

Appendix C
Section 32AA Report

Proposed Plan Change 7 – Rotokauri North

Section 32AA Evaluation Report

Prepared for Hamilton City Council

Prepared by Beca Limited




9 September 2021



Revision History

Revision N°	Prepared By	Description	Date
1	John McCall	Draft Report	16 July 2021
2	John McCall	Final Report	8 September 2021

Document Acceptance

Action	Name	Signed	Date
Prepared by	John McCall		8 September 2021
Reviewed by	Craig Sharman		8 September 2021
Approved by	Marc Dresser		9 September 2021
on behalf of	Beca Limited		

© Beca 2021 (unless Beca has expressly agreed otherwise with the Client in writing). This report has been prepared by Beca on the specific instructions of our Client. It is solely for our Client's use for the purpose for which it is intended in accordance with the agreed scope of work. Any use or reliance by any person contrary to the above, to which Beca has not given its prior written consent, is at that person's own risk.

Contents

1	Overview	1
1.1	Section 32AA Evaluations	1
1.2	Evaluation Approach	1
1.3	Objective of Proposed Private Plan Change 7 – Rotokauri North	2
2	Analysis of Recommended Changes	2
2.1	Chapter 3: Structure Plans	3
2.2	Chapter 4: Residential Zone	24
2.3	Chapter 23: Subdivision	47
2.4	Chapter 25: City-wide	56
2.5	Appendix 1: District Plan Administration	61
2.6	Appendix 15: Transportation	70
2.7	Efficiency and Effectiveness of the Recommended Amendments	73
2.8	The Risk of Not Acting	73
3	Conclusion	73

Tables

Table 1:	Chapter 3: Structure Plans – Recommended Amendments Analysis	3
Table 2:	Chapter 4: Residential Zone – Recommended Amendments Analysis	24
Table 3:	Chapter 23: Subdivision – Recommended Amendments Analysis	47
Table 4:	Chapter 25: City-wide – Recommended Amendments Analysis	56
Table 5:	Appendix 1: District Plan Administration – Recommended Amendments Analysis	61
Table 6:	Appendix 15: Transportation – Recommended Amendments Analysis	70

1 Overview

1.1 Section 32AA Evaluations

This report provides an evaluation under Section 32AA (“**s32AA**”) of the Resource Management Act 1991 (“**RMA**”) on the proposed Private Plan Change 7 – Rotokauri North (“**PPC7**”) sought by Green Seed Consultants Limited (“**GSCL**”). PPC7 applies to Hamilton City Council’s Rotokauri Structure Plan area (“**RSP**”) contained within the Hamilton District Plan (“**HDP**”).

Section 32AA of the RMA requires further evaluation of changes made to the HDP since the original evaluation report was completed (being the *Rotokauri North Private Plan Change Request. Planning Assessment: Section 32 Assessment* by TCL dated April 2019). This further evaluation must be undertaken as per the requirements of Section 32 of the RMA with 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 proposed changes, as follows:

32AA Requirements for undertaking and publishing further evaluations

- a) *The further evaluation is required under this Act —*
 - 1) *is required only for any changes that have been made to, or are proposed for, the proposal since the evaluation report for the proposal was completed (the changes); and*
 - 2) *must be undertaken in accordance with section 32(1) to (4); and*
 - 3) *must, despite paragraph (b) and section 32(1)(c), be undertaken at a level of detail that corresponds to the scale and significance of the changes; and*
 - 4) *must —*
 - (i) *be published in an evaluation report that is made available for public inspection at the same time as the approved proposal (in the case of a national policy statement or a New Zealand coastal policy statement or a national planning standard), or the decision on the proposal, is notified; or*
 - (ii) *be referred to in the decision-making record in sufficient detail to demonstrate that the further evaluation was undertaken in accordance with this section,*
- b) *To avoid doubt, an evaluation report does not have to be prepared if a further evaluation is undertaken in accordance with subsection (1)(d)(ii),*
- c) *In this section, proposal means a proposed statement, national planning standard, plan or change for which a further evaluation must be undertaken under this Act.*

The recommended amendments to the HDP (specifically, the RSP) since the original evaluation report are set out in the Section 42A report (“**s42A**”). The scale and degree of the assessment contained in this s32AA evaluation report is commensurate to those recommended amendments.

1.2 Evaluation Approach

1.2.1 Section 32 Analysis of Proposed Private Plan Change 7 – Rotokauri North

A Section 32 analysis should assess the overall costs and benefits of the proposed policy framework relative to the status quo established by the existing framework. In this regard, the proposed policy is considered the notified PPC7 and the existing policy framework is considered the Operative HDP.

The Section 32 analysis for PPC7 prepared by TCL can be found on HCC’s website.

1.2.2 Section 32AA Evaluation of Proposed Private Plan Change 7 – Rotokauri North

A s32AA analysis should assess the marginal costs and benefits of changes to the proposed policy (that is, the recommended amendments to PPC7), relative to the version assessed in the section 32 analysis (being PPC7, as notified). Therefore, this s32AA evaluation report evaluation reports draws upon the findings of

TCL's section 32 analysis, where necessary, and the discussions and analysis contained in the s42A report, and provides additional consideration regarding the appropriateness, alternatives, costs and benefits of the recommended amendments to PPC7 - that is, the recommended amendments to the various chapters indicated within the s42A report.

A summary of the analysis under s32AA is included in Section 4.0 (Conclusion) of this evaluation report.

1.3 Objective of Proposed Private Plan Change 7 – Rotokauri North

PPC7 seeks to rezone approximately 140 ha of Future Urban Zone (“**FUZ**”) land to Medium Density Residential Zone (“**MDRZ**”) and Business 6 Zone (“**B6Z**”) on an area of land known as Rotokauri North, Hamilton. Specifically, PPC7 seeks to:

- Rezone approximately 137.6 hectares from FUZ to MDRZ to facilitate and support residential development;
- Rezone approximately 1.2 hectares from FUZ to B6Z (Neighbourhood Centre);
- Amend the existing Rotokauri Structure Plan map area to specifically exclude the Rotokauri North area; and
- Insert a new Rotokauri North Structure Plan and associated rules.

The maps and text forming PPC7 are appended as ‘Attachment 4’ to the *Rotokauri North Private Plan Change Request – Planning Assessment: Assessment of Environmental Effects* (dated April 2019) prepared by TCL.

2 Analysis of Recommended Changes

This section of the report evaluates the changes between the notified version of PPC7 and the version of PPC7 adopting the amendments recommended in the s42A report.

The below tables (**Tables 1 – 6**), consider the costs and benefits of the recommended amendments to PPC7 in order to determine the effectiveness and efficiency of those recommendations, and whether they are the most appropriate way to achieve the purpose of the RMA.

Section 2.1 and 2.2 of this report summarise the efficiency and effectiveness of the recommended amendments and the risk of acting or not acting.

Note: A number of very small or inconsequential changes have not been included in the following tables as they do not require any further evaluation as they have no effect on the ability of the proposal to achieve the purpose of the RMA or the objective of PPC7. These include consistent use of terminology, correction of rule references that have altered, and other inconsequential amendments typically made under clause 16 Schedule 1 RMA.

2.1 Chapter 3: Structure Plans

Table 1: Chapter 3: Structure Plans – Recommended Amendments Analysis

3.6 (D) – ROTOKAURI: INTRODUCTION		
Effectiveness and Efficiency	<p>Effectiveness</p> <p>The reduction in unnecessary repetition of text ensures that the application of Chapter 3.6 and Chapter 3.6A to land within ‘Rotokauri North’ is better articulated to Plan Users – insofar as ensuring it is understood that Chapter 3.6A supersedes Chapter 3.6. The proposed amendment is effective at portraying this.</p>	<p>Efficiency</p> <p>The amendments provide minor gains for Plan Users insofar as improving the efficiency of Plan navigation / understanding of the provisions.</p>
Risk of Acting / Not Acting	<p>Any risks associated with implementing the recommended amendments are considered to be <i>de minimis</i> given their scale. In addition, the proposed amendments are to non-statutory text (that is, no amendments to the objective, policy, or rule framework of the Plan) and therefore have no legal implications in the context of resource consenting under the proposed Plan Change.</p> <p>The risk of not acting includes retaining unnecessary duplication of text that diminishes the Plan’s useability.</p>	
Costs		Benefits
Environmental:	Environmental:	
<ul style="list-style-type: none"> • Neutral 	<ul style="list-style-type: none"> • Neutral 	
Economic:	Economic:	
<ul style="list-style-type: none"> • Neutral 	<ul style="list-style-type: none"> • Neutral 	
Social / Cultural:	Social / Cultural:	
<ul style="list-style-type: none"> • Neutral 	<ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through avoiding unnecessary repetition of text that may cause confusion to Plan users. 	
Overall Evaluation:	<p>Overall, the proposed amendments ensure that the useability of the Plan is improved through the reduction of unnecessary repetition of text. In turn, this provides clarity for Plan Users to the relationship between Chapters 3.6 and 3.6A – insofar as Chapter 3.6 will no longer apply to land within ‘Rotokauri North’ as Chapter 3.6A supersedes it.</p>	
3.6A – ROTOKAURI NORTH: INTRODUCTION		

Effectiveness and Efficiency	<p>Effectiveness</p> <p>The amendments are effective to improve consistency and clarity. The amendments remove inconsistencies between Chapter 3.6A and the District Plan. In particular, the removal of the direction on affording greater 'weighting' to Objectives and Policies in Chapter 3.6A.1 and 3.6A.2 respectively is more effective at promoting Part 2 of the RMA (i.e. sustainable management of natural and physical resources).</p>	<p>Efficiency</p> <p>It is considered that given the costs relative to the benefits, this option has a level of efficiency commensurate to the proposed amendments. The removal of inconsistencies will provide greater clarity for Plan Users.</p>
Risk of Acting / Not Acting	<p>Any risks associated with implementing the recommended amendments are considered to be de minimis given their scale. In addition, the proposed amendments are to non-statutory text (that is, no amendments to the objective, policy, or rule framework of the Plan) and therefore have no legal implications in the context of resource consenting under the proposed Plan Change.</p> <p>The risk of not acting includes retaining inconsistencies and inappropriate weighting of Objectives of Policies which in turn diminishes the Plan's useability.</p>	

Costs	Benefits
<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 	<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through removal of inconsistencies and improved clarity for Plan users regarding the vision of the provisions of Chapter 3.6A.

Overall Evaluation:	<p>Overall, the proposed amendments ensure that the useability of the Plan is improved through the removal of inconsistencies and, in particular, removal of inappropriate text regarding the weighting of Objectives and Policies of Chapter 3.6A. In turn, this provides clarity for Plan Users to the relationship between Chapters 3.6A and the remainder of the District Plan. The changes are to non-statutory text and are descriptive / contextual in nature. However, setting a clear vision for the provisions that follow is important to improve the integrity of the District Plan.</p>
----------------------------	--

3.6A.1.1 – STRUCTURE PLAN COMPONENTS: RESIDENTIAL

Effectiveness and Efficiency	Effectiveness	Efficiency
-------------------------------------	----------------------	-------------------

	The reduction in unnecessary repetition of text ensures that the application of Chapter 3.6A to land within 'Rotokauri North' is better articulated to Plan Users.	The amendments provide minor gains for Plan Users insofar as improving the efficiency of Plan navigation / understanding of the provisions.
Risk of Acting / Not Acting	Any risks associated with implementing the recommended amendments are considered to be de minimis given their scale. In addition, the proposed amendments are to non-statutory text (that is, no amendments to the objective, policy, or rule framework of the Plan) and therefore have no legal implications in the context of resource consenting under the proposed Plan Change. The risk of not acting includes retaining unnecessary duplication of text which diminish the Plan's useability.	
Costs		Benefits
Environmental: <ul style="list-style-type: none"> • Neutral Economic: <ul style="list-style-type: none"> • Neutral Social / Cultural: <ul style="list-style-type: none"> • Neutral 		Environmental: <ul style="list-style-type: none"> • Neutral Economic: <ul style="list-style-type: none"> • Neutral Social / Cultural: <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through avoiding unnecessary repetition of text that may cause confusion to Plan users.
Overall Evaluation:	Overall, the proposed amendments ensure that the useability of the Plan is improved through the reduction of unnecessary repetition of text. In turn, this provides clarity for Plan Users to the purpose of Chapter 3.6A – insofar as its vision for land within 'Rotokauri North'.	

3.6A.1.2 – STRUCTURE PLAN COMPONENTS: NEIGHBOURHOOD CENTRE

Effectiveness and Efficiency	Effectiveness The proposed amendments provide clarity and certainty to Plan Users on both the provisions applying to the neighbourhood centre (i.e. Business 6 Zone) and the function of the Neighbourhood Centre (i.e. also serves the nearby industrial areas).	Efficiency The amendments provide minor gains for Plan Users insofar as improving the efficiency of Plan Users understanding of the purpose and vision that Chapter 3.6A seeks to achieve with regard to the neighbourhood centre.
Risk of Acting / Not Acting	Any risks associated with implementing the recommended amendments are considered to be de minimis given their scale. In addition, the proposed amendments are to non-statutory text (that is, no amendments to the objective, policy, or rule framework of the Plan) and therefore have no legal implications in the context of resource consenting under the proposed Plan Change.	

	The risk of not acting includes retaining text that could lead to uncertainty for Plan Users regarding Chapter 3.6A.
--	--

Costs	Benefits
<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 	<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through providing clarity and certainty to Plan user regarding the neighbourhood centre component of Chapter 3.6A.

Overall Evaluation:	Overall, the proposed amendments ensure that the useability of the Plan is improved by way of providing clarity and certainty to Plan Users as to the provisions applying to and the function of the neighbourhood centre component of Chapter 3.6A.
----------------------------	--

3.6A.1.3 – STRUCTURE PLAN COMPONENTS: OPEN SPACE NETWORK

Effectiveness and Efficiency	<p>Effectiveness</p> <p>The proposed amendments provide clarity and certainty to Plan Users on the function of the open space network. In particular, the status of the SNA currently on privately owned land.</p>	<p>Efficiency</p> <p>The amendments provide minor gains for Plan Users insofar as improving the efficiency of Plan Users understanding of the purpose and vision that Chapter 3.6A seeks to achieve with regard to the open space network.</p>
-------------------------------------	---	---

Risk of Acting / Not Acting	<p>Any risks associated with implementing the recommended amendments are considered to be de minimis given their scale. In addition, the proposed amendments are to non-statutory text (that is, no amendments to the objective, policy, or rule framework of the Plan) and therefore have no legal implications in the context of resource consenting under the proposed Plan Change.</p> <p>The risk of not acting includes retaining text that could lead to uncertainty for Plan Users regarding Chapter 3.6A.</p>
------------------------------------	--

Costs	Benefits
<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral 	<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral

<p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 	<p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through providing clarity and certainty to Plan user regarding the open space network component of Chapter 3.6A.
--	---

Overall Evaluation:	Overall, the proposed amendments ensure that the useability of the Plan is improved by way of providing clarity and certainty to Plan Users regarding the open space network component of Chapter 3.6A.
----------------------------	---

3.6A.1.4 – STRUCTURE PLAN COMPONENTS: TRANSPORT NETWORK

Effectiveness and Efficiency	<p>Effectiveness</p> <p>The proposed amendments provide clarity and certainty to Plan Users on the function of the transport network and how the network will be delivered in the context of the growth cell and the wider transport network.</p>	<p>Efficiency</p> <p>The amendments provide minor gains for Plan Users insofar as improving the efficiency of Plan Users understanding of the purpose and vision that Chapter 3.6A seeks to achieve with regard to the transport network.</p>
-------------------------------------	--	--

Risk of Acting / Not Acting	<p>Any risks associated with implementing the recommended amendments are considered to be de minimis given their scale. In addition, the proposed amendments are to non-statutory text (that is, no amendments to the objective, policy, or rule framework of the Plan) and therefore have no legal implications in the context of resource consenting under the proposed Plan Change.</p> <p>The risk of not acting includes retaining text that could lead to uncertainty for Plan Users regarding Chapter 3.6A.</p>
------------------------------------	--

Costs	Benefits
--------------	-----------------

<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 	<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through providing clarity and certainty to Plan user regarding the transport network component of Chapter 3.6A.
---	---

Overall Evaluation:	Overall, the proposed amendments ensure that the useability of the Plan is improved by way of providing clarity and certainty to Plan Users regarding the transport network component of Chapter 3.6A. In particular, these changes provide context for the provisions pertaining to what transport infrastructure will be provided to serve the growth cell, and how this network connects to the rest of the city network.
----------------------------	--

3.6A.2 – OBJECTIVES AND POLICIES

Effectiveness and Efficiency	<p>Effectiveness</p> <p>The proposed amendments both remove unnecessary words and align the wording with the section 104(1)(b)(vi) of the RMA.</p>	<p>Efficiency</p> <p>The amendments provide minor gains for Plan Users insofar as improving Plan clarity and ensuring consistent language with the RMA.</p>
Risk of Acting / Not Acting	<p>Any risks associated with implementing the recommended amendments are considered to be de minimis given their scale. In addition, the proposed amendments are to non-statutory text (that is, no amendments to the objective, policy, or rule framework of the Plan) and therefore have no legal implications in the context of resource consenting under the proposed Plan Change.</p> <p>The risk of not acting includes retaining a Chapter which incorporates language inconsistent with the RMA.</p>	
Costs		Benefits
<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 		<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through improving the useability of the Plan.
Overall Evaluation:	<p>Overall, the proposed amendments ensure that the useability of the Plan is improved by way of ensuring consistent language with the RMA and the removal of unnecessary words.</p>	

3.6A.2.1 – OBJECTIVES AND POLICIES

Effectiveness and Efficiency	<p>Effectiveness</p> <p>The proposed amendments ensure consistency with the Plan structure – effectively improving the useability of the Plan.</p>	<p>Efficiency</p> <p>The amendments provide minor gains for Plan Users insofar as improving Plan useability by way of ensuring the structure of Chapter 3.6A is consistent with the remainder of the District Plan chapters.</p>
Risk of Acting / Not Acting	<p>Any risks associated with implementing the recommended amendments are considered to be de minimis given their scale. In addition, the proposed amendments are simply relocating text (noting any amendments to the relocated text are assessed in the subsequent tables).</p>	

The risk of not acting includes retaining a Chapter that is structurally inconsistent with the remainder of the District Plan – creating confusion for Plan Users familiar with the structure of other chapters in the District Plan.

Costs	Benefits
<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 	<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through improving consistency of Plan structure.

Overall Evaluation: Overall, the proposed amendments ensure that the structure of Chapter 3.6A is consistent with the remainder of the District Plan chapters. The relocation of Objectives and Policies to the relevant chapters (being Chapters 4 and 23, as appropriate), rather than a consolidated set of Objectives and Policies as notified, improves the useability of Chapter 3.6A for Plan Users who are familiar with the structure of the operative chapters.

3.6A.2.2 – OBJECTIVES AND POLICIES

Effectiveness and Efficiency	<i>Effectiveness</i>	<i>Efficiency</i>
	<p>The proposed amendments provide clarity and certainty to Plan Users regarding the policy framework pertaining to the neighbourhood centre in Rotokauri North. The amendments are effective at ensuring the intent of the neighbourhood centre is realised – including realising its purpose.</p>	<p>The amendments provide minor gains for Plan Users insofar as improving the efficiency of Plan Users understanding of the purpose and intent of the neighbourhood centre in Rotokauri North.</p>

Risk of Acting / Not Acting Any risks associated with implementing the recommended amendments are considered to be de minimis given their scale. While the changes are to the policy framework, the changes improve the clarity of the policy framework and not its intent. The risk of not acting includes retaining text that could lead to uncertainty for Plan Users regarding the specific policy framework surrounding the neighbourhood centre in Rotokauri North.

