Attachment H – Section 32 Evaluation Report: Rural Residential Zone and Rural Lifestyle Zone

Section 32 Evaluation Report: Rural Residential and Rural Lifestyle Zones

1. Strategic Context

Section 32(1)(a) of the Resource Management Act 1991 requires that a Section 32 evaluation report must examine the extent to which the proposed objectives are the most appropriate way to achieve the purpose of the Act.

The purpose of the Act requires an integrated planning approach and direction:

> ***5 Purpose***
>
> *(1) The purpose of this Act is to promote the sustainable management of natural and physical resources.*
> *(2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while—*
> *(a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
> *(b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
> *(c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

2. Regional Planning Documents

The Regional Policy Statement 1998 (RPS) is currently under review itself, and may be further advanced in that process by the time the District Plan Review is notified. Amendments to this evaluation may be required to accommodate that change. The District Plan (the Plan) must *give effect to* the operative RPS and must *have regard to* any proposed RPS.

The operative RPS contains a number of objectives and policies of relevance to this plan change, specifically Objectives 5.4.1 to 5.4.4 (Land) and related policies which, in broad terms promote the sustainable management of Otago's land resource by:

- Maintaining and enhancing the primary productive capacity and life supporting capacity of land resources;
- Avoid, remedy or mitigate degradation of Otago's natural and physical resources resulting from activities utilising the land resource;
- Protect outstanding natural features and landscapes from inappropriate subdivision, use and development.

Objective 9.4.3 (Built Environment) and related policies are relevant and seek to avoid remedy or mitigate the adverse effects of Otago's built environment on Otago's natural and physical resources, and promote the sustainable management of infrastructure.

The proposed plan change provisions are consistent with, and give effect to, the relevant operative RPS provisions.

3. Resource Management Issues

The Plan anticipates the Rural Residential and Rural Lifestyle zones are to provide for residential opportunities as an alternative to the suburban living areas of the District.

The 'environmental results anticipated' in part 8.1.3 of the Plan state:

(i) The achievement of a diversity of living and working environments.

(ii) Conservation and enhancement of outstanding landscape values of the District.

(iii) A variety of levels of building density throughout the District.

(iv) Safeguarding the life supporting capacity of water and soil.

(v) Self-sufficiency of services in rural living areas.

In general terms, anticipated environmental results (i), (iii) and (iv) are considered to have been met, while development within the zones has resulted in less than ideal outcomes with regard to anticipated environmental results (ii) and (v).

This review seeks to address a number of key issues (detailed below), whilst also strengthening the existing provisions by providing more targeted objectives and policies, making the Plan easier to understand and improving certainty to what activities are permitted in the zones and whether they require a resource consent.

The resource management issues set out in this section have been identified from the following sources:

- Wanaka Land Demands – Review of the Wanaka Structure Plan (2007)
- Plan Change 14 – Makarora Rural Lifestyle Zone
- Plan Change 20 – Wanaka Urban Boundary
- Plan Change 21 - Queenstown Urban Boundary
- Plan Change 33 – Non-Residential Activities in the Residential, Rural Living and Township Zones
- Hawea Community Plan 2003
- Luggate Community Plan 2003
- Makarora Community Plan 2003
- Tomorrows Queenstown
- Wanaka 2020
- Rural General Zone Monitoring Report 2009
- Rural Living Zones Monitoring report 2009
- Informal Airports Research Report 2012
- QLDC Liquefaction Hazard 2013, prepared by Tonkin and Taylor Limited
- Otago regional Council Natural hazard reports
- Experience processing resource consents for activities in the Rural Residential and Rural Lifestyle zones
- Community consultation, Council workshops and a meeting of the Council's Resource Management Focus Group
- Read Landscapes Limited 'Report to Queenstown Lakes District Council on appropriate landscape classification boundaries within the District, with particular reference to Outstanding Natural Landscapes and Features' 2014.
- Read Landscapes Limited 'Wakatipu Basin Residential Subdivision and Development: Landscape Character Assessment' 2014.
- Otago Regional Council Regional Policy Statement 1998
- Relevant legislative changes enacted since the Plan became operative

The key issues are:

Issue 1: The majority of the Rural Residential and Rural Lifestyle zones are located within and adjacent to sensitive landscapes, and the existing objectives and policies do not place adequate emphasis on the protection and maintenance of these landscapes.

Rural Residential and Rural Lifestyle zones generally provide, subject to natural hazards and density controls, for residential activity at a density of one dwelling per 4000m² in the Rural Residential zone and up to one dwelling per hectare in the Rural Lifestyle zone.

Many of the zones, some of which remain undeveloped, are located within the District's visually sensitive and valued landscapes, including Glenorchy, Bob's Cove, Lake Hayes, Mt Iron, Mt Barker, Makarora and Hawea.

While recognising the ability for this land to be developed for residential activity, it is located amidst and/or adjacent to the district's valued landscape resource and subdivision and development undertaken at a higher density than anticipated has a high likleihoodl for adverse effects on the landscape resource.

Subdivision of an urban-density has occurred in the Rural Living zones throughout Wanaka and near Lake Hayes Estate in Queenstown.

The existing objectives and policies are not considered to place adequate emphasis on the importance of the landscape resource, nor do they provide a strong link to District Wide/Strategic policy.

Issue 2: Effective and efficient resource management. The zones anticipate residential development but there are too many resource consents required for residential activity in the zones.

Generally, anticipated residential development in the Rural Residential and Rural Lifestyle zones require resource consent as a controlled activity. Consequently, the alteration of buildings also require a resource consent, as do changes in colour or changes to previously approved site and landscape plans. Where existing buildings are to be altered, more often than not they require resource consent under section 127 of the RMA to change the conditions of the 'original' resource consent.

In the period from January 2011 to June 2014, 505 resource consents were granted in the Rural Residential and Rural Lifestyle zones (363 Rural Residential zone and 142 Rural Lifestyle zone). Of these, 331 (65%) were identified as a resource consent for a 'controlled activity', with relatively straightforward design and appearance related resource consents. Averaged over a five year period, these resource consents constitute approximately 18% of the resource consents issued by the Council per year.

This reflects a relatively high amount of intervention for development which is anticipated to occur. While acknowledging the comment made in Issue 1 relating to the location of the zones within the District's sensitive landscapes and the desire to control the effects of development on the landscape, it is considered the amount of resource consents required can be reduced without increasing the visual effects of development within these zones.

