

Section 32 Report

Whaitua Taiwhenua/Rural

prepared for the

Proposed

Waimakariri District Plan

18 September 2021



WAIMAKARIRI
DISTRICT COUNCIL

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1. EXECUTIVE SUMMARY

The Rural Chapter covers the largest area of the District and contains a number of natural and physical resources that are important to the overall economic development and prosperity of the District.

The key resource management issues that need to be addressed in relation to rural areas are:

1. Managing development within rural areas so that rural production activities are enabled, and ensuring that reverse sensitivity effects of other activities, that can affect the ability for rural productive activities to continue, are minimised.
2. Managing development within rural areas to ensure that the fragmentation of land by subdivision and subsequent development does not undermine the ability of land to be available for future generations for rural production.
3. Manage effects of activities so that the character of the rural areas and their amenity values can be maintained while recognising the need for rural productive activities to operate within the Zone.
4. Addressing any change from rural land use to accommodate expanded areas of Rural Residential Development.

To address these issues the following key outcomes are proposed:

1. Managing activities within the zones to enable rural production activities but ensure that where necessary any adverse effects of these activities are managed particularly so that to the extent practicable adverse effects are internalised within the site where they occur.
2. Providing for a range of activities that are necessary to support rural activities or are reliant on the natural and physical resources that exist within the rural environment while ensuring that adverse effects of these activities are managed.
3. Clearly identify activities that will not maintain the character within rural areas are not compatible with activities sought within the rural areas, such as retirement villages and multiple residential unit developments.
4. Recognising that the rural environment of the District does not have homogenous character and addressing this by providing two separate zones that clearly define the expectations for residential density within each zone.
5. Identifying areas of future Rural Residential Development in the form of overlays applying to identified land within Rural Zones which envisage the potential for land use change from rural use and zoning to future rural residential development in the form of a Large Lot Residential Zone.

2. OVERVIEW AND PURPOSE

2.1 Purpose of Section 32 RMA

The overarching purpose of Section 32 of the Resource Management Act 1991 (RMA) is to ensure that plans are developed using sound evidence and rigorous policy analysis, leading to more robust and enduring provisions.

Section 32 reports are intended to communicate the reasoning behind plan provisions clearly and transparently to the public. The report should provide a record of the evaluation process, including the consultation, technical work, methods, assumptions, and risks that informed that process. A robust report can prove highly useful to decision makers, particularly where it clearly communicates the analysis undertaken to identify the most appropriate way to achieve the purpose of the RMA.

The District Council is required to undertake an evaluation of any proposed District Plan provisions before notifying those provisions. The Section 32 evaluation report provides the reasoning and rationale for the proposed provisions and should be read in conjunction with those provisions.

2.2 Topic Description

The Rural Chapter is the principal chapter guiding development in the rural environment of the District. The rural zones are the largest zones by area and are the focus of rural productive activities within the District. It is also a location where there are a range of rural and non-rural based businesses and residential activities.

The key matters addressed in the chapter relate to identifying the range of activities that both need to be, and are desired to be, located in the rural environment while retaining the ability for the land to be utilised for rural productive activities and retaining the rural character and amenity values of this area.

A further matter addressed in this chapter relates to the identification of overlay areas that signal a future change of land use from rural to rural residential (Large Lot Residential).

The rural environment is also an area of demand for other activities, including residential activities, recreation and tourism activities. There can be competing demands for the use of rural land in the District and a potential for conflict to occur between the effects of various activities. It is for this reason that it is proposed effects are managed in a manner that is consistent with the character and amenity values sought in the rural environment.

Key changes that have emerged in the rural area of the District since the current District Plan became operative include:

- widespread subdivision and fragmentation of rural sites, particularly in the eastern area of the District,
- development of new 'rural residential' zones,
- business development not directly associated with primary production occurring on rural sites, and
- there have been some examples of conflict between rural activities (such as farms and quarries) and increasing residential activity in the zone. Changes in primary production have also occurred, with intensive activities such as dairying becoming more common, and more land being irrigated to enhance production.

- The Rural Residential Development Strategy has been updated (2019) which has identified new opportunities and locations for future rural residential development by way of overlays that envisage a change in the zoning from Rural to Large Lot Residential Zone.

The current Operative Plan was prepared prior to the Canterbury Regional Policy Statement 2013. In relation to rural zones, the Canterbury Regional Policy Statement reinforces that the main purpose of a rural zone(s) should be for primary production.

The key purpose of the chapter is to manage activities in the rural areas of the District to provide an environment where rural productive activities and activities that support these or are reliant on the resources in the rural area to occur can occur and will remain as the primary focus of the zone. This is sought to be achieved in a manner that does not undermine the character and amenity values of the rural environment. Managing the effects of these activities and avoiding reverse sensitivity effects is also a key focus of the chapter. The chapter also identifies the areas where future rural residential development can be accommodated.

2.3 Significance of this Topic

There are competing demands for use of the rural land (which is a finite resource) with potential for conflict, particularly in relation to continuing access to high quality rural land for production, demand for residential use for lifestyle purposes in the rural environment and a range of businesses that have established in the rural area. Differences in amenity expectations between production and living activities and erosion of productive potential, rural character and amenity values are key considerations.

Rural production is economically significant within the District and direction from the Canterbury Regional Policy Statement is for the retention of rural land for production purposes. The rural areas contain versatile soil resources that are valuable for the range of production activities they can support. Ongoing availability of land for production for the future is compromised by trends for land fragmentation, investment and use for mainly residential purposes. Once land is developed for 'lifestyle' purposes, it is unlikely that it will be returned to productive use in the foreseeable future.

In terms of maintaining land for rural productive purposes and retaining productive potential within the Waimakariri District the minimum effective areas for primary production activities range from between 10-15 ha up to 100ha. The effective areas are those used for primary production systems. The provision of residential units, sheds, access and associated land use for domestic purposes is in addition to the effective production area. It is acknowledged that smaller areas may be sustainable for fresh produce, glasshouses and tunnel houses. However, to sustain the potential for a range of productive uses a larger area is required.

Higher land values for small lots to develop for rural lifestyle purposes can be an incentive to subdivide larger land parcels, thereby increasing the price of rural land to reflect the possibility of subdivision, and for larger parcels that become increasingly scarce. This can be a disincentive to purchase for primary production purposes.