Costs	Benefits
<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral 	<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral

<p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 	<p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through providing clarity and certainty to Plan user navigating the policy framework for the neighbourhood centre in Rotokauri North.
<p>Overall Evaluation:</p>	<p>Overall, the proposed amendments ensure that the useability of the Plan is improved by way of providing clarity and certainty to Plan Users regarding the neighbourhood centre in Rotokauri North. In particular, these changes provide clarity on the purpose and intent of the neighbourhood centre in Rotokauri North.</p>

3.6A.2.3 – OBJECTIVES AND POLICIES

<p>Effectiveness and Efficiency</p>	<p>Effectiveness</p> <p>The proposed amendments ensure consistency with the Plan structure – effectively improving the useability of the Plan.</p>	<p>Efficiency</p> <p>The amendments provide minor gains for Plan Users insofar as improving Plan useability by way of ensuring the structure of Chapter 3.6A is consistent with the remainder of the District Plan chapters.</p>
<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are considered to be de minimis given their scale. In addition, the proposed amendments are simply relocating text (noting any amendments to the relocated text are assessed in the subsequent tables).</p> <p>The risk of not acting includes retaining a Chapter that is structurally inconsistent with the remainder of the District Plan – creating confusion for Plan Users familiar with the structure of other chapters in the District Plan.</p>	

<p>Costs</p>		<p>Benefits</p>	
<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 		<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through improving consistency of Plan structure. 	
<p>Overall Evaluation:</p>	<p>Overall, the proposed amendments ensure that the structure of Chapter 3.6A is consistent with the remainder of the District Plan chapters. The relocation of the subdivision Objective and associated Policies to the relevant chapter (being Chapter 23). This relocation improves the useability of Chapter 3.6A for Plan Users who are familiar with the structure of the operative chapters (noting all subdivision objectives and policies currently sit in one Chapter).</p>		

3.6A.2.4 – OBJECTIVES AND POLICIES

<p>Effectiveness and Efficiency</p>	<p><u>Effectiveness</u></p> <p>Overall, the proposed amendments to the transportation objective and policy framework in Chapter 3.6A improve clarity of the provisions to Plan Uses – including future proofing the policy framework insofar as recognising and responding to the evolving use of e-scooters, for example.</p> <p>Further, the policy can effectively improve the safety and efficiency of SH39 (to the extent of SH39 which abuts Rotokauri North) through direct policy and subsequent rule framework restricting vehicle access to the highway – noting direct vehicle access to SH39 from individual lots, as current, is not considered to be appropriate under any circumstances because of road safety and road function implications.</p> <p>In addition, the proposed amendments will be effective minimise car dominance in Rotokauri North through a policy framework that enables and encourages the use of public transport, walking and cycling instead.</p>	<p><u>Efficiency</u></p> <p>It is considered that given the costs relative to the benefits, the proposed amendments have a level of efficiency. The amendments provide minor gains for Plan Users insofar as improving Plan clarity – in particular, by removing undefined terms and replacing them defined terms.</p> <p>From a safety perspective, the proposed amendments are an efficient approach to reorganising property access for properties within Rotokauri North that currently have direct access to and from SH39 – resulting in net gains to safety and efficiencies at this section of SH39.</p> <p>In addition, minimising car dominance in Rotokauri North and promoting alternative modes of transport such as public transport, walking and cycling can be efficiently enabled through adopting a policy framework which enables and encourages such forms of transport.</p>
<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are outweighed by the risks associated with not acting. While the below assessment identified potential costs / effects of the policy intent, the risks of not acting are considered to have greater potential costs / negative effects, insofar as not realising the potential benefits described below. The risk of not adopting a policy framework that seeks to encourage and enable public transport / active modes of transport in Rotokauri North will inadvertently hinder future provision of such infrastructure (given no policy direction to promote or consider the investment / development of such infrastructure).</p>	
<p>Costs</p>		<p>Benefits</p>
<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral 		<p>Environmental:</p> <ul style="list-style-type: none"> • Minor reduction in carbon emissions through enabling and encouraging both public and active modes of transport (i.e. walking and cycling) will see improvements to the local airshed. <p>Economic:</p>

<p>Social / Cultural:</p> <ul style="list-style-type: none"> Those who are not inclined or able to adopt public or active modes of transport may see the minimisation of car dominance in Rotokauri North an infringement of their personal freedom. 	<ul style="list-style-type: none"> Reductions in private car usage will increase the efficiency of the road network. In turn, this will lead to economic benefits through reducing congestion (such benefits as improvements to commuting times, improvements to the movement of heavy goods vehicles / freight along the road network, reducing medical costs proportional to the reduction in accidents and increasing the time between required road repairs / general maintenance through less vehicle movements). <p>Social / Cultural:</p> <ul style="list-style-type: none"> Promoting active modes of transport can increase the general health and wellbeing of the community and offers transport choice for commuters who otherwise may not be able to operate private vehicles (for financial, health or other reasons).
--	---

<p>Overall Evaluation:</p>	<p>Overall, the proposed amendments to the transportation objective and policy framework in Chapter 3.6A improve clarity, ‘future-proofs’ the policy framework, improves road safety and efficiency (to the extent of SH39 abutting the Plan Change area), and seeks to minimise car dominance in Rotokauri North – enabling and encourage use of public transport, as well as walking and cycling instead.</p>
-----------------------------------	---

3.6A.2.5 – OBJECTIVES AND POLICIES

<p>Effectiveness and Efficiency</p>	<p>Effectiveness</p> <p>The proposed amendments provide clarity and certainty to Plan Users regarding the policy framework pertaining to the coordination of subdivision and development in Rotokauri North. The amendments are effective at ensuring the intent of the policy framework is realised insofar as ensuring consistent expression (requiring things to be done).</p>	<p>Efficiency</p> <p>The amendments provide minor gains for Plan Users insofar as improving the efficiency of Plan Users understanding of the purpose and intent of the requirements around the coordination of subdivision and development in Rotokauri North.</p>
--	--	--

<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are de minimis given their scale. While the changes are to the policy framework, the changes improve the clarity of the policy framework and not its intent. The risk of not acting includes retaining text that could lead to uncertainty for Plan Users regarding the specific policy framework surrounding the coordination of subdivision and development in Rotokauri North.</p>
---	--

<p>Costs</p>	<p>Benefits</p>
---------------------	------------------------

<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 	<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through providing clarity and certainty to Plan user navigating the policy framework for the coordination of subdivision and development in Rotokauri North.
<p>Overall Evaluation:</p>	<p>Overall, the proposed amendments ensure that the useability of the Plan is improved by way of providing clarity and certainty to Plan Users regarding the coordination of subdivision and development in Rotokauri North. In particular, these changes achieve consistent expression (i.e. 'requiring' things to be done) than the notified framework – ensuring the intent is not lost.</p>

3.6A.2 – OBJECTIVES AND POLICIES - EXPLANATION

<p>Effectiveness and Efficiency</p>	<p>Effectiveness</p> <p>The proposed amendments provide clarity and certainty to Plan Users regarding the changes to the policy framework in Chapter 3.6A Rotokauri North – including responding to the relocation of the Medium Density Residential Zone framework. The amendments are effective at ensuring the explanation of the policy framework is consistent with the various changes described (and assessed) in the preceding tables.</p>	<p>Efficiency</p> <p>The amendments provide minor gains for Plan Users insofar as improving the efficiency of Plan Users understanding of the purpose and intent of the policy framework for Rotokauri North.</p>
--	---	--

<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are considered to be de minimis given their scale. In addition, the proposed amendments are to non-statutory text (that is, no amendments to the objective, policy, or rule framework of the Plan) and therefore have no legal implications in the context of resource consenting under the proposed Plan Change.</p> <p>The risk of not acting includes retaining text that could lead to uncertainty for Plan Users regarding Chapter 3.6A.</p>
---	--

<p>Costs</p> <p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral 	<p>Benefits</p> <p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral
--	---

<p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 	<p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through providing clarity and certainty to Plan user understanding the policy framework contained in Chapter 3.6A.
--	---

Overall Evaluation:	Overall, the proposed amendments ensure that the useability of the Plan is improved by way of providing clarity and certainty to Plan Users regarding their understanding of the purpose and intent of the policy framework contained in Chapter 3.6A.
----------------------------	--

3.6A.4.2 – OTHER SPECIFIC PROVISIONS/RULES: STAGING AND INFRASTRUCTURE PROVISION

Effectiveness and Efficiency	<p>Effectiveness</p> <p>The proposed amendments provide clarity and certainty to plan users and developers insofar as ensuring Chapter 3.6A is optimised in enabling/requiring the orderly and threshold-based ‘roll out’ of infrastructure for each of the waters networks and for transport. Effectiveness is through clear and concise thresholds, simply worded (given the complexity and importance of the topic), a strong technical basis around the existing city networks and upstream/downstream effects of not providing additional infrastructure, all of which is different for the four networks covered by the rule.</p>	<p>Efficiency</p> <p>The amendments are a complete re-write of the rule provision given the changes in circumstances with stage 1 qualifying development not proceeding. The rule is entirely different but constructed around technical thresholds unique to each of the four networks covered by the rule. The rule construction is based on development being provided for up to those thresholds, but beyond them only with additional developer-provided infrastructure. This seeks to be as efficient and clear as can be given the complex subject matter involved.</p>
-------------------------------------	--	---

Risk of Acting / Not Acting	Any risks associated with implementing the recommended amendments are de minimis given the level of background technical analysis of the networks that have occurred over the past two years. The level of understanding means that the lack of information is not a reason to avoid acting, and the likely outcomes of not acting would lead to completely unacceptable environmental and social outcomes. The risk of not acting includes retaining text that will prove inadequate, as when drafted it assumed that the stage 1 qualifying development would have occurred and infrastructure would have been built as part of stage 1. The provision does not need to react to the change in circumstances in this regard.
------------------------------------	--

Costs	Benefits
<p>Environmental:</p> <ul style="list-style-type: none"> • None. <p>Economic:</p> <ul style="list-style-type: none"> • There are economic costs and some will be substantial. The rule establishes clear infrastructure thresholds prior to additional infrastructure being constructed, some of it multi-million dollar infrastructure projects. 	<p>Environmental:</p> <ul style="list-style-type: none"> • Similar to social / cultural below, there are substantial benefits from achieving the orderly and effective ‘roll out’ of infrastructure in accordance with clearly established thresholds and trigger points, with upgrades required prior to those thresholds being exceeded. Conversely the

<p>Social / Cultural:</p> <ul style="list-style-type: none"> • None. 	<p>disbenefits of poor transport, water, wastewater and stormwater provision would lead to unacceptable environmental outcomes.</p> <p>Economic:</p> <ul style="list-style-type: none"> • None. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Substantial community benefits will arise from the orderly and well manage infrastructure ‘roll out’ and managed staging approach promoted in the provision. The provision has been re-written to enhance workability and effectiveness as was considered highly deficient given the absence of any qualifying development (stage 1) infrastructure roll-out having occurred and the lack of any other apparent staging. The provision will ensure that three waters and transport infrastructure is ‘rolled out’ as development progresses to the benefit of the community of residents living in Rotokauri North and the wider city.
--	---

<p>Overall Evaluation:</p>	<p>Overall, the proposed amendments ensure that the useability of the Plan is improved by way of providing clarity and certainty to Plan Users regarding their understanding of the purpose and intent of the framework contained in Chapter 3.6A. The rule is a critical provision as it sets out the staging and infrastructure provisions that apply as development and subdivision occurs in the growth cell. The provision has been substantially re-written relative to the notified version of the provision. The reasons for this are that the qualifying development subdivision has not been granted consent or constructed, and that the plan change proponent has not stepped away from any defined sense of staging that previously existed. As a result of these two matters, the rule has been re-written to accommodate scenarios where development could commence anywhere within the growth cell, and to respond to the status quo absence of any infrastructure (as opposed to the plan change as notified which assumed a stage 1 infrastructure roll out would have already occurred). The provision includes clauses a) and b) which are largely administrative, c) in respect of wastewater, d) in respect of water supply, e) in respect of stormwater, and f) in respect of transport. All are challenging in their own right and the staging / triggers identified are based on the Council consultant review team evaluations conducted, and engagement with Council’s asset managers.</p> <p>The provision is a critical one and has been formulated to be efficient and effective and to operate with clarity and precision as far as possible.</p>
-----------------------------------	--

3.6A.4.3 – OTHER SPECIFIC PROVISIONS/RULES: STATE HIGHWAY 39 LANDSCAPE BUFFER

<p>Effectiveness and Efficiency</p>	<p>Effectiveness</p> <p>The proposed amendments provide clarity and certainty to Plan Users regarding the required landscape buffer along SH39. The amendments are effective in addressing the identified issue regarding the inappropriate wording of the notified Assessment Criterion O1a (i.e. worded as a rule) – providing a solution that is better aligned with ‘best practice’ policy drafting. The proposed addition of the rule is effective at resolving this by addressing the intent of the Assessment Criterion as a rule. In addition, the proposed revision and relocation of the Assessment Criterion enables the intent of the landscape buffer to be realised effectively.</p>	<p>Efficiency</p> <p>The amendments provide gains for Plan Users insofar as improving the efficiency of Plan Users understanding of the purpose and intent of the requirements around the landscape buffer along SH38 in Rotokauri North.</p>
<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are outweighed by the risks associated with not acting. The risks of not acting are considered to have greater potential costs / negative effects, insofar as not realising the potential benefits described below (i.e. the intent of the landscape buffer SH38 is not realised). The risk of not adopting the removal and replacement of the Assessment Criterion O1a with Rule 3.6A.4.3 will more likely than not result in the intent of the landscape buffer being lost.</p>	
<p>Costs</p>		<p>Benefits</p>
<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Will ensure the intent of the landscape buffer along SH38 is realised – therefore ensuring the costs associated with the on-going maintenance is applied to the owners (as required). <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 		<p>Environmental:</p> <ul style="list-style-type: none"> • Ensures the proposed landscape buffer (including the associated planting) along SH38 is installed as intended – providing an increase in vegetation within and adjoining Rotokauri North. <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Improvement in the useability of the Plan through providing ‘best practice’ policy drafting to properly convey the intent of the landscape buffer along SH38 to Plan users. • Provides an improvement to the visual amenity of the Rotokauri North development.
<p>Overall Evaluation:</p>	<p>Overall, the proposed amendments ensure that the landscape buffer along SH38 is implemented as intended. In particular, the relocation and revision of Assessment Criterion O1a is considered to align the policy framework with ‘best practice’ drafting – noting, as notified, the Assessment Criterion O1a is drafted as a rule rather than an assessment matter. The proposed</p>	

amendments are effective and efficient at both addressing this drafting issue and ensuring the intent of the landscape buffer along SH38 is realised through the Plan Change.

3.6A.4.4 – OTHER SPECIFIC PROVISIONS/RULES: PUBLIC TRANSPORT INFRASTRUCTURE

Effectiveness and Efficiency

Effectiveness

Overall, the provision is written with clarity and replaces an absence of any similar provision. Effectiveness is clearly higher than there being no equivalent provision, and also effectiveness is achieved through the three clauses that each cover a separate element of the provision. There is clarity around the wording and intent of the provision, and it links with the structure plan diagram to be included that displays the network being provided.

Efficiency

Overall, provision is efficient as it relies on a clear link with a diagram that presents the relevant corridors, the provision has clarity as to when PT infrastructure should be provided, also what that PT infrastructure consists of, and has a clear statement about engaging with the public transport body and the road controlling authority. Efficiency is through the network to be implemented being focused and targeted to specific corridors, clarity around what the terminology means and the network itself being clear. The engagement clause enables flexibility as via agreement and in response to changed circumstances some alternatives can be agreed by the parties, either locationally or in terms of the infrastructure itself.

Risk of Acting / Not Acting

Any risks associated with implementing the recommended amendments are considered to be minimal given that public transport provision will ultimately be constructed, and the provision is simply clarifying the responsibility of developers and ensuring an early 'roll out' and not a reactionary one. The network itself has been determined through engagement with WRC public transport staff.

The risk of not acting includes a complete absence of any implementation plan for public transport. The plan change as notified had such an absence which provided no confidence in an orderly and efficient 'roll out' of public transport in Rotokauri North/

Costs

Environmental:

- None.

Economic:

- There will be economic costs as the provision places a requirement on developers to provide a piece of infrastructure. Inevitably that generates a cost, but that cost would otherwise be borne by regional or district ratepayers, as the 'roll out' of public infrastructure would still be required.

Benefits

Environmental:

- There are environmental benefits as the provision will provide for early adoption of public transport in the growth cell, when it would otherwise not occur (as WRC would only place services into the growth cell based on demand having already been established). This enables a climate change emissions response and will reduce private vehicle dependency from establishing early in the growth cell development cycle.

Economic:

<p>Social / Cultural:</p> <ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> • None. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • There are considered to be substantial social and environmental benefits as the provision enables the orderly and early 'roll out' of public transport infrastructure. This enables new transport corridor as built and existing corridors as upgraded to include public transport infrastructure in accordance with an agreed future indicative network (as shown on Figure 2-9C). Without that public transport infrastructure delivery would be incremental, much slower in the development process, and more chaotic in its implementation.
--	--

<p>Overall Evaluation:</p>	<p>Overall, the provision serves as the key means to implement the public transport network proposed for Rotokauri North. The provision establishes a clear requirement to provide public transport infrastructure as part of the construction of new corridors, and/or the upgrading of existing transport corridor. The provision also clearly links to the diagram to be inserted (Figure 2-9C) that displays the future indicative public transport network also establishes clearly what is meant by the phrase 'public transport infrastructure' as the provision relies on this phrase. The final clause requires a consultation exercise with Waikato Regional Council as the provider of public transport, and with Hamilton City Council as the roads controlling authority. Whilst this is written around reaching an agreement, any agreement is expected to follow the network indicatively shown on the structure plan diagram. The provision replaces an absence of any clear provision in the plan change that requires a 'roll out' of public transport in the growth cell. Inclusion of the provision is considered a key response to achieving a travel mode shift, avoidance of private vehicle dependency and as a climate change emissions response.</p>
-----------------------------------	--

3.6A.4.5 – OTHER SPECIFIC PROVISIONS/RULES: ACTIVE TRANSPORT INFRASTRUCTURE

<p>Effectiveness and Efficiency</p>	<p>Effectiveness</p> <p>The proposed amendments seek to include an additional rule provision that sets clearly the expectations that development or subdivision provides part of the walking and cycling infrastructure, within the footprint of the subdivision or development. The rule also makes clear reference to a structure plan diagram that displays this future indicative network. All of these features provide effectiveness, especially in the context that there is no equivalent rule in the plan change as it was notified.</p>	<p>Efficiency</p> <p>The amendments provide an additional provision, with efficiency enhanced through the simplicity of the rule and the reliance on the diagrammatical representation of the walking and cycling future indicative network, rather than the network being an undefined concept. Efficiency is also provided by the rule focusing on a single network within Rotokauri North and keeping it separate to the wider transport provisions.</p>
<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are outweighed by the risks associated with not acting. While the below assessment identified potential costs / effects of the policy intent, the risks of not acting are considered to have greater potential costs / negative effects, insofar as it is far less likely that the walking and cycling infrastructure would</p>	

be constructed, given the lack of other expression of how this would occur elsewhere in the plan change provisions. Apart from the state highway 39 shared path provision, the plan change as notified otherwise does not either display the future walking and cycling network, nor include any means of implementing the construction of it.

