Table 3 above and commented on in section 5 of the AEE achieve proposed Objective 4.2.16 by;

- Zoning the site as Medium Density Residential, which enables variety of housing types generally up to 5 storeys high, which is higher density than the general residential zone.
- Including a Precinct Plan that includes open space areas, a playground, a street layout that reinforces slow speeds and alternative transport modes, integration with the racecourse and a landscaped buffer area. These elements all contribute to high levels of amenity.
- Including the Precinct Plan which shows access points and potential connections to neighbouring land reinforce connectivity, including to nearby commercial and community services. These are supported by rules requiring new or upgraded shared paths and footpaths to connect to bus stops, the neighbourhood shops on Garnett Avenue and the commercial area on Home Straight.

The plan provisions assessed in Table 3 above and commented on in section 5 of this AEE also achieve the broader Residential objectives which are;

4.2.1 *A range of housing types and densities is available to meet the needs of all communities.*

4.2.2 *Efficient use of land and infrastructure.*

4.2.3 *Residential development produces good on-site amenity.*

4.2.4. *The development contributes to good neighbourhood amenity as the area matures.*

It achieves this by;

- The Medium Density Residential zoning that enables a wide range of housing types within that zoning
- Utilising a site within the city that is already connected to three waters and transport infrastructure. Some upgrading is required but it is an efficient use of that infrastructure.
- A good level of on-site amenity will be achieved through the use of the Precinct Plan and related rules.
- The Precinct Plan, internal and external transport connectivity and open spaces will contribute to good neighbourhood amenity.