Standards can be introduced that enable residential buildings as a permitted activity subject to performance standards controlling colour and the bulk and location of buildings.

It is also considered that the emphasis on any landscaping would be better dealt with at the time of subdivision, particularly where integrated landscaping affecting the entire area to be subdivided would be beneficial, particularly where the subdivision would occur in the more visually sensitive locations.

The entire package of existing rules would benefit from a review to improve phrasing, understanding and certainty of what types of activities require a resource consent.

Issue 3: Protecting amenity values for inhabitants

There is a lack of specificity in the objectives and policies relating to non-residential activities in the Rural Residential and Rural Lifestyle zones. The maintenance of amenity values and a pattern of development consistent with the expectations of inhabitants is an important determinant of the character and amenity of the zones.

Furthermore, the existing objective and policy framework does not identify existing rules relating to specific activities identified such as visitor accommodation within a visitor accommodation subzone.

Through this review, there is also considered an opportunity to specify community activities[1] which may be beneficial to the Rural Residential and Rural Lifestyle zones.

[1] The District Plan definition of Community Activity means: Means the use of land and buildings for the primary purpose of health, welfare, care, safety, education, culture and/or spiritual well being. Excludes recreational activities. A community activity includes schools, hospitals, doctors surgeries and other health professionals, churches, halls, libraries, community centres, police stations, fire stations, courthouses, probation and detention centres, government and local government offices.

Issue 4: Some of the Rural Residential and Rural Lifestyle zones have been developed to an urban-density and are located within the identified urban growth limits. This has created an inefficient resource management regime.

Subdivision of an urban density has occurred in the Rural Residential and Rural Lifestyle zones and it is not appropriate for these areas to remain under the current zoning.

It would be prudent for a new objective and policy framework to start with a clean slate to uphold the integrity of the provisions for the remaining zones. This would also assist the Council resisting proposals for subdivision and development where they would be better dealt with as a plan change.

A legacy associated with urban density subdivision and developments being approved by resource consents in the Rural Residential and Rural Lifestyles zones are that they result in inefficient resource management practices. The reason being, that any applications for resource consent, including anticipated urban residential development approved by the subdivision would be required to be assessed against the underlying Rural Residential or Rural Lifestyle zoning.

An example being a situation where a minor boundary setback rule is not complied with, the resource consent application is required to be processed as a variation to the approval in principle, and also requires assessment under the underlying Rural Residential or Lifestyle zoning. In effect, this results in what would likely be an otherwise relatively straightforward resource consent for a bulk or location non-compliance requiring multiple resource consents. In addition, where the 'rules' for development in these situations are registered on the property's certificate of title, a variation under section 221 of the RMA us also required to change the consent notice/instrument registered on the property's certificate of title. This has created an unnecessarily complex regulatory regime.

Another relevant aspect are the location of Operative Rural Living Zones within the Wanaka urban growth boundary. It would not be appropriate for 'rural' zones to be located within urban growth limits. It is acknowledged there are established Rural Residential zoned neighbourhoods within the urban growth limits and to ensure the character and amenity values of these neighbourhoods are maintained provisions are included in the proposed District Plan residential zones for these established neighbourhoods.

Where urban subdivision has occurred within the Rural Residential or Rural Lifestyle zones, and where the zones are located within the urban growth limits, the review will identify these areas and apply a more suitable zone.

Issue 5: Managing development with Natural hazards

The Council and the Otago Regional Council has undertaken investigations of natural hazards in the District. Plan Change 14 – Makarora Rural Lifestyle Zone, made operative in 2008, introduced to the Rural Lifestyle zone in Makarora provisions to consider the effects of building within or near natural hazards at the time of subdivision and development. The Council and the Otago Regional Council have undertaken district wide assessment of natural hazards, namely:

- QLDC: liquefaction hazard maps 2013 prepared by Tonkin and Taylor Ltd;
- ORC: Otago Alluvial Fans: High hazard Investigation 2011
- ORC: Natural hazards in the Cardrona Valley 2010
- Natural hazards at Glenorchy 2010
- Otago Alluvial Fans project supplementary information 2009
- Seismic Risk in the Otago region 2005

The Rural Lifestyle and Rural Residential zones are located in areas identified as having a natural hazard risk.

Issue 6: Existing issues stated in the operative District Plan providing for specific locations including, Bob's Cove, natural hazards within the Makarora Valley, and form of development within the Makarora Valley are still valid resource management issues.

The existing Plan identifies and provides objectives, policies and rules for specific areas such as Bob's Cove, Ferry Hill, and managing natural hazards and the density of subdivision in Makarora. These issues remain valid and are not considered to be necessary to change.

Issue 7: Managing the effects of rural activities.

The Rural Residential zone anticipates a subdivision and development pattern generally of 4000m² allotments and residential activity. There are not any practical opportunities for farming activities in the established Rural Residential zone.

The Rural Lifestyle Zone anticipates a subdivision and development pattern generally in the order one – two hectare sized allotments. Again, there are opportunities for domestic livestock and pets, but not practical opportunities for economically productive farming activity which requires larger landholdings.

Both zones are located amidst and adjoining rural areas, it is important to recognise for existing and anticipated rural activities in the surrounding Rural zone, however, the opportunities for farming within the zone, particularly more productive farming are limited.

4. Purpose and Options

The overarching purpose of the Rural Residential and Rural Lifestyle zones are to provide rural living opportunities on what are, by rural productive standards, small landholdings. People seek to locate within these zones to benefit from larger landholdings than on urban sized allotments in the Township, or Low Density Residential Zones, amidst or adjacent to the rural area.

The Rural Residential Zone generally anticipates a residential density of 4000m² sized properties and creates essentially large-lot urban style subdivision, with ample open space for landscape planting.
The Rural Lifestyle Zone generally anticipates properties not less than 1 hectare in area and provides the opportunity for a range of smaller scale 'rural' living opportunities which commonly contain domestic livestock or horses, as an example.

Residential development is anticipated in both zones (subject to natural hazards) with an emphasis on the location and external appearance of buildings being recessive in the surrounding rural landscape to ensure the District's landscape values are maintained.