Costs	Benefits
<p>Environmental:</p> <ul style="list-style-type: none"> • None. <p>Economic:</p> <ul style="list-style-type: none"> • Some economic costs as the rule requires development and subdivision to design and construct portions of walking and cycling infrastructure. The absence of this provision would leave no such requirement. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • None. 	<p>Environmental:</p> <ul style="list-style-type: none"> • As with social and cultural, an environmental benefit as the walking and cycling network (along with public transport) is a key means of managing private vehicle dependency and as part of the climate change response to managing emissions. The network (enabled by the rule) also enables benefit through enhancing the levels of community use of public open spaces for recreational use. <p>Economic:</p> <ul style="list-style-type: none"> • None. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Positive social and cultural benefits as the provision provides a robust means for delivering the future indicative walking and cycling network. Without the provision there is no clear implementation means.

Overall Evaluation:	Overall, this additional rule provision provides an important link from intended walking and cycling infrastructure that will be shown on the structure plan diagrams, displaying a future network of shared paths for Rotokauri North (this network is recommended to be added to the structure plan diagrams). The rule makes clear that the portions of walking and cycling infrastructure within the relevant 'footprint' of a subdivision or development need to be provided as part of that development. This enables the incremental extension of the network as development progresses across the growth cell, and eventually enabling it to connect to the wider city network. Without this provision there is no mechanism to achieve this outcome.
----------------------------	---

3.6A.4.6 – OTHER SPECIFIC PROVISIONS/RULES: CONSISTENCY WITH ROTOKAURI NORTH STRUCTURE PLAN

Effectiveness and Efficiency	<p><u>Effectiveness</u></p> <p>Overall, effectiveness is enhanced as the provision provides clarity as to expectations for how the structure plan diagrams and supporting text about the components in Rule 3.6A.1. The 'generally in accordance' wording allows for the structure plan elements to be indicative to display outcomes and intent, and not a 'strictly in accordance' type wording that would be overly restrictive and inflexible.</p>	<p><u>Efficiency</u></p> <p>Overall, the provision is considered effective as it is simply constructed, establishes a flexible threshold of 'generally in accordance with' which is flexible and adaptable to changing circumstances, yet provides clear guidance to developers and the community as to the broad layout and outcomes for the structure plan area.</p>
-------------------------------------	---	---

<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are considered to be minimal. Not having this provision would result in a situation where a lack of clarity would exist and outcomes would be demonstrably poorer. An absence of any form of defined threshold for the extent of consistency with the structure plan diagrams and associated text would be a far poorer outcome.</p> <p>The risk of not acting includes an absence of any clear threshold that a developer needs to meet with subdivision and development proposals. This risks rendering the structure plan material incorporated into the district plan as illustrative rather than determinative. The intent is that the structure plan diagrams and supporting text do direct outcomes and provide clarity to all parties. The risk of not acting is that this does not exist.</p>
<p>Costs</p> <p>Environmental:</p> <ul style="list-style-type: none"> • None. <p>Economic:</p> <ul style="list-style-type: none"> • Neutral, as the provision does not impose any costs, but does provide clarity as to Council and community expectations for Rotokauri North. The provision incorporates sufficient flexibility and adaptability to avoid economic costs arising. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • None. 	<p>Benefits</p> <p>Environmental:</p> <ul style="list-style-type: none"> • Clear expectations of the layout and intent provide clarity to district plan users and the wider community as to how development at Rotokauri North will be 'rolled out'. <p>Economic:</p> <ul style="list-style-type: none"> • Neutral. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • As with environmental, the provision provides clarity to developers and the wider community as to outcomes and intent, which assists all parties to understand the important concepts that feature at Rotokauri North.
<p>Overall Evaluation:</p>	<p>Overall, the provision sets a 'generally be consistent with' threshold for subdivision and development in Rotokauri North. This provision is a recommended addition to the provision, not featuring in the plan change as notified, but is considered an important catch-all provision that give effect to the structure plan diagrams and text (within 3.6A.1). The provision lists the diagrams and 'key components' text that collectively form the Rotokauri North Structure Plan. The provision is important as it sets clear expectations for compliance with the structure plan, and during consenting processes provide a key link back to the structure plan diagrams and supporting text within the district plan. Without this provision the overall effectiveness of Rule 3.6A Rotokauri North would be reduced, levels of consistency with the structure plan diagrams and key concepts would be poorer, and overall environmental and urban design outcomes achieved would be less well connected and in general poorer outcomes.</p>

3.6A.4.7 – OTHER SPECIFIC PROVISIONS/RULES: STAGING ACTIVITY STATUS

<p>Effectiveness and Efficiency</p>	<p>Effectiveness</p> <p>The proposed amendments seek to alter the activity status (discretionary to non-complying) of Rule 3.6A.4.3(a) and delete Rule 3.6A.4.3(c). The amendments are effective at enabling an application to provide an alternative option to address infrastructure requirements, albeit at a higher threshold, and remove unnecessary duplication of the requirements of the RMA. The purpose of the proposed provisions remains unchanged.</p>	<p>Efficiency</p> <p>The amendments provide minor gains for Plan Users insofar as reducing unnecessary duplication of the requirements of the RMA and ensuring the Plan efficiently delivers infrastructure provisions to 'open' Rotokauri North (noting the threshold to provide alternative options to address infrastructure requirements or demonstrate that non-compliance is acceptable is higher by virtue of the non-complying activity status).</p>
<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are outweighed by the risks associated with not acting. While the below assessment identified potential costs / effects of the policy intent, the risks of not acting are considered to have greater potential costs / negative effects, insofar as not realising the potential benefits described below. The risk of not acting includes the potential to allow applications that propose alternative options to address the infrastructure requirements or who demonstrates that under the circumstances, non-compliance is acceptable to be granted – thereby undermining the intent of the provisions (i.e. ensuring infrastructure is provided – as key to opening Rotokauri North for development). By virtue of a non-complying activity, the threshold for granting consents is higher – reducing the likelihood of alternatives to be accepted by Council. In addition, the risk of not acting includes the retention of a rule that unnecessarily duplicates the requirements of the RMA.</p>	
<p>Costs</p>		<p>Benefits</p>
<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 		<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Certainty provided to developers as to the process (and associated costs) regarding the provision of infrastructure to enable development of Rotokauri North. Knowing the requirements surrounding infrastructure provisions enables these costs to be factored early into feasibility assessments - ensuring developers are not only made aware of these costs at the time of resource consent (potentially making a development unfeasible without these forecasted costs). <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through providing clarity and certainty to Plan user understanding the framework contained in Chapter 3.6A.

Overall Evaluation:	Overall, the proposed amendments ensure that the intent of the provisions are realised – the provision of infrastructure is commensurate with that required to open Rotokauri North for development – and that unnecessary duplication of RMA requirements within the proposed framework is avoided.
----------------------------	--

FIGURE 3.6A-1 – FIGURE 3.6A – 7

Effectiveness and Efficiency	<p><u>Effectiveness</u></p> <p>Overall, the deletion of the figures is not considered to represent any loss of effectiveness at all. The detail shown within the cross-sections is problematic and not supported by Council as is contrary to the RITS standards. Further there remains opportunity to progress alternative corridor layouts to that contained within the standard RITS corridor layouts. Accordingly, there is not considered to be any loss of effectiveness.</p>	<p><u>Efficiency</u></p> <p>Overall, the efficiency is considered unchanged with or without the cross-section diagrams given they are indicative anyway, are not supported by Council (in terms of the detail of them shown), and the RITS standard cross-sections are able to be varied through subdivision and engineering approval processes anyway.</p>
-------------------------------------	--	--

Risk of Acting / Not Acting	Any risks associated with implementing the recommended amendments are considered to be minimal given RITS standards contain cross-sections, and the proposed diagrams displayed detail not supported by Council and contrary to RITS standards. The risk of not acting includes a set of cross-section figures being retained in the plan change provisions showing inappropriate detail not supported by Council and contrary to the RITS standards.
------------------------------------	---

Costs	Benefits
<p>Environmental:</p> <ul style="list-style-type: none"> • None. <p>Economic:</p> <ul style="list-style-type: none"> • None, given that alternative transport corridor layouts can still be progressed through subdivision and engineering approval processes. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • None. 	<p>Environmental:</p> <ul style="list-style-type: none"> • The only environmental costs would be if the cross-sections would otherwise be effective in promoting transport outcomes that could not be progressed through RITS standards and subdivision processes. That is not considered the case. <p>Economic:</p> <ul style="list-style-type: none"> • Neutral in terms of costs. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Similar to environmental above, there remains flexibility to progress various street corridor layouts to enhance social and cultural outcomes, particularly in respect of public transport and active mode provision.

Overall Evaluation:	Overall, these transport cross-section figures are recommended to be deleted as they present detail that is unacceptable to Council and contrary to the RITS standard typically applied. The Council Planning and Infrastructure Technical Report at Section 11.10 sets out a series of issues with the detail shown within the figures, that either needs to be substantially amended or deleted entirely. The cross-sections were considered to be of limited value given they are not place-specific, but rather
----------------------------	---

generic cross-sections for different types of transport corridor. Given the stated issues around the detail shown in the cross-sections, and that the plan change proponent agreed to their removal from the plan change, it was determined that the recommendation should be to remove them. Removal means that the standards cross-sections within the RITS standards continue to apply, with RITS having flexibility to consider other alternative layouts. Even if these cross-section diagrams were retained, Council has a clear position that they do not represent any sort of approval of the detail shown and that approval would be through subsequent subdivision application processes and engineering approvals. The overall evaluation is that deletion of the figures is more efficient and effective and better meets the Section 32 'tests' in terms of broad outcomes.

2.2 Chapter 4: Residential Zone

Table 2: Chapter 4: Residential Zone – Recommended Amendments Analysis

4.2.14 – OBJECTIVE: RESIDENTIAL ZONES	
Effectiveness and Efficiency	<p>Effectiveness The proposed amendments provide clarity and certainty to Plan Users regarding the intent and purpose of the objective. Specifically, the amendments are effective insofar as conveying that the purpose of the zone is to achieve overall a “medium” density, and not a range of densities (as interpreted under the notified wording).</p> <p>Efficiency The amendments provide gains for Plan Users insofar as improving the understanding of the purpose and intent of the Rotokauri North Medium Density Residential Zone.</p>
Risk of Acting / Not Acting	Any risks associated with implementing the recommended amendments are outweighed by the risks associated with not acting. The risks of not acting are considered to have greater potential costs / negative effects, insofar as failing to articulate the purpose of the Rotokauri North Medium Density Residential Zone. The risk of not adopting the proposed amendments to the Objective will potentially create confusion surrounding the density envisaged by the Rotokauri North Medium Density North Zone.
Costs	Benefits
<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 	<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Improvement in the useability of the Plan by way of ensuring the intended density of the Rotokauri North Medium Density Residential Zone is clearly articulated to Plan Users through the Objective.
Overall Evaluation:	Overall, the proposed amendments ensure that the density outcome of the Rotokauri North Medium Density Residential Zone is articulated through the Objective as intended. The proposed amendments are effective and efficient at both addressing the identified interpretation issues and ensuring the density of the Zone is realised through the Plan Change.
4.2.14a – POLICY: RESIDENTIAL ZONES	

<p>Effectiveness and Efficiency</p>	<p>Effectiveness</p> <p>The proposed amendments ensure consistency with the style, format, terminology and phrasing of the Operative District Plan – effectively improving the useability of the Plan. In particular, the amendments seek to clarify the intent and purpose of the Policy (insofar as clarifying the words after “including” are examples of “public” spaces - not privates spaces – and the action required by the policy).</p>	<p>Efficiency</p> <p>The amendments provide minor gains for Plan Users. The amendments improve Plan useability through ensuring that the language used in Chapter 3.6A is consistent with the remainder of the District Plan chapters. In addition, the proposed amendments seek to delete words that are considered unnecessary to convey the purpose / intent of the framework – improving the efficiency of the proposed framework.</p>
<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are considered to be de minimis given their scale. In addition, the proposed amendments are simply ‘word smithing’ to ensure consistency between proposed Chapter 3.6A and the remainder of the District Plan.</p> <p>The risk of not acting includes retaining a Chapter that is inconsistent with the remainder of the District Plan – creating inefficiencies for Plan User and creating confusion surrounding the purpose and intent of the Rotokauri North Medium Density North Zone.</p>	
<p>Costs</p>		<p>Benefits</p>
<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 		<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through improving consistency of the proposed Chapter (3.6A) with the remainder of the District Plan chapters and ensuring the purpose and intent of the framework is clearly articulated.
<p>Overall Evaluation:</p>	<p>Overall, the proposed amendments ensure that the style, format, terminology and phrasing of Chapter 3.6A is consistent with the remainder of the District Plan chapters. In turn, this will improve the useability of Chapter 3.6A for Plan Users who are familiar with the Operative District Plan and ensure the purpose and intent of the proposed framework is clearly articulated to Plan Users.</p>	

4.2.14b – POLICY: RESIDENTIAL ZONES

<p>Effectiveness and Efficiency</p>	<p>Effectiveness</p> <p>The proposed amendments ensure consistency with the style, format, terminology and phrasing of the Operative District Plan – effectively improving the useability of the Plan. In particular, the amendments seek to clarify the intent and purpose of the Policy (insofar as that the Rotokauri North Medium Density Residential Zone is to enable development, not vacant lots; and to clarify the minimum vacant lot size).</p>	<p>Efficiency</p> <p>The amendments provide minor gains for Plan Users. The amendments improve Plan useability through ensuring that the language used in Chapter 3.6A is consistent with the remainder of the District Plan chapters. In addition, the proposed amendments seek to delete words that are considered unnecessary to convey the purpose / intent of the framework – improving the efficiency of the proposed framework.</p>
<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are considered to be de minimis given their scale. In addition, the proposed amendments are simply ‘word smithing’ to ensure consistency between proposed Chapter 3.6A and the remainder of the District Plan.</p> <p>The risk of not acting includes retaining a Chapter that is inconsistent with the remainder of the District Plan – creating inefficiencies for Plan User and creating confusion surrounding the purpose and intent of the Rotokauri North Medium Density North Zone.</p>	
<p>Costs</p>		<p>Benefits</p>
<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 		<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through improving consistency of the proposed Chapter (3.6A) with the remainder of the District Plan chapters and ensuring the purpose and intent of the framework is clearly articulated.
<p>Overall Evaluation:</p>	<p>Overall, the proposed amendments ensure that the style, format, terminology and phrasing of Chapter 3.6A is consistent with the remainder of the District Plan chapters. In turn, this will improve the useability of Chapter 3.6A for Plan Users who are familiar with the Operative District Plan and ensure the purpose and intent of the proposed framework is clearly articulated to Plan Users.</p>	

4.2.14c – POLICY: RESIDENTIAL ZONES

<p>Effectiveness and Efficiency</p>	<p>Effectiveness</p> <p>The proposed amendments ensure consistency with the style, format, terminology and phrasing of the Operative District Plan – effectively improving the useability of the Plan. In particular, the amendments seek ensure the proposed policy aligns with the National Policy Statement on Urban Development 2020 (specifically, Policy 11).</p>	<p>Efficiency</p> <p>The amendments provide minor gains for Plan Users. The amendments improve Plan useability through ensuring that the language used in Chapter 3.6A is consistent with the remainder of the District Plan chapters. In addition, the proposed amendments seek to delete words that are considered unnecessary to convey the purpose / intent of the framework – improving the efficiency of the proposed framework.</p>
<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are considered to be de minimis given their scale. In addition, the proposed amendments are simply ‘word smithing’ to ensure consistency between proposed Chapter 3.6A and the remainder of the District Plan.</p> <p>The risk of not acting includes retaining a Chapter that is inconsistent with the remainder of the District Plan – creating inefficiencies for Plan User and creating confusion surrounding the purpose and intent of the Rotokauri North Medium Density North Zone.</p>	
<p>Costs</p> <p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 		<p>Benefits</p> <p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through improving consistency of the proposed Chapter (3.6A) with the remainder of the District Plan chapters and the National Policy Statement on Urban Development 2020. In addition, the proposed amendments ensure that the purpose and intent of the framework is clearly articulated.
<p>Overall Evaluation:</p>	<p>Overall, the proposed amendments ensure that the style, format, terminology and phrasing of Chapter 3.6A is consistent with the remainder of the District Plan chapters and the National Policy Statement on Urban Development 2020 (specifically, Policy 11). In turn, this will improve the useability of Chapter 3.6A for Plan Users who are familiar with the Operative District Plan and ensure the purpose and intent of the proposed framework is clearly articulated to Plan Users.</p>	

4.2.14d – POLICY: RESIDENTIAL ZONES

<p>Effectiveness and Efficiency</p>	<p>Effectiveness</p> <p>The proposed amendments ensure consistency and alignment between this Policy and the relevant rule (Rule 4.6.6). In particular, the amendments seek to clarify the purpose and intent of the policy (i.e. allowing higher site coverage where it is necessary to accommodate car parking accessed from a rear lane and stormwater is managed appropriately). These proposed amendments are effective at addressing the alignment and clarity issues identified with the Policy.</p>	<p>Efficiency</p> <p>The amendments provide minor gains for Plan Users insofar as improving Plan useability through strengthening the alignment between this Policy and Rule cascade. In addition, the proposed amendments seek to ensure the intent of the policy is clarified (regarding the application of higher site coverage while managing stormwater) – improving the clarity of the proposed framework.</p>
<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are outweighed by the risks associated with not acting. The risks of not acting are considered to have greater potential costs / negative effects, insofar as failing to articulate the purpose of the policy (and associated rule) and failing to align the policy to rule cascade. The risk of not adopting the proposed amendments to the Policy will potentially create confusion surrounding the site coverage envisaged for the Rotokauri North Medium Density North Zone.</p>	
<p>Costs</p>		<p>Benefits</p>
<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Reducing the higher site coverage available to land within the Rotokauri North Medium Density Residential Zone to only those properties accommodating carparking access from a rear lane (reducing the total developable area of the Rotokauri North Medium Density Residential Zone). <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 		<p>Environmental:</p> <ul style="list-style-type: none"> • Clarifying the intent of the Policy insofar as only allowing higher site coverage where it is necessary to accommodate carparking accessed from a rear lane (and stormwater is managed appropriately) – noting the significant challenges surrounding stormwater management within the catchment would be exacerbated from the improper application of the increased site coverage. <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through improving the alignment of the Policy and Rule cascade and ensuring the purpose and intent of the framework is clearly articulated.
<p>Overall Evaluation:</p>	<p>Overall, the proposed amendments ensure consistency and alignment between this Policy and Rule 4.6.6. In turn, this will improve the useability of Chapter 3.6A for Plan Users by way of ensuring the intent of the policy is clarified (regarding the higher site coverage while managing stormwater).</p>	

