

Proposed Intensification Planning Instrument for the Upper Hutt City District Plan

Section 32 Evaluation Report

VOLUME 2: RESIDENTIAL ZONES

Upper Hutt City Council
July 2022

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1 Introduction

This report has been prepared to fulfil the obligations of Upper Hutt City Council (UHCC) under section 32 of the RMA, with respect to undertaking a Plan Change to the Operative Upper Hutt District Plan (District Plan). This report should be read together with the text of the District Plan itself and the Proposed Plan Change.

This volume of the section 32 evaluation report relates to the proposed changes to the residential zones as well as consequential changes.

1.1 Incorporation of the MDRS

Section 80H requires the IPI to identify how the MDRS has been incorporated in the district plan. These requirements are met via the use of notes beneath relevant provisions in the IPI (in green text). The notes do not form part of the IPI and will be removed under section 80H(2)(b) of the RMA once the IPI becomes operative. These notes often sit alongside other notes that identify provisions that will have immediate legal effect from notification¹.

Because of the mandatory directions of the IPI to include MDRS provisions, a section 32 evaluation of the MDRS provisions has not been undertaken.

2 Objectives

2.1 Appropriateness of Objectives

Section 32(1)(a) of the RMA requires that the evaluation report examine the extent to which the objectives of the proposal are the most appropriate way to promote the sustainable management of natural and physical resources.

The RMA requires the Council to insert the following MDRS objectives into the General Residential Zone and High Density Residential Zone chapter of the District Plan:

Objective 1

- a. *a well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future:*

Objective 2

- b. *a relevant residential zone provides for a variety of housing types and sizes that respond to—*
 - (i) *housing needs and demand; and*
 - (ii) *the neighbourhood's planned urban built character, including 3-storey buildings.*

As these objectives are mandatory there is no need to examine them or identify any reasonable alternatives. Central government has presumably considered the requirements of section 32 of the RMA before deciding on the wording of the objectives and making them

¹ Subject to determinations under sections

mandatory within all relevant residential zones of Tier 1 local authorities. Consequently a section 32 evaluation has not been undertaken with regards to these provisions.

While not specifically required under section 32, it is appropriate to also consider alternative objectives to those currently included in the Proposed District Plan, so as to ensure that the proposed objective(s) are the most appropriate to achieve the purpose of the RMA.

For the purposes of this evaluation, the Council has considered two potential objectives:

1. The proposed objective
2. The current most relevant objective - the status quo

This evaluation is provided in the table below.

Proposed objectives UDF-O3, SUB-RES-O1, SUB-HRZ-O1, SUB-HRZ-O2, and GRZ-O1

UFD-O3

*The **High Density Residential Zone** provides for higher density housing types and sizes that respond to:*

1. *Identified housing needs and demand.*
2. *The proximity and walkability to the following train stations and zones:*
 - (i) *Silverstream Station*
 - (ii) *Heretaunga Station*
 - (iii) *Trentham Station*
 - (iv) *Wallaceville Station*
 - (v) *Upper Hutt Station*
 - (vi) *City Centre Zone*
 - (vii) *Town Centre Zone*
 - (viii) *Local Centre Zone*
 - (ix) *Neighbourhood Centre Zone*
3. *The planned urban built character of the zone including buildings up to 8 storeys.*

UFD-O4

***Qualifying matters** continue to be provided for via **qualifying matter areas** to:*

- (i) *ensure the ongoing recognition and provision for Matters of National Importance under Section 6 of the RMA;*
- (ii) *give effect to national policy statements;*
- (iii) *ensure the safe and efficient operation of nationally significant infrastructure; and*
- (iv) *open space is provided for public use.*

SUB-RES-01 *The management of the adverse effects of subdivision within the General Residential Zone.*

SUB-HRZ-01 *High quality urban infrastructure is constructed to facilitate the demands of urban intensification and highly walkable urban environments.*

SUB-HRZ-02 *High quality Intensive residential development is provided in close proximity to rapid transport stops, community facilities and commercial activities in multi-storey flats and apartments.*

GRZ-01 *The promotion of a high quality residential environment which acknowledges the physical character of the residential areas; and provides a choice of living styles and types while recognising that character and amenity values develop and change over time.*

General intent

Objective UDF-O3 is an urban form and development objective within the Strategic Direction chapter that outlines the purpose of the proposed High Density Residential Zone, how it has been identified, and an indication of the type of planned urban built character within the zone.

Objective UFD-O4 is an objective that outlines the purpose of the qualifying matters that are to continue to apply within the zones affected by the IPI.

objectives SUB-HRZ-01 and SUB-HRZ-02 are two proposed new objectives outlining the intent of the proposed High Density Residential Zone.

Objectives SUB-RES-01 and GRZ-01 include amendments to these existing objectives to give effect to the NPS-UD and the MDRS objectives and policies, particularly with regard to the consideration of amenity values under NPS-UD Policy 6.

Other potential objectives

Status quo: There is no other potential objective as the High Density Residential Zone is not currently a zone within the District Plan. This is a new objective setting out how the proposed new High Density Residential Zone has been identified, and the outcomes for housing types provided for in the zone.

The status quo would see the High Density Zone policies and rules unsupported by an appropriate objective.

The status quo objectives SUB-RES-01 and GRZ-01 place emphasis on existing amenity values that is inconsistent with the direction of NPS-UD Policy 6.

Alternative: No reasonable alternative has been identified.

	Proposed objectives	Status quo
	<p>The proposed objectives achieve the purpose of the RMA as they support the inclusion of a new High Density Residential Zone that will enable a greater number of people and communities to provide for their social, economic, and cultural wellbeing through the provision of higher density housing within appropriate areas within the City. They objectives will also give correct recognition to the direction of the NPS-UD objectives and policies, and will ensure the district plan continues to recognise and provide for section 6 RMA matters of national importance, and other important matters as existing qualifying matters.</p>	<p>The status quo would be to not include the proposed objectives or amendments to existing objectives. This would not achieve the purpose of the RMA as it would not set out the outcomes for the proposed High Density Residential Zone, and it would leave the proposed policies and rules unsupported by an outcome statement for the High Density Residential Zone. The status quo would also leave the objectives directing a focus on existing amenity values and qualifying matters that is inconsistent with the direction of the NPS-UD.</p>
Addresses a relevant resource management issue	<p>The proposed objectives address the provisions of higher density housing within appropriate locations in the City. This will support the provision of a wider variety of housing typologies, sizes and affordability levels in the City compared to the status quo. The objectives also align the direction of how existing amenity values and qualifying matters are to be considered with that of the NPS-UD.</p>	<p>Does not address the provision of higher density housing within appropriate locations in the City. Does not align objectives with the direction for the consideration of existing amenity values with the NPS-UD.</p>
Assists the Council to undertake its functions under section 31 of the RMA.	<p>The objective directly assists the Council in meeting its functions under section 31(1)(aa) to establish, implement, and review objectives to ensure that there is sufficient development capacity in respect of housing land to meet expected demands of the City. They also directly assist in the Council in meeting the requirements of section 31(1)(b)(i) and (f) with respect to:</p> <ul style="list-style-type: none"> • The avoidance or mitigation of natural hazards; and • The requirement for the district plan to give effect to a national policy statement (e.g. the NPS-ET). 	<p>Fails to assist the Council in meeting section 31(1)(aa), (b)(i) and (f) functions.</p>

Gives effect to higher level documents	The proposed objectives meet the requirements of the NPS-UD by aligning the direction of future growth of the City to that consistent with the objectives and policies of the NPS-UD, while ensuring the on-going legal effect and applicability of existing qualifying matters. The proposed objectives are consistent with and gives effect to all relevant higher level planning documents.	Fails to adequately give effect to the NPS-UD.
Consistent with identified tangata whenua and community outcomes	The proposed objectives give effect to the NPS-UD and MDRS. On this basis tangata whenua and community outcomes are a secondary consideration. However, housing affordability is an important issue that is identified as a vision within the Council's Affordable Housing Strategy as follows: <i>All Upper Hutt residents are well-housed, and have access to adequate, affordable housing that meets their need.</i> The intent of the NPS-UD and MDRS are to enable more permitted activity housing, at greater densities than the status quo.	The status quo is not delivering the level of housing affordability needed. This is identified in the Council's updated HBA.
Realistically able to be achieved within the Council's powers, skills and resources	It is a mandatory requirement to ensure the objectives give effect to the requirements of the NPS-UD and the MDRS.	It is not a realistic option to retain the status quo objectives as they do not adequately give effect to the NPS-UD or MDRS.
SUMMARY		
The proposed objectives are the most appropriate means to achieve the purpose of the RMA as they ensure the housing outcomes within relevant residential zones give effect to the requirements of the NPS-UD and the MDRS. This will enable more people and communities to provide for their social, economic, environmental, and cultural wellbeing. The objectives will also ensure the on-going recognition and provision for the management of significant risks from natural hazards (RMA section 6(h)).		

Proposed papakāinga objectives PK-01 – PK-07

PK-01 Papakāinga – Papakāinga are a Taonga

To provide for traditional **papakāinga**, which are a **taonga** that:

- (i) empower and enable **tangata whenua** to live on their **ancestral land**;
- (ii) provide for **tangata whenua** to maintain and enhance their traditional and cultural relationship with their **ancestral land**; and

(iii) are developed and used in accordance with **tikanga Māori**, while recognising that **papakāinga** may develop their own **tikanga**.

PK-02 Papakāinga – Kia ora te mauri o te Whānau (Māori living as Māori)

Oranga is central to a thriving whānau/hapū/iwi. **Tangata whenua** are supported to ensure they can thrive as a Māori community living on and around their **papakāinga**.

To provide for **papakāinga** development that achieves:

- (i) a place where kaupapa and **Tikanga Māori** are in the ascendant;
- (ii) affordable, warm, dry and safe housing for **tangata whenua**;
- (iii) security of tenure, connection and participation for **tangata whenua** in their community; and
- (iv) access to the services needed by **tangata whenua** to sustain their housing.

PK-03 Papakāinga – Provide for the sustained occupation of ancestral land

To provide for the sustained occupation of **ancestral land** by **tangata whenua**, through **papakāinga** development that provides for the land to be held and managed for the benefit of current and future generations.

PK-04 Papakāinga – Provide for the development of land owned by Tangata Whenua

To provide for the connection between **tangata whenua** and their **ancestral land** through providing for the development of **papakāinga** on land owned by **tangata whenua**.

PK-05 Papakāinga – Working in partnership with Tangata Whenua to exercise their Tino Rangatiratanga

To work in partnership with **tangata whenua** to exercise their **tino rangatiratanga** through the development of **papakāinga**, by providing maximum flexibility for **tangata whenua** to develop and live on their **ancestral land**, within the limitations of the site.

PK-06 Papakāinga – Increasing the visibility of Tangata Whenua through the design of papakāinga

To increase the visibility of **tangata whenua** through **papakāinga** design that is led by **tangata whenua** and guided by **tikanga Māori**.

PK-07 Papakāinga – Implementing Te Ao Māori and demonstrating Kaitiakitanga in papakāinga development

To protect and enhance ecological, cultural and environmental and indigenous values through the design, development and use of **papakāinga**.

General intent

This suite of objectives outline how papakāinga is to be enabled and provided for in the City. The intent of the objectives is to enable and provide for tangata whenua to maintain and enhance their traditional and cultural relationship with their ancestral land, including through enabling the development of papakāinga.

Other potential objectives

Status quo: The status quo objectives are silent on papakāinga.

The status quo would see continue to see the district plan not directly referring to or providing for papakāinga.

Alternative: No reasonably practicable alternatives have been identified.

	Proposed objective	Status quo
	<p>The proposed objectives meet the purpose of the RMA through:</p> <ul style="list-style-type: none"> (i) enabling tangata whenua to provide for their social, economic, and cultural well-being and for their health and safety while avoiding, remedying, or mitigating any adverse effects of activities on the environment. (ii) recognising and providing for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga. (iii) Taking into account the principles of the Treaty of Waitangi, by partnering with Māori in the development of the objectives to support papakāinga. 	<p>The status quo goes part way to achieving the purpose of the RMA through:</p> <ul style="list-style-type: none"> (i) Enabling tangata whenua to provide for their social and economic wellbeing via providing for general housing, which is needed by all people. <p>The status quo does not achieve the purpose of the RMA as it:</p> <ul style="list-style-type: none"> (ii) Although the existing district plan provides a generic catch-all consent path for papakāinga, the objectives fail to provide for the provision of housing in a way that provides for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga.
Addresses a relevant resource management issue	Enabling people (that includes tangata whenua) to provide for their social, economic, and cultural well-being and for their health and safety while avoiding, remedying, or mitigating any adverse effects of activities on the environment is a matter of national importance under section 6 of the RMA.	Does not specifically address enabling tangata whenua to provide for their social, economic, and cultural well-being and for their health and safety in a way that is any different to non-Maori. This approach does not specifically address the issue of papakāinga as a component of the cultural wellbeing of tangata whenua.
Assists the Council to undertake its functions under s31 RMA	Enabling papakāinga across most areas in the City will assist the Council in meeting its section 31(aa) functions by establishing objectives, policies and methods to contribute toward providing for sufficient development capacity	Does not specifically enable papakāinga across most areas in the City. The status quo objectives will not assist the Council in meeting its section 31(aa) functions, as it leaves an unfilled gap for the provision of a

	for housing to meet expected demand in the City.	traditional and cultural-specific form of housing in the City.
Gives effect to higher level documents	Gives effect to NPS-UD objectives 1, 4, and 5 through: <ul style="list-style-type: none"> (iii) Enabling tangata whenua (as a component of 'all people and communities') to provide for this social, economic and cultural wellbeing now and into the future. (iv) The objectives enable changes to the amenity values within the City through the provision of Papakāinga in response to the diverse and changing needs of people, communities and future generations. (v) The objectives take into account the principles of the Treaty of Waitangi. 	Does not give effect to NPS-UD requirements. Fails to give adequate acknowledgement or provision for tangata whenua to provide for their social, economic and cultural wellbeing that papakāinga contributes toward.
Consistent with identified tangata whenua and community outcomes	There are no documents recognised by iwi authorities lodged with the Council. There is very little outside of the RMA and NPS-UD that specifically identifies papakāinga as a tangata whenua or community outcome at a local level. The objectives are generally consistent with the following outcome of the Affordable Housing Strategy: <i>Upper Hutt has a well-functioning housing system that supports sustainable, resilient and connected communities.</i>	Due to the lack of identified tangata whenua or community outcomes for papakāinga in the City, the status quo is more consistent with identified outcomes, but less consistent with the direction of the RMA and other statutory planning documents.
Realistically able to be achieved within the Council's powers, skills and resources	The suite of objectives is supported by a package of policies and rules that will enable and provide for papakāinga within most areas of the City. The provisions give effect to the RMA and higher-level statutory documents and will be able to be monitored and enforced in the same manner as any other activity authorised or managed under the district plan.	Status quo has many years of being achieved within the Council's powers, skills and resources – however they fail to identify, provide for and manage papakāinga specifically.
SUMMARY		

The proposed papakāinga objectives are the most appropriate means to achieve the purpose of the RMA as they recognise and provide for the social, economic and cultural wellbeing of tangata whenua now and into the future. The objectives also take into account the Treaty of Waitangi through recognising and providing for a degree of self-determination by Māori through the recognition of tino rangatiratanga. The objectives recognise and provide for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga, in accordance with RMA section 6(e), demonstrate particular regard has been had to kaitiakitanga in accordance with section 7(a), and take into account the principles of the Treaty of Waitangi in accordance with section 8.

Proposed Indigenous Biodiversity Precinct Objectives SUB-RES-O3, and GRZ-PREC1-O1

SUB-RES-O3 *To encourage the maintenance of indigenous biological diversity values within the Indigenous Biodiversity Precinct.*

GRZ-PREC1-O1 *The maintenance of indigenous biological diversity values within the Indigenous Biodiversity Precinct is encouraged.*

General intent

The intent of these objectives is to encourage the maintenance of indigenous biological diversity values within the Indigenous Biodiversity Precinct.