Cumulative effects from small scale subdivision include:

- increasing potential for conflict between rural and residential land uses and expectations,
- development of 'nodes' where demand for new or upgraded infrastructure and services may occur,
- loss of rural character, and
- higher dominance of residential focused activities, rather than rural productive activities

- undermining the Canterbury Regional Policy Statement directions that rural production is the focus for rural areas.

Since the Operative Plan became operative in 2005 and introduced a 4-ha minimum subdivision standard, there has been a trend of developing smaller sized rural lots. While the creation of small rural lots has been most apparent in the eastern areas of the District, closer to urban centres and the main transport link to Christchurch; more recent trends have identified an increased number of smaller lots being created in the west of the District.

The fragmentation of land and the potential implications of that fragmentation to retaining land use options for rural productive activities is a key issue within the Proposed District Plan and is a matter of significance in the development of the provisions in the Proposed District Plan.

Table 1 and Figure 1 show the number of lots¹ created in the Waimakariri Rural Zone in the Operative Plan from 2006 to 2020 by lot size. The focus is on lots created since 2006 as this is when the Operative Plan and its change to a 4ha minimum lot size in the Rural Zone was confirmed, replacing the previous District Plan's minimum lot size of 20ha.

Table 1. Lots created between 2006 & 2020 in Rural Zone in the Operative Plan by lot size						
	<4ha	4ha - 7.99ha	8ha - 11.99ha	12-19.99ha	20ha+	TOTAL
2006	9	361	11	10	23	414
2007	6	255	14	10	21	306
2008	0	60	6	4	10	80
2009	0	57	3	3	14	77
2010	0	126	4	7	7	144
2011	6	82	1	5	14	108
2012	5	183	8	6	16	218
2013	1	74	3	3	3	84
2014	5	82	5	6	5	103
2015	27	81	4	5	8	125
2016	3	60	7	9	11	90
2017	1	91	0	6	3	101
2018	1	90	1	3	5	100
2019	1	133	3	4	9	150
2020	1	304	6	3	14	328
TOTAL	66	2058	76	84	163	2428

¹ For the purpose of this table, the term 'lot' is used to refer to an area of subdivided land that is a land parcel which can be made up of one or more sections, reserve, titles.

% of total	3%	84%	3%	3%	7%	100%
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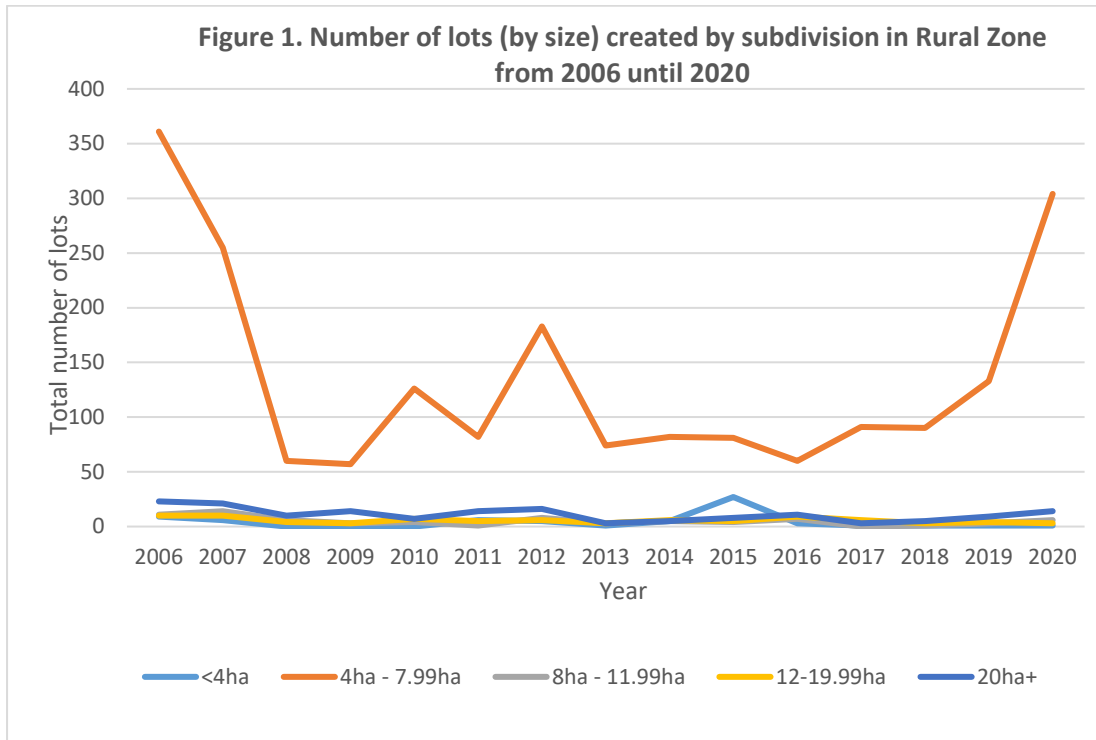


Table 1 and Figure 1 show there was an initial peak in the creation of 4ha to 7.99ha lots in the Operative Rural Zone in 2006 (361 lots), followed by an up/down pattern over years when unusual events occurred such as the Global Financial Crisis (dip in 2008-09), and post-Canterbury earthquakes housing peak (peak in 2012). The creation of 4ha to 7.99ha lots has increased in recent times - particularly from 2018.

The key information shown in Figure 1 is:

1. The creation of 4ha – 7.99ha sized lots is the most common lot size category and has seen a significant increase in subdivision consent applications.
2. The initial peak in the creation of 4ha – 7.99ha lots in 2006 following the District Plan becoming operative and replacing the previous District Plan’s minimum lot size limit of 20ha.
3. The dip in 4ha – 7.99ha lots during 2008 - 2009 coincides with the impact of the Global Financial Crisis.
4. The peak in 2012 represents the recovery and relocation following the Canterbury earthquakes.
5. The creation of 4ha - 7.99ha lots has increased from 2016 onwards, with a strong peak from 2018 to present. This coincides with the signals given by Council² that the fragmentation of rural land is a major resource management issue that needs to be addressed. It also coincides with when district wide geotechnical requirements being relaxed.