4.2.14e – POLICY: RESIDENTIAL ZONES

Effectiveness and Efficiency	<p><i>Effectiveness</i></p> <p>The proposed amendments provide clarity and certainty to the Policy (noting “urban street frontage character” is not a defined term in the District Plan) and delete unnecessary / inappropriate wording in the Policy – specifically, deleting text that is considered to be written as an assessment criterion.</p>	<p><i>Efficiency</i></p> <p>The amendments provide minor gains for Plan Users insofar as improving Plan useability through clarity and certainty on the purpose and intent of this policy – improving the efficiency of the proposed frameworks as a package.</p>
Risk of Acting / Not Acting	<p>Any risks associated with implementing the recommended amendments are outweighed by the risks associated with not acting. The risks of not acting are considered to have greater potential costs / negative effects, insofar as failing to clarify the purpose and intent of the proposed Policy. The risk of not adopting the proposed amendments to the Policy will potentially create confusion surrounding the intent of the Policy.</p>	
Costs		Benefits
<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 	<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through improving the purpose and intent of the proposed Policy. 	
Overall Evaluation:	<p>Overall, the proposed amendments ensure that the intent of the provisions are realised and that elements of the policy that are considered to be written as an assessment criterion are removed from the Policy.</p>	

4.2.14f – POLICY: RESIDENTIAL ZONES

Effectiveness and Efficiency	<p><i>Effectiveness</i></p> <p>This additional Policy is effective at filling in the gap within the notified framework regarding apartments. The proposed policy is effective at realising the outcomes set out in s1.4.2.3 and s1.4.2.4 of the Residential Design Guide (refer to Appendix 1.4.2 of the District Plan).</p>	<p><i>Efficiency</i></p> <p>The amendments provide minor gains for Plan Users. The amendments improve Plan useability through minimising ‘gaps’ within Chapter 3.6A framework.</p>
-------------------------------------	---	---

<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are outweighed by the risks associated with not acting. The risks of not acting are considered to have greater potential costs / negative effects, insofar as failing to realise the purpose and intent of Chapter 3.6A regarding the provision of apartments in Rotokauri North. The risk of not adopting the proposed amendments retains a 'gap' within the policy framework that will create uncertainty leading to a shortfall in the intended built form outcome / enablement of residential development in Rotokauri North.</p>
<p>Costs</p> <p>Environmental:</p> <ul style="list-style-type: none"> • Neutral. <p>Economic:</p> <p>Potential to result in increased urban design input into resource consent applications due to greater residential densities of development and the need to manage built form outcomes (with the costs placed on the landowner / developer).</p> <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Higher density residential developments (such as apartments) can create internalised costs / effects in relation to congestion, overcrowding as well as potential impacts / costs to neighbours (e.g. associated with overshadowing, blocking views etc.). These costs / effects are generally able to be mitigated through measures such as design-related rules to manage the quality of the built environment. 	<p>Benefits</p> <p>Environmental:</p> <ul style="list-style-type: none"> • Providing potential longer-term benefits to the natural environment associated with the more efficient use of residential land and flow-on impacts for reducing travel distances (where people have increased opportunities to live in closer proximity by virtue of enabling apartment living) - such as reduced carbon emissions over time. <p>Economic:</p> <ul style="list-style-type: none"> • Enabling higher-density residential development (by virtue of enabling apartments within Rotokauri North) will likely increase the value of land. This land value increase in combination with the intensification enablement (through the provisions of apartment development) will provide more feasible options for developments (that is, the ability to develop more units on the same area of land than was previously possible). <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Provides greater certainty regarding expectations relating to the location, scale and intensity of residential development within Rotokauri North. • Minor improvement to the useability of the Plan through improving the purpose and intent of the proposed framework.
<p>Overall Evaluation:</p>	<p>Overall, the proposed amendments ensure that the identified gaps (i.e. a policy framework for apartments) are realised and that elements of the policy that are considered to be written as an assessment criterion are removed from the Policy.</p>

4.2.14i – POLICY: RESIDENTIAL ZONES

Effectiveness and Efficiency	<p><u>Effectiveness</u></p> <p>This additional Policy is effective at filling in the gap within the notified framework regarding ancillary residential units. The proposed policy supports Rule 4.7.1.d (refer to Section 15.12 of the District Plan).</p>	<p><u>Efficiency</u></p> <p>The amendments provide minor gains for Plan Users. The amendments improve Plan useability through minimising 'gaps' within Chapter 3.6A framework.</p>
-------------------------------------	---	---

Risk of Acting / Not Acting	<p>Any risks associated with implementing the recommended amendments are outweighed by the risks associated with not acting. The risks of not acting are considered to have greater potential costs / negative effects, insofar as failing to realise the purpose and intent of Chapter 3.6A regarding the provision of ancillary residential units within Rotokauri North. The risk of not adopting the proposed amendments retains a 'gap' within the policy framework that will create uncertainty leading to a shortfall in the intended built form outcome / enablement of residential development in Rotokauri North.</p>
------------------------------------	---

Costs	Benefits
<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral. <p>Economic:</p> <p>Potential to result in increased urban design input into resource consent applications due to greater residential densities of development and the need to manage built form outcomes (with the costs bared on the landowner / developer).</p> <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Higher density residential developments (such as the provision of ancillary residential units) can create internalised costs / effects in relation to congestion, overcrowding as well as potential impacts / costs to neighbours (e.g. associated with overshadowing, blocking views etc.). These costs / effects are generally able to be mitigated through measures such as design-related rules to manage the quality of the built environment. 	<p>Environmental:</p> <ul style="list-style-type: none"> • Providing potential longer-term benefits to the natural environment associated with the more efficient use of residential land and flow-on impacts for reducing travel distances (where people have increased opportunities to live in closer proximity by virtue of enabling apartment living) - such as reduced carbon emissions over time. <p>Economic:</p> <ul style="list-style-type: none"> • Enabling higher-density residential development (by virtue of enabling ancillary residential units within Rotokauri North) will likely increase the value of land. This land value increase in combination with the intensification enablement (through the provisions of ancillary residential units) will provide more feasible options for developments (that is, the ability to develop more units on the same area of land than was previously possible). <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Provides greater certainty regarding expectations relating to the location, scale and intensity of residential development within Rotokauri North. • Minor improvement to the useability of the Plan through improving the purpose and intent of the proposed framework.

Overall Evaluation:	Overall, the proposed amendments ensure that the identified gaps (i.e. a policy framework for ancillary residential units) are realised and that elements of the policy that are considered to be written as an assessment criterion are removed from the Policy.
----------------------------	---

4.2.14j – POLICY: RESIDENTIAL ZONES

Effectiveness and Efficiency	<p>Effectiveness</p> <p>The proposed amendments provide clarity and certainty to Plan Users regarding the policy framework pertaining to the provision of outdoor living spaces in Rotokauri North. The amendments are effective at ensuring the intent of the policy framework is realised insofar as ensuring consistent expression (requiring things to be done).</p>	<p>Efficiency</p> <p>The amendments provide minor gains for Plan Users insofar as improving the efficiency of Plan Users understanding of the purpose and intent of the requirements around the provision of outdoor living spaces in Rotokauri North.</p>
-------------------------------------	---	---

Risk of Acting / Not Acting	Any risks associated with implementing the recommended amendments are considered to be de minimis given their scale. While the changes are to the policy framework, the changes improve the clarity of the policy framework and not its intent. The risk of not acting includes retaining text that could lead to uncertainty for Plan Users regarding the specific policy framework surrounding the provision of outdoor living spaces in Rotokauri North.
------------------------------------	---

Costs	Benefits
<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 	<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through providing clarity and certainty to Plan users navigating the policy framework for the provision of outdoor living space in Rotokauri North.

Overall Evaluation:	Overall, the proposed amendments ensure that the useability of the Plan is improved by way of providing clarity and certainty to Plan Users regarding the coordination of subdivision and development in Rotokauri North. In particular, these changes provide consistent expression (i.e. ‘requiring’ things to be done) than the notified framework – ensuring the intent is not lost.
----------------------------	--

4.2.14k – POLICY: RESIDENTIAL ZONES

Effectiveness and Efficiency	<p>Effectiveness</p> <p>The proposed amendments provide clarity and certainty to Plan Users regarding the policy framework pertaining to the provision of service areas within Rotokauri North. The amendments are effective at ensuring the intent of the policy framework is realised insofar as enabling greater flexibility for the location of service areas given the more compact medium density residential development anticipated in Rotokauri North.</p>	<p>Efficiency</p> <p>The amendments provide minor gains for Plan Users insofar as improving the efficiency of Plan Users understanding of the purpose and intent of the greater flexibility applied to the provision of service areas with development in Rotokauri North.</p>
Risk of Acting / Not Acting	<p>Any risks associated with implementing the recommended amendments are considered to be de minimis given their scale. While the changes are to the policy framework, the change provide greater flexibility regarding the location of service areas for development in Rotokauri North rather than altering the intent of the framework.</p> <p>The risk of not acting includes retaining text that could lead to uncertainty for Plan Users regarding the specific policy framework surrounding the provision of service areas in Rotokauri North.</p>	
Costs		Benefits
<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 		<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Enables greater flexibility for developers regarding the bulk and massing of development and the provision of service areas – providing more feasibility in the form of greater development options. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through providing clarity and certainty to Plan users navigating the policy framework for the provision of outdoor living space in Rotokauri North.
Overall Evaluation:	<p>Overall, the proposed amendments ensure that the useability of the Plan is improved by way of providing clarity and certainty to Plan Users regarding the greater flexibility enabled for the location of service areas in Rotokauri North.</p>	

4.5.4.ff - gg– RULES: ACTIVITY STATUS TABLE

<p>Effectiveness and Efficiency</p>	<p>Effectiveness</p> <p>The proposed amendments ensure consistency with the terminology used in the Operative District Plan – effectively improving the useability of the Plan. In particular, the amendments seek to replace the undefined “duplex-building” with the defined term “duplex-dwelling”.</p>	<p>Efficiency</p> <p>The amendments provide minor gains for Plan Users. The amendments improve Plan useability through ensuring that the terminology used in Chapter 3.6A is consistent with the defined terms of the Operative District Plan.</p>
<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are considered to be de minimis given their scale. In addition, the proposed amendments are simply ‘word smithing’ to ensure consistency between the terminology used in Chapter 3.6A and the defined terms of the Operative District Plan.</p> <p>The risk of not acting includes retaining a Chapter which includes terminology inconsistent with the remainder of the District Plan.</p>	
<p>Costs</p>		<p>Benefits</p>
<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 		<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through improving consistency of the proposed Chapter (3.6A) with the Operative District Plan – specifically, ensuring the terminology adopted in the proposed framework is aligned with the terms defined in the Operative District Plan (where practicable / appropriate).
<p>Overall Evaluation:</p>	<p>Overall, the proposed amendments ensure consistency with the terminology used in the Operative District Plan. In turn, this will improve the useability of Chapter 3.6A for Plan Users who are familiar with the Operative District Plan and ensure the purpose and intent of the proposed framework is clearly articulated to Plan Users.</p>	

4.5.4.ii, jj, kk, mm – RULES: ACTIVITY STATUS TABLE

<p>Effectiveness and Efficiency</p>	<p>Effectiveness</p> <p>The proposed amendments ensure consistency with the terminology used in the Operative District Plan – effectively improving the useability of the Plan. In particular, the amendments seek to provide certainty around “accessory buildings” and their activity status.</p>	<p>Efficiency</p> <p>The amendments provide minor gains for Plan Users. The amendments improve Plan useability through ensuring that the terminology used in Chapter 3.6A is consistent with the defined terms of the Operative District Plan.</p>
<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are considered to be de minimis given their scale. In addition, the proposed amendments are simply ‘word smithing’ to ensure consistency between the terminology used in Chapter 3.6A and the defined terms of the Operative District Plan.</p> <p>The risk of not acting includes retaining a Chapter which includes terminology inconsistent with the remainder of the District Plan.</p>	
<p>Costs</p>		<p>Benefits</p>
<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 		<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through improving consistency of the proposed Chapter (3.6A) with the Operative District Plan – specifically, ensuring the terminology adopted in the proposed framework is aligned with the terms defined in the Operative District Plan (where practicable / appropriate).
<p>Overall Evaluation:</p>	<p>Overall, the proposed amendments ensure consistency with the terminology used in the Operative District Plan. In turn, this will improve the useability of Chapter 3.6A for Plan Users who are familiar with the Operative District Plan and ensure the purpose and intent of the proposed framework is clearly articulated to Plan Users.</p>	

4.6.6 – RULES - ROTOKAURI NORTH MEDIUM DENSITY RESIDENTIAL ZONE: SITE COVERAGE

<p>Effectiveness and Efficiency</p>	<p>Effectiveness</p> <p>The proposed amendments provide clarity and certainty to Plan Users regarding the rule framework pertaining to site coverage for development within Rotokauri North. The amendments are effective at ensuring that the rule framework aligns with the associated rule and Policies.</p>	<p>Efficiency</p> <p>The amendments provide minor gains for Plan Users insofar as improving the efficiency of Plan Users' understanding of the purpose and intent of the framework surrounding site coverage for development in Rotokauri North.</p>
<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are considered to be de minimis given their scale. While the changes are to the rule framework, the change provides clarity and certainty around the application of the Rule in relation to site coverage for development in Rotokauri North (rather than altering the intent of the framework). The risk of not acting includes retaining text that could lead to uncertainty for Plan Users regarding the specific rule framework surrounding site coverage for development in Rotokauri North.</p>	
<p>Costs</p>		<p>Benefits</p>
<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 		<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Enables certainty for developers regarding the application of the site coverage rule for proposed development. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through providing clarity and certainty to Plan users on the application of the site coverage Rule for development in Rotokauri North.
<p>Overall Evaluation:</p>	<p>Overall, the proposed amendments ensure that the useability of the Plan is improved by way of providing clarity and certainty to Plan Users on the application of the site coverage rule for development in Rotokauri North.</p>	

4.6.7 – RULES - ROTOKAURI NORTH MEDIUM DENSITY RESIDENTIAL ZONE: BUILDING HEIGHT

<p>Effectiveness and Efficiency</p>	<p>Effectiveness</p> <p>The proposed amendments provide clarity and certainty to Plan Users regarding the rule framework pertaining to building height for development within Rotokauri North. The amendments are effective at ensuring that the rule framework correctly references the overlay figures numbers, eliminates unnecessary words and aligns the rule structure with that of 4.6.7.a.</p>	<p>Efficiency</p> <p>The amendments provide minor gains for Plan Users insofar as improving the efficiency of Plan Users' understanding of the purpose and intent of the framework surrounding building height for development in Rotokauri North.</p>
<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are considered to be de minimis given their scale. While the changes are to the rule framework, the change provides clarity and certainty around the application of the Rule in relation to building height for development in Rotokauri North (rather than altering the intent of the framework). The risk of not acting includes retaining text that could lead to uncertainty for Plan Users regarding the specific rule framework surrounding building height for development in Rotokauri North.</p>	
<p>Costs</p>		<p>Benefits</p>
<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 	<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Enables certainty for developers regarding the application of the building height rule for proposed development. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through providing clarity and certainty to Plan users on the application of the building height Rule for development in Rotokauri North. 	
<p>Overall Evaluation:</p>	<p>Overall, the proposed amendments ensure that the useability of the Plan is improved by way of providing clarity and certainty to Plan Users on the application of the building height rule for development in Rotokauri North.</p>	

4.7.1 – RULES – SPECIFIC STANDARDS - ALL RESIDENTIAL ZONES: ANCILLARY RESIDENTIAL UNIT

<p>Effectiveness and Efficiency</p>	<p>Effectiveness</p> <p>The proposed amendments provide clarity and certainty to Plan Users regarding the rule framework pertaining to ancillary residential units within Rotokauri North. The amendments are effective at ensuring that the rule framework aligns with the associated rule and Policies.</p>	<p>Efficiency</p> <p>The amendments provide minor gains for Plan Users insofar as improving the efficiency of Plan Users' understanding of the purpose and intent of the framework surrounding ancillary residential units in Rotokauri North.</p>
<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are considered to be de minimis given their scale. While the changes are to the rule framework, the change provides clarity and certainty around the application of the Rule in relation to ancillary residential units in Rotokauri North (rather than altering the intent of the framework). The risk of not acting includes retaining text that could lead to uncertainty for Plan Users regarding the specific rule framework surrounding ancillary residential units in Rotokauri North.</p>	
<p>Costs</p>		<p>Benefits</p>
<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 		<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Enables certainty for developers regarding the application of the ancillary residential units rule for proposed development. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through providing clarity and certainty to Plan users on the application of the ancillary residential units Rule for development in Rotokauri North.
<p>Overall Evaluation:</p>	<p>Overall, the proposed amendments ensure that the useability of the Plan is improved by way of providing clarity and certainty to Plan Users on the application of the ancillary residential unit rule for development in Rotokauri North. In particular, the amendments improve clarity that all clauses must be met as well as enhancing the clarity of the meaning of Clause d (i) – (iv).</p>	

4.7.12 – RULES – SPECIFIC STANDARDS - ALL RESIDENTIAL ZONES: SPECIFIC PROVISIONS FOR ROTOKAURI NORTH

<p>Effectiveness and Efficiency</p>	<p>Effectiveness</p> <p>The proposed amendments ensure consistency with the terminology used in the Operative District Plan – effectively improving the useability of the Plan. In particular, the amendments seek to replace the undefined “duplex-building” with the defined term “duplex-dwelling”.</p>	<p>Efficiency</p> <p>The amendments provide minor gains for Plan Users. The amendments improve Plan useability through ensuring that the terminology used in Chapter 3.6A is consistent with the Operative District Plan (including alignment with defined terms).</p>
<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are considered to be de minimis given their scale. In addition, the proposed amendments are simply ‘word smithing’ to ensure consistency between the terminology used in Chapter 3.6A and that adopted in the Operative District Plan. This includes aligning the terms used in the rule with those terms defined in the Operative District Plan.</p> <p>The risk of not acting includes retaining a Chapter which includes terminology inconsistent with the remainder of the District Plan.</p>	
<p>Costs</p> <p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 		<p>Benefits</p> <p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through improving consistency of the proposed Chapter (3.6A) with the Operative District Plan – specifically, ensuring the terminology adopted in the proposed framework is aligned with the terms defined in the Operative District Plan (where practicable / appropriate).
<p>Overall Evaluation:</p>	<p>Overall, the proposed amendments ensure consistency with the terminology used in the Operative District Plan. In turn, this will improve the useability of Chapter 3.6A for Plan Users who are familiar with the Operative District Plan and ensure the purpose and intent of the proposed framework is clearly articulated to Plan Users.</p>	

4.8.2.f – RULES – SPECIFIC STANDARDS – ROTOKAURI NORTH MEDIUM DENSITY RESIDENTIAL ZONE: BUILDING SETBACKS

<p>Effectiveness and Efficiency</p>	<p>Effectiveness</p> <p>The proposed amendments provide clarity and certainty to Plan Users regarding the rule framework pertaining to building setbacks within Rotokauri North. The amendments are effective at increasing the choice / options available to property owners regarding plan enabled development on a site adjoining the transport corridor boundary.</p>	<p>Efficiency</p> <p>The amendments provide minor gains for Plan Users insofar as improving the efficiency of Plan Users' understanding of the purpose and intent of the framework surrounding building setbacks in Rotokauri North.</p>
<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are outweighed by the risks associated with not acting. While the changes are to the rule framework, the change provides clarity and certainty around the application of the Rule in relation to building setbacks in Rotokauri North (rather than altering the intent of the framework).</p> <p>The risk of not acting includes retaining text that could lead to uncertainty for Plan Users regarding the specific rule framework surrounding building setbacks in Rotokauri North as well as reducing choice / options available to property owners regarding plan enabled development on sites adjoining the transport corridor boundary.</p>	
<p>Costs</p>		<p>Benefits</p>
<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 		<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Enables certainty for developers regarding the application of the building setbacks rule for proposed development. • Improves the options available to developers when developing sites adjoining the transport corridor boundary. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through providing clarity and certainty to Plan users on the application of the building setbacks rule for development in Rotokauri North. • Improves choice available to property owners through increased flexibility / options for residential units on sites which adjoin the transport corridor boundary.