Other potential objectives

Status quo: The existing objectives of the district plan are not given effect to via provisions on urban environment allotments. Therefore, the existing objectives do not apply to residential subdivision and development on urban environment allotments. As the proposed objectives seek to encourage, rather than require any specific actions to retain indigenous biodiversity, the retention of the status quo is a reasonably practicable option.

Alternative: Status Quo - Do not include the proposed objectives. Completely leave the issue of the protection of significant indigenous vegetation and significant habitats of indigenous fauna on urban environment allotments, including any encouragement objectives, to a future plan change.

	Proposed objective	Status quo
	<p>The proposed objectives go part way to meet the purpose of the RMA by identifying the presence of areas of significant indigenous vegetation and habitats on urban environment allotments and encouraging the maintenance of indigenous biodiversity values when proposing development.</p> <p>This encouragement falls short of the protection needed for these sites under section 6(c) of the RMA, but it does identify the presence of these significant sites</p>	<p>The status quo objectives do not achieve the purpose of the RMA as they do not link with any methods that ensure section 6(c) vegetation and habitats are protected on urban environment allotments.</p>

	<p>and demonstrates the Council is aware of their presence and the need to meet the function to maintain indigenous biodiversity under section 31 of the RMA.</p> <p>The proposed objectives are a method to raise awareness and require consideration of the maintenance of indigenous biodiversity until the Council notifies a specific plan change to identify and protect the identified areas.</p>	
Addresses a relevant resource management issue	<p>Partially addresses a relevant resource management issue. Significant indigenous vegetation and habitats are a matter of national importance under section 6(c) of the RMA.</p> <p>The RPS requires the Council to identify and protect the significant indigenous vegetation and habitats identified within the proposed precinct.</p> <p>The district plan is required to give effect to the RPS.</p>	Does not address the protection of significant indigenous vegetation and significant habitats of indigenous fauna on urban environment allotments.
Assists the Council to undertake its functions under s31 RMA	Assist the Council undertake its function to maintain indigenous biodiversity under section 31(1)(b)(iii).	Does not assist the Council undertake its function to maintain indigenous biodiversity under section 31(1)(b)(iii).
Gives effect to higher level documents	In part – a first step in the identification of areas of significant indigenous vegetation and habitats of indigenous fauna on urban environment allotments under RPS Policy 23.	Does not give effect to the requirements of higher level documents to identify and protect significant indigenous vegetation and habitats of indigenous fauna on urban environment allotments.
Consistent with identified tangata whenua and community outcomes	<p>Consistent with the following goal of the Council's Sustainability Strategy 2020: <i>We will prioritise protecting and enhancing our natural environment.</i></p> <p>Consistent with the following goal of the Council's Land Use Strategy 2016-2043: <i>To preserve and enhance the quality of our natural environment.</i></p> <p>Consistent with the following community outcome of the Council's Long Term Plan: TAIAO</p>	The status quo is not consistent with any identified tangata whenua and community outcomes on this issue.

	<i>Environment We're immersed in natural beauty. We care for and protect our river, our stunning parks, and our natural environment.</i>	
Realistically able to be achieved within the Council's powers, skills and resources	The encouragement of the consideration of the maintenance of indigenous biodiversity is achievable within the Council's powers, skills and resources.	The status quo is able to be achieved within the Council's powers, skills and resources.
SUMMARY		
The proposed objectives are the most appropriate means to achieve the purpose of the RMA until the Council progresses a specific plan change to comprehensively address the protection of areas of significant vegetation and significant habitats of indigenous fauna as required by section 6(c) or the RMA and the RPS.		

2.2 Evaluation Of Objectives against the Purpose of the Act

The objectives generally address the following matters in the two residential zones:

- Achievement of a well-functioning urban environment
- Purpose of each residential zone
- Indigenous Biodiversity Precinct
- Enabling papakainga
- Location of intensive residential development
- Housing variety
- Stormwater management systems / hydraulic neutrality

Objective or group of objectives
UFD-O1 Well-functioning Urban Environments
UFD-O2 Purpose of residential zones
UFD-O3 Purpose of High Density Residential Zone
UFD-O4 Qualifying Matters
SUB-GEN-O7 Peak demand on stormwater management systems
Amendments to SUB-RES-O1
SUB-RES-O2 Well-functioning urban environments
SUB-RES-O3 Indigenous Biodiversity Precinct
SUB-HRZ-O1 Well-functioning urban environments
SUB-HRZ-O2 High quality urban infrastructure
SUB-HRZ-O3 Location of intensive residential development
Seven new objectives in the Papakainga chapter
Amendments to GRZ-O1
GRZ-O2 Well-functioning urban environments
GRZ-O3 Housing variety
GRZ-O4 Stormwater management systems
GRZ-PREC1-O1 Indigenous Biodiversity Precinct
HRZ-O1 Well-functioning urban environments
HRZ-O2 Housing variety
HRZ-O3 Hydraulic neutrality
HRZ-O4 High Density Residential Zone
Evaluation of objectives

Part 2 RMA	Comment
Section 5 Purpose	<p>The proposed objectives achieve the purpose of the RMA as they promote the sustainable management of natural and physical resources.</p> <p><u>Well-functioning urban environment</u></p> <p>There are a number of objectives to be inserted in various locations in the District Plan which seek to achieve a well-functioning urban environment. As set out in the NPS-UD, a well-functioning urban environment at a minimum enables a variety of homes to meet the needs of different households, Māori to express their cultural traditions and norms, a variety of sites suitable for different business sectors, good accessibility between housing, jobs and other amenities and services. It also seeks to support reductions in greenhouse gas emissions and be resilient to climate change.</p> <p>It is a requirement of the Amendment Act that this objective be included in the IPI. This objective has been included in the Strategic Directions as the residential zones are critical to enabling a well-functioning urban environment for the whole city.</p> <p>This objective achieves section 5 of the Act through four domains, being the built environment, the social environment, the natural environment and the cultural environment. A well-functioning urban environment reflects the context and purpose of its development, meeting the practical, economic, physical, social and cultural needs of all the citizens it serves today and into future generations. A well-functioning urban environment reflects the diversity in society and enables all people and communities to be an integral part of the urban fabric.</p> <p><u>All other amendments to the objectives</u></p> <p>Providing good quality land suitable for a wide variety of residential activities is essential to people and communities providing for their social and cultural needs in accordance with section 5(2).</p> <p>The objectives seeks to achieve a variety of housing types and range of densities that will contribute to housing supply, choice and access to sustainable transport options. The objectives set out the differentiation of the planned built urban form between the relevant zones. This form of development will further support the sustainable management of natural and physical resource through the efficient use of the urban land resource.</p> <p>The design of residential development is important - not only to the quality of private living spaces but residential development also helps create a safer environment with more eyes on the street and public places, and by generally enabling more activity. Residential activities create vibrancy and activity. The location of residential development is important in local access opportunities to live, work and play without needing to travel.</p> <p>Recognising the importance of functional, safe and inclusive residential development will assist people and communities to provide for their social, economic and cultural well-being in accordance with section 5(2) of the Act.</p> <p>Recognising residential activities in the objectives will contribute to housing supply, choice and access to sustainable transport options. Residential activities in existing urban areas will further support the sustainable management of natural and physical resource through the efficient use of the urban land resource, by reducing the need to expand into greenfield land</p>

<p>Section 6 Matters of national importance</p>	<p>Section 6 matters are addressed primarily through existing objectives contained in other parts of the District Plan. Volume 4 Qualifying Matters provides more detail on this, although a brief explanation of the qualifying matters-specific objective is provided below.</p> <p><u>Qualifying matters</u></p> <p>Objective UFD-O4 supports the delivery of well-functioning urban environments by providing the overarching methodology and assurance that important resource management issues such as flood hazards, historic heritage, the protection of significant indigenous vegetation and significant habitats of indigenous fauna, and the safe and efficient operation of nationally significant infrastructure will continue to be managed appropriately to give effect to the purpose of the RMA, including through the recognition and provision of Matters of National Importance under section 5(c), (d), (e), (f), and (h).</p> <p><u>Papakāinga</u></p> <p>However, the definition of well-functioning urban environment in the NPS-UD includes enabling a variety of homes that enable Māori to express their cultural traditions and norms. Therefore, objective UFD-O1 contributes towards recognising and providing for the matter of national importance set out in s6(e) the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga. The objective around residential diversity also provides for a range of dwelling types and densities that could include various forms of papakainga housing.</p> <p>The inclusion of seven new objectives in a newly-created Papakainga chapter will assist Maori to retain their culture and traditions in accordance with section 6(e) of the Act.</p>
<p>Section 7 Other matters</p>	<p><i>(a) kaitiakitanga</i></p> <p>Papakāinga is explicitly enabled in objective PK-O1 through to PK-O7 and this enables Māori to exercise a greater degree of kaitiakitanga on their land compared to how papakāinga is currently provided for under the District Plan.</p> <p><i>(b) the efficient use and development of natural and physical resources</i></p> <p>The proposed objectives explicitly recognise the importance of providing for residential opportunities in the city. Enabling increased residential activity in the existing urban areas will reduce the need to sprawl urban development into greenfield areas. This is further enabled through the proposed High Density Residential Zone that allows for greater heights and densities of urban form within walkable catchments of rapid transit stops and centre zones. This is an efficient use of existing natural and physical resources in accordance with Section 7(b) of the Act. The objectives which seek to achieve a well-functioning urban environment enables a variety of homes to meet the needs of different households, Māori to express their cultural traditions and norms, a variety of sites suitable for different business sectors, good accessibility between housing, jobs and other amenities and services. This constitutes an efficient use and development of resources.</p> <p>The objectives that seek to achieve hydraulic neutrality ensure efficient management of stormwater.</p> <p><i>(c) the maintenance and enhancement of amenity values</i></p> <p>Amenity values will be enhanced the creation of a “well-functioning urban environment”. In order to achieve these outcomes, amenity values will be maintained or enhanced. Amenity is an important contributor to a safe place to live. In addition, the objectives in each zone recognise the amenity values. However, having particular regard to the maintenance and enhancement of the amenity values is constrained by the direction of NPS-UD Policy 3 that specifies how decision makers must consider amenity values when making planning</p>

	<p>decisions that affect urban environments. The wording of all relevant objectives has been considered and amended to ensure they give effect to Policy 3 of the NPS-UD.</p> <p><i>(f) maintenance and enhancement of the quality of the environment</i></p> <p>The quality of the environment will be enhanced through by use of words such as “an attractive place to live” and the creation of a “well-functioning urban environment”. In order to achieve these outcomes, the quality of the environment will be maintained or enhanced.</p> <p>The objectives that seek to achieve hydraulic neutrality ensure maintenance of the quality of the environment by managing stormwater in a way that captures post-development peak runoff so that it does not exceed the pre-development peak flow rate. If a property is hydraulically neutral then the peak flow rate from the site will be the same, or less than, what it was prior to development. This means that the quality of the environment in terms of management of stormwater will be maintained.</p> <p><i>(i) the effects of climate change</i></p> <p>Explicitly enabling increased residential development in the urban environment ensures a compact and liveable city with opportunities to live, work and play. Because it reduces the need to travel by vehicle, there will be a corresponding reduction in greenhouse gas emissions and contributions to climate change. The objectives that seek to achieve hydraulic neutrality also demonstrate particular regard to the effects of climate change as the provisions will assist the Council in addressing the predicted effects of climate change including increased frequency, duration and severity of rain events.</p>
<p>Section 8 Treaty of Waitangi</p>	<p>The definition of well-functioning urban environment in the NPS-UD includes enabling a variety of homes that enable Māori to express their cultural traditions and norms. Therefore, Objective CMU-O1 contributes towards taking account of the principles of Te Tiriti o Waitangi. Community engagement has been generally supportive for intensification in existing urban areas and improving opportunities to increase housing capacity and choice in existing urban areas. Refer to Appendix B for feedback received from iwi.</p> <p>Papakainga is explicitly enabled in objective PK-O1 through to PK-O7 and this enables Maori to express their cultural traditions in accordance with section 8 of the Act.</p> <p>In addition, the achievement of hydraulic neutrality is a matter that is important to iwi and expressed through the Whaitua process.</p>

The proposed objectives are the most appropriate way to achieve the purpose of the Act because:

- The proposed objectives are in line with national best practice and implement national and regional guidance and direction (s5, NPS-UD, MDRS, RPS) by providing for a wide range of activities (including residential and business activities) while also giving clear guidance on intended outcomes for the zones.
- They have regard to the strategies relevant to the development of the urban environment.
- The proposed objectives provide greater certainty to decision makers and plan users.
- While the existing objectives provide some direction, they do not fully reflect the higher level direction of the NPS-UD, and in some instances are inconsistent with NSP-UD requirements.
- The objectives will assist in providing for the economic, social and cultural well-being expressed in section 5 of the Act by supporting the development of the urban environment.
- The proposed objectives will be effective at creating a well-functioning urban environment that meets the needs for people and communities, including by focusing the highest densities in the most appropriate locations.

- The objectives will enable increased residential options and opportunities and enable people and communities to meet their housing needs, including tangata whenua needs via the enablement of papakāinga.

3 Options and Assessment of Provisions

3.1 Introduction

Under section 32(1)(b) of the RMA, reasonably practicable options to achieve the objectives associated with this proposal need to be identified and examined. This section of the report evaluates the proposed policies and rules, as they relate to the associated objectives.

Along with the proposed provisions, the Council has also identified through the research, consultation, information gathering and analysis undertaken in relation to this topic a small number of reasonably practicable alternatives for some of the methods to achieve the objective/s. These reasonably practicable alternatives focus on the components of the IPI that are not mandatory and where an element of discretion has been exercised by the Council to:

- give effect to the MDRS and Policies 3 and 4 of the NPS-UD;
- make consequential amendments that support or are consequential on the MDRS and Policies 3 and 4 of the NPS-UD;
- make consequential amendments that give effect to the direction of Policy 6 of the NPS-UD with respect to the consideration of amenity effects within the relevant zones;
- introduce papakāinga provisions;
- introduce hydraulic neutrality provisions; and
- retain existing qualifying matters.

The technical and consultation input used to inform this process is outlined in Volume 1.

For each potential approach an evaluation has been undertaken relating to the costs, benefits and the certainty and sufficiency of information (informed by the sacel and significance assessment contained in Volume 1) in order to determine the effectiveness and efficiency of the approach, and whether it is the most appropriate way to achieve the relevant objective(s).

The evaluations below consider the methods to achieve the relevant objectives which are grouped under each topic heading.

Any potential reasonable alternatives identified are included and evaluated under each topic in the tables below. Potential alternative options that were considered but discarded are also included, along with the reasons for them being discarded.

3.2 Mandatory Provisions – MDRS

As discussed previously in this evaluation report, assessing the mandatory requirements of the MDRS under section 32 would be a irrelevant exercise. There are no practicable alternatives to inserting the MDRS into all relevant residential zones. The costs, benefits, risks, efficiency, and effectiveness of implementing the MDRS as mandatory subdivision and development standards and requirements have presumably been fully considered by Central Government prior to requiring them to be mandatory for all Tier 1 territorial authorities.

Notwithstanding the above points, the RMA does not include an exception for the evaluation of the MDRS against the requirements of section 32 of the RMA. On this basis a high-level evaluation of the compulsory MDRS provisions is provided below, however it is limited in detail due to the mandatory nature of the provisions, and the fact the costs, benefits, risks, efficiency and effectiveness have already been considered by Central Government. A number of

consequential amendments to other district plan provisions including rules, standards and map overlays are included in this evaluation on the mandatory requirements on the basis that:

1. The amendments are the necessary deletions of provisions (including map overlays) that conflict with the MDRS;
2. Additional rules and standards are necessary to ensure there is a working rule framework to support the mandatory MDRS rules, to manage situations where the requirements of the MDRS rules and standards are not met. These amendments are necessary to ensure that giving effect to the MDRS will result in a functioning district plan that does not create regulatory gaps, omissions, or unanticipated consequences within the rule framework.
3. Consequential amendments that are required across the district plan to support the MDRS.