² via the District Development Strategy (2017 – 2018), District Plan Review ‘Issues & Options’ (2017) consultation and ‘What’s the Plan?’ consultation (2019)

2.4 Current Objectives, Policies and Methods

The Operative District Plan for the District contains three zones applying in the rural environment. They are:

1. The Rural Zone which is the principal zone for the majority of the rural environment of the District.
2. The Mapleham Rural 4B Zone recognises the development of a 70-hectare specific rural environment based on a Concept Plan as approved by a decision of the Environment Court (C9/2002).
3. The Pegasus Rural Zone recognises the special characteristics of the rural areas surrounding Pegasus, for nature conservation and cultural heritage values in some areas and for treated wastewater disposal in others.

In addition, specific provisions for the rural area within Maori Reserve MR873 were developed to facilitate development for descendants of the original grantees from the Canterbury Purchase 1848 (Kemp's Deed). These date from 2015.

The District Plan contains objectives and policies for the rural zones and identifies that character and features of the rural environment are valued by people who live in the Rural Zones, and that maintenance of these qualities is important and they should differ significantly from Residential Zones.

It is also stated that it is important for agriculture, pastoral farming and horticulture to continue to be the predominant land use in the Rural Zones because this will contribute most to the maintenance and enhancement of rural character and notes the effect of reverse sensitivity from residential use.

The District Plan also contains effects-based provisions for the zones that are generally permissive and allow a wide range of activities subject to performance controls. In contrast, there are some very specific provisions to manage effects on sensitive activities in relation to effluent spreading.

Management of subdivision and density has taken a uniform approach to allow subdivision and residential development on sites of 4 hectares or greater. This approach has resulted in many new lots at or near the minimum size across the District and taken up largely for residential purposes.

2.5 Information and Analysis

This section sets out a list of relevant background assessments and reports and the key matters addressed or arising.

Table 1 – List of relevant background assessments and reports

Title	Author	Description of Reports
District Plan Effectiveness – Rural Zone - Quality of the Environment	WDC (August 2016)	The District Plan Effectiveness Review for the rural zones considered a range of aspects and the degree to which outcomes had been achieved, and made the following key observations:
District Plan Effectiveness – Rural Zone – Subdivision	WDC (August 2016)	1. A review of the minimum standard for rural subdivision and its relationship with the purpose of the zone, character, amenity and use for farm and forestry production is recommended to

District Plan Effectiveness – Rural Zone – Business	WDC (August 2016)	<p>ensure that the outcomes sought by the community and under the RMA are being achieved. To further inform the above, a review of national trends and research, plan standards and subdivision controls could be undertaken.</p> <p>2. Further investigation into the characteristics of, and thresholds for, amenity in the Rural Zone is recommended as the basis for the development of clear policy and management techniques, whether these are within or outside of the District Plan. The investigation should consider any differences within the zone in relation to expectations and environmental quality.</p>
District Plan Effectiveness – Rural Zone – Bulk and Location)	WDC (August 2016)	
District Plan Effectiveness – Rural Zone – Transport	WDC (August 2016)	
District Plan Effectiveness – Residential 6, 6A & 7 Zones and Mapleham 4B & Pegasus Rural Zones - Quality of the Environment	WDC (September 2016)	
District Plan Effectiveness – Residential 6, 6A & 7 Zones and Mapleham 4B & Pegasus Rural Zones – Bulk and Location	WDC (September 2016)	
District Plan Effectiveness – Residential 6, 6A & 7 Zones and Mapleham 4B & Pegasus Rural Zones – Business	WDC (September 2016)	
District Plan Effectiveness – Residential 6, 6A & 7 Zones and Mapleham 4B & Pegasus Rural Zones – Transport	WDC (September 2016)	
District Plan Effectiveness – Residential 6, 6A & 7 Zones and Mapleham 4B & Pegasus Rural Zones – Subdivision	WDC (August 2016)	
Small Holding Owners Survey 2006	WDC	

		results indicated that although reasonably satisfied with their properties, there was some concern about the pace of subdivision and development in the rural area.
<p>WDC GIS Analysis Rural Zone Parcel Size Analysis</p> <p>Land size analysis of Rural Zone and Residential 4A and 4B Zone Map and table</p> <p>Vacant and Occupied Land Parcels in Rural and Residential 4A and 4B Zones</p> <p>Lot size and vacancy from March 2017 to August 2018</p> <p>Figure 1 Total lots, created in Rural Zone during 2006 – 2018 in terms of size</p> <p>Figure 1 Total lots, created in Rural Zone during 2006 – 2020 in terms of size</p>	<p>August 2018</p> <p>August 2018</p> <p>Map January 2019</p> <p>May 2018</p> <p>September 2020</p> <p>June 2021</p>	<p>Various GIS analysis of subdivision trends and the number and size of lots in Rural and Residential 4A and 4B Zones. Mapping of lot size, vacant and developed sites, and land in private or public ownership.</p> <p>The numbers included in this report are those from June 2021.</p>
Policy and Strategy Occasional Paper: Farming in the Waimakariri District	2014	Describes the change in employment, farm production types and intensity of production in the period from 2001 to 2013. A key change identified is a drop in percentage of people employed in primary sector to 7.7% (usually resident) and 13.1% (daytime workforce).
Residential 4 landscape review	Andrew Craig May 2015	This report identifies and discusses the provisions that affect landscape character and amenity outcomes and determines whether there are any desirable outcomes that either require further objectives and policies or amendments to existing provisions. It also determines whether the methods (primarily the rules) appropriately implement and achieve the relevant objectives and policies.
Waimakariri District Council - Rural Futures	KPMG May 2018	This report looks at a range of rural resources and emerging and foreseeable changes in rural production,