Strategic Directions
The following goals, objectives and policies from the Strategic Directions chapter of the draft Plan are relevant to this assessment:

Goal 1:	*To develop a prosperous, resilient and equitable economy.*
Objective 4:	*To recognise the potential for rural areas to diversify their land use beyond the strong productive value of farming, provided a sensitive approach is taken to rural amenity, landscape character and healthy ecosystems.*
Goal 2:	*The strategic and integrated management of urban growth*
Objective 1:	*To ensure urban development occurs in a logical manner:* • *to promote a compact, well designed and integrated urban form;* • *to manage the cost of Council infrastructure; and* • *to protect the District's rural landscapes from sporadic and sprawling development.*
Policy 1.1	*Apply Urban Growth Boundaries (UGBs) around the urban areas in the Wakatipu Basin (including Jack's Point) and Wanaka.*
Policy 1.2	*Apply provisions that enable urban development within the UGBs and avoid urban development outside of the UGBs.*
…	
Policy 1.4	*Encourage a higher density of residential development in locations that have good access to public transport and centres.*
Policy 1.5	*Ensure Urban Growth Boundaries contain sufficient land, when measured district-wide, to accommodate 10 years of urban growth and prioritise areas*

to be developed within the boundary *Policy 1.6* *Manage development within UGBs so that future urban growth opportunities are not compromised.* *Policy 1.7* *That further urban development of the District's small rural settlements be located within and immediately adjoining those settlements.* *Objective 2* *To manage development in areas affected by natural hazards.*
Goal 4: The protection of our natural environment and ecosystems *Objective 1* *To promote development and activities that sustain or enhance the life-supporting capacity of air, water, soil and ecosystems.* *Objective 2* *To protect areas with significant Nature Conservation Values.* *Policy 2.1* *Identify areas of significant indigenous vegetation on the District Plan maps and ensure their protection.* *Policy 2.2* *Where adverse effects on nature conservation values cannot be avoided, remedied or mitigated, consider environmental compensation as an alternative.* *Objective 3* *To maintain or enhance the survival chances of rare, endangered, or vulnerable species of indigenous plant or animal communities.* *Policy 3.1* *That development does not adversely affect the survival chances of rare, endangered, or vulnerable species of indigenous plant or animal communities* *Objective 4* *To avoid Exotic vegetation with the potential to spread and naturalise.* *Policy 4.1* *That the planting of exotic vegetation with the potential to spread and naturalise is banned.* *Objective 5* *To preserve or enhance the natural character of the beds and margins of the District's lakes, rivers and wetlands.* *Policy 5.1* *That subdivision and / or development which may have adverse effects on the natural character and nature conservation values of the District's lakes, rivers, wetlands and their beds and margins be carefully managed so that life-supporting capacity and natural character is maintained or enhanced.* *Objective 6* *To maintain or enhance the water quality of our lakes and rivers.* *Policy 6.1* *That subdivision and / or development be designed so as to avoid adverse effects on the water quality of lakes and rivers in the District.* *Objective 7* *To facilitate public access to the natural environment.* *Policy 7.1* *That opportunities to provide public access to the natural environment are sought at the time of plan change, subdivision or development.* *Objective 8* *To respond positively to Climate Change.* *Policy 8.1* *To concentrate development within existing urban areas, promoting higher density development that is more energy efficient and supports public transport, to limit increases in greenhouse gas emissions in the District.*
Goal 5: Our distinctive landscapes are protected from inappropriate development. *Objective 3* *To direct new subdivision, use or development to occur in those areas which have potential to absorb change without detracting from landscape and visual amenity values.* *Policy 3.1* *Direct urban development to be within the UGBs of The Wakatipu Basin or Wanaka, or within the existing rural townships.* *Objective 4* *To recognise there is a finite capacity for residential activity in rural areas if*

	the qualities of our landscape are to be maintained.
Policy 4.1	*Give careful consideration to cumulative effects in terms of character and environmental impact when considering residential activity in rural areas.*
Policy 4.2	*Provide for rural living opportunities in appropriate locations*
Objective 5	*To recognise that agricultural land use is fundamental to the character of our landscapes.*
Policy 5.1	*Give preference to farming activity in rural areas except where it conflicts with significant nature conservation values.*
Policy 5.2	*Recognise that the retention of the character of rural areas is often dependent on the ongoing viability of farming and that evolving forms of agricultural land use which may change the landscape are anticipated.*

In general terms, and within the context of this review, these goals and objectives are met by:

- enabling anticipated residential development and enhancement while maintaining the Districts landscape values and amenity values within and adjoining the Rural Residential and Rural Lifestyle zones;
- creating efficiencies in the administration of the District Plan and reducing costs for the community;
- avoiding commercial activities that have the potential to undermine the amenity of the zone and the role of commercial centres;
- avoiding urban subdivision and development not located within the urban growth limits;
- recognising natural hazards exist in the Rural Residential and Rural Lifestyle zones and managing the risks of development, where hazards have been identified.

Determining the most appropriate methods to resolve the issues highlighted for the Rural Residential and Rural Lifestyle zones will enable the Plan to give effect to relevant parts of the Strategic Directions chapter, and ultimately meet the purpose of the RMA.

As required by section 32(1)(b) RMA, the following section considers various broad options considered to address each issue, and makes recommendations as to the most appropriate course of action in each case.

Broad options considered to address issues

Issue 1: The majority of the Rural Residential and Rural Lifestyle zones are located within and adjacent to sensitive landscapes, and the existing objectives and policies do not place adequate emphasis on the protection and maintenance of these landscapes.

Option 1: Retain the operative provisions.

Option 2: Amend the operative provisions to recognise the value of the landscape resource to the District **(Recommended).**

Option 3: Comprehensively review the zone and/or provisions to reduce development where it has potential to degrade landscape values.

	Option 1: **Status quo/ No change**	**Option 2:** **Amend operative provisions**	**Option 3:** **Rezone to Rural**
Costs	• The objectives and policies do not give effect to Proposed Strategic Directions chapter. • The integrity of the existing objective and policy framework has been weakened by subdivision at an urban density. The landscape resource is subject to potential degradation from further urban subdivision. • The existing policies do not assist with the identification of community and commercial activities that may be appropriate a lack of strategic guidance for commercial activities constitutes poor resource management.	• Costs associated with going through the District Plan Review process (but this is required by legislation). • Would still allow subdivision and development in sensitive landscapes.	• Would remove development rights of landowners in these zones. • Costs associated with going through the District Plan Review process (but this is required by legislation). • High costs for Council from potential litigation. • Removes a diversity of future housing options and rural living opportunities to the community. • Many of the undeveloped areas hold resource consents for subdivision, a development right is already established.