<p>Overall Evaluation:</p>	<p>Overall, the proposed amendments ensure that the useability of the Plan is improved by way of providing clarity and certainty to Plan Users on the application of the building setbacks rule for development in Rotokauri North. In particular, the amendments avoid the need for applying for a resource consent when constructing a residential unit with a 1.8m minimum depth enclosed verandahs / porch space attached to it and setback 1m from the transport corridor boundary. As notified, the current wording of the rule would require a Restricted Discretionary Activity consent for such an activity - therefore preventing alternatives to be made with the additional 0.2m strip of an allotment (reducing optionality and choice for developers).</p>
-----------------------------------	--

4.8.3 – RULES – SPECIFIC STANDARDS – ROTOKAURI NORTH MEDIUM DENSITY RESIDENTIAL ZONE: INTERFACE BETWEEN PUBLIC AND PRIVATE

<p>Effectiveness and Efficiency</p>	<p>Effectiveness The proposed amendments provide clarity and certainty to Plan Users regarding the rule framework pertaining to the interface between public and private realms within Rotokauri North. In particular, the amendments are effective at addressing the concerns around fence heights – specifically addressing the potential CPTED and visual amenity issues identified under the notified rule framework.</p>	<p>Efficiency The amendments provide minor gains for Plan Users insofar as improving the efficiency of Plan Users’ understanding of the purpose and intent of the framework surrounding the interface between public and private realms in Rotokauri North.</p>
--	--	--

<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are outweighed by the risks associated with not acting. The risks of not acting are considered to have greater potential costs / negative effects, insofar as failing to realise the purpose and intent of Chapter 3.6A regarding the interface between public and private realms within Rotokauri North. The risk of not adopting the proposed amendments creates uncertainty in the rule framework and has the potential to reduce opportunities for passive surveillance between a residential unit and the Open Space Zone. In addition, the risks of not acting has the potential to reduce the potential for improved visual amenity and social interaction between neighbours and between residents and users of the Open Space Zone.</p>
---	---

<p>Costs</p> <p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Potential increase in costs for property owners given the requirement for ‘see-through’ materials for fences between a residential unit and Open Space Zone. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor reduction in privacy for those residents that may wish to reduce and / or avoid social interactions between neighbours and users of the Open Space Zone / reserves. 	<p>Benefits</p> <p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Provides increased opportunity for passive surveillance between residential units and users of the Open Space Zone – improving the safety of the community using these spaces.
--	---

	<ul style="list-style-type: none"> • Increases opportunities for interactions between neighbours and residents and open space users – improving wellbeing of the community through reducing social isolation and loneliness. • Minor improvement to the useability of the Plan through providing clarity and certainty to Plan user on the application of the interface between public and private realms within Rotokauri North.
--	---

<p>Overall Evaluation:</p>	<p>Overall, the proposed amendments ensure that the useability of the Plan is improved by way of providing clarity and certainty to Plan Users on the application of the interface between public and private realms rule in Rotokauri North. In particular, the amendments provide increased opportunities for passive surveillance and social interactions between both neighbours and residents and opens space / reserve users. Such opportunities help reduce social isolation, loneliness, and instances of crime – improving the wellbeing of the community. In addition, such amendments will improve the overall visual amenity between the public and private interface (residential units and the open space zone / reserves) through requirements to adopt ‘see-through’ materials for fences along these interfaces.</p>
-----------------------------------	---

4.8.4 – RULES – SPECIFIC STANDARDS – ROTOKAURI NORTH MEDIUM DENSITY RESIDENTIAL ZONE: RESIDENTIAL BUILDINGS – SEPARATION AND PRIVACY

<p>Effectiveness and Efficiency</p>	<p>Effectiveness</p> <p>The proposed amendments provide clarity and certainty to Plan Users regarding the rule framework pertaining to separation of residential buildings within Rotokauri North. In particular, the amendments seek to ensure that the rule does apply to ancillary residential units on the same site given, as notified, these ancillary residential units are currently exempt from complying. In addition, the proposed amendments to the rule are to ensure that when applying the setback distance, this distance is consistent with the setback required for residential buildings on different sites.</p>	<p>Efficiency</p> <p>The amendments provide minor gains for Plan Users insofar as improving the efficiency of Plan Users understanding of the purpose and intent of the setback requirements for residential buildings on the same site within Rotokauri North.</p>
--	--	--

<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are outweighed by the risks associated with not acting. The risks of not acting are considered to have greater potential costs / negative effects, insofar as failing to ensure privacy between residential units and ancillary residential units located on the same site within Rotokauri North. The risk of not adopting the proposed amendments creates a ‘gap’ in the rule framework and undermines the intent and purpose of the rule.</p>
---	---

<p>Costs</p>	<p>Benefits</p>
---------------------	------------------------

<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Reduces flexibility for developers regarding the bulk and massing of development within the same site given the required setbacks of ancillary residential units from residential units on the same site. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 	<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through providing clarity and certainty to Plan user navigating the rule framework pertaining to setback distances between residential units and ancillary residential units on the same site within in Rotokauri North. • Ensures the privacy of detached residential units on a site in Rotokauri North is not compromised through the locating ancillary residential units within close proximity to residential units on the same site.
<p>Overall Evaluation:</p>	<p>Overall, the proposed amendments ensure that the useability of the Plan is improved by way of providing clarity and certainty to Plan Users regarding the setback of residential units on the same site within Rotokauri North. The rule is effective in protecting the privacy of each detached residential building when there is more than one on the same site. However, as drafted, the rule exempts any ancillary residential unit from requiring to be set back from another residential unit on the same site – generating potential for privacy issues. The proposed amendments are both effective and efficient at applying this rule to both residential units and ancillary residential units located on the same site – ensuring the purpose of the rule is correctly applied as intended.</p>

4.8.5 – RULES – SPECIFIC STANDARDS – ROTOKAURI NORTH MEDIUM DENSITY RESIDENTIAL ZONE: OUTDOOR LIVING AREA

<p>Effectiveness and Efficiency</p>	<p>Effectiveness</p> <p>The proposed amendments provide clarity and certainty to Plan Users regarding the rule framework pertaining to outdoor living area within Rotokauri North. In particular, clarifying that the new provisions (specifically 4.8.5.d) apply to the Rotokauri North Medium Density Residential Zone and not the operative provisions. In addition, the amendments seek to ensure consistency with the terminology used in the Operative District Plan – effectively improving the useability of the Plan.</p>	<p>Efficiency</p> <p>The amendments provide minor gains for Plan Users insofar as improving the efficiency of Plan Users understanding of the purpose and intent of the outdoor living area provisions for development within Rotokauri North.</p>
--	---	---

Risk of Acting / Not Acting	<p>Any risks associated with implementing the recommended amendments are outweighed by the risks associated with not acting. The risks of not acting are considered to have greater potential costs / negative effects, insofar as failing to ensure correct application of the outdoor living area provisions for decisions within Rotokauri North. The risk of not adopting the proposed amendments creates the potential for the unintended application of the rule framework - undermining the intended residential development within the zone.</p>				
<table border="1"> <thead> <tr> <th data-bbox="152 343 1072 399">Costs</th> </tr> </thead> <tbody> <tr> <td data-bbox="152 399 1072 726"> Environmental: <ul style="list-style-type: none"> • Neutral Economic: <ul style="list-style-type: none"> • Neutral Social / Cultural: <ul style="list-style-type: none"> • Neutral </td> </tr> </tbody> </table>	Costs	Environmental: <ul style="list-style-type: none"> • Neutral Economic: <ul style="list-style-type: none"> • Neutral Social / Cultural: <ul style="list-style-type: none"> • Neutral 	<table border="1"> <thead> <tr> <th data-bbox="1072 343 1933 399">Benefits</th> </tr> </thead> <tbody> <tr> <td data-bbox="1072 399 1933 726"> Environmental: <ul style="list-style-type: none"> • Neutral Economic: <ul style="list-style-type: none"> • Neutral Social / Cultural: <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through providing clarity and certainty to Plan users navigating the rule framework pertaining to outdoor living areas within in Rotokauri North. </td> </tr> </tbody> </table>	Benefits	Environmental: <ul style="list-style-type: none"> • Neutral Economic: <ul style="list-style-type: none"> • Neutral Social / Cultural: <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through providing clarity and certainty to Plan users navigating the rule framework pertaining to outdoor living areas within in Rotokauri North.
Costs					
Environmental: <ul style="list-style-type: none"> • Neutral Economic: <ul style="list-style-type: none"> • Neutral Social / Cultural: <ul style="list-style-type: none"> • Neutral 					
Benefits					
Environmental: <ul style="list-style-type: none"> • Neutral Economic: <ul style="list-style-type: none"> • Neutral Social / Cultural: <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through providing clarity and certainty to Plan users navigating the rule framework pertaining to outdoor living areas within in Rotokauri North. 					
Overall Evaluation:	<p>Overall, the proposed amendments ensure that the useability of the Plan is improved by way of providing clarity and certainty to Plan Users regarding outdoor living areas for residential development within Rotokauri North. The proposed amendments are effective and efficient at ensuring the purpose of the rule is correctly applied as intended.</p>				

4.8.6 – RULES – SPECIFIC STANDARDS – ROTOKAURI NORTH MEDIUM DENSITY RESIDENTIAL ZONE: SERVICE AREAS

<p>Effectiveness and Efficiency</p>	<p><u>Effectiveness</u></p> <p>The proposed amendments are effective in resolving the ‘gap’ in the solid waste requirements for the Rotokauri North Medium Density Residential Zone. Excluding the Zone from compliance with Rule 4.8.6 is inappropriate considering Council’s new waste collection bins. The proposed amendments are effective in resolving this ‘gap’ by way of adopting existing provisions (specifically the General Residential Service Area Rule 4.4.11.h) and those amendments incorporated through Plan Change 6. The amendments to these existing provisions are effective at responding to the different density anticipated in the Medium Density Residential Zone compared to the Operative General Residential Zone.</p>	<p><u>Efficiency</u></p> <p>The adoption of an existing rule framework to resolve an identified ‘gap’ proves an efficient resolution. Minor amendments to the existing rule framework to recognises the difference between the zones is considered an efficient approach compared to, for example, a suite of new provisions.</p>
--	--	--

<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are outweighed by the risks associated with not acting. The risks of not acting are considered to have greater potential costs / negative effects, insofar as failing to provide an appropriately sized service area to accommodate the bins used in Council’s new waste collection system.</p>
---	--

<p>Costs</p>	<p>Benefits</p>
<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 	<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Enables greater flexibility for developers regarding the provision of service areas for the Rotokauri North Medium Density Residential Zone (noting that the Operative General Residential Zone service area rule has been adopted subject to minor amendments that are sympathetic to the different development outcomes between the two zones). <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Ensure that service areas are appropriately designed such that they can accommodate the Council’s new waste collection system – preventing potential amenity effects from the ad hoc storage of bins on properties where a service area has not been appropriately sized.

Overall Evaluation:	Overall, the proposed amendments ensure that service areas are appropriately sized for residential development within Rotokauri North. The proposed amendments are effective and efficient at ensuring the required service areas respond to the intended density and built form outcomes of the Rotokauri North Medium Density Residential Zone.
----------------------------	---

4.14.1-2 –ROTOKAURI NORTH ACCEPTABLE SOLUTIONS CODE (FOR DUPLEX DWELLINGS) - STANDARDS

Effectiveness and Efficiency	<p>Effectiveness</p> <p>The proposed amendments provide clarity and certainty to Plan Users regarding the rule framework pertaining to duplex dwellings within Rotokauri North. In particular, the changes are effective at aligning the terminology and activity status cascade with that of the Operative District Plan – effectively improving the useability of the Plan. In addition, the proposed amendments improve the structure of the framework ensuring that the advice notes are clearly notes and not rules.</p>	<p>Efficiency</p> <p>The amendments provide minor gains for Plan Users insofar as improving the efficiency of Plan Users understanding of the purpose and intent of the duplex dwelling standards for development within Rotokauri North.</p>
-------------------------------------	--	--

Risk of Acting / Not Acting	Any risks associated with implementing the recommended amendments are outweighed by the risks associated with not acting. The risks of not acting are considered to have greater potential costs / negative effects, insofar as failing to provide a clear framework to ensure that the specific form of duplex dwellings anticipated in Rotokauri North Medium Density Residential Zone is realised and that the built form intent of the standards is clearly articulated to Plan Users.
------------------------------------	--

Costs	Benefits
<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 	<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through providing clarity and certainty to Plan users navigating the rule framework pertaining to duplex dwellings within in Rotokauri North.

Overall Evaluation:	Overall, the proposed amendments ensure that the intended built form outcomes for duplex dwellings within the Rotokauri North Medium Density Residential Zone is realised. The proposed amendments are effective and efficient at ensuring this is clearly articulated and the purpose of the duplex dwellings is effectively articulated to Plan Users.
----------------------------	--

2.3 Chapter 23: Subdivision

Table 3: Chapter 23: Subdivision – Recommended Amendments Analysis

23.2.7 – OBJECTIVE: SUBDIVISION	
Effectiveness and Efficiency	<p>Effectiveness</p> <p>The proposed amendments ensure consistency with the terminology and structure of the objectives and policies of the Operative District Plan structure – effectively improving the useability of the Plan and clarifying the intent of the policy framework. In particular, the replacement of the terms “shall be”, “deliver”, and “well planned” aligns Objective 23.2.7 with the terminology used in the Operative District Plan and provides clarity to the purpose and intent of the outcome. Similar changes are proposed to the wording of the associated policy framework to improve clarity and consistency of the framework. The proposed amendments are considered effective insofar as retaining the intent and purpose of the objective and policy framework while not substantially re-writing the policy framework.</p> <p>Efficiency</p> <p>The amendments provide minor gains for Plan Users insofar as improving both the intent and purpose of the objective and policy framework and Plan useability - by way of ensuring the structure and terminology is consistent with the remainder of the District Plan chapters.</p>
Risk of Acting / Not Acting	Any risks associated with implementing the recommended amendments are outweighed by the risks associated with not acting. The risks of not acting are considered to have greater potential costs / negative effects, insofar as failing to convey the intended outcome (particularly the high standard of urban design anticipated) for subdivision in Rotokauri North Medium Density Residential Zone.
Costs	Benefits
<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral 	<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral <p>Economic:</p> <ul style="list-style-type: none"> • Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Minor improvement to the useability of the Plan through providing clarity and certainty to Plan users navigating the policy framework pertaining to subdivision within in Rotokauri North.

	<ul style="list-style-type: none"> Ensures a high level of amenity is realised through the subdivision framework (as intended).
--	--

Overall Evaluation:	Overall, the proposed amendments ensure that the intended outcomes for subdivision (in particular, a high standard of urban design quality) within the Rotokauri North Medium Density Residential Zone is realised. The proposed amendments are effective and efficient at ensuring this intent is clearly articulated and the built form outcomes is effectively articulated to Plan Users.
----------------------------	--

23.3.3d – RULES – ACTIVITY STATUS TABLES

Effectiveness and Efficiency	<p>Effectiveness</p> <p>The proposed amendments provide clarity and certainty to Plan Users regarding the rule framework pertaining to subdivision within Rotokauri North. In particular, the changes are effective at removing words that do not improve the clarity of the rule – effectively improving the useability of the Plan. In addition, the proposed changes set up a cascade of activity status for both compliance and non-compliance with the Structure Plan standards in Rule 3.6A.4 – closing the gap in the framework.</p>	<p>Efficiency</p> <p>The amendments provide minor gains for Plan Users insofar as improving the efficiency of Plan Users understanding of the purpose and intent of the subdivision standards for development within Rotokauri North.</p>
-------------------------------------	--	--

Risk of Acting / Not Acting	Any risks associated with implementing the recommended amendments are outweighed by the risks associated with not acting. The risks of not acting are considered to have greater potential costs / negative effects, insofar as failing to provide a clear framework for subdividing lots in the Rotokauri North Medium Density Residential Zone.
------------------------------------	---

Costs	Benefits
<p>Environmental:</p> <ul style="list-style-type: none"> Neutral <p>Economic:</p> <ul style="list-style-type: none"> Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> Neutral 	<p>Environmental:</p> <ul style="list-style-type: none"> Neutral <p>Economic:</p> <ul style="list-style-type: none"> Neutral <p>Social / Cultural:</p> <ul style="list-style-type: none"> Minor improvement to the useability of the Plan through providing clarity and certainty to Plan users navigating the rule framework pertaining to subdivision within in Rotokauri North.