Analysis: Future agrifood scenario planning for a prosperous District		technology and markets. Three potential scenarios are identified that reflect a range of opportunities and different types of land-based productions.
Waimakariri District – Rural Character Assessment	Boffa Miskell June 2018 (Update) Zone Matters 2020	This report identifies 12 rural character areas within the Rural Zone and describes the landform, land cover and land use elements, and the key characteristics that typify each character area. The report also determines areas that are capable of rural residential development or more intensive subdivision. The February 2020 update related to specific consideration from a character perspective as to the location of any zone boundary between any proposed Rural Zones having a different density of subdivision and development of residential activity.
Waimakariri District Plan Review – Rural and Rural Residential Location and Density – Interim Draft Report	Boffa Miskell 19 April 2018	This report relates the rural character findings to inform rural and rural residential zoning provisions for the District Plan Review. The report covers background research, and the requirements of statutory documents that are relevant including the Canterbury Regional Policy Statement.
Waimakariri District Plan Review: Rural Production Advice – Rural Land Zoning	Jamie Gordon Macfarlane Rural Business November 2018	This report reviews the impact from change in zoning of rural land, particularly minimum lot size impacts on primary production. The report presents an informed view on the effect land parcel size has on productivity and profitability but does not to recommend precise land use and or zoning options.
Analysis of Drivers and Barriers to Land Use Change	AgFirst for Ministry of Primary Industries August 2017	This report discusses the drivers and barriers to land use change including potential drivers and barriers. It identifies and examines a range of influences including biophysical resources, economic, technological, societal and personal factors.
Rural Subdivision and Lifestyle Property Analysis: Waimakariri District	QV December 2018	A supply and demand analysis for small rural holdings and rural residential properties in Waimakariri District, and analysis of the implications for potential allotment size changes. Areas considered were the area in Greater Christchurch, North Eastern Waimakariri and the rest of the District.
Industrial Activity in Rural Zones	Property Economics 2015	This report identifies trends in industrial development within Rural Zones. It identified: <ul style="list-style-type: none"> Industrial and commercial activity growth has been faster proportionally in the Rural and

		<p>Residential Zones than in Waimakariri Business 1 & Business 2 Zones</p> <ul style="list-style-type: none"> • The Rural Zone will increasingly be used for industrial and commercial activity.
Industrial Activities in Rural Zones	Colliers 2019	<p>This report addressed the availability of industrial zoned land and land used for industrial activities. It identified that while there is sufficient zoned land for industrial activities there are constraints relating to the ability for activities to establish in Industrial Zones due to</p> <ul style="list-style-type: none"> • availability of large land parcels • availability of land to purchase rather than lease <p>The outcome is that historically the rural environment has been important for industrial activities and district self-sustainability and projections are that this will continue.</p>
Waimakariri Rural Residential Development Strategy	WDC 2019	This strategy identifies areas anticipated for future Rural Residential Development within the Waimakariri District.
Application for Immediate Legal Effect of Rules	WDC June 2021	<p>This is an application to the Court seeking immediate Legal effect applies to two rules in the General Rural Zone addressing minimum residential density and one rule in the Subdivision Chapter addressing minimum lot size.</p> <p>The information consists of an application supported by four Affidavits.</p>

2.6 Consultation Undertaken

Consultation has been undertaken as part of this District Plan Review process with key internal and external stakeholders and the wider community. This section focuses on engagement undertaken and feedback received through means administered by the Waimakariri District Council.

Consultation has been undertaken with respect to Rural Based activities as well as potential Rural Residential (Large Lot Residential) overlay areas. In relation to future overlay areas there has been consultation with directly affected landowners.

Details of the feedback received from the consultation is provided in Appendix 1. A brief summary of consultation undertaken is provided below:

Summary of Consultation:

- (a) **District Plan Effectiveness Review** – Summary of findings consultation.
- (b) **District Development Strategy 'Your Early Thoughts' Survey (2016)**: Submissions to a document that introduced seven key District Development Strategy themes including 'Our rural area and small settlements', with prompting questions posed against each theme to

begin a conversation with the community and stakeholders about the directions in which they wish the District to grow over the next 30 years.

- (c) **District Development Strategy.** Consultation findings for 'Our rural area and small settlements' that proposed options for how the District provides for rural development and rural residential development in the District. This mandated the review of the Council's Rural Residential Development Plan.
- (d) **Issues and Options Consultation** This included a specific paper on Rural Issues and Options. This consultation opportunity was identified in local newspapers, website and social media. Summary of consultation October 2017. This also addressed rural residential matters which relate to the management of rural residential subdivision and development and consider options including continuing the current regime of identifying new rural residential zoned land, extending and/or intensifying existing rural residential areas, or only extending existing rural residential areas.
- (e) **Comments** sought from real estate agents, developers and Enterprise North Canterbury in relation to rural residential development in the District, trends and demand.
- (f) **WDC engineering staff:** Servicing and development considerations for intensifying possible rural residential areas.
- (g) **WDC staff review groups:** Development of rural directions for drafting, background technical report findings, land use, subdivision and development.
- (h) **Inquiry by Design Workshops (2018):** Brainstorming sessions held with key staff, external stakeholders and Councillors to identify potential new areas for rural residential activity.
- (i) **WDC Technical Advisory Group (2018/2019):** Review of shortlist of potential growth directions for rural residential activity as well as ongoing feedback on concept options, implications, serviceability, urban form outcomes, consultation, final growth locations and other matters.
- (j) **WDC Workshop 4 December 2019** Councillor and staff enquiry by design workshop to identify rural density and zoning issues and options for drafting.
- (k) **Stakeholder Consultation:** Discussion on proposed issues and directions in relation to subdivision and activity management and issues for within the Rural Environment with industry groups and individual farmers. It is recognised that matters relating to minimum lot size and minimum residential density were not addressed in detail. In particular potential lot sizes were not discussed.
- (l) **Community Boards Workshops (2019):** Community Board members and staff sessions to brief the Boards on the content of the draft Rural Residential Development Strategy, in order to assist Boards to prepare submissions.
- (m) **Draft Waimakariri Rural Residential Development Strategy (2019):** Submissions to a draft Strategy that sought community feedback on five existing rural residential areas for further growth.
- (n) **'What's the Plan' Consultation – District Plan Review April 2019** Public consultation for District Plan preparation to test direction, particularly in relation to management of business activities in rural areas, subdivision and residential development. Submissions that address how densely settled the District's rural areas should be, and ways this can be managed, including in what way rural residential activity is provided. Drop in sessions were held at Rangiora, Woodend, Oxford, Kaiapoi 11 – 17 April 2019.
- (o) **Councillor Committee Workshops** Councillor and staff workshop to address rural issues and options informing drafting.
- (p) **Update emails/letters to immediately affected landowners within the rural residential growth areas (LLRZ Overlays), and associated responses to queries via email, phone and**

meetings (June 2019 – ongoing): Key project updates to landowners via email/letter following the adoption of the final Rural Residential Development Strategy, as well as phone/email enquiry responses to, and associated meetings with landowners and consultants.