The consideration of alternative options is not relevant to the requirement to insert the MDRS provisions into the General Residential Zone chapter.

3.3 A well-functioning urban environment

This analysis relates to provisions which achieve the following objectives:

UFD-01 - A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

UFD-02 - *Relevant residential zones provide for a variety of housing types and sizes that respond to*

1. *Housing needs and demand; and*
2. *The neighbourhood's planned urban built character, including 3-storey buildings.*

GRZ-02 Well-functioning Urban Environments

A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

GRZ-03 Housing Variety

A relevant residential zone provides for a variety of housing types and sizes that respond to—

- (i) *housing needs and demand; and*
- (ii) *the neighbourhood's planned urban built character, including 3-storey buildings.*

SUB-RES-02

A well-functioning Urban Environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

The provisions are the mandatory insertion of MDRS into relevant residential zone chapters with consequential and supporting amendments)

Policies	Rules and Standards	Other Methods
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<ul style="list-style-type: none"> • GRZ-P1 • GRZ-P1A • GRZ-P1B • GRZ-P1C • GRZ-P1D • GRZ-P2 • GRZ-P5 • GRZ-P9 • GRZ-P10 • SUB-RES-P1 • SUB-RES-P4 • SUB-RES-P5 • SUB-RTES-P6 	<p>General Residential Zone</p> <ul style="list-style-type: none"> • GRZ-R2 – Residential units per site. • GRZ-R3 – Buildings. • GRZ-R5A – Residential Activities. • GRZ-S3 – Building coverage. • GRZ-S4 – Setbacks. • GRZ-S5 – Outdoor living space (per residential unit). • GRZ-S7 – Building Height. • GRZ-S8 – Height in relation to boundary. • GRZ-S9 – Water-permeable surface. • GRZ-S13 – Number of residential units per site. • GRZ-S14 – Outlook space (per residential unit). • GRZ-S15 – Windows to street. • GRZ-S16 – Landscaped Area. • GRZ-R12 • GRZ-R12A • GRZ-R12B 	<ul style="list-style-type: none"> • Amend provisions across the district plan to support and ensure consistency with the MDRS. • Deletion of all provisions and associated district plan map overlays that conflict with the MDRS. • Insert the following definitions to support the MDRS: <ul style="list-style-type: none"> ○ Accessory building (national planning standards) ○ Driveway ○ Dwelling ○ Entrance strip ○ General Residential Zone ○ Medium Density Residential Standards (MDRS) ○ Net site area (national planning standards) ○ Public street. ○ Qualifying Matter. ○ Qualifying Matter Area. ○ Relevant residential zone. <p>Walkable catchment.</p>
<p>Subdivision in the General Residential Zone</p> <ul style="list-style-type: none"> • SUB-RES-P7 • SUB-RES-P8 • SUB-RES-P9 	<p>Subdivision in the General Residential Zone</p> <ul style="list-style-type: none"> • SUB-RES-R1 • SUB-RES-R2 • SUB-RES-S1 • SUB-RES-R6 	

Evaluation of Preferred Option Against Objectives		
	Costs	Benefits
Environmental	<p>Due to the mandatory nature of the MDRS this evaluation does not evaluate the environmental costs that may result from implementing the MDRS.</p> <p>In some instances, development authorised under the MDRS is likely to result in adverse amenity effects a site-specific basis. Environmental costs were considered by Central Government when deciding to make the insertion of the MDRS mandatory for all tier 1 territorial authorities.</p>	<p>Due to the mandatory nature of the MDRS this evaluation does not evaluate the environmental benefits that may result from implementing the MDRS. Environmental benefits were considered by Central Government when deciding to make the insertion of the MDRS mandatory for all tier 1 territorial authorities.</p>
Economic	<p>Due to the mandatory nature of the MDRS the economic cost benefit analysis commissioned by the Council did not specifically evaluate the economic costs of implementing the MDRS. Economic costs were considered by Central Government when deciding to make the insertion of the MDRS mandatory for all tier 1 territorial authorities.</p>	<p>Greater certainty to plan users due to the district plan not containing regulatory gaps or omissions as a result of inserting the MDRS into the General Residential Zone.</p> <p>Due to the mandatory nature of the MDRS the economic cost benefit analysis commissioned by the Council did not specifically evaluate the economic benefits of implementing the MDRS, but it did evaluate the difference in costs and benefits between the MDRS and the proposed more enabling provisions of the HRZ. Economic benefits were considered by Central Government when deciding to make the insertion of the MDRS mandatory for all tier 1 territorial authorities.</p>
Social	<p>No social costs over and above those already considered by Central Government in making the MDRS have been considered, as there is not ability for the Council to take them into account in this evaluation due to a lack of any alternative options.</p>	<p>As a result of the consequential amendments necessary to insert the MDRS into the General Residential Zone chapter, the community will have a district plan that will function without regulatory gaps or omissions.</p>
Cultural	<p>Due to the mandatory nature of the MDRS this evaluation does not evaluate the cultural costs that may result from implementing the MDRS. Cultural costs were considered by Central Government when deciding to make the insertion of the MDRS mandatory for all tier 1 territorial authorities.</p>	<p>Due to the mandatory nature of the MDRS this evaluation does not evaluate the cultural benefits that may result from implementing the MDRS. Cultural benefits were considered by Central Government when deciding to make the insertion of the MDRS mandatory for all tier 1 territorial authorities.</p>

Economic growth provided or reduced	No specific opportunities for economic growth and employment are identified. Additional residential units that may result from the implementation of the MDRS will add to the rates levied by the Council, however the rates are levied to meet the costs of the Council carrying out its statutory functions.	
Employment opportunities		
Uncertain or insufficient information	The provisions are either mandatory or are consequential to enable the MDRS to function without regulatory gaps and omissions.	
Risk of acting or not acting	On this basis there is sufficient information to act.	
Effectiveness		
The MDRS and supporting provisions have been inserted into the General Residential Zone chapter to ensure they operative in an effective way to achieve the relevant objectives.		
Efficiency		
The provisions have been incorporated into the district plan to ensure they can be applied in an efficient way, while also ensuring any regulatory gaps and omissions that would have resulted from the incorporation of the MDRS into the chapter are also addressed.		
Summary		
This option is the most appropriate approach to achieving the relevant objectives, as it is a compulsory exercise.		

3.4 Extent of zoning

Options considered under this topic are:

1. Option 1: Retaining the existing residential zones and their spatial extent

2. Option 2: Amending the extent of the High Density Residential Zone to include a walkable catchment of centres and rapid transit stops.

Evaluation of reasonably practicable options				
Option	Relevance <i>Is the option related to addressing the resource management issues?</i>	Achievability <i>Can the option achieve the outcome / objective?</i> <i>Is it within council's powers, responsibilities and resources, degree of risk and uncertainty of achieving objectives, ability to implement, monitor and enforce.</i>	Acceptability / Reasonableness <i>How acceptable is this to the community? What are the likely effects on the community – ie widespread or limited</i>	Recommendation
Option 1 – Status quo	Retaining the extent of the zoning does not give effect to the NPS-UD. Retaining the mapped extent would not enable increased residential opportunities or capitalise on the advantages of having increased density of population within walking distance of the city centre. This may lead to greater use of private vehicles, and greater carbon emissions.	The option can partially achieve the objectives. The option is within Council's powers.	The option is largely acceptable to the public as it is what they are familiar with. A reduced mapped extent of the High Density Residential Zone may appeal to property owners who do not wish to see the level of residential development enabled occurring within their area. Conversely, there are other landowners who wish to increase the development potential of their property.	DISCARD This option does not give effect to the NPS-UD by enabling increased housing options in close proximity to urban centres.
Option 2 - amending the pattern and extent of residential zoning	This option gives effect to the NPS-UD by enabling increased housing opportunities and options in close proximity to urban centres.	The option would achieve the objectives. The option is within Council's powers.	There will be mixed views to this option as some parts of the community do not support change, whilst others wish to maximise the development potential of their sites.	RETAIN The mapped extent of the High Density Residential Zone has been created by real-world walking routes and times. Conversely, reducing the mapped extent of the High Density Residential Zone would fail to take advantage

				<p>of the potential environmental benefits of reduced carbon emissions, as high density residential development would not be enabled within all of the most suitable locations within the City.</p> <p>The justification for the mapped extent of the High Density Residential Zone arises from giving effect to NPS-UD Policy 3(c)(i) and (ii), and (d). Therefore, the existing mapped extent is an efficient method to achieve the relevant objectives.</p> <p>Small amendments to the mapped extent of the High Density Residential Zone under this option could result in neutral effects while still achieving the relevant objectives. However, this is dependent on the rationale and physical transition impacts between the High Density Residential Zone and the General Residential Zone. This option could be an effective and efficient method to achieve the relevant objectives, however this would require a case-by-case assessment of each</p>
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				potential amendment to confirm.
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The analysis below relates to the following objectives:

UFD-O3

The High Density Residential Zone provides for higher density housing types and sizes that respond to:

1. *Identified housing needs and demand.*
2. *The proximity and walkability to the following train stations and zones:*
 - (i) *Silverstream Station*
 - (ii) *Heretaunga Station*
 - (iii) *Trentham Station*
 - (iv) *Wallaceville Station*
 - (v) *Upper Hutt Station*
 - (vi) *City Centre Zone*
 - (vii) *Town Centre Zone*
 - (viii) *Local Centre Zone*
 - (ix) *Neighbourhood Centre Zone*
3. *The planned urban built character of the zone including buildings up to 8 storeys.*

HRZ-O1 Well-functioning Urban Environments

A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

SUB-HRZ-O1 Well-functioning Urban Environments

A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

SUB-HRZ-O2 *High quality urban infrastructure is constructed to facilitate the demands of urban intensification and highly walkable urban environments.*

SUB-HRZ-O3 *High quality Intensive residential development is provided in close proximity to rapid transport stops, community facilities and commercial activities in multi-storey flats and apartments.*

The method for achieving the objective is planning maps.

Evaluation of Preferred Option Against Objectives		
	Costs	Benefits
Environmental	Lack of efficient use of the existing urban resource for housing may result in sprawl	Increased housing and population density within walkable catchments of centres and train stations may reduce the use of private vehicles thus leading to reduced carbon emissions in the City.
Economic	There are no economic costs identified.	Increased subdivision and development certainty leading to potentially greater economic investment into residential development and subdivision. Higher population density in close proximity to urban centres may increase spend
Social	Some existing members of the established residential areas where high density residential development is to be enabled may dislike the change in the intensity of residential development and use. A greater number of people living in the same geographical area leads to greater social interactions and this change may potentially result in adverse amenity effects for some.	Less reliance on private vehicles, greater potential for increased use of alternative modes of transport. Social benefits from increased density of living near the centres, including greater access to services
Cultural	No cultural costs identified	A greater range of plan-enabled housing typologies including apartments within walkable catchments of centres and train stations may result in a wider variety of housing that is available to meet the specific needs of all cultures.

Economic growth provided or reduced	The proposed High Density Residential Development provide opportunities for growth of housing stock through enabling greater intensification, and this may result in economic growth through development opportunities being realised by developers, and a greater number of houses being available for purchase and rent.
Employment opportunities	
Uncertain or insufficient information	The most significant uncertainty is unknown quantum or timing of growth.
Risk of acting or not acting	The risk of not acting is that there is insufficient land to accommodate population growth, Lost opportunity to capitalise on the benefits of increased population in appropriate locations such as economic activity and creation of a logical walkable city centre.
Effectiveness	
Amending the spatial extent of the residential zones will be the most effective way to achieve the relevant objectives.	
Efficiency	
The proposed policies and rules under this option are very enabling of increased heights and densities of urban form, resulting in greater development opportunities to provide for a wide variety of housing types.	
Summary	
This option is the most efficient and effective method to achieve the relevant objectives, and strikes an appropriate balance between the requirements of NPS-UD Policy 6(b) and MDRS policies 3 and 4. This option allows for changes to the density of the built form to occur over time and respond to the diverse range of housing needs.	

3.5 Heights and standards for development

This issue considers the most appropriate height for the High Density Residential Zone. The options include:

1. Option 1: The recommended High Density Residential Zone extent but allowing for unlimited heights.

2. Option 2: Maximum height of 20m, with everything above that restricted discretionary activity.

Evaluation of reasonably practicable options				
Option	Relevance <i>Is the option related to addressing the resource management issues?</i>	Achievability <i>Can the option achieve the outcome / objective?</i> <i>Is it within council's powers, responsibilities and resources, degree of risk and uncertainty of achieving objectives, ability to implement, monitor and enforce.</i>	Acceptability / Reasonableness <i>How acceptable is this to the community? What are the likely effects on the community – ie widespread or limited</i>	Recommendation
Option 1 - Unlimited heights	The option would enable increased density of residential development.	<p>This option would achieve the objectives in terms of residential density, but would not result in a well-functioning urban environment.</p> <p>The option is within Council's powers.</p>	<p>Unlimited heights could result in significant adverse effects on surrounding properties with respect to their health and safety (elimination of sunlight access into homes). This would make it more difficult for landlords to meet the requirements of the Residential Tenancies (Healthy Homes Standards) Regulations 2019. It is noted all options that enable greater height and densities carry this risk, but this option results in the greatest risk due to unlimited heights and potential resulting shading effects.</p> <p>The lack of the applicability of the medium and high density design guide to buildings of unlimited height may lead to less attractive and safe streets. Such an outcome would be inconsistent with Objective 1 of the NPS-UD.</p>	<p>DISCARD</p> <p>This option carries the highest level of risk due to the likely unanticipated planning outcomes that may result from enabling unlimited building heights.</p> <p>Site-specific adverse environmental effects would be likely to result on existing and future residents of adjacent properties, and there is no evidential justification or policy requirements from the higher level statutory planning documents that would require or support such adverse effects.</p> <p>This is the least appropriate method to achieve the objectives as it would potentially result in the</p>

			<p>The unlimited heights would also make it difficult to encourage development that achieves attractive and safe streets due to the unlimited heights and the uncertainty of site-specific and general area adverse effects from tall buildings within a residential zone.</p>	<p>greatest level of adverse effects and poor planning outcomes unnecessarily. This option would mean unlimited building heights could be constructed without taking into account whether or not it will result in safe and attractive streets or meet the day-to-day needs of residents. There is no evidential justification for enabling unlimited heights within the High Density Residential Zone</p>
<p>Option 2: Maximum height of 20m, with everything above that restricted discretionary activity</p>	<p>The option would enable increased density of residential development.</p>	<p>This option would achieve the objectives in terms of residential density, and would result in a well-functioning urban environment.</p> <p>The option is within Council's powers.</p>	<p>Buildings proposed to exceed the MDRS would require a resource consent, meaning the design guide would apply. This may lead to better streetscape and safety outcomes compared to enabling for heights greater than the MDRS as a permitted activity.</p> <p>People living within High Density Residential Zones would have greater certainty that development beyond the MDRS height limits would need to appropriately consider streetscape and safety effects, in particular the need to provide passive surveillance of the street. This could result in improved safety and a feeling of safety in public areas.</p>	<p>RETAIN</p> <p>This option will enable greater heights and densities of urban form within walkable catchments of centres and trains stations, while allowing consideration of any effects relative to the scale at which the height is exceeded.</p>

The analysis below relates to the following objectives:

UFD-O3

The High Density Residential Zone provides for higher density housing types and sizes that respond to:

1. *Identified housing needs and demand.*
2. *The proximity and walkability to the following train stations and zones:*
 - (i) *Silverstream Station*
 - (ii) *Heretaunga Station*
 - (iii) *Trentham Station*
 - (iv) *Wallaceville Station*
 - (v) *Upper Hutt Station*
 - (vi) *City Centre Zone*
 - (vii) *Town Centre Zone*
 - (viii) *Local Centre Zone*
 - (ix) *Neighbourhood Centre Zone*
3. *The planned urban built character of the zone including buildings up to 8 storeys.*

HRZ-O1 Well-functioning Urban Environments

A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

HRZ-O2 – Housing Variety

A relevant residential zone provides for a variety of housing types and sizes that respond to—

- a. *housing needs and demand; and*

b. the neighbourhood's planned urban built character, including 3-storey **buildings**.