Benefits	• Retains the established approach which parties are familiar with. • Low cost for Council.	• Will not diminish the existing development rights but would bolster the protection of landscapes where the situation arises. • Enables anticipated economic development and investment. • Provides the community with a diversity of housing. • Consistent with the Strategic Directions Chapter.	• Applying a more development restrictive zoning such as the Rural zone would enable the Council to more effectively protect, maintain and enhance the districts distinctive landscapes.
Ranking	**2**	**1**	**3**

Issue 2: Effective and efficient resource management. The zone anticipates residential development but there are too many resource consents required for residential activity in the zone.

Option 1: Retain the operative provisions

Option 2: Amend the existing rule requiring the construction and alteration of buildings to obtain a resource consent as a controlled activity

Option 3: Review the entire package of rules **(Recommended)**

	Option 1: **Status quo/ No change**	**Option 2:** **Amend the 'controlled' activity rule only relating to building**	**Option 3:** **Review the entire package of rules**

Costs	• Inefficient resource management practice for the Council. • Cost to the community for applying for resource consents and variations for anticipated development activities. • The deficiencies in the rule structure create inefficiencies and create unnecessary layers of complexity. • The existing rule phrasing and resultant administration divorces laypeople from the District Plan.	• Inefficiencies would remain with the existing rules. • Potential for visibility for buildings to increase, reduced control on landscaping. • Short term inefficiency to the council where it would be likely to alter its review of servicing to the building consent process. • Reduced control by the Council (however these are already constricted by anticipated development control rights either required by bulk and location standards in the Rural Residential zone or placement of buildings in building platforms in the Rural Lifestyle Zone).	• The 'permitted' range of colours is conservative, some consents will be required where a different colour is sought. • Potential for visibility of buildings to increase, reduced control on landscaping on a site by site basis. • Short term inefficiency to the council where it would be likely to alter its review of servicing to the building consent process. • Cost for Council to review the rules. • Reduced control by the Council of development. (however these are already constricted by anticipated development control rights either required by bulk and location standards in the Rural Residential zone or the identification and placement of buildings in building platforms in the Rural Lifestyle Zone).
Benefits	• Retains the established approach which parties are familiar with. • Retains a relatively high level of control for the Council to manage the effects of activities. • Low cost for Council.	• Retains the established approach which parties are familiar with. • Lower cost for Council than option 3. • Provision for water and wastewater disposal are Building code requirements. Efficiencies to the Council and the applicant to remove this component from RMA reporting requirements. • Place emphasis on landscaping at the subdivision, reduced burden on individual landowners for landscape design.	• Removes deficiencies with the existing phrasing and rules. • Provides the community the opportunity to develop to a permitted activity and avoid costs and time associated with the resource consent process. • Increased efficiency for the Council's district plan administration. • Efficiency for the community when developing in these zones.

			• Provision for water and wastewater disposal are Building code requirements. Efficiencies to the Council and the applicant to remove this component from RMA reporting requirements. • Place emphasis on landscaping at the subdivision, reduced burden on individual landowners for landscape design. • Retains the established approach which parties are familiar with. • Provision for water and wastewater disposal are Building code requirements. Efficiencies to the Council and the applicant to remove this component from RMA reporting requirements. • Place emphasis on landscaping at the subdivision, reduced burden on individual landowners for landscape design.
Ranking	**3**	**2**	**1**

Issue 3: Protecting amenity values for inhabitants

Option 1: Retain the operative provisions including policies.

Option 2: Amend the operative provisions to acknowledge existing rights or restrictions within the rules but amend the policy to identify potential effects on amenity arising from commercial activities **(Recommended).**

Option 3: Comprehensive review to create a new suite of provisions.

	Option 1: **Status quo/ No change**	**Option 2:** **Amend Operative provisions**	**Option 3:** **Comprehensive changes**

Costs	• The objectives and policies do not give effect to Proposed Strategic Directions chapter. • The existing policies do not assist with the identification of community and commercial activities that may be appropriate. • Aside from the class of activity distinction (Controlled activity in a identified sub-zone), there is no specific direction relating to visitor accommodation in or outside subzones.	• Has costs associated with going through the District Plan Review process (but this is required by legislation.	• Has a high cost relative to the likely demand for commercial activities in the zones. • Unnecessary because the intervention already exists, a discretionary consent is required for visitor accommodation and any commercial or industrial that does not comply with the 'nature and scale' zones standards require a non-complying resource consent.
Benefits	• Retains the established approach which parties are familiar with. • Low cost for Council.	• Would bolster the ability for the Council to protect residential amenity, where required. • Justifies the existing provisions and expectations relating to visitor accommodation subzones.	• Comprehensive review of opportunities and constraints for non-residential land uses.
Ranking	**2**	**1**	**3**

Issue 4: Some of the Rural Residential and Rural Lifestyle zones have been developed to an urban-density and are located within the likely urban growth limits. This has created an inefficient resource management regime.

Option 1: Retain the operative provisions.

Option 2: Remove the Rural Residential or Rural Lifestyle zoning from land developed to an urban density.

Option 3: Remove the Rural Residential or Rural Lifestyle zoning from land developed to an urban density and land located within the urban growth limits **(Recommended).**

	Option 1: **Status quo/ No change**	**Option 2:** **Rezone where an urban subdivision has occurred.**	**Option 3:** **Rezone where an urban subdivision has occurred and rezone land within the urban growth limits.**
Costs	• The existing situation does not uphold the integrity of the District Plan. • Where a subdivision of urban densities has occurred, minor non-compliances associated with anticipated development can result in the need for resource consents that are more complex than necessary, creating inefficiencies. • Land identified within the proposed urban growth boundaries will be subject to increasing demand for urban subdivision and the occurrence of 'de facto' plan changes will increase. Further creating a complex planning regime.	• Cost to the Council associated with the plan change. • Potential complexities where conditions on developments, such as where deals are struck at the subdivision may conflict with the new zone rules. • Does not efficiently or effectively plan for future development within the urban growth limits.	• Cost to the Council associated with the plan change. • Potential complexities where conditions on developments, such as where deals are struck at the subdivision may conflict with the new zone rules. • Council may need to consider staging or deferring development areas within the urban growth limits.
Benefits	• Low cost for Council.	• Efficient District Plan administration to both the Council and applicants. • Integrity of the zones upheld for future resource consent administration.	• Efficient to address the future urban growth and pattern of development as part of the District Plan review, rather than by private plan change requests or by subdivision proposals. • Confirms the identity of Rural Residential and Rural Lifestyle zones outside the urban growth limits. • Efficiencies for the community when developing within the areas subject to urban

			subdivision. • Efficient District Plan administration.
Ranking	**3**	**2**	**1**

Issue 5: Managing development with Natural hazards

Option 1: Retain the operative provisions.