Feedback was also sought and received (prior to the formal first schedule consultation) from Te Ngāi Tūāhuriri Rūnanga on provisions within the Draft Rural Chapter and on matters relating to further rural residential areas.

In relation to rural residential proposals, the views of Te Ngāi Tūāhuriri Rūnanga were sought in February 2019 whereby the draft Waimakariri Rural Residential Development Strategy was included on the Te Ngāi Tūāhuriri Rūnanga Hui agenda for consideration. This was arranged through Mahaanui Kurataio Limited (MKT). Feedback was provided on 19 February as follows:

1. The Kaitiaki have reservations about further development along / adjacent to the Ashley River / Rakahuri due to risks of flooding which may be exacerbated by climate change.
2. The Kaitiaki do not support any further development at Gressons Road due to concerns relating to increased traffic, infrastructure upgrades required, potential adverse effects on waterways within the area, as well as the development encroaching further into a Silent File area.
3. The Kaitiaki are generally comfortable with the other proposed locations but are particularly interested in infrastructure / servicing upgrades within the development areas and having input into these upgrades, e.g. stormwater and wastewater management.

In relation to feedback item 1 above, the final Strategy excluded the original growth direction arrow to the west of the existing Ashley village, along the north of the Ashley River. Only a northern growth direction arrow from Ashley village remained in the final Strategy. This addressed the Kaitiaki's first concern. Regarding feedback item 2 above, the Silent File Area SF017 Pekapeka to the south of the proposed growth area at Gressons Road, indicating the presence of significant wāhi tapu or wāhi taonga somewhere in the area, is identified as a constraint and acknowledged. Therefore, consultation with Ngāi Tūāhuriri is particularly important in order to identify effects of the activity and to avoid, remedy or mitigate those effects. This has been clearly communicated to the landowner in question, who was also the developer of another rural residential area in a culturally relevant area and has good experience engaging with the Rūnanga on cultural matters. Furthermore, the Gressons Road growth area had already been included in the previous 2010 Rural Residential Development Plan. Feedback item 3 above will be further addressed during more detailed design of infrastructure and servicing design and upgrades when development commences.

Generally, there has been regular engagement with Te Ngāi Tūāhuriri Rūnanga (via MKT) under the partnership between the Iwi and Council on the drafting of the District Plan. Drafts of proposed provisions relating to the LLRZ have been provided to MKT for comment. No specific comments have been received.

In relation to matters relating to the wider rural environment and rural activities, the draft Rural provisions have been provided to Te Ngāi Tūāhuriri Rūnanga. Feedback received related to seeking to ensure that there was appropriate integration with other chapters of the plan that address matters of particular relevance to tāngata whenua matters. In particular:

- ensuring that there is integration with the provisions relating to the development of MR873; and

- that the objectives, policies and rules provide clarity as to the important matters of relevance to tāngata whenua were to be considered. In particular that they address matters associated with the development of land and use and impact of any use and development on water;
- the assessment matters were clear in enabling consideration of matters of relevance to tāngata whenua.

These matters have all been considered and addressed in the development of the provisions that are included in the Proposed District Plan. This is in relation to the provisions within the Rural Chapter, but also other chapters including the provisions applying to Sites of significance to Māori and the provisions in the Kāinga Nohoanga special purpose zone. To the extent practicable, given the different purpose and focus for the Rural Zones and the Kāinga Nohoanga zone, the provisions are consistent and seek to achieve integrated management of natural and physical resources.

Summary of feedback:

(a) In relation to Rural Areas:

- Rural density is a key topic of interest with concerns being raised on the impact subdivision has on retaining the ability to use rural land for productive rural activities.
- Activities occurring in rural areas do not affect the ability to undertake productive rural activities is another key area of feedback.

(b) In relation to Rural Residential Activities:

- There is support for the rural residential growth directions (which informed the development of the specific LLRZ Overlays) by directly affected landowners.
- There is general support for the rural residential growth directions (which informed the development of the specific LLRZ Overlays) by the wider community, though a number of other growth areas are also sought.
- There is general support for the proposed District Plan mechanism for releasing relevant land for development.

2.7 Iwi Authority Advice

Clause 3(1)(d) of Schedule 1 of the RMA sets out the requirements for local authorities to consult with iwi authorities during the preparation of a proposed plan. Clause 4A requires the District Council to provide a copy of a draft proposed plan to iwi authorities and have particular regard to any advice received. This section summarises the consultation feedback/advice received from the iwi authority relevant to the Rural Chapter, and the District Council's consideration of, and response to (as required by Section 32(4A)(b) of the RMA), that feedback/advice.

Feedback was received concerning the site of permitted Rural Industries located in a Site or Area of Significance to Māori. As a result of the feedback received a new standard and matter of discretion has been included within the provisions to respond to this issue.

2.8 Reference to Other Relevant Evaluations

This Section 32 topic report should be read in conjunction with the following evaluations:

- Residential Chapter, this includes the provisions for the Large Lot Residential Zone and Large Lot Residential Zone Overlay,
- Strategic Directions, as there are provisions directly relevant to the management of rural areas,

- (c) Development Areas as future urban areas are currently located within rural zones;
- (d) Transport, as a number of activities that will occur within the rural zone or utilise the roading network;
- (e) Coastal environment, as the rural zone directly adjoins the coastal environment;
- (f) Noise, as a number of activities that will occur within the rural zone will generate noise on either a permanent or temporary basis;
- (g) Signs, as a number of activities occurring within rural zones will seek signage;
- (h) Subdivision, as to the subdivision chapter is key to ensuring that appropriate density requirements in rural zones are maintained;
- (i) Natural hazards, as a number of natural hazards occur within rural zones;
- (j) Sites and areas of significance to Maori, as a number of sites in areas of significance are located within rural zones or activities that may occur in rural zones could impact on sites and areas of significance;
- (k) Ecosystems and indigenous biodiversity, as many ecosystems and indigenous biodiversity areas are located within rural zones;
- (l) Natural features and landscapes, as a number of the natural features and landscapes identified as important are located within rural zones;
- (m) Earthworks, as a number of activities that occur within rural areas generate earthworks;
- (n) Energy and Infrastructure, as a number of energy and infrastructure activities take place within rural areas;

3. STATUTORY AND POLICY CONTEXT

3.1 Resource Management Act 1991

Section 5 of the RMA sets out the purpose of the RMA, which is to promote the sustainable management of natural and physical resources. In achieving this purpose, authorities need to recognise and provide for matters of national importance identified in Section 6, have particular regard to other matters listed in Section 7, and take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) under Section 8.