SUB-HRZ-O1 High quality urban infrastructure is constructed to facilitate the demands of urban intensification and highly walkable urban environments.

SUB-HRZ-O1 Well-functioning Urban Environments

A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

SUB-HRZ-O2 High quality urban infrastructure is constructed to facilitate the demands of urban intensification and highly walkable urban environments.

SUB-HRZ-O3 High quality Intensive residential development is provided in close proximity to rapid transport stops, community facilities and commercial activities in multi-storey flats and apartments.

The methods for achieving the objectives are set out below:

Policies	Rules and Standards	Other Methods
<ul style="list-style-type: none"> • UFD-P1 • UFD-P2 • HRZ-P1 • HRZ-P2 • HRZ-P3 • HRZ-P4 • HRZ-P5 • HRZ-P6 • HRZ-P7 • SUB-HRZ-P1 • SUB-HRZ-P2 • SUB-HRZ-P3 • SUB-HRZ-P4 • SUB-HRZ-P5 • SUB-HRZ-P6 • SUB-HRZ-P7 • SUB-HRZ-P8 	<p>Rules:</p> <ul style="list-style-type: none"> • HRZ-R1 • HRZ-R2 • HRZ-R3 • HRZ-R4 • HRZ-R5 • HRZ-R6 • HRZ-R7 • HRZ-R8 • HRZ-R9 • SUB-HRZ-R1 • SUB-HRZ-R2 • SUB-HRZ-R3 • SUB-HRZ-R4 • SUB-HRZ-P5 • SUB-HRZ-P6 • SUB-HRZ-P7 • SUB-HRZ-P8 • SUB-HRZ-P9 <p>Standards:</p>	<ul style="list-style-type: none"> • All supporting and explanatory text. • Extent of walkable catchment reflected by the boundaries of the High Density Residential Zone identified on the District Plan Maps. • Insert definition for High Density Residential Zone.

	<ul style="list-style-type: none"> • HRZ-S1 • HRZ-S2 • HRZ-S3 • HRZ-S4 • SUB-HRZ-S1 • SUB-HRZ-S2 	
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Evaluation of Preferred Option Against Objectives		
	Costs	Benefits
Environmental	<p>Visual effects resulting from greater building heights.</p> <p>Amenity – shading and privacy effects resulting from increased heights. However, these effects are reduced via the Medium and High Density Design Guide applying to buildings that require resource consent.</p> <p>Potential to place greater loading on infrastructure</p>	<p>Enabling higher buildings may negate the need for urban sprawl if population growth can be accommodated in the existing urban areas through increased density of development</p> <p>The stepped activity status for different heights will allow consideration of any adverse effects including shading and dominance</p>
Economic	<p>There are no economic costs identified.</p>	<p>Increased subdivision and development certainty leading to potentially greater economic investment into residential development and subdivision.</p> <p>Greater population density results in increased economic activity</p>
Social	<p>Some existing members of the established residential areas where high density residential development is to be enabled may dislike the change in the intensity of residential development and use. A greater number of people living in the same geographical area leads to greater social interactions and this change may potentially result in adverse amenity effects for some.</p> <p>Potential for socially unacceptable behaviours if the design of buildings does not adhere to the urban design principles</p>	<p>Increased heights above the MDRS within walkable catchments of centres and train stations means more people will be able to live within a walkable area of services and public transport. Less reliance on private vehicles, greater potential for increased use of alternative modes of transport.</p>

Cultural	No cultural costs identified	<p>Papakāinga is enabled and provided for in within the High Density Residential Zone.</p> <p>A greater range of plan-enabled housing typologies including apartments within walkable catchments of centres and train stations may result in a wider variety of housing that is available to meet the specific needs of all cultures.</p>
Economic growth provided or reduced	The proposed High Density Residential Development provide opportunities for growth of housing stock through enabling greater intensification, and this may result in economic growth through development opportunities being realised by developers, and a greater number of houses being available for purchase and rent.	
Employment opportunities		
Uncertain or insufficient information	<p>MDRS</p> <p>Enabling the heights and densities as permitted development and as-of-right subdivision is largely untested in New Zealand. This increased the risk of unanticipated development outcomes and potential adverse effects that cannot be managed by the plan provisions under the requirements of the MDRS.</p> <p>The proposed objectives, policies and rules have been drafted to give effect to the MDRS, as required by the RMA, however although mandatory to do so there is a degree of uncertainty and risk that adverse planning outcomes may arise on a site-specific or area basis.</p> <p>There is sufficient information on which to base the proposed policies and rules as they give effect to the MDRS, and the potential adverse effects that may arise from this have been considered by Central Government.</p> <p>NPS-UD Policy 3</p> <p>The High Density Residential Zone provisions are more enabling of permitted activity development than required, and this increases the level of risk that poor planning outcomes may occur compared to the option that would require a restricted discretionary resource consent for development that exceeds the MDRS.</p> <p>The Council has decided to place greater weight on NPS-UD provisions that focus on enabling greater heights and densities in appropriate locations to encourage increased housing delivery rather than placing equal weight on provisions that seek to deliver more</p>	

	<p>qualitative aspects of physical development such as safe and attractive streets. This risk is acknowledged, and the uncertainty in outcomes will need to be monitored as development occurs.</p> <p>It is considered there is sufficient information available to implement the provisions, noting the potential risk that the Medium and High Density Design Guide will not apply until resource consent is required for exceeding the enabling High Density Residential Zone provisions.</p>
Risk of acting or not acting	The risk of not acting is that the development potential of the existing urban areas is not optimised and leads to sprawl.
Effectiveness	
<p>This is the most effective option to achieve the relevant objectives as it enables for increased heights within walkable catchments of centres and train stations. The increased heights provided for as a permitted activity will encourage greater investment and development of greater density housing types such as apartments within the most appropriate areas in the City.</p> <p>The consent pathway provided for proposed buildings exceeding 8 stories enables the consideration of effects that may result from such heights. This would be effective at achieving the objectives, as the resource consent process requires decision makers to consider consistency with the objectives and policies for the High Density Residential Zone.</p>	
Efficiency	
<p>The proposed policies and rules under this option are very enabling of increased heights and densities of urban form, resulting in greater development opportunities to provide for a wide variety of housing types. This enabling approach means there is little requirement for RMA regulatory intervention until a resource consent is required. The application of the medium and high density design guide will ensure the Council is meeting the requirements of NPS-UD Objective 1 and MDRS Objective 1, and Policies 3 and 4.</p>	
Summary	
<p>This option delivers the MDRS as intended by the RMA. The enabling approach to allowing greater heights and densities over and above the MDRS within walkable catchments of centres and rail stations will encourage greater densities and a variety of housing typologies in the most appropriate locations of the City.</p> <p>This option is the most efficient and effective method to achieve the relevant objectives, and strikes an appropriate balance between the requirements of NPS-UD Policy 6(b) and MDRS policies 3 and 4. This option allows for changes to amenity to occur over time and in response to the diverse range of housing needs while encouraging development that results in attractive and safe streets, including by providing for passive surveillance and enabling housing to be designed to meet the day to day needs of residents.</p> <p>This option carries the most appropriate balance of costs and benefits to achieve the relevant objectives and Part II of the RMA.</p>	

3.6 Papakāinga Provisions

The options considered under this topic are:

- 1) Option 1: A comprehensive suite of new provisions to enable, provide for and support papakāinga throughout the City as a permitted activity with no standards
- 2) Option 2: Status quo – do not specifically provide for papakāinga.
- 3) Option 3: Either insert additional performance standards for papakāinga or require resource consent for papakāinga.

All three options are considered reasonable alternatives and are evaluated in the table below.

Evaluation of reasonably practicable options				
Option	Relevance <i>Is the option related to addressing the resource management issues?</i>	Achievability <i>Can the option achieve the outcome / objective?</i> <i>Is it within council's powers, responsibilities and resources, degree of risk and uncertainty of achieving objectives, ability to implement, monitor and enforce.</i>	Acceptability / Reasonableness <i>How acceptable is this to the community? What are the likely effects on the community – ie widespread or limited</i>	Recommendation
Option 1: new provisions to enable, provide for and support papakāinga throughout the City with no standards	The option is highly relevant to the objectives.	This option will clearly achieve the objectives by enabling papakainga in all zones with no limitations.	This options is unlikely to be acceptable to the community as it does not manage any effects of development. There is no certainty as to where the development may occur, or what form or density they may be. There is the potential to undermine the centre hierarchy with residential and commercial developments in inappropriate locations.	DISCARD While highly enabling, this option does not allow any effects to be managed.
Option 2: Status quo	There are no specific existing provisions that provide for	This option is the least effective option at achieving the relevant objectives with enabling tangata	This option fails to recognise and provide for the relationship of Māori and their culture and	DISCARD This option is the least appropriate method to

	papakāinga that differentiates it from other housing types.	whenua to establish and live in papakāinga developments on their own land.	traditions with their ancestral lands with respect to being able provide a more culturally traditional way of living. This option is the least efficient at achieving the relevant objectives of enabling tangata whenua to establish and live in papakāinga developments on their own land. Resource consent would generally be required if papakāinga developments breach the permitted activity standards that manage residential use and development.	achieve the relevant objectives as it places the greatest costs on tangata whenua while failing to adequately give effect to NPS-UD Objectives 1 and 3, and Section 6 of the RMA. It provides the greatest certainty in terms of outcomes (as it represents the status quo), however many of the outcomes of the status quo do not give effect to the requirements of the relevant statutory planning documents and the RMA to take into account the principles of the Treaty of Waitangi, and to recognise and provide for the relationship of Māori and their culture and traditions with their ancestral lands.
Option 3: Either insert additional performance standards for papakāinga or require resource consent for papakāinga	This option is similar suite of provisions to those proposed under Option 1 but include additional performance standards or amend the activity status to another category such as controlled or restricted discretionary.	The papakāinga provisions will enable Maori landowners to provide housing that suits their specific requirements. This may include the provision of more affordable types of homes and opportunities for community living that the housing market does not typically deliver.	This approach would be acceptable to the community as it sets standards for development and provides certainty.	RETAIN Although it is clear papakāinga is an anticipated form of development within most zones, resource consent may still be required where the basic building standards are infringed.

The following objectives are relevant:

PK-O1 Papakāinga – Papakāinga are a Taonga

To provide for traditional **papakāinga**, which are a **taonga** that:

- (i) empower and enable **tangata whenua** to live on their **ancestral land**;
- (ii) provide for **tangata whenua** to maintain and enhance their traditional and cultural relationship with their **ancestral land**; and
- (iii) are developed and used in accordance with **tikanga Māori**, while recognising that **papakāinga** may develop their own **tikanga**.

PK-02 Papakāinga – Kia ora te mauri o te Whānau (Māori living as Māori)

Oranga is central to a thriving whānau/hapū/iwi. **Tangata whenua** are supported to ensure they can thrive as a Māori community living on and around their **papakāinga**.

To provide for **papakāinga** development that achieves:

- (i) a place where kaupapa and **Tikanga Māori** are in the ascendant;
- (ii) affordable, warm, dry and safe housing for **tangata whenua**;
- (iii) security of tenure, connection and participation for **tangata whenua** in their community; and
- (iv) access to the services needed by **tangata whenua** to sustain their housing.

PK-03 Papakāinga – Provide for the sustained occupation of ancestral land

To provide for the sustained occupation of **ancestral land** by **tangata whenua**, through **papakāinga** development that provides for the **land** to be held and managed for the benefit of current and future generations.

PK-04 Papakāinga – Provide for the development of land owned by Tangata Whenua

To provide for the connection between **tangata whenua** and their **ancestral land** through providing for the development of **papakāinga** on **land** owned by **tangata whenua**.

PK-05 Papakāinga – Working in partnership with Tangata Whenua to exercise their Tino Rangatiratanga

To work in partnership with **tangata whenua** to exercise their **tino rangatiratanga** through the development of **papakāinga**, by providing maximum flexibility for **tangata whenua** to develop and live on their **ancestral land**, within the limitations of the **site**.

PK-06 Papakāinga – Increasing the visibility of Tangata Whenua through the design of papakāinga

To increase the visibility of **tangata whenua** through **papakāinga** design that is led by **tangata whenua** and guided by **tikanga Māori**.

PK-07 Papakāinga – Implementing Te Ao Māori and demonstrating Kaitiakitanga in papakāinga development

To protect and enhance ecological, cultural and environmental and indigenous values through the design, development and use of **papakāinga**.

The provisions to be assessed include a comprehensive suite of new provisions to enable, provide for and support papakāinga throughout the City:

Definitions	Policies	Rules
<ul style="list-style-type: none"> • Ancestral land • General Title Land (in relation to papakāinga) • Iwi Authority • Papakāinga • Tikanga/ Tikanga Māori • Tino Rangatiratanga • Tipuna/ Tupuna • Whakapapa 	<p>PK-P1 - Providing for papakāinga on Māori owned land.</p> <p>PK-P2 - Papakāinga development to be led by Tangata Whenua.</p> <p>PK-P3 - Location, extent and design of papakāinga.</p> <p>PK-P4 - Maximum scale of papakāinga development.</p> <p>PK-P5 - Non-residential aspects of papakāinga.</p> <p>PK-P6 - Papakāinga Design Guides and Development Plans.</p>	<p>PK-R1 – Permitted Activity rule, with default to Discretionary Activity. Public notification is precluded except where standard (b) is not met.</p> <p>PK-R2 – Restricted Discretionary Activity rule. Public notification is precluded.</p> <p>PK-R3 – Discretionary Activity Rule. Public notification is precluded except where standard (b) of rule PK-R1 is not met.</p>

Evaluation of Preferred Option Against Objectives		
	Costs	Benefits
Environmental	<p>Papakāinga developments may result in different effects on the surrounding environment compared to traditional types of housing.</p> <p>This change in amenity may be considered by some to be undesirable but may also be appreciated by others, including future generations. It is noted such changes in amenity are anticipated to occur when providing for a range of housing types that meets the needs of the community under NPS-UD Policy 6.</p> <p>More communal living typologies such as papakāinga can result in a greater occupancy rate of a site compared to traditional forms of housing on individual sites, and this may result in different amenity</p>	<p>There are no environmental benefits.</p>

	effects on neighbouring properties and others in the surrounding neighbourhood.	
Economic	There are no identified economic growth or employment related costs.	Reduces the cost of housing for tangata whenua as papakāinga will be a permitted activity across the City on ancestral land.
Social	There are no identified social costs associated with this option.	<p>The ability to establish and non-residential aspects of papakāinga such as social, cultural, educational, recreational and commercial activities that are consistent with tangata whenua aspirations for papakāinga and are of a scale, character and intensity that are consistent with Kaupapa, kawa and tikanga Māori will provide potential economic benefits to owners and occupiers of the papakāinga.</p> <p>Potential employment opportunities through establishment and operation of non-residential components of papakāinga.</p> <p>Potential improved economic wellbeing of tangata whenua.</p> <p>Enables the provision of additional housing that is of a type and scale, and affordability that provides housing for a proportion of the community whose housing needs are not being met by the private housing market.</p> <p>Contributes toward well-functioning urban environments as expressed by NPS-UD Objective 1 and Policy 1.</p> <p>Future generations of tangata whenua will benefit from the availability of a more diverse housing typology.</p>
Cultural	There are no identified potential cultural costs associated with this option.	<p>Provides for a more traditional and culturally beneficial type of housing and living arrangement for existing and future generations of tangata whenua in the City.</p> <p>Enables tangata whenua to practice and demonstrate kaitiakitanga and to exercise their rangatiratanga.</p>