Option 2: Prohibit residential buildings in natural hazard areas.

Option 3: Amend objectives and policies to better recognise natural hazards across the zones **(Recommended)**.

	Option 1: **Status quo/ No change**	**Option 2:** **Prohibit residential activity**	**Option 3:** **Amend Objectives and Policy**
Costs	• Some properties created by subdivision prior to the existence of information currently held by the Council may be able to build/rebuild in identified natural hazard areas (with the exception of Makarora). Therefore, not managing the risk of natural hazards.	• Inconsistent with the anticipated development rights in the zones. • Inefficient use of land, many hazards can be mitigated if identified and considered as part of a subdivision or development.	• Cost for Council. • Increase perception of constraining development.

Benefits	• Maintains the established approach which parties are familiar with, Council principally relying on section 106 of the RMA to not allow subdivision where there is an unacceptable natural hazard risk. • Low cost for Council. • Identified risks are noted in Land Information Memorandum reports.	• Would limit the damage to property and risk to safety in the case of a natural hazard event. • Easier to prevent development within areas susceptible to natural hazards.	• Acknowledges natural hazard potential in the zones and provides decision makers with a provision to utilise if required when considering applications for resource consent. • Does not arbitrarily restrict anticipated development within the zones. • Complements the information known by the Council and made available to the public.
Ranking	**2**	**3**	**1**

Issue 6: Existing issues stated in the operative District Plan providing for specific locations including, Ferry Hill, Forest Hill, Bob's Cove, natural hazards within the Makarora Valley, and form of development within the Makarora Valley are still valid resource management issues.

Option 1: Retain the existing provisions

Option 2: Remove the provisions and apply the same zoning as the rest of the zone

Option 3: Amend some provisions only to improve legibility and to fit the new plan template style **(Recommended)**

	Option 1: **Status quo/ No change**	**Option 2:** **Remove specific provisions**	**Option 3:** **Amend**
Costs	• Some of the provisions are confusing and convoluted and are likely to create inefficiencies.	• These areas have been previously identified as special cases and there may be little to be gained from re-visiting these issues. • Notwithstanding the convoluted provisions, areas such as Bob's Cove require additional landscaping and bulk and location controls because it has been determined they are located in a visually sensitive part of the District, with importance views and outlook from	• The convoluted nature of some of the provisions will remain.

		within the zones. It may degrade landscape values to relax these controls.	
Benefits	• The provisions applying (for instance) to Bob's Cove and Makarora only affect a relatively small component of the zones, the inefficiencies have a relatively small impact. • Low cost for Council.	• Easier for future property owners to develop. • Easier for the Council to administer the District Plan. • Lower costs with consents and compliance/monitoring.	• Does not create potential effects on landscape or neighbouring properties by changing provisions. • Lower cost for Council. • Improved legibility of the provisions without impacting the existing opportunities or constraints for development.
Ranking	**2**	**3**	**1**

Issue 7: Managing the effects of rural activities.

Option 1: Retain the existing provisions.

Option 2: Remove the provisions referring to managing the effects of rural activities.

Option 3: Amend the provisions to recognise distinction between avoiding conflict between established and anticipated activities, and the protection of amenity within the zones **(Recommended)**.

	Option 1: **Status quo/ No change**	**Option 2:** **Remove the provisions**	**Option 3:** **Amend the Provisions**

Costs	• Inadequate, confusing provisions. The existing objective, relating to 'rural amenity' is not direct because the underlying policies attempt to manage both reverse sensitivity issues from residential activity on the rural productive environment, but also has policy seeking to maintain amenity for inhabitants.	• Existing rural activities are located in some Rural Lifestyle zones and these zones are on the periphery of rural areas. Removing the provisions may constrain existing and anticipated rural activities.	• Cost associated with reviewing the provisions.
Benefits	• Reduced costs associated with changing the provisions.	• The policy is inefficient and removing this would improve the legibility of the District Plan.	• Distinguishing between two different types of issues, both currently referred to as 'rural amenity' will provide better policy direction and assist decision makers when considering development proposals.
Ranking	**2**	**3**	**1**

5. Scale and Significance Evaluation

The level of detailed analysis undertaken for the evaluation of the proposed objectives and provisions has been determined by an assessment of the scale and significance of the implementation of the proposed provisions. In making this assessment, regard has been had to the following, namely whether the objectives and provisions:

- Result in a significant variance from the existing baseline.
- Have effects on matters of national importance.
- Adversely affect those with specific interests, e.g., Tangata Whenua.
- Involve effects that have been considered implicitly or explicitly by higher order documents.
- Impose increased costs or restrictions on individuals, communities or businesses.

6. Evaluation of proposed Objectives Section 32 (1) (a)

Proposed Objective	***Appropriateness***

Objective 1 **Maintain and enhance the district's distinctive landscapes while enabling rural living opportunities in areas that can avoid detracting from those landscapes.**	Recognises the importance of the landscape resource to the District and the location of the Rural Residential and Rural Lifestyle zones within it. Acknowledges the expectation of development in the zones but development is subject to controls to maintain and enhance the landscape. Consistent with Goal 5 of the draft Strategic Directions chapter. Gives effect to RPS objective 5.4.3 Gives effect to RPS policy 5.5.6
Objective 2 **Ensure the predominant land uses are rural, residential and where appropriate, community activities.**	Sets expectation for predominantly rural and residential activities and identifies ability for community based activities, subject to scale and intensity, where these activities benefit the community. Consistent with Goal 1 of the draft Strategic Directions chapter. Gives effect to RPS objective 9.4.1 and 9.4.3 Gives effect to RPS policy 9.5.4
Objective 3 **Manage new development and natural hazards**	Acknowledges that notwithstanding the enabling zoning, natural hazard risk is present within the zones and needs to be managed. Consistent with Objective 2 of Goal 2 of the draft strategic directions chapter. Give effect to RPS objectives 11.4.1 and11.4.2 Gives effect to RPS policies 11.5.2 and 11.5.3
Objective 4 **Ensure new development does not exceed available capacities for servicing and infrastructure.**	Recognises the costs associated to the Council and community associated with connecting its infrastructure to subdivision and development isolated from existing capacity. Consistent with Objective 1 of Goal 2 of the draft strategic directions chapter. Give effect to RPS objectives 9.4.1, 9.4.2, 9.4.3 Gives effect to RPS policies 9.5.2 and 9.5.3