The Section 6, 7 and 8 matters listed below are relevant because they address a natural or physical resource that is either located within a rural zone, or are physical resources the use, development or protection of which is relevant to activities occurring within the rural area of the District.

3.1.1 Section 6

The Section 6 matters relevant to this topic are:

- (a) the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use and development:

- (b) the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development:
- (c) the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna:
- (e) the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga:
- (h) the management of significant risks from natural hazards.

A number of the areas associated with lakes, rivers and their margins, outstanding natural features and landscapes and significant indigenous vegetation and a number of the sites of significant to Māori are located within the Rural Zones. These matters are also specifically addressed in other Chapters of the Plan and as such the key resource management issues and outcomes are not addressed within the Rural Chapter itself. However, in order to achieve integrated management it is important that provisions within the Rural Chapter support the achievement of the outcomes specified in other chapters, and importantly does not undermine their achievement.

There are a number of activities that occur in rural areas that can have an impact on these values, features and sites.

3.1.2 Section 7

The Section 7 matters relevant to this topic / chapter are:

- (a) kaitiakitanga.
- (aa) the ethic of stewardship.
- (b) the efficient use and development of natural and physical resources.
- (c) the maintenance and enhancement of amenity values.
- (d) intrinsic values of ecosystems.
- (f) maintenance and enhancement of the quality of the environment.
- (g) any finite characteristics of natural and physical resources.
- (j) the benefits to be derived from the use and development of renewable energy.

The rural land of the District generally provides an open rural environment within the District. The rural areas surround the settlements and a number of the key natural features within the District. The rural landscape has been recognised as being important to the District's overall amenity values and in maintaining the quality of the environment.

Maintenance of the rural environment and resources in the rural areas is addressed in the RMA within the Council's duties, including its functions related to the establishment, implementation, and review of objectives, policies, and methods to achieve integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district. This is of particular relevance to having regard to the maintenance and enhancement of amenity values (section 7(c)) and the maintenance and enhancement of the quality of the environment (section 7(f)).

The District's productive soils and rural land resource are a valuable resource for primary production and the economy of the District. The management of this resource is in accordance with the Council's

duties under the RMA for achieving the sustainable management purpose of the Act. Particular regard also needs to be had to the finite nature of the rural land resource (section 7(g)).

In addressing matters such as kaitiakitanga and intrinsic values of ecosystems it is important that any provisions in the Rural Chapter support the achievement of the specific provisions in other chapters addressing these matters.

When considering matters relating to the benefits to be derived from the use and development of renewable energy this is primarily addressed in the Energy and Infrastructure provisions, but it is recognised that the rural environment is a location these activities can occur within.

3.1.3 Section 8

Section 8 requires the Council to take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi). The section 8 principle of most relevance to this topic is the duty to make informed decisions through consultation. Tāngata whenua, through Mahaanui Kurataiao Limited have been consulted as part of the review process and the obligation to make informed decisions based on that consultation is recognised and has been considered in the development of provisions. These matters are relevant when considering the rural issues and ensuring the ongoing use, development and protection of resources in the rural zone is achieved.

3.2 National Instruments

The following national instruments are relevant to this topic / chapter:

3.2.1 National Planning Standards

The National Planning Standards came into effect in May 2019 and minor amendments were incorporated in November 2019. The purpose of the Planning Standards is to improve the consistency of council plans and policy statements.

Of particular relevance is the application of the planning zones for the 'General Rural Zone' and the 'Rural Lifestyle Zone'. Also, to the extent possible these zone provisions have used the definitions associated with the rural focused provisions, including primary production, rural industry, intensive indoor primary production, home business. In any situations where definitions in addition to those in the Planning Standards are needed, such as intensive outdoor primary production, they have sought to be drafted in a manner consistent with the existing standards to the extent possible.

3.2.2 National Policy Statements

New Zealand Coastal Policy Statement

The purpose of the New Zealand Coastal Policy Statement 2010 (NZCPS) is to state policies in order to achieve the purpose of the RMA in relation to the coastal environment of New Zealand. Local authorities must give effect to the NZCPS through their plans and policy statements. Within the Proposed District Plan these matters are primarily addressed within the provisions relating to the Coastal Environment which applies additional provisions to some parts of the District covered by the

Rural Zones. However, there has been consideration given to the interrelationship between the Coastal environment and the Rural Environment in the development of the provisions, and in particular in ensuring policies and assessment matters for restricted discretionary activities recognise the existence of areas of high natural value.

To the extent necessary the Rural Chapter gives effect to the NZCPS.

National Policy Statement for Electricity Transmission 2008

The National Policy Statement for Electricity Transmission 2008 (NPSET) was developed to recognise the national significance of the electricity transmission network, while managing the network's environmental effects and the adverse effects of other activities on the network. Within the Proposed District Plan these matters are primarily addressed within the provisions relating to the Transport, Energy and Infrastructure Chapter which has specific provisions relating to these matters. However, with respect to the Rural Zones there are some reverse sensitivity and integrated land management matters with these provisions that have been considered and addressed within the Rural Provisions.

To the extent necessary the Rural Chapter gives effect to the NPSET.

National Policy Statement for Renewable Electricity Generation 2011

The National Policy Statement for Renewable Electricity Generation 2011 (NPSREG) addresses the national significance of renewable electricity generation under the RMA. Within the Proposed District Plan these matters are primarily addressed within the provisions relating to the Transport, Energy and Infrastructure Chapter which has specific provisions relating to these matters. However, with respect to the Rural Zones there are some reverse sensitivity and integrated land management matters with these provisions that have been considered and addressed within the Rural Provisions.

To the extent necessary the Rural Chapter gives effect to the NPSREG.