		<p>Recognises and provides for the relationship of Māori and their culture and traditions with their ancestral lands.</p> <p>Empowers and enables tangata whenua to live on their ancestral land in housing that is affordable.</p> <p>Enables Māori to express their cultural traditions and norms.</p> <p>Enables Iwi Authorities to work in partnership with the Council in considering and authorising papakāinga on general title land.</p> <p>The expression of traditional cultural social, cultural, educational and recreation activities in association with papakāinga is enabled.</p>
Economic growth provided or reduced	There are opportunities for employment and economic growth through construction and enabling more people to live in the urban environment.	
Employment opportunities		
Uncertain or insufficient information	<p>It is considered that there is certain and sufficient information on which to base the proposed policies and methods as:</p> <p>The proposed suite of provisions ensure papakāinga can be provided to meet the housing and cultural needs of tangata whenua in the City, while requiring all buildings to comply with the relevant zone standards for:</p> <ul style="list-style-type: none"> o Maximum height; o Height in relation to boundary; o Yard setbacks; and o Site coverage. <p>The proposed provisions will manage potential effects on adjoining properties arising from buildings in the same way as non-papakāinga buildings.</p>	

	<p>The ability to publicly notify resource consent applications that propose to exceed the maximum commercial activity gross floor area, to ensure the potential adverse effects on the environment and the centres hierarchy can be appropriately considered and addressed.</p> <p>The ability to establish papakāinga on general title land is a restricted discretionary activity, with a requirement the applicant is a member of one of the three recognised iwi authorities who hold mana whenua in the City. The Council will seek advice from the relevant iwi authority on whether the applicant has demonstrated whakapapa or ancestral connection to the land, and any other matter relating to tikanga Māori. The Council will rely on that advice.</p>
Risk of acting or not acting	<p>The provisions propose to introduce a largely untested and significantly more permissive approach compared to the status quo. The provisions enable non-residential activities as permitted activities, and as such there is a residual risk of potential adverse effects on the environment. This residual risk is addressed via the proposed permitted activity standards specifying the types of non-residential activities that can occur, and through limiting the maximum gross floor area that can be used. The ability to publicly notify resource consent applications that propose to breach the permitted gross floor area is an important component to the provisions that helps reduce this residual risk.</p>
Effectiveness	
<p>Due to the comprehensive and permissive approach proposed by the suite of papakāinga provisions, this option is highly effective at achieving the objectives for providing for papakāinga. The permitted activity status for papakāinga and associated non-residential activities on Māori land provides certainty to tangata whenua that papakāinga is a type of housing that is specifically provided for.</p> <p>The permitted activity standards require all papakāinga buildings to comply with the bulk and location standards for the zone in which they are in, therefore ensuring any adverse effects on neighbouring properties associated with the buildings fit with the planned built urban form.</p> <p>The papakāinga provisions give effect to the higher-level statutory planning documents specifically:</p> <p>NPS-UD:</p> <ul style="list-style-type: none"> • Objective 1 – well functioning urban environments. • Objective 2 – planning decisions improve housing affordability. • Objective 4 – amenity values of urban environments develop over time in response to diverse housing needs. • Objective 5 – planning decisions take into account the principles of the Treaty of Waitangi. <p>RPS:</p> <ul style="list-style-type: none"> • Objective 24 – principles of the Treaty of Waitangi. • Objective 25 – integration of the concept of kaitiakitanga 	

- Objective 28 – maintenance of cultural relationship between Māori and their ancestral lands.

The existing district plan objectives do not specifically provide for or support papakāinga. However, the purpose and proposed objectives of the IPI specifically enable, provide for, and support the development of papakāinga within the City. On this basis this option is highly effective at achieving the objectives of the district plan and the IPI.

Efficiency

The proposed suite of papakāinga provisions are drafted to present an efficient and simple approach to enabling and providing for papakāinga within the City. The permitted activity status for papakāinga on Māori owned land, subject to permitted activity standards for building bulk and location and non-residential activities is a simple and efficient approach to enabling papakāinga that meets the needs of tangata whenua on their land.

Where gross floor area of commercial activities exceeds the permitted activity limits, this elevates the activity status to discretionary, with the ability to publicly notify an application retained to ensure any more than minor adverse effects on the environment area appropriately considered by the community.

The ability of tangata whenua to establish papakāinga on general title land via a restricted discretionary resource consent, with confirmation from the relevant iwi authority the applicant has established an ancestral connection to the land is an efficient method to address what could otherwise be a difficult resource consent process for the Council with respect to establishing the whakapapa and ancestral connection to the land of applicants. Working with iwi authorities in this way acknowledges their role in the resource management process, and is an efficient method to achieve the objectives of enabling and providing for papakāinga in the City.

This option presents the most cost-effective option to both tangata whenua and the wider community compared to an option of requiring a greater level of regulation for papakāinga developments.

Summary

This is the most appropriate option to achieve the relevant objectives and Part II of the RMA for the following reasons:

- The approach recognise and provide for the relationship of Māori and their culture and traditions with their ancestral lands (section 6(e) RMA);
- The approach demonstrates particular regard has been had to kaitiakitanga (section 7(a) RMA);
- The approach takes into account the principles of the Treaty of Waitangi (section 8 RMA);
- The approach will contribute towards achieving Objectives 1, 2, 4, and 5 of the NPS-UD;
- The approach gives effect to Policies 1, 6, and 9 of the NPS-UD;
- The approach will contribute towards achieving Objectives 1 and 2 of the MDRS (Schedule 3A RMA);
- The approach gives effect to Policies 1 and 4 of the MDRS (Schedule 3A RMA).

After taking into account the costs, benefits, risks, efficiency and effectiveness, and the reasonably practicable alternatives, the approach is the most appropriate method to achieve the relevant objectives of the District Plan, the IPI, and the purpose of the RMA as expressed in the higher-level statutory planning documents.

3.7 Precinct 1 - Indigenous Biodiversity Precinct

Options considered under this topic are:

1. Option 1: Insert Precinct 1 – Indigenous Biodiversity Precinct and supporting policy guidance as recommended.
2. Option 2: Do not acknowledge identified significant areas of indigenous vegetation and significant habitats until the Council progresses a plan change to protect these areas on urban environment allotments.
3. Option 3: Implement the remaining MDRS provisions but retain the status quo requirements for properties containing an identified significant natural area for permitted number of residential units, site coverage, and the minimum allotment size requirements for subdivision until the Council progresses a plan change to protect these areas on urban environment allotments. This would require the addition of a new qualifying matter.
4. Option 4: Include significant natural areas in the IPI with a full suite of subdivision, use and development provisions that will protect the areas to give effect to section 6 of the RMA and policies 23 and 24 of the RPS. This would add the SNAs to the district plan as a new qualifying matter.

All these options are considered reasonable alternatives and are therefore included in the assessment below.

Evaluation of reasonably practicable options				
Option	Relevance <i>Is the option related to addressing the resource management issues?</i>	Achievability <i>Can the option achieve the outcome / objective? Is it within council's powers, responsibilities and resources, degree of risk and uncertainty of achieving objectives, ability to implement, monitor and enforce.</i>	Acceptability / Reasonableness <i>How acceptable is this to the community? What are the likely effects on the community – ie widespread or limited</i>	Recommendation
Option 1: Insert Precinct 1 – Indigenous	The Indigenous Biodiversity Precinct identifies areas where the Council is applying additional	The option will achieve the objectives.	The approach is likely to be most acceptable to the community as the policies only	RETAIN This option signals where significant natural areas are

Biodiversity Precinct	<p>policy direction and guidance regarding significant natural areas that have been identified for the purpose of giving effect to section 6(c) of the RMA and Policies 23 and 24 of the RPS, but have not yet been incorporated into the district plan via a comprehensive plan change.</p> <p>This option addresses the resource management issue.</p>		<p>apply when a resource consent application is needed for development on a GRZ site.</p>	<p>located on GRZ sites and ensures they are protected from any adverse effects of development.</p>
Option 2: Significant areas of indigenous vegetation and significant habitats deferred for a later process	<p>This option does not address the issues.</p>	<p>This option will not achieve the objectives. It is within Council's powers.</p>	<p>This option is unlikely to be acceptable to the community as it provides no protection for areas of significant natural areas.</p> <p>The community may perceive the Council does not value the identified significant vegetation and habitats, or that the Council is not meeting its statutory duties to maintain indigenous vegetation within the City.</p> <p>This option is likely to result in loss of indigenous vegetation and habitat.</p>	<p>DISCARD</p> <p>This is the least appropriate option to achieve the relevant objectives as it fails to recognise section 6(c) vegetation and habitats on urban environment allotments, resulting in the greatest potential loss of indigenous biodiversity. This option would result in the application of the MDRS without any awareness raising of the significant indigenous biodiversity values present, or any encouragement of its retention. For these reasons this option is inconsistent with Part II of the RMA.</p>
Option 3: carve out the intensified zoning for properties with an identified	<p>This option is related to the resource management issues, but does not address the issue directly.</p>	<p>This option will not achieve the objectives. It is within Council's powers.</p>	<p>This option would have a mixed result of protecting the significant natural areas, but resulting in inefficient land uses and zoning pattern.</p>	<p>DISCARD</p> <p>Although the intent of this option is to maintain indigenous biodiversity in the absence of specific</p>

<p>significant natural area</p>			<p>As this option does not include any provisions that would prevent the removal of identified significant vegetation, it could have the unintended consequence of encouraging its removal to enable an easier resource consent process for breaching the permitted activity standards and minimum allotment size.</p>	<p>provisions that give effect to section 6(c) of the RMA and policies 23 and 24 of the RPS on urban environment allotments, it is uncertain how developers would respond. Positive and negative outcomes are equally possible under this option. For some developers this option may provide an incentive to remove the significant indigenous vegetation before applying for a building consent or a resource consent under one of the standards that have been breached.</p> <p>This option could also be seen by some affected property owners to be circumventing the Council's intent to work with affected property owners to identify and protect section 6(c) vegetation and habitats on urban environment allotments, therefore providing an incentive to remove the vegetation before it is protected by the district plan.</p> <p>This option is not the most appropriate method to achieve the relevant objectives as it attempts to manage effects on significant</p>
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				indigenous vegetation and habitats without putting in place specific provisions to achieve this. This option carries a high level of risk from unanticipated consequences by undermining the Council's work with affected property owners to identify and protect the section 6(c) vegetation and habitats on urban environment allotments. This option carries a low level of effectiveness and efficiency in achieving the relevant objectives.
Option 4: Include significant natural areas in the IPI with a full suite of provisions	This option directly addresses the resource management issue.	This option will achieve the objectives, although it will take a considerable amount of time and resources to develop a comprehensive suite of provisions.	<p>The district plan provisions would appropriately give effect to Part II of the RMA and the RPS with respect to the identification of significant indigenous vegetation and significant habitats of indigenous fauna, and its protection from inappropriate subdivision, use and development.</p> <p>The community benefits from the retention of the intrinsic values of ecosystems and the maintenance of indigenous biodiversity. The Council's LTP, district plan and other strategies place importance on the protection of the natural environment within the City. This</p>	<p>DISCARD</p> <p>Section 6(c) of the RMA requires the protection of these sites, and this will typically result in an increase in costs to those who wish to modify the protected vegetation to enable other activities such as residential subdivision and development.</p> <p>This option is the most effective and efficient method to achieve the relevant objectives and Part II of the RMA, however due to timing issues it carries an unacceptably high level of</p>

			option would contribute toward these goals.	risk and uncertainty. More time would be required for the Council to prepare suitable provisions and consult with directly affected property owners and other stakeholders for inclusion in the IPI. The additional residential subdivision development enabled by the MDRS adds complications to this work. It is also unknown whether such provisions would give effect to the soon to be released exposure draft of the NPS-IB.
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The relevant objectives are:

GRZ-PREC1-01

*The maintenance of indigenous biological diversity values within the **Indigenous Biodiversity Precinct** is encouraged.*

SUB-RES-03

*To encourage the maintenance of indigenous biological diversity values within the **Indigenous Biodiversity Precinct**.*

The provisions associated with the recommended approach which is to insert Precinct 1 – Indigenous Biodiversity Precinct and associated objectives and policies are:

Policies	Rules and Standards	Other Methods
<ul style="list-style-type: none"> • GRZ-PREC1-P1 • GRZ-PREC1-P2 • SUB-RES-P2 • SUB-RES-P3 • SUB-RES-P6 	<ul style="list-style-type: none"> • GRZ-PREC1-R1 • GRZ-PREC1-R2 • GRZ-PREC1-R3 • GRZ-PREC1-R4 • GRZ-PREC1-R5 • GRZ-PREC1-R6 • GRZ-PREC1-R7 	<ul style="list-style-type: none"> • Mapped extent of Precinct on District Maps. • Insert definition for Precinct. • Amend SUB-GEN-I2

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Evaluation of Preferred Option Against Objectives		
	Costs	Benefits
Environmental	There are no environmental costs that would result from this option. Areas of significant indigenous vegetation on urban environment allotments will continue to be unprotected until the Council notifies a plan change under Schedule 1 of the RMA to give effect to section 6(c) of the RMA and policies 23 and 24 of the RPS.	The precinct may increase awareness and encourage people who intend to construct additional residential units on their allotments to maintain the identified indigenous biodiversity.
Economic	There are no economic costs.	There are no economic benefits
Social	This option will not result in any social costs that are different to the status quo.	This option may result in the retention of areas of significant indigenous vegetation and habitats through encouragement and raising awareness. The community has expressed it values the natural environment via the LTP, the Land Use Strategy, and District Plan objectives and policies.
Cultural	This option will not result in any cultural costs that are different to those that may occur under the status quo.	This option will not result in any cultural benefits that are different to those that may occur under the status quo.
Economic growth provided or reduced	There are no opportunities for economic growth and employment identified under this option.	
Employment opportunities		
Uncertain or insufficient information	It is considered that there is certain and sufficient information on which to base the proposed policies and methods as:	

	<ul style="list-style-type: none"> • The precinct identifies areas of significant indigenous vegetation and significant indigenous habitats of indigenous fauna but does not impose any rules to protect them as the Council is still consulting with affected landowners on the development of a plan change to protect them under Schedule 1 of the RMA. • The areas of significant indigenous vegetation have been identified by an independent suitably qualified and experienced ecologist in accordance with accepted methodology and practice for the identification of these sites for resource management purposes. It is noted however that some amendments to the boundaries of the sites may still occur as consultation progresses and more detailed site-specific information comes forward. • This option effectively retains the status quo with respect to rules but introduces policy direction to raise awareness of the identified sites and to encourage the maintenance of indigenous biodiversity. • The MDRS density standards and subdivision provisions will apply.
Risk of acting or not acting	This option does carry an element of risk the identification of the SNAs within the district plan in the absence of provisions that protect them may encourage some property owners to remove the SNAs before any future regulatory methods are included in the district plan via a future Schedule 1 RMA process.
Effectiveness	
<p>The relevant objectives of the plan change are to raise awareness of the identified areas of significant indigenous vegetation and habitats that are within the precinct and encourage their retention to assist in maintaining indigenous biodiversity. This option will be effective at awareness raising as it will place an outline of the identified areas on district plan maps.</p> <p>As there are no associated rules to protect the identified areas, the effectiveness of this option to actually maintain the identified indigenous vegetation and habitats on urban environment allotments may be minimal.</p> <p>Due to the lack of regulatory tools proposed under the precinct it is an effective method to achieve the objectives of the plan change to introduce the MDRS to the relevant residential zones.</p>	
Efficiency	
<p>The proposed policy direction and encouragement will apply at the time of land use consent and subdivision consent. The policies require resource consent applicants to demonstrate they have considered methods to avoid, remedy or mitigate adverse effects on the identified areas, and methods to ensure positive ecological effects. This is an efficient method to raise awareness of the importance of the identified sites without imposing significant additional costs to developers and those wishing to erect additional residential units on their properties.</p> <p>This method is an efficient method to achieve the objectives of the plan change to introduce the MDRS into the relevant residential zones.</p>	
Summary	

The Council is required to recognise and provide for the protection of significant indigenous vegetation and significant habitats of indigenous fauna under section 6(c) of the RMA. The Council is required to give effect to the RPS in its district plan, which requires the Council to identify and protect areas of significant indigenous vegetation and significant habitats of indigenous fauna from inappropriate subdivision, use and development. The Council is required to maintain indigenous biodiversity under section 31(1)(b)(iii) of the RMA. The precinct represents the first step for the district plan to meet these requirements for urban environment allotments.