Objective 5 **Manage situations where sensitive activities conflict with existing and anticipated rural activities.**	This objective recognises and maintains the existence of established rural activities and that activities such as residential development seeking to locate amidst established rural activities have an expectation to not hinder these activities, providing the rural activity being undertaken within reasonable limits. For instance, with particular regard to aspects such as odour, noise, lighting and traffic generation. Consistent with goal 5 and objective 5 of the draft strategic directions chapter. Give effect to RPS objective 5.4.1 Gives effect to RPS policies 5.5.3 and 5.5.4
Objective 6 **Bob's Cove Rural Residential sub-zone – To create comprehensively-planned residential development with ample open space and a predominance of indigenous vegetation throughout the zone.**	Existing policy which acknowledges the visually and ecologically sensitive location. Consistent with Goal 5 of the draft Strategic Directions chapter. Gives effect to RPS objective 5.4.3 Gives effect to RPS policy 5.5.6
Objective 7 **Bob's Cove Rural Residential Zone - To maintain and enhance the ecological and amenity values of the Bob's Cove Rural Residential zone.**	Existing policy which acknowledges the visually and ecologically sensitive location. Consistent with Goal 5 of the draft Strategic Directions chapter. Gives effect to RPS objective 5.4.3 Gives effect to RPS policy 5.5.6
Objective 5.3.1 (Landscape) Objective 1 **The District contains and values Outstanding Natural Features, Outstanding Natural Landscapes, and Rural Landscapes that require protection from inappropriate subdivision and development.**	Confirms the importance of the landscape resource to the District. Recognises the importance of landscape to iwi. Recognises cultural and geological elements contribute to landscape values Establishes a basis for policy to identify landscape categories and for them to be identified on the planning maps. Establishes a basis for subdivision and development proposals to be assessed against the applicable assessment criteria. Recognises the interrelationship between the location of urban growth boundaries and the

	landscape resource, with regard to future proposals for plan changes. Discourages the establishment of urban subdivision by way resource consent within the rural zones. Recognises the importance of pastoral farming on large landholdings is an important determinant of landscape character. Consistent with Goal 5 (all objectives) of the draft Strategic Directions chapter. Consistent with Goal 2 (objective 1) of the draft Strategic Directions chapter. Gives effect to RPS objective s 4.4.1, 4.4.2, 4.4.3 and 4.4.5 (Manawhenua). Gives effect to RPS objective 5.4.3 and policies 5.5.1 and 5.5.6 (Land). Gives effect to RPS objective 9.4.1 and 9.4.3 and policy 9.5.4 (Built Environment).
5.3.7 (Landscape) Objective 7 **Recognise and protect indigenous biodiversity where it contributes to the visual quality and distinctiveness of the District's landscapes.**	Indigenous vegetation also contributes to the quality of the District's landscapes. Whilst much of the original vegetation has been modified the colour and texture of indigenous vegetation within these landforms contribute to the distinctive identity of the District's landscapes. Recognises the importance indigenous biodiversity contributes to the District's distinctive landscapes. Establishes a basis for policy to manage the effects on landscape associated with indigenous vegetation clearance, and the opportunity for subdivision and development which constitutes a change in land use from traditional pastoral farming to consider opportunities for indigenous biodiversity protection or restoration. Consistent with Goals 4 and 5 of the draft Strategic Directions chapter. Gives effect to RPS objective s 4.4.1, 4.4.2, 4.4.3 and 4.4.5 (Manawhenua). Gives effect to RPS objective 10.4.3 and policies 10.5.1 and 10.5.2 (Biota). Gives effect to RPS objective 9.4.1 and 9.4.3 and policy 9.5.4 (Built Environment).

The above objectives are considered to be the most appropriate methods of achieving the purpose of the Act, as they identify and give direction as to the how the specific issues that pertain to the Rural residential and Rural Lifestyle zones are addressed.

7. Evaluation of the proposed provisions Section 32 (1) (b)

The below table considers whether the proposed provisions are the most appropriate way to achieve the relevant objectives. In doing so, it considers the costs and benefits of the proposed provisions and whether they are effective and efficient. The proposed provisions are grouped by issue for the purposes of this evaluation.

(Also refer to the Table detailing broad options considered in Section 4, above)

Issue 1: The majority of the Rural Residential and Rural Lifestyle zones are located within and adjacent to sensitive landscapes and the existing objectives and policies do not place adequate emphasis on the protection and maintenance of these landscapes.

Issue 3: Protecting amenity values for inhabitants

Objective 1: Maintain and enhance the district's distinctive landscapes while enabling rural living opportunities in areas that can avoid detracting from those landscapes.

Objective 2: Ensure the predominant land uses are rural, residential and where appropriate, community activities.

Objective 5.3.1 (Landscape) The District contains and values Outstanding Natural Features, Outstanding Natural Landscapes, and Rural Landscapes that require protection from inappropriate subdivision and development.

Objective 5.3.7 (Landscape) Recognise and protect indigenous biodiversity where it contributes to the visual quality and distinctiveness of the District's landscapes.

Summary of proposed provisions that give effect to these objectives:

- To provide for development commensurate with the anticipated residential densities in the of the Rural Residential and Rural Lifestyle zones while acknowledging the location of these zones within the wider rural area and the landscape values, in particular an emphasis on maintaining landscape quality, with particular regard to proposals for development of a greater intensity or scale than that anticipated by the existing provisions.
- To protect the amenity for residents within the zone from adverse effects activities which are not anticipated such urban-density subdivision, industrial or commercial activities.