National Policy Statement for Freshwater Management 2020 (NPSFM)

The NPS for Freshwater Management directs regional councils to set objectives for the state of freshwater bodies in their regions and to set limits on resource use to meet these objectives. While these matters are primarily addressed through Regional Plans there are some matters relevant to integrated management of land and water of relevance to the Rural Zones. The NPSFM has Te Mana o te Wai as a fundamental concept. This relates to the fundamental importance of water and recognises that protecting the health of freshwater protects the health and well-being of the wider environment. Te Mana o te Wai is about restoring and preserving the balance between the water, the wider environment and the community.

The NPSFM was made operative in September 2020 and as such has not yet been fully implemented, and this will likely not occur until at least 2025 with new regional plans being prepared in accordance with the processes set out in the NPSFM. To the extent it can, the Rural Chapter gives effect to the NPSFM.

The relationship between land and freshwater has been considered in developing the provisions in the Rural Chapter. This has included considering the relationship between land use activities occurring

in Rural Zones and freshwater. In addition when developing the policy, rules and standards that apply to a variety of rural productive uses, consideration has been given to avoiding the duplication of controls on activities that are or will be specifically managed under the plans developed to give effect to the NPSFM.

National Policy Statement for Urban Development 2020 (NPSUD)

The NPS for Urban Development is focused on ensuring New Zealand's towns and cities are well-functioning urban environments that meet the changing needs of diverse communities. While the main implementation of the NPSUD is addressed within other chapters of the District Plan, in particular those in Strategic Directions and Urban Form and Development, it is relevant to rural areas. This is because future development areas of land that provide new urban development opportunities, including residential development and rural residential development through future development areas or overlays were or are within the Rural Environment.

To the extent necessary, the Rural Chapter gives effect to the NPSUD, in particular in relation to the provisions that address future areas for rural residential development through providing Large Lot Residential Development Overlays.

3.2.3 National Environmental Standards

National Environmental Standards are regulations that prescribe technical standards, methods or requirements for environmental matters so as to ensure a consistent standard for an activity or resource use. The key national environment standards of relevant to the Rural Chapter are:

- The National Environmental Standards for Plantation Forestry (NESPF)

The NESPF has influenced the development of the provisions in the Rural Chapter as the Chapter does not contain any specific provisions that control activities covered under the NESPF. The NESPF manages a wide range of aspects associated with forestry activity which is over 1 ha in size and is for the purpose of being commercially harvested. The only controls on forestry activities in the Rural Chapters relate to areas less than 1ha. It is noted however that forestry controls also exist within identified areas within the Rural Zone, such as in Significant Natural Areas.

- The National Environmental Standards for Freshwater (NESFM)

The NESFM has influenced the development of the provisions in the Rural Chapter, particularly relating to the type and level of controls that are included for rural production activities affecting discharge of nutrients or activities such as winter grazing. The provisions of the rural zone have recognised the matters that are controlled in the NESFM and have sought to avoid duplication, to the extent necessary, given the functions of the Waimakariri District Council under the Resource Management Act, in the management of effects of activities where these effects are specifically controlled in the NESFM, such as feedlots and stockholding areas and winter grazing.

- National Environmental Standard for Air Quality (NESAQ)

The NESAQ provides a framework for ambient air quality and particulate matter in the air. It sets a guaranteed minimum level of health protection for all New Zealanders. This NES is relevant to activities with an air discharge, such as the extraction of minerals. Management of Air Quality is

a function of the Canterbury Regional Council and for territorial authorities the focus is more on amenity value matters such as dust discharges.

3.3 Regional policy statement and plans

The Canterbury Regional Policy Statement, which the District Plan must give effect to, has a number of provisions of relevance to the Rural Zones and management of the use development and protection of land within the Rural environment. The most relevant matters include:

Chapter 5 Land use and infrastructure. This chapter identifies that development in the region is to be located and designed to enable rural activities that support the rural environment, including primary production and development being enabled that avoids or mitigates reverse sensitivity effects and conflicts between incompatible activities, including with identified mineral extraction areas. Within this chapter there is policy recognition that the rural areas are intended mainly for primary production activities and there is a requirement that district plans identify areas to be used for primary production and control the adverse effects of subdivision and land-use in rural areas.

Rural activities, that support the rural environment, including primary production, are to be enabled. While development is enabled it is to ensure that adverse effects are avoided, remedied or mitigated, including where these would compromise or foreclose Natural and physical resources are maintained and enhanced contributing to overall rural productive economy in areas which are valued for existing and foreseeable future primary production.

Rural residential activities are addressed as their own activity. Rural residential development is addressed in the Waimakariri District Plan through the Large Lot Residential Zoning. New areas that may be suitable for Large Lot Residential Zones are addressed in the Rural Chapter in the context of identifying overlay areas.

Chapter 6 Recovery and Rebuilding of Greater Christchurch directs that recovery of Greater Christchurch maintains the character and amenity of rural areas and settlements. This chapter does address the separation of rural and urban activities, and the need to restrict urban activities within the rural area. Urban activities are described to include any residential units, other than rural residential development, occurring on sites that are less than 4 ha in area. Rural activities are those involving residential activity on lots 4 ha or more. Rural residential activities are addressed as their own activity. New areas of rural residential development are able to occur, but only in areas where they are identified in a Rural Residential Development Strategy. Rural residential development is addressed in the Waimakariri District Plan through the Large Lot Residential Zoning. New areas that may be suitable for Large Lot Residential Zones are addressed in the Rural Chapter in the context of identifying overlay areas. These are in locations that are identified in the Waimakariri Rural Residential Development Strategy.

Chapter 7 directs the consideration of the effects of land uses and intensification of land uses on demand for water and on water quality in the sustainable management of fresh water in an integrated way within and across catchments. This has been addressed to the extent that is necessary and is compatible with the functions of the Waimakariri District Council under the Resource Management Act and is not duplicating matters contained in existing national instruments.

Chapter 9 directs that restoration or enhancement of ecosystem functioning and indigenous biodiversity contributes to Canterbury's distinctive natural character and identity and promotes enhancement in appropriate locations. This matter is primarily addressed through other chapters,

but the Rural Chapter seeks to recognise integrated management by recognising appropriate matters within objectives, policies, rules and assessment matters.