Although no additional rules are proposed, the policy direction seeks to encourage the maintenance of indigenous biodiversity within the precinct and requires resource consent applicants to demonstrate they have considered methods to avoid, remedy or mitigate adverse effects on indigenous biodiversity values within the precinct, and methods to ensure positive ecological effects.

In the absence of rules to give effect to the requirements of the RMA and the statutory planning documents to identify and protect the identified areas, this option is the most efficient and effective method to achieve the relevant objectives. It may result in minor positive benefits through the encouragement of the retention of the indigenous biodiversity without imposing any significant additional costs.

The Council must still progress a plan change to identify and protect the identified areas in accordance with the RMA and the RPS, however in the meantime the precinct raises awareness of this issue and the potential impacts on permitted development under the MDRS once the Council progresses that work.

3.8 Incorporation of Medium and High Density Design Guide

Options considered under this topic are:

1. Option 1: The incorporation of the medium and high density residential design guide to apply to residential development that requires a resource consent.
2. Option 2: Implement medium residential development (including the mandatory MDRS objectives and policies) and the intensification required by NPS-UD Policy 3 without design guidance.

Both options are considered reasonable options, although Option 2 would overlook some of the requirements of the MDRS (e.g. mandatory policy 3). Notwithstanding this limitation, both options are evaluated in the table below.

Evaluation of reasonably practicable options				
Option	Relevance	Achievability	Acceptability / Reasonableness	Recommendation

	<i>Is the option related to addressing the resource management issues?</i>	<i>Can the option achieve the outcome / objective? Is it within council's powers, responsibilities and resources, degree of risk and uncertainty of achieving objectives, ability to implement, monitor and enforce.</i>	<i>How acceptable is this to the community? What are the likely effects on the community – ie widespread or limited</i>	
Option 1: The incorporation of the medium and high density residential design guide to apply to residential development that requires a resource consent.	This option is clearly related to the resource management issue if ensuring that urban areas are well designed.	The option will result in well-functioning and attractive urban environments and will achieve the objectives.	While there may be additional costs to developers, the resulting development is likely to be supported by the community. Urban areas are more likely to be safer with increased surveillance on to public spaces and attractive places to live.	RETAIN This option is an effective and efficient way to achieve good urban design outcomes with respect to safe and attractive streets, passive surveillance, and ensuring residential development meet the day to day needs of residents.
Option 2: Do not include design guidance	This option is less likely to address the resource management issue.	The option will not achieve the objectives, although it is within Council's powers.	This option is less likely to contribute toward well-functioning urban environments as it does not encourage development that will create attractive and safe streets, including by providing for passive surveillance. Housing will be less likely to be designed to meet the day to day needs of residents if the design elements of the design guide are not incorporated into residential developments. Leaving good design outcomes to chance will result in examples of residential development that will not achieve the relevant objectives.	DISCARD This option is the least appropriate method to achieve the relevant objectives that seek to create well-functioning urban environments. Any potential cost benefits associated with this option are negated by the high likelihood of poor urban design outcomes including the creation of unsafe streets through the lack of passive surveillance, and poor usability of medium and high density housing to meet the needs of residents. This option carries the greatest risk, as it would fail to encourage the creation of

			Some developments may be cheaper to develop as they will not need to address and incorporate any of the design outcomes identified in the design guide.	attractive and safe streets and could lead to examples of residential development that is contrary to the relevant objectives.
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The relevant objectives are:

UFD-01

A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

GRZ-01 - Well-functioning Urban Environments

A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

HRZ-01 – Well-functioning Urban Environments

A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

The preferred provisions to incorporate the medium and high density residential design guide and achieve the objectives are:

Policies	Rules and Standards	Other Methods
<ul style="list-style-type: none"> • UFD-P1 • GRZ-P1C • GRZ-P1E • GRZ-P5 • HRZ-P2 • HRZ-P4 • HRZ-P5 • HRZ-P6 	<ul style="list-style-type: none"> • SUB-HRZ-S1 • PK-R2 • GRZ-R11 • GRZ-R12 • GRZ-R12A • GRZ-R12B • HRZ-S2 • HRZ-S3 • HRZ-S4 • HRZ-R8 • HRZ-PREC2-R4 	Medium and High Density Design Guide.

Evaluation of Preferred Option Against Objectives		
	Costs	Benefits
Environmental	There are no environmental costs.	There are no environmental benefits.
Economic	Design of residential subdivision and development will need to address the outcomes sought within the design guide. This may have an impact on construction costs compared to not addressing the design outcomes sought by the design guide, but these costs can be minimised by considering the design guide outcomes early during the design stage.	There are no economic benefits.
Social	There are no social costs.	Developments will contribute toward well-functioning urban environments through the encouragement of development that creates attractive and safe streets, including by providing for passive surveillance. Housing will be more likely to be designed to meet the day to day needs of residents if the design elements of the design guide are incorporated into residential developments.
Cultural	There are no cultural costs.	There are no cultural benefits
Economic growth provided or reduced	Environmental	
Employment opportunities		
Uncertain or insufficient information	The use of a design guide will ensure the Council is meeting NPS-UD Objective 1, and MDRS Objective 1 and Policies 3 and 4. For these reasons it is considered that there is certain and sufficient information on which to base the proposed policies and methods	

Risk of acting or not acting	This option has a low level of risk. The existing district plan provisions for comprehensive residential development incorporates the use of a design guide. The consenting process, requirements and design outcomes and benefits from the use of a design guide are well understood and demonstrated in the City.
Effectiveness	
The effectiveness of design guides to achieve the objectives of the district plan is demonstrated by the numerous comprehensive residential development resource consents that have been approved under the existing district plan provisions and design guide. This option is a highly effective method to achieve the relevant objectives.	
Efficiency	
The design guide is incorporated into the district plan as an appendix and is linked with relevant subdivision and development rules and standards. This is a highly efficient method to achieve the objectives as it is clear when the design guide applies, and that the Council retains discretion over how it has been applied to residential subdivision and development proposals that require resource consent.	
Summary	
This option is the most appropriate method to achieve the relevant objectives because it has been demonstrated to be an effective and efficient way to encourage and achieve good urban design outcomes with respect to safe and attractive streets, passive surveillance, and ensuring residential development meet the day to day needs of residents. The benefits of this option outweigh the costs, and it carries a very low degree of risk or uncertainty.	

3.9 Amendments to Financial Contributions Provisions

Sections 77E, 77T and 80E(1)(b)(i) enable the Council to include provisions relating to financial contributions to address the effects that may result from the additional permitted activity development realised by the implementation of the MDRS and giving effect to NPS-UD policy 3.

The Council recognises the amount of development that will be permitted by the IPI is greatly increased from the status quo, and this will have negative impacts on the Council's infrastructure and assets for three waters, roading and open space.

The Council therefore proposes to amend the district plan as part of the IPI to include financial contributions to help fund necessary infrastructure works and upgrades to service the new growth.

It is likely the Council will review its development contributions policy in the future to adequately identify, manage and fund the effects that would result from the greatly increased permitted and as-of-right residential development and subdivision that will be enabled upon notification of the IPI, however the timeframes for that work do not align with the notification or decision deadlines for the IPI. In the meantime, the Council requires financial contributions in the district plan as the method to ensure the additional stress placed on the community's infrastructure is funded by the additional development that will place that stress rather than placing additional financial burden on ratepayers.

The options considered under this topic are:

1. Option 1: Amend the financial contributions provisions as recommended.
2. Option 2: The status quo.

Both options are considered reasonably practicable options and are therefore both evaluated in the table below.

Evaluation of reasonably practicable options				
Option	Relevance <i>Is the option related to addressing the resource management issues?</i>	Achievability <i>Can the option achieve the outcome / objective?</i> <i>Is it within council's powers, responsibilities and resources, degree of risk and uncertainty of achieving objectives, ability to implement, monitor and enforce.</i>	Acceptability / Reasonableness <i>How acceptable is this to the community? What are the likely effects on the community – ie widespread or limited</i>	Recommendation
Option 1: Amend the financial contributions provisions	The option is directly relevant to the resource management issues. Subdividers and developers should bear the cost of providing all utility services within the land being subdivided or developed where the benefits accrue to the land being subdivided or developed.	The provisions are appropriate to achieve the objectives.	There is likely to be a mixed response to the provisions. The provisions ensure that the developer contributes to providing all utility services to new sites. This costs may eventually be passed onto the eventual purchaser. However the provisions also ensure that the community is not bearing the cost of new development through its rates.	RETAIN The implementation and payment of financial contributions is a well-established resource management tool that is well understood by developers and the Council. The Council has existing methods and systems in place to calculate, charge and recover financial contributions. This is a demonstrated effective

				method to achieve the relevant objectives.
Option 2: Status quo	The option is relevant to the resource management issue of funding for infrastructure to support new development.	This option would fail to efficiently achieve the relevant objectives.	The costs necessary to provide new infrastructure and upgrade existing infrastructure to ensure it can service the new growth that will result from the IPI would need to be funded by the community via rates. This approach will not be supported by the community.	DISCARD The status quo makes no contribution toward addressing the identified issue. This option is not effective in achieving the objectives as it would leave the community carrying the costs associated with necessary infrastructure costs to service growth. This would come at the opportunity cost of reduced funding available for other Council activities, or would require increased rates to cover the additional costs.

The relevant objective is:

DC-O1 *Contribution by developers and subdividers towards the costs of providing acceptable standards of utilities, services, roading, community facilities and amenities.*

The preferred amendments to achieve the objectives are:

Policies	Rules and Standards	Other Methods
<ul style="list-style-type: none"> • DC-P1 • DC-P2 • DC-P3 • DC-P4 • DC-P5 • DC-P6 • DC-P7 	<ul style="list-style-type: none"> • DC-R2A • DC-R2B • DC-R2C • DC-R2D • DC-R2E • DC-R2 	Consequential amendments and updates to introduction and explanatory text.

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Evaluation of Preferred Option Against Objectives		
	Costs	Benefits
Environmental	There are no environmental costs.	Infrastructure systems designed to transport, treat and discharge wastewater will have funding provided by developers to help ensure those systems are fit for purpose and do not result in any unanticipated or unauthorised environmental effects due to system capacity issues.
Economic	<p>Those placing additional burden on the capacity of the community's infrastructure will be required to contribute toward the costs of any necessary upgrading or offsetting of adverse effects.</p> <p>The additional costs of financial contributions are likely to be passed on to buyers of the allotments and residential units by adding these costs to the asking price.</p>	Funding is provided by the developments that place additional stress on existing community infrastructure, easing the economic burden on ratepayers to meet these costs. Council will be able to allocate the funding sourced from financial contribution towards capital works for infrastructure via the long term plan and annual plan processes.
Social	There are no social costs.	The financial contributions can include land that could be used for community purposes, or cash to acquire land for community use.
Cultural	There are no cultural costs.	There are no specific cultural benefits.
Economic growth provided or reduced	There are no direct or indirect opportunities for economic growth and employment.	
Employment opportunities		

Uncertain or insufficient information	There is sufficient information to put in place the proposed provisions, noting the limitation of the provisions between notification of the IPI and when a decision is made at the end of the ISPP.
Risk of acting or not acting	<p>The risk of not acting is the additional development enabled by the IPI will not be required to contribute towards the costs of the provision of new infrastructure or the upgrading of existing infrastructure that would be necessary to service the enabled growth. This would leave the financial burden of these necessary works on the Council and the community.</p> <p>Unfortunately, the financial contribution provisions cannot have legal effect until a decision is made on the IPI. This leaves a gap between the MDRS provisions that have immediate legal effect from notification, and the time when the Council will be able to require the payment of financial contribution via the IPI provisions.</p>
Effectiveness	
Requiring financial contributions to contribute toward the costs associated with upgrading infrastructure to meet the increased demands placed on it from development is a very effective method to achieve the relevant objectives. Financial contributions can be imposed as conditions of consent, therefore ensuring they are paid as part of, or prior to, giving effect to a resource consent. They can also be required to be paid before confirmation that a building consent proposal complies with the district plan.	
Efficiency	
The implementation and payment of financial contributions is a well-established resource management tool that is well understood by developers and the Council. The Council has existing methods and systems in place to calculate, charge and recover financial contributions. This is a demonstrated effective method to achieve the relevant objectives.	
Summary	
This option is the most appropriate option to achieve Part II of the Act and the relevant objectives. The costs, benefits, efficiency and effectiveness of this option come out well in favour of this option compared to Option 2. Notwithstanding the limitation in the timing of when the financial contribution provisions will have legal effect, the risk of not acting outweighs the risk of acting.	

3.10 Including Hydraulic Neutrality Provisions

The IPI includes new provisions to require hydraulic neutrality for new subdivision and development. This is provided for by section 80E(2)(f). This is necessary to manage increased stormwater runoff and its contribution to flooding that will result from increasing the building site coverage standard from 35% to 50% in the General Residential Zone, and 70% in the High Density Residential Zone. Requiring hydraulic neutrality is not a new concept in the district plan as it is already required for subdivision and development within the Pinehaven Catchment Overlay.

Hydraulic neutrality is identified as an important component in addressing freshwater management issues in the region within the document Te Whaitua te Whanganui-a-Tara. Although a stormwater strategy has not yet been prepared by the regional council, the role of territorial authorities in requiring hydraulic neutrality via their district plan is a clearly specified recommendation within the Whaitua Implementation Programme. The IPI proposes to deliver on this clearly articulated recommendation via the proposed hydraulic neutrality provisions.

Stormwater is also addressed in the existing district plan for medium density housing via the requirements for a minimum on-site water permeability allowance where medium density housing is proposed. However, these provisions are to be deleted as part of the IPI as they are part of a suite of provisions for medium density housing that conflict with the MDRS. Rather than focusing on water-permeability requirements specifically, the Council considers hydraulic neutrality to be a more appropriate approach to managing the increased stormwater that will result from the implementation of the MDRS, in particular the increased site coverage standard of the MDRS compared to the status quo.

The reasonably practicable options considered under this topic are:

1. Option 1: inclusion of hydraulic neutrality provisions in the IPI to be applied to all new subdivision and development;
2. Option 2: The status quo – rely on district plan MDRS and other site coverage provisions and the requirements of the Building Regulations.
3. Option 3: Introduce water-permeability requirements for new development.

All three options are evaluated in the table below.