Overall Evaluation:	Overall, the proposed amendments ensure that the intended subdivision standards within the Rotokauri North Medium Density Residential Zone is realised. The proposed amendments are effective and efficient at ensuring this is clearly articulated to Plan Users and any 'gaps' in the framework are closed insofar as providing for a cascade of activity status that responds to both compliance and non-compliance with Rule 3.6A.4.
----------------------------	--

23.7.8.a & c – SUBDIVISION DESIGN STANDARDS: ROTOKAURI NORTH SUBDIVISION

Effectiveness and Efficiency	<p><u>Effectiveness</u></p> <p>Overall, the effectiveness of the provisions is considered enhanced through the various changes. The changes are several but all will achieve a better targeted and more effective rule framework for managing design of rear lanes and public roads. The wording is now clearer, better targeted to potential effects, and simplified by the removal of the single lane rear lane provisions now these are no longer being pursued by the plan change proponent.</p>	<p><u>Efficiency</u></p> <p>Overall, the efficiency is considered to be enhanced through the recommended changes. The changes will ensure a simpler, more efficient set of standards for design of rear lanes and public roads in Rotokauri North subdivisions. The efficiency is enhanced through deletion of unnecessary standards (single lane rear lanes) and clarity around the design standards for rear lanes, and some flexibility around legal mechanisms for ongoing management of rear lanes.</p>
-------------------------------------	---	---

Risk of Acting / Not Acting	<p>Any risks associated with implementing the recommended amendments are considered to be minimal. The amendments will ensure the better operation of the rule operating as a design standard for rear lanes and roads within Rotokauri North. The risks are well understood and are outweighed by the risks of not acting.</p> <p>The risk of not acting includes a situation where subdivision applications are submitted involving rear lanes and/or public roads (as will often be the case), with incomplete or poorly targeted rule requirements that do not manage the potential transport and other adverse effects. Without the recommended amendments the operation of the rule to manage potential effects would be poor and less well targeted.</p>
------------------------------------	---

Costs	Benefits
<p>Environmental:</p> <ul style="list-style-type: none"> There are not considered to be environmental costs as the rule amendments will lead to generally better environmental outcomes that respond better to potential design issues. <p>Economic:</p> <ul style="list-style-type: none"> Some economic costs to developers and applicants in the sense that the requirements for rear lanes and public roads do impose costs as they set widths, surface standards and design standards. The level of costs are considered similar though relative to the previous rule, and being better targeted are considered to be outweighed by the corresponding benefits. 	<p>Environmental:</p> <ul style="list-style-type: none"> Positive effects in the sense that the changes will result in a provision better attuned to needs and potential issues in respect of rear lanes and public roads. The changes lead to better management of potential effects. <p>Economic:</p> <ul style="list-style-type: none"> Fairly neutral in this regard, as whilst being a rule there is an economic cost with the requirements, the rule as amended now is better attuned to managing the anticipated effects and with enhanced clarity of meaning and is better targeted to the issues. <p>Social / Cultural:</p>

<p>Social / Cultural:</p> <ul style="list-style-type: none"> As with environmental, there are social and cultural benefits to the amendments in the form of better designed neighbourhoods and access arrangements. 	<ul style="list-style-type: none"> As with environmental, there are some benefits to the changes as they set clearer expectations that are better targeted to potential effects, for rear lanes and public roads within a subdivision. Social and cultural benefits are in the form of well-connected and walkable communities, and with practical standards for lanes that include consideration of the type of vehicles that will be using them given that vehicle access to many properties will be via rear lanes rather than the public roads they front to.
---	--

<p>Overall Evaluation:</p>	<p>Overall, the efficiency and effectiveness of the provisions has been enhanced through the recommended amendments. The amendment to (a) is the deletion of clause v) 'lots shall be rectangular' as this wording in the form of a rule was considered impractical and unenforceable. Inevitably lots will be a variety of shapes due to topography and subdivision layout with some lots being more angular in shape. The intent of the provision had been to ensure that lots were generally rectangular but whilst this wording is suitable as a policy, it is not suitable as a rule without a complicated accompanying set of definitions and interpretive rule provisions. The broad intent of the clause will be met anyway given the policy and the remaining clauses within the rule.</p> <p>The recommended changes to (c) reflect that the plan change proponent has abandoned the earlier proposals to have single lane rear lanes, enabling deletion of that wording. Several new provisions have been recommended to create a robust set of requirements around rear lanes, given that nothing of this nature currently exists within the district plan. The changes are regarding the lane surface, that the rear lane shall be connected to public roads at each end (if there are several lane ends), be designed for emergency vehicles and larger vehicles such as furniture removal trucks and rubbish trucks, given there is a likelihood that the rear lanes will need to serve this purpose. The various other changes to clause (c) are minor amendments to simplify and clarify the wording.</p> <p>Collectively the changes will enhance the clarity and operation of the rule to ensure that rear lanes and roads have a clear set of robust rule provisions for their width, surface and design elements. The recommended changes will ensure a more effective and efficient rule framework.</p>
-----------------------------------	---

23.7.8.d and e – SUBDIVISION DESIGN STANDARDS: ROTOKAURI NORTH SUBDIVISION

<p>Effectiveness and Efficiency</p>	<p><u>Effectiveness</u></p> <p>Overall, the provisions are considered effective as the vehicle crossing widths are clear and tailored to the Rotokauri North circumstances of narrower lots and a medium density residential intent, and with clear standards as to where new vehicle entrances are being strongly discouraged. It is apparent through design measures the use of rear lanes and subdivision layouts that provide access arrangements in compliance with the standards are</p>	<p><u>Efficiency</u></p> <p>Overall, efficiency is enhanced through a simple and concise set of vehicle crossing width and location standards, and also that they complement the equivalent land use provisions. The provisions will be efficient as they set clear expectations around the layouts and widths of vehicle entrances, and several specific locational aspects that need to be avoided due to adverse community safety and travel mode conflicts that would otherwise occur. Efficiency would</p>
--	---	--

	<p>possible and will create better transport and community safety outcomes.</p>	<p>be reduced if either the provisions were absent (as there would then be an inconsistency with the equivalent land use provisions) or if the drafting was less clear and concise. An example is the recommended wording of (e)(iii) where a judgement has been removed from the wording.</p>
--	---	--

<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are considered to be minimal, as the subject matter is well understood, already exists within the associated land use provisions, and covers the important topics of state highway access from the growth cell which is to be strictly controlled, avoidance of vehicle crossings across shared cycle paths/walkway, and avoidance (unless specifically consented) of vehicle entrances interfering with street parking bays. All are well understood transport / land use topics with no absence of information regarding the effect of the provisions. The risk of not acting includes uncontrolled vehicle accesses onto the state highway, potentially widespread interference with street-base parking bays, and crossings conveying cars across shared cycle paths and walkways when rear lanes and other design measures can avoid this.</p>
---	--

<p>Costs</p>	<p>Benefits</p>
<p>Environmental:</p> <ul style="list-style-type: none"> • None. <p>Economic:</p> <ul style="list-style-type: none"> • There will be some economic costs to developers and consent applicants with the provisions. As with all land use / subdivision requirements, there are some costs as the provisions restrict some layout options and direct subdivision applicants to pursue other design alternatives than might otherwise be the case. These costs are minimised though clear and concise wording pertaining to the requirements - with consent applicant's having the ability to lodge a resource consent application to put forward any site-specific factors where contravening the standards may be appropriate. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • None. 	<p>Environmental:</p> <ul style="list-style-type: none"> • There are significant environmental benefits to ensure that for future subdivisions in Rotokauri North that design measures are incorporated that ensures suitable entrance widths, avoids vehicle entrances seeking direct access to the state highway and avoiding conflict with shared paths and street-based parking bays. All will lead to enhanced pedestrian, cycling and motorist safety and efficiency through a general avoidance of conflict with state highway traffic and between modes. <p>Economic:</p> <ul style="list-style-type: none"> • Minimal, given the drivers for the provisions being inserted are community safety and avoidance of conflict between travel modes within Rotokauri North. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • As with environmental, there are social and cultural benefits through provisions that protect public safety and seek to avoid conflict between travel modes, as all of these amended standards do. These provisions are being inserted to complement similar provisions within Rule 25.14 that apply to development proposals.

<p>Overall Evaluation:</p>	<p>Overall, clauses (d) and (e) are new rule provisions being inserted into the plan change provisions to address vehicle crossing widths and location restrictions in Rotokauri North. The purpose of inclusion within the subdivision chapter is to ensure that all subdivision applications must respond to these standards, in addition to similar standards within Rule 25.14 (relating to land use development). The new provisions set clear minimum and maximum vehicle crossing widths serving different combinations of dwellings, and a standard for all other zones (the Business 7 Zone). Clause (e) sets out clear standards around vehicle crossings not being permitted to cross shared paths, having no access directly to State Highway 39, and avoidance of crossing locations interfering with street parking bays which is significant given the generally narrower street widths anticipated. The provisions are generally consistent with similar provisions for land use decisions in Rule 25.14. These changes are largely as per the Council Planning and Infrastructure Technical Report, except for clause (e) iii) where the ‘adversely affect’ wording has been replaced with a wording that clearly will establish compliance without relying on a judgement to be made. The insertion of the rules will be more efficient and effective and create a consistency with the associated land use provisions for the same matters.</p>
-----------------------------------	--

23.7.8.f and g – SUBDIVISION DESIGN STANDARDS: ROTOKAURI NORTH SUBDIVISION

<p>Effectiveness and Efficiency</p>	<p><u>Effectiveness</u></p> <p>Overall, effectiveness with the recommended provisions is considered strong given the standards include clear and well-reasoned parameters for location, size, street frontage and distribution within the growth cell. The provisions replace an absence of any provisions specifying such things, and therefore the clarity and intent is delivered on far stronger than the plan change as notified.</p>	<p><u>Efficiency</u></p> <p>Overall, efficiency is considered to be far enhanced, as the plan change as notified had an absence of provisions specifying where and what should be delivered in terms of neighbourhood reserves. The plan change as notified relied on a ‘provide in general accordance with the structure plan diagrams’ wording only with poor clarity as to what would be delivered. The provisions are efficient as they contain clearly expressed parameters that can be delivered through individual subdivision applications. The provisions also contain some flexibility with allowance for neighbourhood reserves to be provided through the central green corridor and the larger community park. This level of flexibility enhances efficiency as potentially these are large public open space elements that can also provide the ‘neighbourhood’ function otherwise provided for through neighbourhood reserves.</p>
<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are considered to be minimal given the strong knowledge base around the provision of reserves, that 500 metres serves as a strong measure of a walkable distance, and that the risk of setting clear parameters for the distribution, locational and size requirements for neighbourhood reserves far outweighs having no such parameters within the provisions.</p>	

The risk of not acting includes the poor provision of neighbourhood reserves in Rotokauri North as residential subdivision 'roll out'. This would have a permanent negative impact on social and wellbeing outcomes for the future residents of Rotokauri North. The risk of not acting far outweighs the risk of acting given the poorer urban outcomes that are possible.

Costs	Benefits
<p>Environmental:</p> <ul style="list-style-type: none"> • None. <p>Economic:</p> <p>Some economic costs for landowners / developers in the form of land being required for neighbourhood reserves (and not housing). This appears the plan change intent anyway, with the provisions simply providing a clear means of giving effect to that intent. Economic costs are mitigated through clear and concise rule provisions that state clearly what needs to be provided and the standards to be met. This enables subdivision consent applicants to easily measure compliance with their reserves provision within a consent application, and to set aside sufficient land that is in the right place and meets the various other locational requirements. This remains better than a loose arrangement of rules with no clear statement of requirements to be met. These economic costs are considered to be outweighed by the corresponding social / cultural and the environmental benefits.</p> <p>Social / Cultural:</p> <ul style="list-style-type: none"> • There will be some social and cultural costs in the sense that some land that is much needed for housing (given housing affordability issues in the city) will instead be utilised for public open space. This could be several hectares of land given the minimum 5,000m² area and that 3-4 will be required within the growth cell to achieve the 500 metre locational requirement. This is considered to be outweighed however by the social / cultural benefits given this is community-building and that provision of neighbourhood reserves is a critical component of community wellbeing. Residential development occurring within Rotokauri North without an adequate provision for neighbourhood reserves is not a suitable outcome, nor is a set of provisions that only express an intent for the provision of neighbourhood reserves, with no quantitative or qualitative standards as to the nature of that provision. 	<p>Environmental:</p> <ul style="list-style-type: none"> • Substantial benefits as the provisions provide certainty that neighbourhood parks will be provided in Rotokauri North through subdivision applications, and that they will be with a suitable distribution through the growth cell to meet local need, and be of suitable size, shape, street frontage and gradient to serve the intended purpose. Provision of neighbourhood reserves provide much-needed green space (public open space) which along with public streets will be the public space in the future medium density residential development in Rotokauri North. Environmental benefits are through tree planting and landscaping and providing connections to residential neighbourhoods to enhance the residential development that will occur. <p>Economic:</p> <ul style="list-style-type: none"> • Limited economic benefits, and some economic costs. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • As with environmental, there are significant social and cultural benefits from the provision of neighbourhood reserves interspersed within medium density residential neighbourhoods. Social benefits in the form of providing for passive and small-scale active recreational activities, meetings places for the community, and green open spaces for well-being. Cultural benefits in the form of opportunities for place-making and story-telling at key locations within the growth cell. The provisions avoid an unclear framework for provision of neighbourhood reserves and the possibility that reserves are provided in the wrong place, with poor shape and locational attributes, and leaving neighbourhoods with no provision of neighbourhood reserves.

<p>Overall Evaluation:</p>	<p>Overall, Rule 23.7.8 f) and g) are standards regarding the provision of neighbourhood parks in Rotokauri North. The Rotokauri Structure Plan diagrams show a large Community Park in the south-eastern corner of the growth cell, and a series of smaller ‘neighbourhood parks’. The plan change as notified then had no provisions to give effect to the broad intent expressed that these reserves would be provided as development progressed. The recommended provisions fill that gap with clear standards that give effect to the intent stated within the plan change. In particular that neighbourhood parks should generally be at least 5,000m² in area, have frontage to a public road, be suitable topographically in terms of gradient, be of a shape that is suitable, and that such a park be within 500 metres of all dwellings within the growth cell. These provisions are largely as per the Council Planning and Infrastructure Technical Report, with several amendments to acknowledge that the function of a neighbourhood park will also be performed by the larger Community Park, or ‘any other park/reserve’ which provides a similar function (being a reference to the large extents of green corridors within the growth cell primarily for stormwater purposes but also potentially able to fulfil a neighbourhood reserve function). The provisions ‘plug’ an important gap in the overall set of subdivision provisions relating to the provisions of parks and reserves through subdivision applications.</p>
-----------------------------------	---

23.7.8.h – SUBDIVISION DESIGN STANDARDS: ROTOKAURI NORTH SUBDIVISION

<p>Effectiveness and Efficiency</p>	<p><u>Effectiveness</u></p> <p>Overall, the effectiveness of the provision is robust as without there would be little to implement the broad intent that landscape and ecological matters of importance will be considered within subdivision applications. The provision is clear and concise and bridges the gap in the plan change between broad intent and provisions to implement that intent. The scale threshold recommended does not undermine the effectiveness but does enhance efficiency.</p>	<p><u>Efficiency</u></p> <p>Overall, the provision is simple and operates efficiently alongside the information requirement (1.2.2.24). The provision sets out the requirements in clear and concise manner and includes a scale threshold to ensure the provision only applies with the larger scale subdivisions where landscape and ecological effects are likely to be more significant, and the opportunities to undertake enhancing works stronger.</p>
<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are considered to be outweighed by the risks with not acting. The plan change as notified contained few responses to landscape and ecological issues, with a heavy reliance on broad urban design proposals but little in the way of clear implementation mechanisms. The additional rule provision sets out requirements for providing ecological and landscape reports that set out clear requirements for including design responses and environmental evaluation within subdivision applications above a specified size threshold. The rule provision will be effective in giving effect to the broad urban design, ecological and landscape outcomes articulated within the plan change document and supporting report.</p> <p>The risk of not acting would create an unacceptable risk that landscape and ecological matters are not reported on sufficiently within even large-scale subdivisions. This would not encourage subdivision layout and design to make adequate provision for landscape and ecological matters within the subdivision footprint, and place undue reliance on broader objectives, policies and assessment matters in restricted discretionary subdivision processes.</p>	

Costs	Benefits
<p>Environmental:</p> <ul style="list-style-type: none"> • None. <p>Economic:</p> <ul style="list-style-type: none"> • There are economic costs with this provision, as with any provision that requires additional information to be compiled. These costs will fall on subdivision applicants and be in the form of needing to engage landscape and ecological specialists as part of the team compiling subdivision applications, at least at larger scale above the specified threshold. These costs will not be substantial given that such expertise should be available anyway as part of a subdivision design process. These costs will also be mitigated over time a set of reports and proposals will be available for other consent applicants to consider, given all of the subdivisions are in the same growth cell and some will be adjacent to each other, enabling a sharing of concepts and some complementarity of approaches. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • None. 	<p>Environmental:</p> <ul style="list-style-type: none"> • The purpose of the provision is to enable environmental enhancements through greater integration of ecological and landscape concepts within subdivision design. The provision is a key means of giving effect to the broader ecological and landscape values within Rotokauri North, and the provision will enable this to be integrated into subdivision design. These benefits are considered to outweigh the corresponding economic costs, given this is a greenfield urban growth cell and the proposals for medium density residential development. <p>Economic:</p> <ul style="list-style-type: none"> • None. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • There are social and cultural benefits given that the provisions provide a key means to give effect to the cultural impact assessment prepared for Rotokauri North, the Vision and Strategy for the Waikato River, and broader policy documents (NPS-Freshwater, Regional Policy Statement), as part of the assessment process for larger-scale subdivision applications.
<p>Overall Evaluation:</p>	<p>Overall, this recommended provision aims to better give effect to ecological and landscape objectives/policies within the District Plan, the cultural impact assessment prepared for Rotokauri North, and more broadly the Vision and Strategy for the Waikato River. The plan change as notified had little response to these issues beyond broadly stated objectives and policies. This is described at Section 16.11 of the Planning and Infrastructure Technical Report and is an associated provision to the information requirements that set out in detail what these plans need to consist of.</p> <p>There is an amendment recommended to ensure that these requirements do not apply to any application for subdivision, but rather only larger scale subdivisions above a specified size threshold. This amendment serves to ensure that small scale (for example two lot subdivision, unit title subdivision around already constructed residential dwellings, all of a small scale and unlikely to be of sufficient scale to generate any landscape or ecological effects) subdivisions do not need to provide such plans, given the expense of doing so is not considered justified for smaller scale subdivision applications. Larger scale subdivisions above the size threshold will be required by the provision to include such a report given the much stronger likelihood that the scale of the subdivision will generate potential landscape and/or ecological impacts or provide enhancement opportunities. This is not considered likely with small-scale subdivision applications with a far smaller footprint.</p> <p>The provision is considered to be effective and efficient given this scale threshold, and that provision is clear when such reports need to be provided to ensure compliance with the rule, and through the separate provision within Appendix 1 (1.2.2.24) information requirements clear requirements around what such reports must contain.</p>

2.4 Chapter 25: City-wide

Table 4: Chapter 25: City-wide – Recommended Amendments Analysis

25.14.4.1.h – RULES – GENERAL STANDARDS: VEHICLE CROSSINGS AND INTERNAL VEHICLE ACCESS - DESIGN AND ACCESS WIDTHS		
Effectiveness and Efficiency	<p><u>Effectiveness</u></p> <p>Overall, the rule amendments will enhance effectiveness. They represent a series of minor amendments to the clauses of the rule, that collectively will enhance effectiveness. The enhanced wording will enable the rule framework around vehicle crossing and internal access dimensions in Rotokauri North to better achieve the intent of the rule.</p>	<p><u>Efficiency</u></p> <p>Overall, the efficiency of the rule is enhanced through a series of minor rule amendments that address several matters (as detailed below). The amendments seek to enhance the operation of the rule and therefore effectiveness.</p>
Risk of Acting / Not Acting	<p>Any risks associated with implementing the recommended amendments are considered to be minimal. The changes are not introducing new elements to the rule, but rather enhancing the rule elements in the rule wording as drafted in the original plan change.</p> <p>The risk of not acting includes a rule that operates poorly, with unintended consequences, poor operational elements and a general lack of clarity in its meaning and operation.</p>	
Costs	Benefits	
<p>Environmental:</p> <ul style="list-style-type: none"> None, as some environmental benefit from the rule amendments now recommended. <p>Economic:</p> <ul style="list-style-type: none"> None, given economic benefits achieved. <p>Social / Cultural:</p> <ul style="list-style-type: none"> None, given the discussion of social / cultural benefits achieved. 	<p>Environmental:</p> <ul style="list-style-type: none"> Some benefits environmentally through the better targeting of rules, enhanced clarity and implication of the rules, all to ensure that the environmental intent of the rule is better achieved. <p>Economic:</p> <ul style="list-style-type: none"> There are some benefits as the rule changes remove several elements that otherwise would be overly restrictive and poorly targeted to effects, with consequent economic costs. These costs have been reduced through the changes. Further through the simplification of the wording and the enhanced clarity of what applies to Rotokauri North (and what does not). <p>Social / Cultural:</p> <ul style="list-style-type: none"> Similar to above, some benefits in the sense that the enhanced rule wording better meets community needs and is generally more efficient. 	