Proposed provisions	***Costs***	***Benefits***	***Effectiveness & Efficiency***
Policies: 15.3.1.1 – 15.3.1.7 (inclusive) 15.3.2.1- 15.3.2.4	***Environmental*** ***Economic*** The provisions will have the potential to constrain industrial or commercial activities in the zones.	***Environmental*** The provisions will better protect the zones and surrounding rural areas from ad-hoc urban density subdivision and commercial development.	The proposed provisions introduce clearer parameters for permitting anticipated activities, while providing direct policies to gauge the appropriateness of non-residential or

(inclusive) **Rules:** 15.4.3.1, 15.4.3.2, 15.4.3.3 15.4.3.5 – 15.4.3.16 (inclusive). 15.4.1 - 15.5.31 (inclusive)	***Social & Cultural*** The permitted activities relating to Home Occupations has been widened, potentially increasing adverse effects on amenity, to a small degree on surrounding persons.	***Economic*** The provisions provide more certainty for the Council and persons contemplating activities in the zones. Would protect the landscape resource which the District relies on for tourism. ***Social & Cultural*** Maintaining the District's landscapes within the Rural Residential and Rural Lifestyle zones will provide for peoples well-being by not degrading these landscapes. Protecting the residential based amenity of inhabitants from the effects associated with commercial activities.	farming activities, or activities that can have a significant impact on amenity. Introducing reference to landscape policy gives effect to the strategic directions chapter and enables consideration of activities within the Rural Residential and Rural Lifestyle zones that may affect the Districts landscape resource.
Alternative options considered less appropriate to achieve the relevant objectives and policies:			
Option 1: Amend the majority of the rules including the residential density standards.		• *The residential density of the Rural Residential zone enables subdivision and the establishment of a residential unit generally at a density of one dwelling per 4000m² area. The resultant outcome is essentially a 'large lot urban' pattern of subdivision and development. Further lowering the density standards would protect landscape values from subdivision and development. However, this would constrain growth and development which is anticipated to occur.* • *The type and scale of non-residential activities which require resource has not substantially changed, however the rule structure has clarified what activities require consent and the policies make it clearer what types of non-commercial activities may be appropriate. There is not considered the need to make non-residential activity either more permissive or constrained, but to better identify the appropriateness of these activities bu providing more thorough policy to assess the merits of proposals.*	

Issue 2: Effective and efficient resource management. The zones anticipate residential development but there are too many resource consents required for residential activity in the zones.

Objective 1: Maintain and enhance the district's distinctive landscapes while enabling rural living opportunities in areas that can avoid detracting from those landscapes.

Summary of proposed provisions that give effect to this objective:

- To permit residential buildings subject to bulk, location and colour controls

Proposed provisions	***Costs***	***Benefits***	***Effectiveness & Efficiency***
Policies: 15.3.1.1 to 15.3.1.7. **Rules:** 15.4.3.1 – 15.4.3.3 (inclusive) 15.4.4.1, 15.4.4.3, 15.4.4.6	***Environmental*** Council will no longer have control over aspects associated with the development such as 'nature conservation values', landscape plans and control on the 'external appearance' of buildings, only the colour to control the degree of visual prominence. Potential for large buildings to be built, increasing the visual prominence of buildings. ***Economic*** Potential for higher costs with subdivision that previously as any mitigation required for landscaping would be focused at this stage, as opposed to leaving it for individual future allotment owners. ***Social & Cultural*** Potential for effects on neighbouring	***Environmental*** Permitting a range of reasonably conservative colours (20% LRV pre-finished steel and roofs, 30% LRV all other surfaces) will encourage applicants to utilise colours within this range to avoid resource consents. Utilising these colours would result in less prominent buildings than the status quo which may accept a building within the QLDC's generic guidelines of 36%, but still open to scrutiny depending on the location and sensitivity of the landscape. More emphasis for landscaping requirements to be at the time of subdivision. This would promote more integrated landscaping that would be responsive to the sensitivity of the surrounding landscape and whether any mitigation is required. Any more conservative controls imposed on a site by a subdivision consent notice will still apply, thus ensuring location specific landscaping requirements are provided for.	The proposed provisions will replace the need for a resource consent by permitting buildings within a range of controls to ensure that anticipated development would maintain landscape values. The ability to build as a permitted activity significantly increases efficiency while permitted activities will be effective at achieving objectives and policies to maintain landscape values.

	owners of some properties due to the reduction of control.	***Economic*** Reduced costs for applicants through resource consents and monitoring fees. Reduced cost for the Council through resource District Plan administration, including the requirement for development engineering staff to prepare RMA style reports on servicing. Removal of the potential for a 'double up' of processing where the existing controlled activity, matters of control for servicing (water supply, wastewater and stormwater) can be controlled via the building consent. Less delays in the overall build time and cost and more certainty for prospective development. ***Social & Cultural*** More certainty for applicants. Emphasis on landscaping applied at the time of subdivision to mitigate effect of infrastructure and future buildings. More certainty for future landowners with regard to landscaping expectation.	
Alternative options considered less appropriate to achieve the relevant objectives and policies:			
Option 1: Provide for residential buildings as a permitted activity but with less development controls, permitting a higher range of colours.		• *Would not be likely to maintain landscape values and could be at odds with the strategic direction goals.* • *Potential for reduced amenity of establishing and existing neighbourhoods.*	

Option 2: Require a landscape plan to be submitted with applications.	• *Too subjective, uncertain and difficult to apply as a rule that could be reasonably efficient to interpret and administer.*

Issue 4: Some of the Rural Residential and Rural Lifestyle zones have been developed to an urban-density and are located within the identified urban growth limits. This has created an inefficient resource management regime.

Objective 1: Maintain and enhance the district's distinctive landscapes while enabling rural living opportunities in areas that can avoid detracting from those landscapes.

Objective 2: Ensure the predominant land uses are rural, residential and where appropriate, community activities.

Objective 4: Ensure new development does not exceed available capacities for servicing and infrastructure.

Summary of proposed provisions that give effect to these objectives:

- Remove the Rural Residential and Rural Lifestyle zoning that applies to these sites.

Proposed provisions	***Costs***	***Benefits***	***Effectiveness & Efficiency***
Not Applicable	***Environmental*** None, the potential impacts are established. ***Economic*** ***Social & Cultural***	***Environmental*** The environment of these areas does not reflect the anticipated environmental outcomes of the zone. Removing these areas from the rural residential and rural lifestyle zones will enhance the integrity of the District Plan. ***Economic*** Reduced costs and complexity for relatively minor resource consents for anticipated activities within this zone. ***Social & Cultural***	The new urban zoning would better reflect development that has occurred in these areas or is anticipated to occur. Remove multiple layers of complexity and unwieldy district plan administration.