Evaluation of reasonably practicable options				
Option	Relevance <i>Is the option related to addressing the resource management issues?</i>	Achievability <i>Can the option achieve the outcome / objective?</i> <i>Is it within council's powers, responsibilities and resources, degree of risk and uncertainty of achieving objectives, ability to implement, monitor and enforce.</i>	Acceptability / Reasonableness <i>How acceptable is this to the community? What are the likely effects on the community – ie widespread or limited</i>	Recommendation
Option 1: inclusion of hydraulic neutrality provisions in the	The option is directly relevant to the resource management issue of managing stormwater.	Hydraulic neutrality is an established and well-tested method to manage the adverse off-site and downstream effects of stormwater.	This option is unlikely to be favoured by developers as it will increase costs. However it will minimise risk to the community from future flood events and is	RETAIN There will be an increase in construction costs for developers who do not

<p>IPI to be applied to all new subdivision and development</p>		<p>Hydraulic neutrality is a recommendation identified in the relevant Whaitua implementation plan and programme. Once developed, this requirement is highly likely to be included in the stormwater strategy that is to be prepared by the regional council.</p> <p>The option will be effective at achieving the objective.</p>	<p>therefore likely to be acceptable for the community.</p>	<p>already install hydraulic neutrality systems into their developments, but this cost is offset by the wider benefits to the community and the environment.</p>
<p>Option 2: The status quo – rely on district plan MDRS and other site coverage provisions and the requirements of the Building Regulations.</p>	<p>While the option addresses a resource management issue, incremental increase in flood hazards from stormwater as a result of increased densities and reduced building site coverage requirements.</p>	<p>This option will not achieve the objectives. Increased frequency and severity of flooding from stormwater can affect many people and businesses in the community and impact on the safe and efficient operation of infrastructure.</p>	<p>This option is likely to exacerbate flooding with the increase of development. In terms of the effectiveness of water-permeability, this method relies on the ability of the soil to absorb water, which can be reduced significantly during storm events.</p> <p>Increased stormwater is likely to carry a greater amount of contaminants that can enter water bodies. This is of particular concern to tangata whenua, as expressed in the document Whaitua Te Whanganui-a-Tara.</p> <p>This is not an efficient or effective option to address the issue or achieve the relevant objectives and carries a high level of risk that flood hazards exacerbated by stormwater will become more severe as development and intensification</p>	<p>DISCARD</p> <p>It is known the existing district plan provisions and the building regulations do not effectively manage all actual and potential adverse effects on the environment that can arise from stormwater, such as an increase in flood hazards to other properties and downstream flooding effects.</p> <p>As increased intensification with a corresponding increase in site coverage occurs, off-site flooding effects from stormwater are likely to increase.</p> <p>This option simply delays the implementation of hydraulic neutrality, which is clearly identified as an implementation deliverable under the Whaitua</p>

			occurs over time throughout the City.	implementation plan and programme.
Option 3: Introduce water-permeability requirements for new development	While the option addresses a resource management issue, the option relies on on-site permeability	Some stormwater may be adequately managed via this method, but the effectiveness of this method would decrease the greater the storm event. The option would not be effective at achieving the objectives.	This option may result in increased frequency and severity of flooding from stormwater can affect many people and businesses in the community and impact on the safe and efficient operation of infrastructure.	DISCARD The methods under this option would be unlikely to address the issue effectively and would not achieve the relevant objectives. Although stormwater would still be managed where a building consent is required via the Building Regulations, this would not be to achieve hydraulic neutrality. In terms of the effectiveness of water-permeability, this method relies on the ability of the soil to absorb water, which can be reduced significantly during storm events. This is not an efficient or effective option to address the issue or achieve the relevant objectives and carries a high level of risk that flood hazards exacerbated by stormwater will become more severe as development and intensification occurs over time throughout the City.

The relevant objectives are:

GRZ-O4 - There is no increase in the peak demand on stormwater management systems and increase in flooding from new buildings and development.

HRZ-O3 - There is no increase in the peak demand on stormwater management systems and increase in flooding from subdivision and development.

NCZ-O4 - There is no increase in the peak demand on stormwater management systems and increase in flooding from subdivision and development.

LCZ-O4 - There is no increase in the peak demand on stormwater management systems and increase in flooding from subdivision and development.

MUZ-O4 - There is no increase in the peak demand on stormwater management systems and increase in flooding from subdivision and development.

TCZ-O4 - There is no increase in the peak demand on stormwater management systems and increase in flooding from subdivision and development.

CCZ-O4 - There is no increase in the peak demand on stormwater management systems and increase in flooding from subdivision and development.

The preferred option is to include hydraulic neutrality provisions to apply to all new subdivision and development, through the following provisions:

Policies	Rules and Standards	Other Methods
<ul style="list-style-type: none"> • SUB-GEN-P13 • GRZ-P11 • HRZ-P8 • NCZ-P8 • LCZ-P8 • MUZ-P8 • TCZ-P8 • CCZ-P8 	<ul style="list-style-type: none"> • SUB-GEN-R2A • GRZ-S9 • GRZ-R12 • GRZ-R12A • MUZ-S7 • MUZ-S8 • NCZ-S9 • NCZ-S10 • TCZ-S10 • TCZ-R1 • TCZ-S9 • TCZ-S10 • CCZ-S9 • CCZ-R7 • CCZ-R16 	Definition for hydraulic neutrality.

Evaluation of Preferred Option Against Objectives		
	Costs	Benefits
Environmental	There are no environmental costs. This option will require the discharge of stormwater from a site to be the same as before development occurs. This will result in any environmental effects from stormwater after development occurs will be the same as the pre-development situation.	Hydraulic neutrality will reduce flooding effects that are created by or contributed to by stormwater leaving sites. Hydraulic neutrality will greatly reduce the volume and speed of stormwater entering waterbodies compared to the other options considered.

		Although not a territorial authority responsibility, it is likely hydraulic neutrality will reduce some types of contaminants entering waterbodies, therefore assisting in achieving freshwater quality aspirations identified in the Te Whaitua te Whanganui-a-Tara implementation plan and implementation programme.
Economic	The costs of installing systems and infrastructure necessary to achieve hydraulic neutrality will be at the cost of the developer. This will increase the cost of development and will likely be passed on to future buyers of the development.	Potential reduction in the severity of flood events and resulting damage to property. Over time as hydraulic neutrality becomes more common in the City, this economic benefit will likely increase as predicted increased rainfall events occur as a consequence of climate change.
Social	There are no social costs associated with this option.	A reduction in the severity of flood events compared to what would occur under the status quo option, and the better management of stormwater entering waterbodies will result in benefits to society through greater resilience to the effects of natural hazards and potentially, improved water quality.
Cultural	There are no cultural costs associated with this option.	Requiring hydraulic neutrality for new subdivision and development within Upper Hutt is an important step in achieving the recommendations for territorial authorities outlined in the document Whaitua Te Whanganui-a-Tara. Requiring hydraulic neutrality is likely to have an indirect impact on reducing the flow and contaminant loads of stormwater entering freshwater, which is an issue of particular relevance to mana whenua.
Economic growth provided or reduced	No direct or significant opportunities for economic growth and employment have been identified other than an increase in demand for on-site stormwater management systems in the City.	
Employment opportunities		

Uncertain or insufficient information	<p>It is considered that there is certain and sufficient information on which to base the proposed policies and methods as:</p> <ul style="list-style-type: none"> Hydraulic neutrality is an established and well-tested method to manage the adverse off-site and downstream effects of stormwater. Hydraulic neutrality is a recommendation identified in the relevant Whaitua implementation plan and programme. Once developed, this requirement is highly likely to be included in the stormwater strategy that is to be prepared by the regional council. The risks of not acting is that increased development and site coverages will result in increased stormwater discharges adversely affecting other properties through increased flooding.
Risk of acting or not acting	<p>Notwithstanding the increased costs achieving hydraulic neutrality may have on developers, there are no identified risks associated with acting.</p>
Effectiveness	
<p>Hydraulic neutrality has been demonstrated to be an effective method to achieve the objectives. Managing the adverse effects of off-site stormwater discharges via hydraulic neutrality is a method that has been required by other territorial authorities to manage flood hazards and the related infrastructure capacity constraints for some time.</p> <p>This option is considered highly effective at achieving the relevant objectives and the purpose of the Act.</p>	
Efficiency	
<p>Hydraulic neutrality would be required as a permitted standard for development, and for all subdivision within the zones affected by the IPI. Implementation of hydraulic neutrality provisions through the district plan is an effective method because:</p> <p>All building consents for new buildings are checked for compliance against the requirements of the district plan, therefore identifying any proposed developments that do not address hydraulic neutrality requirements; and</p> <p>All subdivision requires subdivision consent under the district plan. Subdivision consent applications must demonstrate how proposed subdivisions meet the requirements of the district plan. Conditions of consent can be imposed ensuring the installation and on-going maintenance of hydraulic neutrality systems to ensure their continued effectiveness.</p>	
Summary	
<p>This is the most appropriate option to achieve the relevant objectives as it carries the greatest benefits and least costs, with the lowest level of risk compared to the other options. There will be an increase in construction costs for developers who do not already install hydraulic neutrality systems into their developments, but this cost is offset by the wider benefits to the community and the environment.</p>	

3.11 Rezoning sites to General Residential Zone and High Density Residential Zone

The IPI includes the rezoning of multiple sites to better provide for residential subdivision and development. None of the sites are greenfield rezonings of rural land, however the part of the St Patrick’s Estate site that is proposed to be rezoned is relatively undeveloped (Managed Development Area and College Area south of the Mawaihakona Stream only). This option comprises the following proposed rezonings:

1. Rezoning a part of the St Patrick’s Estate Area (Managed Development Area and College Area south of the Mawaihakona Stream only) from Special Purpose Zone to High Density Residential Zone (with a precinct overlay retaining existing outcomes specified in the District Plan for the site via policies); and
2. Rezoning the following sites from Business Commercial Zone to General Residential Zone or High Density Residential Zone (as shown):

Address	Existing Zoning	Proposed Zoning
26 Whitley Avenue	Business Commercial Zone	General Residential Zone
245 Fergusson Drive	Business Commercial Zone	General Residential Zone
68 & 68A Pinehaven Road	Business Commercial Zone	General Residential Zone
100 McLeod Street	Business Commercial Zone	General Residential Zone
3 Turon Crescent	Business Commercial Zone	General Residential Zone
1102 Fergusson Drive	Business Commercial Zone	General Residential Zone
1183 – 1185 Fergusson Drive	Business Commercial Zone	General Residential Zone
2 – 16 Chalfont Road, 9 – 27 Ashington Road, 2 Field Street	Business Commercial Zone	High Density Residential Zone
42 Camp Street	Business Commercial Zone	High Density Residential Zone
450-452 Fergusson Drive	Business Commercial Zone	High Density Residential Zone
60 Ararino Street / 32 Tawai Street	Business Commercial Zone	High Density Residential Zone
510–514 Fergusson Drive, 3-5 Ranfurly Street, 4-6 & 10 Liverpool St	Business Commercial Zone	High Density Residential Zone

522 Fergusson Drive	Business Commercial Zone	High Density Residential Zone
37 Beth Street	Business Commercial Zone	High Density Residential Zone
654–672 Fergusson Dr, 2-4 Ward St	Business Commercial Zone	High Density Residential Zone
674 Fergusson Drive	Business Commercial Zone	High Density Residential Zone
17 Ward Street	Business Commercial Zone	High Density Residential Zone
58 – 60 Ward Street	Business Commercial Zone	High Density Residential Zone
40 – 42 MacLean Street	Business Commercial Zone	High Density Residential Zone
1 Redwood Street	Business Commercial Zone	High Density Residential Zone
63 Pine Avenue	Business Commercial Zone	High Density Residential Zone
20 Ebdentown Street	Business Commercial Zone	High Density Residential Zone

The options considered under this topic are:

1. Option 1: Rezone the sites as proposed; or
2. Option 2: Leave the sites under their current zoning.

Evaluation of reasonably practicable options				
Option	Relevance <i>Is the option related to addressing the resource management issues?</i>	Achievability <i>Can the option achieve the outcome / objective? Is it within council's powers, responsibilities and resources, degree of risk and uncertainty of achieving objectives, ability to implement, monitor and enforce.</i>	Acceptability / Reasonableness <i>How acceptable is this to the community? What are the likely effects on the community – ie widespread or limited</i>	Recommendation
Option 1: Rezone the sites	This option addresses a relevant resource management issue, being sufficient housing to accommodate population growth.	The option will achieve the objectives.	The rezoning of some sites will be of most interest to adjoining sites.	RETAIN The rezoning of these sites recognises existing land use activities as well as enabling

				additional housing opportunities and options.
Option: Retain current zoning for the sites	This option does not address a relevant resource management issue, being sufficient housing to accommodate population growth.	<p>It is unknown what the impact of implementing the MDRS and Policy 3 of the NPS-UD will be on district plan-enabled housing capacity and how this addresses the City's anticipated housing needs. It could be that the implementation of the MDRS results in there being no shortfall in plan-enabled housing capacity. This situation would reduce the policy support and justification for rezoning the St Patrick's Estate are in particular. The impact of the MDRS and giving effect to Policy 3 of the NPS-UD will not be known until the next update of the HBA.</p> <p>Retaining the status quo zoning of the sites is a less efficient method to achieve the relevant objectives seeking the provision of more plan-enabled housing capacity.</p>	<p>This option is likely to be acceptable to the community given that it is the existing approach.</p> <p>Less housing would potentially be delivered under this option that Option 1 due to the requirement for more onerous resource consents for the subdivision, use and development of the sites under the existing zone provisions.</p>	<p>DISCARD</p> <p>Notwithstanding that the rezoning of the sites under Option 1 is not compulsory under the NPS-UD or to incorporate the MDRS into the district plan, this option is considered to be the least effective and efficient method to achieve the relevant objectives that seek to provide for greater housing capacity to meet the needs of the City's existing and projected housing needs.</p>

Both options are reasonably practicable options and are therefore evaluated in the table below. The relevant objectives are:

- All General Residential Zone objectives, including relevant subdivision objectives.
- All High Density Residential Zone objectives, including relevant subdivision objectives.

The preferred provisions to achieve the objectives include:

Policies	Rules and Standards	Other Methods
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<ul style="list-style-type: none"> • All policies within the General Residential Zone chapter. • All policies within the High Density Residential Zone chapter, and the St Patrick's Estate Precinct policy HRZ-PREC2-P1. • All policies in the Subdivision within the General Residential Zone chapter. • All policies in the Subdivision within the High Density Residential Zone chapter including the St Patrick's Estate Precinct policy SUB-HRZ-P9. 	<ul style="list-style-type: none"> • All rules within the General Residential Zone chapter. • All rules within the High Density Residential Zone chapter. • All rules in the Subdivision within the General Residential Zone chapter. • All rules in the Subdivision within the High Density Residential Zone chapter. 	<ul style="list-style-type: none"> • All relevant defined terms, explanatory and supporting text, district plan maps, and the medium and high density design guide. • St Patrick's Estate Precinct overlay.
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Evaluation of Preferred Option Against Objectives		
	Costs	Benefits
Environmental	<p>Rezoning the St Patrick's Estate will enable medium and high density residential development, and this will change the existing visual character of the site significantly. The amenity of the area will be altered from the current relative undeveloped state.</p> <p>There are no environmental costs associated with the proposed rezoning of the commercial sites to General Residential Zone</p>	<p>The changes in character and amenity of the St Patrick's Estate site may be appreciated by some people including future generations.</p>
Economic	<p>Opportunity cost of the loss of the potential use of the two commercial zoned sites for permitted commercial zone uses.</p> <p>The proposed St Patrick's Estate Precinct policies require landscaping of the site along the frontage of the site with Fergusson Drive, and the provision of pedestrian linkages through the site to the Hutt River and Silverstream Railway Station. These requirements may impose additional development costs on the developer.</p>	<p>The development and use of the sites to be rezoned to enable residential subdivision, use and development will result in economic benefits to the owners.</p>