<p>Overall Evaluation:</p>	<p>Overall, (h) consists of clauses (i) to (v) with a series of relative minor changes to enhance the clarity of the provision and better achieve the intent. The recommended changes to clause (i) recommends a series of minor wording changes for clarity and simplifies the statements about what clauses apply to Rotokauri North and what clauses do not. Changes to clauses (iii) and (iv) likewise clarifies what applies (and not) to Rotokauri North given the rule is a city-wide rule. The recommended changes to clause (v) are the more significant as they involve the deletion of the single lane rear lane provisions (as the plan change proponent does not pursue these any longer), removes overly-specific references to having to be common property under the Unit Titles Act given the range of other legal mechanisms available, and the deletion of a requirement setting a maximum number of residential units able to be serviced by a rear land (as all rear lanes will now be double lane width). Many of these changes are as recommended within the HCC Technical Planning and Infrastructure report, with several further recommended changes to the wording to address the above. The intent of the changes is to be clear what applies to Rotokauri North and what is city-wide, to generally simplify the wording, and achieve better effectiveness/efficiency.</p>
-----------------------------------	---

25.14.4.1.k – RULES – GENERAL STANDARDS: VEHICLE CROSSINGS AND INTERNAL VEHICLE ACCESS – VEHICLE CROSSING, LOCATION RESTRICTIONS IN ROTOKAURI NORTH

<p>Effectiveness and Efficiency</p>	<p><u>Effectiveness</u> Overall, the rule amendments will enhance effectiveness. They represent a series of minor amendments to the clauses of the rule, that collectively will enhance effectiveness. The enhanced wording will enable the rule framework around vehicle crossing and internal access location restrictions in Rotokauri North to better achieve the intent of the rule.</p>	<p><u>Efficiency</u> Overall, the efficiency of the rule is enhanced through a series of minor rule amendments that address several matters (as detailed below). The amendments seek to enhance the operation of the rule and therefore effectiveness.</p>
<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are considered to be minimal. The changes are not introducing new elements to the rule, but rather enhancing the rule elements in the rule wording as drafted in the original plan change.</p> <p>The risk of not acting includes a rule that operates poorly, with unintended consequences, poor operational elements and a general lack of clarity in its meaning and operation.</p>	
<p>Costs</p>		<p>Benefits</p>

<p>Environmental:</p> <ul style="list-style-type: none"> • None, given the intent of the changes are to achieve clarity and better environmental outcomes. <p>Economic:</p> <ul style="list-style-type: none"> • None, given the economic costs avoided through an overly restrictive rule in respect of a narrow reference to Unit Title subdivision and not other legal mechanisms. Economic costs are avoided through the enhanced clarity of the wording achieved. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • None, for the same reasons as above. 	<p>Environmental:</p> <ul style="list-style-type: none"> • Similar as with economic benefits below, there will be some benefits environmentally through the enhanced and more efficient operation of the rule, relative to the original rule wording. <p>Economic:</p> <ul style="list-style-type: none"> • The various changes seek to ensure a rule provision that operates as intended, without unintended consequences, and with enhanced clarity. There are economic benefits with the change as it better avoids capturing situations that are not intended to be captured by the rule. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • As above, there will be some social and cultural benefits, in the form of a better operating rule that achieves traffic, cyclist and pedestrian safety outcomes.
--	---

<p>Overall Evaluation:</p>	<p>Overall, (k) consists of clauses (i), (ii) and (iii) with a series of relative minor changes to enhance the clarity of the provision and better achieve the intent. The recommended changes to clause (i) widens the form of legal mechanism available (as a multitude of mechanisms may exist, not just a Unit Title subdivision), and also clarifies the wording of share paths removing ‘dedicated’ and references to the width of the shared-use path. The recommended change to clause (ii) deletes ‘new’ so the provision relates to any future crossing proposal (it cannot retrospectively apply to any existing crossing with existing use rights), and a minor wording change for clarity. Clause (iii) was recommended to be inserted in the HCC Technical Planning and Infrastructure report, with a further recommended change to the wording to avoid a judgement being involved in the rule wording, replaced with a clear wording that can be used to determine compliance or not. All of the changes seek to enhance the wording clarity and better deliver the intent.</p>
-----------------------------------	---

25.14.4.2.f – RULES – GENERAL STANDARDS: PARKING, LOADING SPACES AND MANOEUVRING AREAS - DESIGN

<p>Effectiveness and Efficiency</p>	<p><u>Effectiveness</u></p> <p>Overall, the deletion of the permeable pavers note is considered to marginally enhance the effectiveness of the provision, as it brings it into line with the city-wide / Regional Infrastructure Technical Specification standards.</p>	<p><u>Efficiency</u></p> <p>Overall, the efficiency of the rule is enhanced as the permeable paver exclusion for Rotokauri North is not recommended, with consistency with the remainder of the city.</p>
<p>Risk of Acting / Not Acting</p>	<p>Any risk associated with implementing the recommended amendment is considered to be minimal. The risk of not acting is minimal but involves retention of a rule that the plan change proponent is no longer pursuing.</p>	

<p>Costs</p>	<p>Benefits</p>
---------------------	------------------------

<p>Environmental:</p> <ul style="list-style-type: none"> • Neutral. <p>Economic:</p> <ul style="list-style-type: none"> • Neutral. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral. 	<p>Environmental:</p> <ul style="list-style-type: none"> • A minor environmental benefit from the change, given the concerns regarding potential inundation of rear lanes and roadways with the use of permeable pavers with ground conditions where they were likely to be unsuitable. <p>Economic:</p> <ul style="list-style-type: none"> • Neutral. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Neutral.
--	--

Overall Evaluation:	Overall, the recommended change is to delete Note 2 regarding permeable pavers as a means of compliance, as this is no longer being pursued by the plan change proponent. Council also had strong concerns regarding the merits of this position and was being opposed in addition. The effect is that this provision as proposed within the plan change is now not being pursued and need not be considered further.
----------------------------	---

25.14.4.3.n – RULES – GENERAL STANDARDS: INTEGRATED TRANSPORT ASSESSMENT REQUIREMENTS – ROTOKAURI NORTH

Effectiveness and Efficiency	<p><u>Effectiveness</u></p> <p>Overall, effectiveness is much enhanced by the additional provision, as otherwise the specific needs to consider Rotokauri North-specific elements would not be included in the Broad ITA requirements. More generic and less effective ITA reports accompanying subdivision applications would be the outcome. The amendment serves to require evidence of documentation and also consideration of demand, safety, levels of service and options at key transport locations.</p>	<p><u>Efficiency</u></p> <p>Overall, the efficiency of the provision will be somewhat enhanced as the provision will provide for transport matters to be considered more comprehensively at subdivision stage within Rotokauri North, and with earlier resolution of wider network constraints and issues that may arise through a building level of traffic movements on the network. The provision will generally enhance efficiency for this reason.</p>
-------------------------------------	---	--

Risk of Acting / Not Acting	Any risk associated with implementing the recommended amendment is considered to be minimal given that the transport issues in Rotokauri North area well know being the absence of large parts of the future transport network. The risk of not acting would be that the city-wide Broad ITA provisions already within the District Plan would apply to Rotokauri North, being insufficient both in terms of transport stakeholder engagement and any consideration of impact at key locations on the wider Rotokauri rural transport network.
------------------------------------	--

Costs	Benefits
--------------	-----------------

<p>Environmental:</p> <ul style="list-style-type: none"> • None. <p>Economic:</p> <ul style="list-style-type: none"> • Some economic cost on subdivision applicants given some additional requirements in conjunction with subdivision applications. Considered to be outweighed by the environmental and other benefits however. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • None. 	<p>Environmental:</p> <ul style="list-style-type: none"> • There are considered to be environmental benefits in terms of managing transport outcomes, as the additional Broad ITA requirements specific to Rotokauri North will better ensure consideration at key transport locations in Rotokauri North and require evidence of engagement with the key transport stakeholders in the growth cell context. <p>Economic:</p> <ul style="list-style-type: none"> • None. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • As with environmental, some benefits in the form of transport outcomes better suited to the specific context of Rotokauri North given the incomplete transport network that exists and the need to gauge impacts on key locations on the wider rural transport network.,
<p>Overall Evaluation:</p>	<p>Overall, the recommended inclusion of a specific provision setting out additional requirement for Broad Integrated Transport Assessments (ITA) for Rotokauri North is considered necessary and enhancing of efficiency/effectiveness of the provision. Otherwise the city-wide Broad ITA provision would solely apply in Rotokauri North, preventing the more growth-cell specific provisions being included. That outcome would result in poorer quality and less effective Broad ITA reports being submitted with future Rotokauri North subdivision applications. Rationale for the provision is also provided within the Council 'Planning and Infrastructure Report, but essentially is ensuring key transport locations are considered in the ITA, and evidence of consultation with key transport partners being Waikato Regional Council., Hamilton City Council, Waikato District Council and Waka Kotahi, given the incomplete transport network that will exist in the early stages of future development within Rotokauri North. The recommended changes to the provision provides a much more complete and robust set of Broad ITA requirements for Rotokauri North.</p>

2.5 Appendix 1: District Plan Administration

Table 5: Appendix 1: District Plan Administration – Recommended Amendments Analysis

1.2.2.23.b – INFORMATION REQUIREMENTS - ROTOKAURI NORTH: SUBDIVISION CREATING A REAR LANE		
Effectiveness and Efficiency	<p><u>Effectiveness</u></p> <p>Overall, the provision will be effective as it avoids the situation where rear lanes are proposed with inadequate information to demonstrate what design parameters have been applied, what the design seeks to achieve in terms of vehicle manoeuvring, and what legal mechanisms for ongoing management are being implemented, given these are private lanes with multiple owners involved.</p>	<p><u>Efficiency</u></p> <p>Overall, the extent of efficiency is considered high. The provision only applies where a subdivision application involves creating a rear lane, on the basis that other subdivisions need not address this. The provision is targeted to the key matters only.</p>
Risk of Acting / Not Acting	<p>Any risks associated with implementing the recommended amendments are considered to be minimal, as rear lanes are an integral part of the wider urban design approach to the plan change and will feature heavily in future subdivision applications. The elements included within the provision are considered to be the only elements that require being addressed specifically in all subdivision applications involving rear lanes. The risk of acting is mitigated through the provisions being very specific to the key matters being targeted and are not broad or onerous.</p> <p>The risk of not acting includes subdivision applications that do create rear lanes not providing supporting information on the design assumptions and the legal mechanisms for ongoing management.</p>	
Costs	Benefits	
<p>Environmental:</p> <ul style="list-style-type: none"> • None. <p>Economic:</p> <ul style="list-style-type: none"> • There is an economic cost with any provision that requires additional information to be provided. For this reason the provision targets three specific matters and is well targeted to those matters and not other broader matters. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • None. 	<p>Environmental:</p> <ul style="list-style-type: none"> • There are environmental benefits in the sense that the aim of the provision is to ensure that lane widths and designs are ‘fit for purpose’ for the intended use, that vehicle manoeuvring is provided for sufficiently, and that the legal mechanisms have been selected. <p>Economic:</p> <ul style="list-style-type: none"> • None. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Corresponding social benefits as to environmental, in that the provision requires evaluation of them important matters, whereas otherwise these matters may not be addressed, generating ongoing poor performance of the rear lane layout. 	

<p>Overall Evaluation:</p>	<p>Overall, the provision has been introduced to the district plan (was not part of the plan change as notified) to address a matter that is anticipated to arise fairly frequently in Rotokauri North with subdivision application proposals. That being subdivisions that create a rear lane, with the provision requiring information to be required on the lane width and suitability for the vehicles likely to be using it, that the associated lots are of a size and shape that enables vehicle manoeuvring utilising the lane, and that legal mechanisms are proposed to manage ownership, maintenance and related matters. The provision targets the specific matters to be addressed and is not a wide ranging or overly broad provision. The provision is considered effective and efficient.</p>
-----------------------------------	---

1.2.2.23.c – INFORMATION REQUIREMENTS - ROTOKAURI NORTH: ANY SUBDIVISION IN ROTOKAURI NORTH

<p>Effectiveness and Efficiency</p>	<p><u>Effectiveness</u> Overall, the provision puts in place an effective safeguard that with all subdivision applications submitted to Council, that it is apparent whether any infrastructure ‘trigger’ has been exceeded, as per Rule 3.6A.4.2.</p>	<p><u>Efficiency</u> Overall, the provision is efficient in that it is simple, not onerous, and yet achieves a significant benefit in that where exceedances are involved with an application, that those exceedances are explicitly acknowledged.</p>
--	---	---

<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are considered to be minimal given that the provision simply requires that a statement of compliance or otherwise be made. The risk of not acting includes there being less clarity in the evaluation of subdivision applications in Rotokauri North, creating a potential for where a ‘trigger’ has been exceeded but without any action taken or awareness of this exceedance.</p>
---	---

<p>Costs</p>	<p>Benefits</p>
<p>Environmental:</p> <ul style="list-style-type: none"> • None. <p>Economic:</p> <p>None, as not an onerous requirement to make a statement on whether a ‘trigger’ is exceeded or not.</p> <p>Social / Cultural:</p> <ul style="list-style-type: none"> • None. 	<p>Environmental:</p> <ul style="list-style-type: none"> • Some benefits, as then enables assessment of whether the exceedance of the ‘trigger’ generates any environmental effect or not, and what if any mitigation measures might be employed. <p>Economic:</p> <ul style="list-style-type: none"> • Some benefits, as then enables assessment of whether the exceedance of the ‘trigger’ generates any costs that might otherwise be borne by Council or another party. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • As above. Some benefits, as then enables assessment of whether the exceedance of the ‘trigger’ generates any costs that might otherwise be

	borne by Council or another party, or that works are not completed with some corresponding social effect as an outcome.
--	---

Overall Evaluation:	Overall, information requirement (c) simply requires a statement to be provided in any subdivision application as to whether any of the development (infrastructure) ‘triggers’ within Rule 3.6A.4.2 would be exceeded or not. This is not onerous but does provide important clarity to identify whether any of the ‘triggers’ are exceeded, as a focus area of the application would then be to address any effects and/or mitigation measures with that exceedance.
----------------------------	--

1.2.2.23.d – INFORMATION REQUIREMENTS - ROTOKAURI NORTH: ROTOKAURI NORTH ECOLOGICAL REHABILITATION MANAGEMENT PLAN (ERMP)

Effectiveness and Efficiency	<p>Effectiveness</p> <p>The provisions to require an ERMP were not part of the plan change as notified but are recommended to be inserted to support a corresponding rule that requires an ERMP to be provided for subdivision applications in Rotokauri North (23.7.8h). The provision will be effective as it clearly sets out the objective of any ERMP prepared and sets out the matters to be addressed. Without such a provision there would be large variability in the matters addressed and quality of ERMPs prepared and submitted.</p>	<p>Efficiency</p> <p>The provision is efficient as it sets out clearly and concisely the objective and the matters to be addressed. The efficiency is also enhanced as the provision only applies for subdivision where there is ‘green spine’ or significant natural area within the subdivision ‘footprint’, and otherwise there is no such requirement. This qualifying matter enhances efficiency. Without the provision the efficiency would be much lower.</p>
-------------------------------------	--	---

Risk of Acting / Not Acting	The risk of not acting would be that the corresponding rule requiring the preparation of an ERMP would have no guidance within the district plan as to what that plan should address, nor what the objective of the plan is. There is not considered to be a risk of acting as the provision is modelled on similar provisions elsewhere in the city, with adaptations to suit Rotokauri North, but is well understood as a mechanism.
------------------------------------	--

Costs	Benefits
<p>Environmental:</p> <ul style="list-style-type: none"> None, given there are identified benefits. <p>Economic:</p> <ul style="list-style-type: none"> There are some economic costs as the provision requires that a report is prepared covering a range of specified matters. The provision has been amended from earlier iterations to ensure this applies only to subdivision proposals where subdivision ‘footprint’ includes ‘green spine’ or the significant 	<p>Environmental:</p> <ul style="list-style-type: none"> Clear ecological benefits to ensure that aquatic and terrestrial ecological values and related matters are included within subdivision application submitted within Rotokauri North. <p>Economic:</p> <ul style="list-style-type: none"> Neutral. <p>Social / Cultural:</p>

<p>natural area, to ensure there ecological matters of key relevance where the ERMP will make an appreciable difference.</p> <p>Social / Cultural:</p> <ul style="list-style-type: none"> • None. 	<ul style="list-style-type: none"> • There are considered to be positive benefits as evidence of engagement with mana whenua is a requirement, and ecological enhancements will assist with giving effect to the Vision and Strategy for the Waikato River and wider benefits.
<p>Overall Evaluation:</p>	<p>Overall, the provision is important as it provides clarity to plan users as to the information requirements to support a subdivision consent application where a corresponding rule in Chapter 23: Subdivision requires a ERMP to be provided. Without this information requirement there would be an absence of clarity as to what a ERMP would address, with a correspondingly poorer standard of plan submitted with applications. The information requirements clearly set out the objectives of the ERMP and set out clearly the items and key matters to be addressed within the clauses of the provision within any ERMP submitted with subdivision applications within Rotokauri North. The provision is important to ensure that aquatic and terrestrial ecological values and matters are considered thoroughly within larger scale subdivision proposals within the growth cell. The provision will achieve this effectively and efficiently.</p>

1.2.2.23.e – INFORMATION REQUIREMENTS - ROTOKAURI NORTH: LONG-TAILED BATS AND LIZARD MANAGEMENT

<p>Effectiveness and Efficiency</p>	<p><u>Effectiveness</u></p> <p>Overall, effectiveness is considered robust as the provision targets the most likely causes of bat/lizard loss of loss, being habitat destruction without prior study to identify presence and without management measures in place. The provision is pre-cautionary rather than a reaction to known species populations, but factors indicating presence are sufficient to warrant the provision. There are thresholds within the provisions beneath which reporting is not required which to some extent may reduce the effectiveness of the provision, but seeks to moderate the costs and enhance efficiency through applying the provision to the most needed situations.</p>	<p><u>Efficiency</u></p> <p>Overall, the efficiency of the provision is strong as it is targeted at key species based on their protection status, based around a two hectare subdivision footprint threshold, and for bats also based around the presence of any trees of sufficient width. In all other circumstances (smaller scale subdivisions, no such large trees) then the provision will not apply.</p>
<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are considered to be minimal. The risk of acting with the provision and then an absence of any bats/lizards being located is possible, but represents a typical risk with a precautionary approach such as this. The risk of acting is being moderated by the provision only applying in the specific circumstances (being a two hectare or more subdivision footprint, and for bats also trees of sufficient width to be possible bat roost trees).</p>	

The risk of not acting includes an absence of any proactive management approach to the management of long-tailed bats and lizards in Rotokauri North. This risk is not considered appropriate given the ecologist advice provided to Council by WSP and the at-risk/threatened classification of the species concerned.

Costs	Benefits
<p>Environmental:</p> <ul style="list-style-type: none"> • None. <p>Economic:</p> <ul style="list-style-type: none"> • There are economic costs arising from the provision as it requires a study to be conducted (either for bats or lizards as applicable) and a report to be produced. These costs are moderate and are considered to be outweighed by the environmental benefits. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • None. 	<p>Environmental:</p> <ul style="list-style-type: none"> • Long-tailed bats and lizards are all classified as at-risk/threatened and are either known to be present in Rotokauri North (in the case of lizards) or are likely to be at least transiently present (in the case of bats) given their distribution. The provision establishes a mechanism for study and reporting prior to works taking place, and with the ultimate outcome sought being the avoidance of loss of life of bats / lizards, even if their habitat is disturbed. The environmental benefits are significant given the species involved. <p>Economic:</p> <p>None.</p> <p>Social / Cultural:</p> <ul style="list-style-type: none"> • As with environmental, long-tailed bats and lizards are highly valued by the community at large and mana whenua in particular as taonga. A provision that sets out study and reporting requirements is significant as otherwise there is an absence of such requirements.