		Certainty and confidence in the District Plan zones.	
Alternative options considered less appropriate to achieve the relevant objectives and policies:			
Option 1: Retain zoning.		• *Would maintain existing status of complexity of the District Plan rules.* • *Would potentially erode the integrity of the proposed provisions and the strategic direction goals.*	

<u>Issue 5: Managing development with Natural hazards</u>

Objective 3: Manage new development and natural hazards

Summary of proposed provisions that give effect to these objectives:

- Retention of the operative District Plan rule requiring a controlled activity resource consent for development in Makarora.
- Section 106 of the RMA to assess the adequacy of proposals against natural hazards at the time of subdivision.
- Sections 95 and 104 of the RMA to assess the adequacy of proposals against this objective and policies.

Proposed provisions	***Costs***	***Benefits***	***Effectiveness & Efficiency***

Policies: 15.3.3.1 **Rules:** 15.4.3.4, 15.4.4.7.	***Environmental*** Natural hazard mitigation work may have impacts on landscape and natural topography and vegetation. ***Economic*** May restrict development in certain areas. May increase the costs of resource consent applications to provide design and mitigation with regard to the potential for natural hazards ***Social & Cultural*** None identified. The existing provisions are in place.	***Environmental*** ***Economic*** Reduced costs associated with building repair or replacement in the case of a natural hazard occurring. ***Social & Cultural*** Provide for the safety and wellbeing of people, in particular future owners of properties.	The proposed objective and policy does not arbitrarily constrain development rights. The provisions recognise the natural hazard potential which exists within multiple areas throughout the zones and provides the council with the discretion to apply the policy.
Alternative options considered less appropriate to achieve the relevant objectives and policies:			
Option 1: Contain rules that require a resource consent in any area identified on the Councils natural hazard register.		• *May unnecessarily constrain development where the hazard information may have been addressed by the subdivision which created the property.*	

<u>Issue 6: Existing issues stated in the operative District Plan providing for specific locations including, Deferred and Buffer Zones, Ferry Hill, Forest Hill, Bob's Cove, and form of development within the Makarora Valley are still valid resource management issues.</u>

Objective 6: Bob's Cove Rural Residential sub-zone – To create comprehensively-planned residential development with ample open space and a predominance of indigenous vegetation throughout the zone.

Objective 7: Bob's Cove Rural Residential Zone - To maintain and enhance the ecological and amenity values of the Bob's Cove Rural

Residential zone.

Summary of proposed provisions that give effect to these objectives:

- Existing rules applying to development in the Bob's Cove Rural Residential and sub-zone.

Proposed provisions	***Costs***	***Benefits***	***Effectiveness & Efficiency***
Policies: 15.3.1.7 15.6.1 – 15.7.2. Rules: 15.4.3.1, 15.4.3.4, 15.4.3.5, 15.4.3.6, 15.4.3.7, 15.4.3.8, 15.4.3.10 – 15.4.3.15. Standards Tables 2 and Standards Table 2 to 6.	***Environmental*** ***Economic*** Potential higher costs for developers at the time of subdivision to undertake landscape design, however this already exists within the provisions. ***Social & Cultural***	***Environmental*** Higher level of control reflects the more visually sensitive location. ***Economic*** ***Social & Cultural***	The existing provisions could be more efficient, however they are not so poorly phrased to the point the point they are not able to be interpreted, administered and enforced. The provisions affect a small part overall of the zones and not substantially modifying the provisions is considered the most efficient and effective option in this case.
Alternative options considered less appropriate to achieve the relevant objectives and policies:			
Option 1: Remove provisions to emulate the 'general' Rural Lifestyle zone		• *It is established these areas are a special case and require a higher level of intervention.*	

Issue 7: Managing the effects of rural activities.

Objective 5: Manage situations where sensitive activities conflict with existing and anticipated rural activities

Summary of proposed provisions that give effect to these objectives:

- Policy 15.3.5.1 to recognise anticipated and existing rural activities, distinguishes the concept of 'reverse sensitivity' from rural amenity.
- Non-complying activity resource consent for commercial activities
- Discretionary activity resource consent for visitor accommodation outside a visitor accommodation sub-zone.
- Minimum setback of buildings from roads and internal boundaries.
- Rural Lifestyle zone: Discretionary activity resource consent to identify a building platform (which has not been previously identified as part of a controlled activity subdivision).
- Rural Residential Zone: Density controls

Proposed provisions	***Costs***	***Benefits***	***Effectiveness & Efficiency***
Policies: 15.3.5.1 **Rules:** 15.4.3.1, 15.4.3.2, 15.4.3.6, 15.4.3.7, 15.4.3.8, 15.4.3.12, 15.5.4, 15.5.5.	***Environmental*** None identified ***Economic*** May constrain some commercial and residential developments on less expensive rural land that may be subject to effects from rural activities. ***Social & Cultural*** None identified	***Environmental*** Promotes the separation of activities from farming activities where required. ***Economic*** Would not constrain farming activities. ***Social & Cultural*** Protects future inhabitants from being subject to reverse sensitivity.	The existing rules are in place, the changes distinguish the issue of activities locating near existing and anticipated farming activities that may have an adverse effect. The changes increase the effectiveness at protecting anticipated farming activities and increase efficiency with regard to District Plan administration.

Alternative options considered less appropriate to achieve the relevant objectives and policies:

Option 1: require greater separation between farming and residential activity.	• *The existing controls are effective, as are the controls on factory farming and dairy farming in the Rural zone.*

8. Efficiency and effectiveness of the provisions

The above provisions are drafted to specifically address the resource management issues identified with the current provisions, and to enhance those provisions that already function well. A number of areas of the existing chapter have been removed to aid the readability of the Plan by keeping the provisions at a minimum, whilst still retaining adequate protection for the resource.

By simplifying the objectives, policies and rules (the provisions), the subject matter becomes easier to understand for users of the Plan both as applicant and administrator (processing planner). Removal of technical or confusing wording, also encourages correct use. With easier understanding, the provisions create a more efficient consent process by reducing the number of consents required and by expediting the processing of those consents.

9. The risk of not acting

There is the opportunity to rollover many of the existing provisions. This may also be improved by some minor amendments to the provisions in response to the resource management issues raised. Neither of these approaches reflect the current changing nature of the RMA with its drive to simplify and streamline. The District Plan is a forward planning mechanism and the opportunity to make bold changes in order to make a more noticeable difference. Not taking the more compact approach to this section and others, will not advance the usefulness of the District Plan in pursuit of its function in the sustainable management of natural and physical resources.