Social	There are no social costs.	The provision of a large new area for medium and high density residential development within close proximity to Silverstream Station will enable more people to live within walking distance of a station and will providing additional housing to help meet the demand for housing in the City.
Cultural	There are no cultural costs identified.	There are no cultural benefits identified.
Economic growth provided or reduced	The rezoning of the St Patrick's Estate area will generate a significant opportunity for increased residential subdivision and development. Development of the site following the proposed rezoning will result in opportunities for economic growth and employment associated with residential subdivision and development.	
Employment opportunities		
Uncertain or insufficient information	<p>Giving effect to the NPS-UD and implementing the MDRS do not require the rezoning of any sites. The rezoning of these sites is proposed as consequential amendments that support the MDRS and the NPS-UD.</p> <p>There are no risks associated with not progressing these rezonings. The consideration of whether to rezone any of the sites could be carried out outside of the IPI via a standard Schedule 1 process.</p> <p>Rezoning part of the St Patrick's Estate site could be achieved via a private plan change or a Council-initiated plan change in the event it is required to meet the City's projected housing needs.</p> <p>Notwithstanding the above, there is little risk or uncertainty in acting. The commercial zoned sites proposed to be rezoned to General Residential Zone or High Density Residential Zone are not generally used for commercial activities, and those that do will benefit from existing use rights under Section 10 of the RMA. In addition, none of the sites have been identified as part of the centre's hierarchy. Therefore, the rezoning of these sites is considered to carry little risk or uncertainty in the likely outcomes.</p> <p>With regard to the proposed rezoning of part of the St Patrick's Estate site to High Density Residential Zone, it is acknowledged that the resulting subdivision and development will result in a significant change from the existing undeveloped character of the site. However, as the Council has previously consulted the community on the proposed rezoning of part of the site to enable residential</p>	

	<p>subdivision and development, the resulting effects and change in existing character is not unanticipated by the community. This fact reduces the levels of risks and uncertainty significantly.</p> <p>It is unknown what the impact of implementing the MDRS and giving effect to the NPS-UD is on district plan-enabled housing capacity and how this addresses the City's anticipated housing needs. It could be that the implementation of the MDRS and the NPS-UD results in there being no shortfall in plan-enabled housing capacity. This situation would reduce the policy support and justification for rezoning part of the St Patrick's Estate area in particular. The impact of the MDRS and giving effect to Policy 3 of the NPS-UD will not be known until the next update of the HBA in 2023.</p>
Risk of acting or not acting	<p>On this basis, and notwithstanding the unknown impact of incorporating the MDRS and giving effect to Policy 3 of the NPS-UD on plan-enabled housing capacity with respect to anticipated housing needs, it is considered there is sufficient information and low levels of risk associated with this option.</p>
Effectiveness	
<p>Rezoning sites to enable residential subdivision, use and development is an effective method to achieve the relevant objectives and is consistent with the NPS-UD with respect to the provision of housing to meet anticipated demand while ensuring well-functioning urban environments.</p>	
Efficiency	
<p>Rezoning is an efficient method to achieve the relevant objectives. Zoning is a demonstrated efficient method to manage residential subdivision, use and development.</p>	
Summary	
<p>This option is the most efficient and effective method to achieve the relevant objectives. In giving effect to the NPS-UD and incorporating the MDRS into the District Plan, section 80E of the RMA enables the Council to amend related provisions and zones that support or are consequential on the MDRS or Policy 3 of the NPSP-UD. These rezonings fall into this category as they are not required by the NPS-UD, but they do provide an opportunity for the Council to enable for greater residential subdivision, use and development that will support the MDRS and Policy 3 of the NPS-UD.</p> <p>This option carries the greatest environmental costs compared to the status quo, but it is noted the residential subdivision, use and development of the St Patrick's Estate site can still occur under the existing zoning via the resource consent process. This option does not carry a high level of risk or uncertainty, as the medium and high density design guide will apply to subdivision, use and development that requires a resource consent, and the policies for the St Patrick's Estate Precinct will ensure the existing District Plan outcomes for landscaping and pedestrian connections are considered through the resource consent process.</p> <p>The rezoning of the multiple sites from Business Commercial to General Residential Zone or High Density Residential Zone is an efficient and effective method to achieve the relevant objectives, as the rezoning aligns with the existing use of the sites and the sites are not identified as part of the proposed centres hierarchy. This option has low risk and uncertainty, and the benefits outweigh the costs.</p>	

3.12 All Other Consequential Amendments

This topic includes a variety of amendments that support or are consequential on the MDRS or Policies 3 and 4 of the NPS-UD. These types of amendments include but are not limited to:

- (i) Amendments, including deletions and the insertion of new text into chapters across the district plan to:
 - a. Ensure the proposed High Density Residential Zone is referred to appropriately within all chapters;
 - b. Explanatory text is amended to reduce its focus on the maintenance of amenity values;
 - c. Explanatory text is amended to delete references to provisions that are to be removed.
 - d. Deletion of precincts, objectives, policies, rules and other methods (including mapping) of provisions that conflict with the MDRS and the requirements of Policy 3 of the NPS-UD.

The recommended approach is to make consequential amendments, noting in some instances alternative consequential amendments could use different wording to achieve the same outcomes. No other reasonably practicable alternative options have been identified, therefore only the recommended option is evaluated in the table below.

The relevant objectives are all the objectives included in the IPI. The provisions include:

- All consequential amendments to policies in the IPI excluding the mandatory MDRS policies.
- All consequential amendments to rules excluding the mandatory MDRS rules.
- All consequential amendments to explanatory text, supporting text, defined terms, district plan maps and appendices across the plan.

Evaluation of Preferred Option Against Objectives		
	Costs	Benefits
Environmental	Effects on amenity values arising from subdivision and development within residential zones may be adversely impacted by the refocus of objectives and policies to give effect to the policies of the NPS-UD.	There are no environmental benefits.
Economic	There are no direct or indirect economic costs that would arise from this option.	More efficient district plan implementation. Provisions that conflict with the MDRS and NPS-UD requirements will be removed.

		Clearer objective and policy direction providing greater certainty for applicants and decision makers on resource consent applications.
Social	There are no social costs that would arise under this option.	There are no direct or indirect social benefits.
Cultural	There are no cultural costs identified under this option.	There are no direct or indirect cultural benefits identified.
Economic growth provided or reduced	There are no specific opportunities for economic growth and employment under this option.	
Employment opportunities		
Uncertain or insufficient information	<p>There is certain and sufficient information on which to base the proposed consequential amendments.</p> <p>The majority of amendments support or are consequential on MDRS or Policies 3 and 4 of the NPS-UD. A number of amendments are also made to align the wording of provisions with NPS-UD Policy 6 with respect to the consideration of amenity values in relevant zones.</p> <p>Discretion has been used in many instances on the proposed wording amendments to objectives, policies and supporting text, and it may be possible to make alternative wording changes to these provisions to achieve the same outcomes, but this is not considered to be a risk or area of uncertainty.</p>	
Risk of acting or not acting		
Effectiveness		
This is considered to be a highly effective option. All consequential amendments have been drafted to ensure plan effectiveness, and that the relevant objectives are appropriately given effect to across all relevant district plan chapters.		
Efficiency		

All consequential amendments have been prepared to ensure the district plan efficiently achieves the relevant objectives. Provisions that conflict with the MDRS and the requirements of NPS-UD are either amended or deleted. This is considered to be the most efficient method to achieve the relevant objectives.

Summary

This option is the most efficient and effective method to achieve the relevant objectives while resulting in the lowest costs and highest benefits. The risks and uncertainty associated with this option are low. Although in some instances it may be possible to achieve the same outcomes via alternative consequential wording amendments, this is not considered to be a risk.

4 Conclusion

This evaluation has been undertaken in accordance with section 32 of the RMA in order to identify the need, benefits and costs and the appropriateness of the proposal having regard to its effectiveness and efficiency relative to other means in achieving the purpose of the RMA. The evaluation demonstrates that this proposal is the most appropriate option as it:

- Incorporates the MDRS into all relevant residential zones;
- Gives effect to Policy 3 of the NPS-UD with regard to heights and densities of urban form within walkable catchments of rapid transit stops and the proposed centres zones;
- Appropriately provides for existing qualify matters;
- Takes the opportunity to better provide for a variety of housing needs in the City through:
 - Enabling and supporting papakāinga;
 - Providing for heights and densities of urban form that exceed the MDRS as a permitted activity within the proposed High Density Residential Zone;
 - The incorporation of a medium and high density design guide to:
 - encourage development that achieves attractive and safe streets and public open spaces, including by providing for passive surveillance; and
 - Enable housing to be designed to meet the day-to-day needs of residents;
- Amends the financial contributions provisions to enable the Council to obtain funding from developers to assist in meeting the costs of infrastructure necessary to service new growth;
- Identifies SNAs on urban environment allotments and encourages the maintenance of indigenous biodiversity within them to assist the Council in meeting the requirements of sections 6 and 31 of the RMA;
- Provides for the rezoning of three sites to support the MDRS and Policy 3 of the NPS-UD;

- Makes a wide variety of consequential amendments to provisions across the district plan that support or are consequential on the MDRS, policies 3 and 4 of the NPS-UD, and consequential amendments necessary to give effect to policy 6 of the NPS-UD.

The IPI is consistent with the requirements of the RMA, the NPS-UD, the relevant provisions of the RPS and all relevant higher-level statutory planning documents. It proposed the most efficient and effective method to achieve the relevant objective of the district plan and the IPI. The options proposed in the IPI carry the highest benefits relative to risks, and carry the least level of risk and certainty compared to the reasonably practicable alternatives, taking into account that much of the content of the IPI is mandated by the RMA and NPS-UD.

APPENDIX M: Rationale for Residential Zones

National Planning Standards – Zoning Options

The National Planning Standards provide for a number of residential zone options with the following purposes:

Zone Name	Description
<i>Large Lot Residential Zone</i>	<i>Areas used predominantly for residential activities and buildings such as detached houses on lots larger than those of the Low density residential and General residential zones, and where there are particular landscape characteristics, physical limitations or other constraints to more intensive development.</i>
<i>Low Density Residential Zone</i>	<i>Areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern, such as one to two storey houses with yards and landscaping, and other compatible activities</i>
<i>General Residential Zone</i>	<i>Areas used predominantly for residential activities with a mix of building types, and other compatible activities.</i>
<i>Medium Density Residential Zone</i>	<i>Areas used predominantly for residential activities with moderate concentration and bulk of buildings, such as detached, semi-detached and terraced housing, low-rise apartments, and other compatible activities</i>
<i>High Density Residential Zone</i>	<i>Areas used predominantly for residential activities with high concentration and bulk of buildings, such as apartments, and other compatible activities.</i>

Having considered these zone options for the implementation of the MDRS and giving effect to NPS-UD Policy 3, the zones shown in bold have been selected for the management of residential subdivision, use and development within the relevant residential zones of Upper Hutt. An explanation for why these zones have been chosen is provided below.

Proposed zones

The identified zones have been selected with regard to the fact they are both *relevant residential zones* under the MDRS, and their descriptions best capture all forms of subdivision, use and development catered for within them under the requirements of the MDRS, Policy 3 of the NPS-UD, and the existing residential uses that will continue to be provided for.

The table below provides further information regarding the description of these zones, the expected outcomes, and the spatial extent of the zones:

Zone	Description
General Residential Zone GRZ	<p>This is the primary existing residential zone in the City that covers all existing residential areas. The General Residential Zone is a relevant residential zone where the MDRS must be incorporated.</p> <p>The part of the GRZ located within a walkable catchment of centres and rapid transit stops is proposed to be rezoned to High Density Residential Zone to more appropriately provide for the heights and densities of urban form required by Policy 3(c) and (d) of the NPS-UD. All remaining GRZ areas are to remain zoned GRZ.</p>

Zone	Description
	<p>Built Form and Amenity</p> <p>The built form and amenity within the GRZ can be expected to range from the status quo up to the maximum levels permitted and enabled by the MDRS, including multi-unit residential medium density housing. Amenity is expected to evolve over time in response to the diverse and changing housing needs of existing and future generations.</p> <p>The built form and amenity that will result from residential subdivision and development that exceeds permitted and controlled activity levels will be influenced by the proposed Medium and High Density Design Guide. This is expected to result in amenity and built form consistent with Policies 3 and 4 of the MDRS. This will enable the Council to more effectively deliver on the requirements of the NPS-UD to ensure well-functioning urban environments.</p> <p>Activities</p> <p>The GRZ chiefly provides for residential activities including residential units, rest homes and community care housing. A limited number of non-residential activities are provided for as permitted activities (subject to limits) such as home business ancillary to residential activities. Other non-residential activities must be authorised via the resource consent process to ensure the objectives of the GRZ and the purpose of the Act are achieved.</p> <p>Location of Zone</p> <p>The full spatial extent of the existing GRZ excluding the proposed High Density Residential Zone – as shown on the IPI planning maps.</p> <p>Site Specific Controls</p> <p>N/A</p>
<p>High Density Residential Zone HRZ</p>	<p>The HRZ comprises the part of the GRZ that is located within a walkable catchment of centres and rapid transit stops. The HRZ is to be created by rezoning these spatial catchments from GRZ to HRZ to more appropriately provide for the heights and densities of urban form required by Policy 3(c) and (d) of the NPS-UD.</p> <p>Built Form and Amenity</p> <p>The built form and amenity within the HRZ can be expected to range from the status quo up to and beyond the maximum levels permitted and enabled by the MDRS, as the HRZ provides for increased heights and densities over-and-above the MDRS as a permitted activity as follows:</p> <ul style="list-style-type: none"> • Up to six residential units per site; • Up to 70% site coverage; • 5m vertical and 60 degrees height in relation to boundary; and • 20m maximum permitted height, heights beyond 20m are a restricted discretionary activity. <p>Amenity is expected to evolve over time in response to the diverse and changing housing needs of existing and future generations.</p>

Zone	Description
	<p>The HRZ provides for and encourages higher and more intensive residential development than the GRZ.</p> <p>The built form and amenity that will result from residential subdivision and development that exceeds permitted and controlled activity levels will be influenced by the proposed Medium and High Density Design Guide. This is expected to result in amenity and built form consistent with Policies 3 and 4 of the MDRS. This will enable the Council to more effectively deliver on the requirements of the NPS-UD to ensure well-functioning urban environments.</p> <p>Activities</p> <p>The HRZ provides for the same activities as those provided for within the GRZ as described above.</p> <p>Location of Zone</p> <p>Within walkable catchments of the centres and rapid transit stops as shown on the IPI planning maps.</p> <p>Site Specific Controls</p> <p>N/A</p>

APPENDIX N: Explanation of Residential Provisions

General Residential Zone and High Density Residential Zone – Objectives and Policies

As *relevant residential zones*, the GRZ and HRZ include the mandatory MDRS objectives and policies. The IPI also amends the existing objectives and policies to ensure they are consistent with and give effect to the relevant objectives and policies of the NPS-UD.

The GRZ and HRZ objectives and policies have been amended or drafted to ensure they give effect to the following NPS-UD provisions:

- *Objective 1 – well functioning urban environments*
- *Objective 3 – enabling more people to live in areas near a centre or public transport*
- *Objective 4 – amenity values of urban environments develop and change over time*
- *Policy 1 – well-functioning urban environments*
- *Policy 3 (c) and (d) – building heights and density requirements*
- *Policy 4 – qualifying matters*
- *Policy 6 – particular regard to the planned urban built form of the district plan when it has given effect to the NPS-UD, and amenity values develop and change over time.*

Comparison of Development Standards

The table below provides a summary and comparison of the development standards that apply in the General Residential Zone versus the High Density Residential Zone:

	General Residential Zone	High Density Residential Zone
Building Height	11m + 1m for specified roof types (permitted). Beyond permitted height is restricted discretionary – consistency with design guide is a matter of discretion.	20m (permitted). Above 20m (restricted discretionary – consistency with design guide is a matter of discretion).
Height in relation to boundary	4m + 60° as per MDRS	5m + 60°
Setbacks	As per MDRS	
Number of Residential Units	3 (permitted as per MDRS)	6 (permitted)
Outdoor Living Space	As per MDRS	
Site coverage	50% as per MDRS	70%
Water Supply, Stormwater and Wastewater	Compliance with Council’s code of practice and proposed IPI hydraulic neutrality requirements.	

Notification clauses

Notification clauses in the GRZ and HRZ are consistent with the requirements of the MDRS and the Act. Apart from the specific notification clauses required by the MDRS, no notification or non-notification provisions are proposed by the IPI for the GRZ or HRZ.