Overall Evaluation:	Overall, the provision seeks to protect long-tailed bats and lizards in Rotokauri North and to address an absence of any such provisions in the plan change as notified. Whilst Rotokauri North is a heavily modified environment, as detailed in the ecology assessment prepared by WSP on behalf of Council, the at-risk classifications for these species, that bats ranges appear to be increasing across Hamilton and with at least a transient population at lake Waiwhakareke, and that lizards are found within the wider Rotokauri locality during development, all requires a regulatory response to the issue (in addition to the Wildlife Act 1953). The provision seeks to be targeted and effective with a two hectare subdivision 'footprint' threshold meaning that for smaller scale subdivisions the provisions do not apply. Whilst this runs some risk that habitat is missed, the provision seeks to be targeted and effective and seeks to capture the majority of the situations where bat and lizard habitat are present. Noting also that the purpose is not the protection of that habitat, but the avoidance of risk to the animals present within that habitat.
----------------------------	---

1.2.2.23.f – INFORMATION REQUIREMENTS - ROTOKAURI NORTH: KERERU RESERVE MANAGEMENT PLAN (KRMP)

Effectiveness and Efficiency	<u>Effectiveness</u> Overall, effectiveness is considered strong as the provision is simply and concisely constructed with clear purpose,	<u>Efficiency</u> Overall, the provision is considered effective as the provision clearly sets out when it applies, the purpose of the KRMP,
-------------------------------------	---	--

	<p>matters to be addressed and when applicable, and provides a mechanism for Council and the developer to work through management measures on an ongoing basis (whether vested in Council or not) and for subdivision design to be provided the clear context of SNA enhancement as a key objective in Rotokauri North.</p>	<p>and clauses A to D set out the items to be addressed. A less efficient provision would be one where clarity did not exist in respect of these things. It is likely that the KRMO provision will only be applicable to one to two subdivision applications only.</p>
<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are considered to be minimal. The significant natural area already has protection through the district plan, but the provision aims to manage the subdivision of land around the protected area, and to encourage the vesting of the SNA in Council as a reserve for the community (currently being privately owned land). The rule provision requires a management plan to be formulated and submitted with subdivision applications where some or all of the SNA is within the subdivision footprint, but not applicable to subdivision where it is not. The risk of not acting includes an ad hoc approach to subdivision around the SNA, and a reduction in attention be paid to the opportunity that development brings for the enhancement of the SNA (which currently is on private land).</p>	
<p>Costs</p>		<p>Benefits</p>
<p>Environmental:</p> <ul style="list-style-type: none"> • None. <p>Economic:</p> <ul style="list-style-type: none"> • There are economic costs in the formulation of a report and analysis of the management measures to be included. These are borne by the developer. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • None. 		<p>Environmental:</p> <ul style="list-style-type: none"> • Significant environmental benefits with the provision as it establishes the means to enable the enhancement of the significant natural area as development proceeds around it. The rule requires a management plan be prepared as a means to give effect to the intent shown on the structure plan diagrams for environmental protection of the SNA. <p>Economic:</p> <ul style="list-style-type: none"> • None. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • Substantial benefits as the Tangata Whenua Working Group highlighted the location as significant to mana whenua and it is significant as a rare remnant of the original forest in Rotokauri North. The provision provides an effective means to protect this location through management measures and subdivision design.
<p>Overall Evaluation:</p>	<p>Overall, the provision is considered to fill an important gap in the provisions and be effective and efficient in its formulation. Along with the 'green spine' the significant natural area at Kereru Reserve is the primary ecological location within Rotokauri North and presents an opportunity for enhancement. For any subdivision application that includes some or all of the significant natural area (as a public reserve) the provision requires that a management plan be prepared to demonstrate how the subdivision will lead to enhancement of the SNA through design and management approaches. The SNA lies on private land and is not yet a public reserve, but it is hoped it will be vested to Council as a reserve with some sort of landscape buffer</p>	

around its perimeter. Regardless of the future development layouts the NSA is protected from modification, but its enhancement is dependent on active management occurring. The provision sets out the means for this to occur.

1.2.2.23.g – INFORMATION REQUIREMENTS - ROTOKAURI NORTH: ROTOKAURI NORTH LANDSCAPE CONCEPT PLAN (LCP)

<p>Effectiveness and Efficiency</p>	<p>Effectiveness</p> <p>The provisions to require an LCP were not part of the plan change as notified but is recommended to be inserted to support a corresponding rule that requires an LCP to be provided for larger subdivision applications in Rotokauri North. The provision will be effective as it clearly sets out the objective of any LCP prepared, and sets out the matters to be addressed. Without such a provision there would be large variability in the matters addressed and quality of LCP's prepared and submitted.</p>	<p>Efficiency</p> <p>The provision is efficient as it sets out clearly and concisely the objective and the matters to be addressed. The requirement to provide an LCP is only for larger scale subdivisions where landscape design will be influential and landscape enhancement opportunities exist. Without the provision the efficiency would be much lower.</p>
--	--	--

<p>Risk of Acting / Not Acting</p>	<p>The risk of not acting would be that the corresponding rule requiring the preparation of an LCP would have no guidance within the district plan as to what that plan should address, nor what the objective of the plan is. There is not considered to be a risk of acting as the provision is modelled on similar provisions elsewhere in the city, with adaptations to suit Rotokauri North, but is well understood as a mechanism.</p>
---	--

<p>Costs</p>	<p>Benefits</p>
<p>Environmental:</p> <ul style="list-style-type: none"> • None, given there are identified benefits. <p>Economic:</p> <ul style="list-style-type: none"> • There are some economic costs as the provision requires that a report is prepared covering a range of specified matters, and a design exercise to be conducted to then be reported on via the LCP report. The corresponding rule provision has been amended to ensure this applies only to larger subdivision proposals where landscape matters are at a scale where the LCP will make an appreciable difference. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • None. 	<p>Environmental:</p> <ul style="list-style-type: none"> • Clear landscape benefits to ensure that landscape design and related matters are included within subdivision application submitted within Rotokauri North. <p>Economic:</p> <ul style="list-style-type: none"> • Neutral. <p>Social / Cultural:</p> <ul style="list-style-type: none"> • There are considered to be positive benefits as evidence of engagement with mana whenua is a requirement, as is details of any cultural protocols.

<p>Overall Evaluation:</p>	<p>Overall, the provision is important as it provides clarity to plan users as to the information requirements to support a subdivision consent application where a corresponding rule in Chapter 23: Subdivision (23.7.8h) requires a LCP to be provided. Without this information requirement there would be an absence of clarity as to what a LCP would address, with a correspondingly poorer standard of LCPs submitted with applications. The information requirements clearly set out the objectives of the LCP and set out clearly the items and key matters to be addressed within clauses A to S within any LCP submitted with subdivision applications within Rotokauri North. The provision is important to ensure that landscape matters are considered thoroughly within larger scale subdivision proposals within the growth cell. But avoiding any LCP requirements for smaller subdivision as the ability to usefully consider landscape design issues rapidly diminishes. The provision will achieve the intent effectively and efficiently.</p>
-----------------------------------	---

1.3.3.01-011 – RESTRICTED DISCRETIONARY, DISCRETIONARY AND NON-COMPLYING ASSESSMENT CRITERIA – ROTOKAURI NORTH

<p>Effectiveness and Efficiency</p>	<p><i>Effectiveness</i> Overall, the modifications will enhance the effectiveness of the assessment matters as all the changes seek to improve alignment with corresponding rules and to key matters that consent conditions would likely be imposed in respect of to address specific Rotokauri North considerations. The effectiveness would be far lower if the modifications were not introduced.</p>	<p><i>Efficiency</i> Overall, the efficiency of the administration of the district plan is enhanced through the modifications proposed to the assessment matters as without them the matters would be less well aligned with corresponding rules and matters of significance specific to Rotokauri North. Efficiency is enhanced through the matters relating strongly to items of significance, and particularly to other non-significant matters not featuring within the assessment matter framework.</p>
--	--	---

<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are considered to be minimal, as they achieve better alignment with the corresponding rules and other district plan provisions. There is no absence of information that would favour not acting, and the risks of not acting are considered far higher than the risk of acting, given that the plan change has introduced assessment matters and the recommended amendments seek to enhance them.</p> <p>The risk of not acting includes a set of assessment matters that no longer correspond strongly to the rules and provisions applying to Rotokauri North. This would not assist plan users and applicants as there would be a poor level of alignment, the assessment matters would operate in a mis-matched manner and would be poorly targeted as a result.</p>
---	---

<p>Costs</p> <p>Environmental:</p> <ul style="list-style-type: none"> Not considered to be environmental costs as the purpose of the modified assessment matters is to achieve enhanced targeting and alignment with the corresponding set of rules. <p>Economic:</p>	<p>Benefits</p> <p>Environmental:</p> <ul style="list-style-type: none"> The assessment matters as modified draw attention to the key environmental matters that the corresponding set of rule provisions seek to manage. This includes evaluation of mana whenua matters, the need for and timing of infrastructure upgrades to match demand being generated
---	--

- Minimal, given that costs would also be associated with maintaining the prior set of assessment matters without change, that would then be poorly targeted and aligned with.

Social / Cultural:

- Similar to above in the sense that the purpose of the modifications is to achieve enhanced social and cultural outcomes, as described in the 'benefits' column. Not considered to be any particular costs associated with social or cultural values.

within Rotokauri North, and consistency with the key components of the structure plan.

Economic:

- Some economic benefits as the modifications to the assessment matters are relatively minor, strongly reflect other changes to the rule framework, and achieve reducing costs for plan users and applicants through better targeting of assessment matters to key items.

Social / Cultural:

- Some social and cultural benefits that correspond to the environmental benefits, as the modified assessment matters seek to address construction and upgrade of infrastructure to avoid social effects of poor service levels, and mana whenua elements to be incorporated into decision-making that otherwise may not be.

Overall Evaluation:

Overall, the plan change as notified introduced a set of assessment matters within 1.3.3 specific to Rotokauri North. As part of the Council review of the plan change some substantial modifications have been proposed that maintain alignment with corresponding plan provisions. Many of the modifications reflect changes to those corresponding rules and provisions. Assessment matter O1 addresses subdivision adjacent to SH39; O2 addresses the creation of a private rear lane; O3 addresses general matters including the extent of compliance with the structure plan 'components', ecological values, mana whenua values and heritage matters; O4 addresses subdivision of a duplex development; O5 addresses subdivision of a duplex where non-compliance with Rule 4.14; O6 addresses the extent of compliance the core infrastructure networks to be developed within Rotokauri North and the timing of upgrades; O7 addresses public transport provision with new and upgraded transport corridors; O8 addresses the design and construction of walking and cycling infrastructure in support of the related rule provision; O9 addresses service areas for apartments and especially in terms of suitable sizes and screening; O10 addresses the timing for public transport services and the extent to which demand-responsive services are needed to reduce reliance of private vehicle dependency; and O11 addressing the walking and cycling shared paths, that they are continuous routes, the standard necessary and that they be step-free for mobility-impaired users. The matters are intended to act as a collective in support of the subdivision and development provisions for Rotokauri North, with a particular focus on the specific matters of importance to Rotokauri North (as general assessment matters already within the District Plan will apply anyway). The assessment matters have been drafted to supplement the generic assessment matters and seek to assist the plan user and consent applicants with clarity as to the key matters to be assessed. The changes recommended have sought to enhance clarity and ease of use and reflect other amendments to plan provisions.

2.6 Appendix 15: Transportation

Table 6: Appendix 15: Transportation – Recommended Amendments Analysis

Table 15-1a: NUMBER OF PARKING, LOADING AND CYCLE SPACES		
Effectiveness and Efficiency	<p><u>Effectiveness</u></p> <p>Overall, a low level of statutory effect from the recommended changes given that NPSUD already requires the removal of such provisions without the use of the Schedule 1 process. These recommended changes therefore avoid the insertion of parking minimum standards specific to Rotokauri North, on the basis that they will be removed from the district plan shortly anyway. The effectiveness of the recommended changes is therefore enhanced relative to the ‘as notified’ provisions.</p>	<p><u>Efficiency</u></p> <p>Overall, similar to effectiveness a low level of statutory effect from the recommended changes given that NPSUD already requires the removal of such provisions without the use of the Schedule 1 process. These recommended changes therefore avoid the insertion of parking minimum standards specific to Rotokauri North, on the basis that they will be removed from the district plan shortly anyway. The efficiency of the recommended changes is therefore enhanced relative to the ‘as notified’ provisions as no development is likely within the period prior to the NPSUD taking effect (18 months from August 2020) anyway.</p>
Risk of Acting / Not Acting	<p>Any risks associated with implementing the recommended amendments are considered to be minimal as the 18-month period from August 2020 concludes at the end of 2021. No development is likely possible within that timescale, in any event with little to no risk of acting.</p> <p>The risk of not acting is minimal also as even if the recommended changes were not adopted then the minimum car parking standards within the original plan change as notified would be redundant in a short time span.</p>	
Costs		Benefits
<p>Environmental:</p> <ul style="list-style-type: none"> Minimal. The only environmental cost could be a shortage of carparking from that required in a short period of time prior to the impending removal of car parking standards city-wide as required by the NPSUD. <p>Economic:</p> <ul style="list-style-type: none"> Neutral. <p>Social / Cultural:</p> <ul style="list-style-type: none"> Similar to environmental, minimal given the change impending as a result of the NPSUD. 		<p>Environmental:</p> <ul style="list-style-type: none"> Neutral given the recommended changes foreshadow compulsory changes in district plans within a few months anyway. <p>Economic:</p> <ul style="list-style-type: none"> Some minor economic benefits with no minimum car parking required (as car parks present a development cost) in the unlikely event that some development does proceed prior to the 18 month period within the NPSUD. <p>Social / Cultural:</p> <ul style="list-style-type: none"> As with environmental and economic, neutral to minimal for the above reasons.

<p>Overall Evaluation:</p>	<p>Overall, the changes proposed to the plan change in Table 15-1a (and introduction of Table 15-1aa) are a direct response to the NPS Urban Development 2020 Policy 11 and Subpart 8. The statutory impact of these provisions is to require the removal of minimum car parking standards in district plans within an 18 month period of the commencement date of 20 August 2020. Council is already planning an update to the district plan (Schedule 1 RMA is not required) to give effect to this change and this will be promulgated in 2022. Given this it is considered that the deletion of minimum car parking is appropriate and the introduction of such standards would be ineffective as development is unlikely prior to the 18 month period in any event. The changes themselves are deletion of (g) and (nn), and the introduction of an exception for Rotokauri North within Table 15-1a (and introduction of Table 15-1aa. It is likely that Table 15-1a will be either deleted entirely or substantially removed in the future. As a result the statutory effect of the plan change 7 changes as notified would be virtually nil.</p>
-----------------------------------	--

Table 15.1-aa: NUMBER OF PARKING SPACES IN ROTOKAURI NORTH

<p>Effectiveness and Efficiency</p>	<p><u>Effectiveness</u> Overall, a low level of statutory effect from the recommended changes given that NPSUD already requires the removal of such provisions without the use of the Schedule 1 process. These recommended changes simply insert a clear statement that there are no minimum car parking requirements in Rotokauri North, on the basis that they will be removed from the district plan shortly anyway. The effectiveness of the recommended changes is therefore enhanced relative to the 'as notified' provisions.</p>	<p><u>Efficiency</u> Overall, similar to effectiveness a low level of statutory effect from the recommended changes given that NPSUD already requires the removal of such provisions without the use of the Schedule 1 process. These recommended changes simply insert a clear statement that there are no minimum car parking requirements in Rotokauri North, on the basis that they will be removed from the district plan shortly anyway. The efficiency of the recommended changes is therefore enhanced relative to the 'as notified' provisions as no development is likely within the period prior to the NPSUD taking effect (18 months from August 2020) anyway.</p>
<p>Risk of Acting / Not Acting</p>	<p>Any risks associated with implementing the recommended amendments are considered to minimal for the reasons described in the above table. The risk of not acting is also largely as described in the above table, given the statutory impact of the NPS Urban Development removal of minimum car parking standards at the end of the year anyway.</p>	
<p>Costs</p>		<p>Benefits</p>

<p>Environmental:</p> <ul style="list-style-type: none"> Minimal. The only environmental cost could be a shortage of carparking from that required in a short period of time prior to the impending removal of car parking standards city-wide as required by the NPSUD. <p>Economic:</p> <ul style="list-style-type: none"> Neutral. <p>Social / Cultural:</p> <ul style="list-style-type: none"> Similar to environmental, minimal given the change impending as a result of the NPSUD. 	<p>Environmental:</p> <ul style="list-style-type: none"> Neutral given the recommended changes foreshadow compulsory changes in district plans within a few months anyway. <p>Economic:</p> <ul style="list-style-type: none"> Some minor economic benefits with no minimum car parking required (as car parks present a development cost) in the unlikely event that some development does proceed prior to the 18 month period within the NPSUD. <p>Social / Cultural:</p> <ul style="list-style-type: none"> As with environmental and economic, neutral to minimal for the above reasons.
<p>Overall Evaluation:</p>	<p>Overall, largely as in the above table as the recommended change to introduce a new Table 15-1aa states clearly that no minimum parking space requirements apply to Rotokauri North for 'all activities', meaning that only the non-parking standards from Table 15-1a continue to apply to activities within Rotokauri North.</p>

2.7 Efficiency and Effectiveness of the Recommended Amendments

The recommended amendments to the PPC7 policy framework are considered to be an enhancement of the PPC7 provisions as notified. There are numerous, mainly minor, amendments to the provisions as detailed within the above tables. Efficiency and effectiveness have been enhanced through consistency of terminology used, reliance on terms defined within the district plan as opposed to other undefined terms, use of terms used in other parts of the district plan wherever possible to enhance readability and clarity, simplification of provisions where possible, and avoidance of unnecessary wording. Whilst there have been technical wording changes made also (as described in the above table and as per the 'live' chapters attached to the s42A report), the majority of the changes are considered minor wording changes. Where technical changes have been made these are to address workability and achieve the intent of each provision more efficiently and effectively.

2.8 The Risk of Not Acting

In evaluating the recommended amendments outlined in the s42A report, Section 32(2)(c) of the RMA requires the consideration of the risk of 'acting' or 'not acting' if there is uncertain or insufficient information about the subject matter of the recommended amendments. This consideration with respect to the recommended amendments has been undertaken in **Tables 1 – 6** of this evaluation.

In summary, the risk of 'acting' by adopting the recommended amendments to the PPC7 policy framework is that there is insufficient information to make the change, or that the statutory impact of the change is unknown or poorly understood, or that the change to a provision will reduce the effectiveness and efficiency of the particular provisions. None of these circumstances are considered to be the case. Rotokauri North has now been thoroughly studied with a high level of relevant information now available, meaning that issues are well understood and the statutory effect of the provisions can be measured and understood. The individual risks of acting are described in the tables above, but at a broad level the risks of not acting outweigh the risks of acting.

The risk of 'not acting', by retaining the notified PPC7 policy framework, is that the provisions relate poorly to the other provisions within the district plan, rely on terms that are either undefined or do not have clear means, rely on terms that are not used elsewhere within the district plan (but other similar terms are used), and that the intent will not be effectively and efficiently achieved.

3 Conclusion

The purpose of this report is to provide an evaluation of the recommended amendments to PPC7 as outlined in the s42A report. This evaluation has been undertaken in accordance with sections 32 and 32AA of the RMA in order to identify the benefits, costs and appropriateness of the recommended amendments having regard to the effectiveness and efficiency relative to other means in achieving the purpose of the RMA.

Overall, it is considered that the recommended amendments are the most appropriate in assisting the Council carrying out its functions for the purpose of achieving the RMA's sustainable management purpose. Further the benefits outweigh the costs and there are efficiencies to be gained from adopting the recommended amendments. The risks of acting are also clearly identifiable and limited in their extent.

Given the elevation presented in this report, it is concluded that the recommended amendments outlined in the s42A report meet the tests of section 32 of the RMA, and, furthermore, will promote the sustainable management of natural and physical resources.