Chapter 15 directs the maintenance and improvement of the quality of Canterbury's soil to safeguard its mauri, life supporting capacity, health and productive capacity and ensuring that land use and land management practices avoid significant long term adverse effects on soil quality, including significant new induced soil erosion. Matters such as managing soil and safeguarding productive capacity of soil has been a key matter considered when developing the provisions for the Rural Zone, including through the policies, activities provided for in the zone and rules managing the amount of site coverage and coverage by impervious surfaces as well as assessment matters.

With respect to Regional Plans the **Canterbury Land and Water Regional Plan** is of relevance. Plan Change 7 to this Plan has recently introduced water quality standards and objectives, policies and rules to address water quality and quantity matters associated with land uses, particularly rural land uses that will apply within the Waimakariri Catchment. Once, operative, this will supersede the Waimakariri River Regional Plan. To the extent necessary the provisions of the District Plan are consistent with the Land and Water Regional Plan, and importantly seeks to minimise any duplication in regulation.

In addition, the **Canterbury Air Regional Plan** is also relevant. This provides a regional policy framework that manages air discharges within Canterbury. The focus of this Plan is on maintaining air quality where people's health and cultural well-being is being provided for, and where it is not for air quality to be improved. This is also relevant in relation to amenity values which is a function of the Waimakariri District Council.

3.4 Iwi Management Plan

The Mahaanui Iwi Management Plan 2013 (IMP) contains objectives and policies of relevance to the Rural Chapter.

Consultation has been undertaken with Te Ngāi Tūāhuriri Rūnanga regarding a range of District Plan matters, and specific feedback was provided with respect to the provisions in the Rural Chapter.

It is considered that all provisions in the IMP have relevance to activities and resources that are within the rural environment. Therefore, the IMP as a whole has been considered. The table below provides a summary of those provisions directly related to matters addressed in the Rural Chapter.

IMP Objectives/Policies	Response (Summary)
5.3 Wai Maori	
<p>Nga Paetae Objective 3 identifies the integrated resources of water and land and the practice of Ki Uta Ki Tai.</p> <p>Nga Kaupapa Policy</p> <p>WM7.1 recognising rural land and water planning management and use recognise factors including land capability</p> <p>WM 7.2 Taking a precautionary approach to land use conversion and intensification</p> <p>WM 7.4 Relating to land conversion for irrigation and intensive land use</p> <p>WM 7.5 Relating to land conversion for irrigation and intensive land use</p> <p>WM 7.14 Relating to effects of land use activities on water quality and quantity having regard to cumulative and individual effects</p>	<p>The interrelated nature of land and water has been recognised in the development of the provisions, including the identification of areas of natural value.</p> <p>It is recognised that many of the specific policy matters are primarily provided for through Regional Plan matters and is the topic covered by proposed Plan Change 7 to the Land and Water Regional Plan.</p> <p>The District Plan provisions have considered potential effects of land intensification and land use to the extent consistent with the functions of the Waimakariri District Council and in a number of situations such as intensive indoor or intensive outdoor farming resource consent is required for the activity to establish, which while accepting the land use needs to occur within the Rural Zone, enables the consideration of conditions required to manage adverse effects.</p> <p>The provisions in the Rural Zones endeavour to recognise the importance of land and soil resources and the integrated management of all natural resources.</p>
5.4 Papatuanuku	
<p>Nga Paetae Objectives</p> <p>All objectives 1-8 have some relevance to the management of rural zones, in particular objectives 1, 2, 3, 4 and 5</p> <p>(1) The mauri of land and soil resources is protected mō tātou, ā, mō kā uri ā muri ake nei.</p> <p>(2) The ancestral and contemporary relationship between Ngāi Tahu and the land is recognised and provided for in land use planning and decision making.</p> <p>(3) Land use planning and management in the takiwā reflects the principle of Ki Uta Ki Tai.</p>	<p>The District Plan provisions have considered potential effects of land intensification and land use to the extent consistent with the functions of the Waimakariri District Council and in a number of situations such as intensive indoor or intensive outdoor farming resource consent is required for the activity to establish, which while accepting the land use needs to occur within the Rural Zone enable the consideration of conditions required to appropriately manage adverse effects.</p> <p>The provisions in the Rural Zones endeavour to recognise the importance of land and soil resources and the integrated management of all natural resources.</p> <p>The Rural Chapter provisions establish the natural and physical resources and the reasons they are being managed including addressing adverse effects in requiring</p>

IMP Objectives/Policies	Response (Summary)
<p>(4) Rural and urban land use occurs in a manner that is consistent with land capability, the assimilative capacity of catchments and the limits and availability of water resources.</p> <p>(5) Inappropriate land use practices that have a significant and unacceptable effect on water quality and quantity are discontinued.</p> <p>Nga Kaupapa Policy</p> <p>P1.1 Principles of land management</p> <p>P2 .1 Rural land use prioritising the protection of resources</p> <p>P2 .2 Adverse effects of rural land use</p> <p>P7.1 Disposal of waste</p> <p>P9.1 Sustain and safeguard the life supporting capacity of soils</p> <p>P9.2 Value soils as a taonga</p> <p>P9.3 Protect soils from unsustainable land use and development</p> <p>P9.4 To support methods and measures to maintain or improve soil</p> <p>P11 .1 Earthworks</p> <p>P 12.1 Soil disturbance and vegetation clearance</p> <p>P 13.2 Mining and quarrying</p> <p>P 14.2 Forestry</p>	<p>consents for rural and other activities where adverse effects may require specific management. In addition, there are a number of standards that activities need to meet in order to be permitted which address matters in order to maintain the soil resource.</p> <p>A key factor in the provisions developed for the Rural Zones, particularly the General Rural Zone relates to seeking that the potential for land to be used for a range of rural productive activities are maintained both now and into the future. Primarily this is driven through managing the effects of activities and reducing the ability to subdivide rural land below 20 ha in the General Rural Zone and 4 ha in the Rural lifestyle Zone.</p> <p>The management of intensive rural land use while recognised as suitable in the Rural zones is subject to resource consent to establish to ensure that the effects of the activity on the particular site are managed and to the extent practicable adverse effects of internalised to within the site itself.</p> <p>Within the Rural Zone provisions other than for small-scale farm Quarry activities other quarry and mining activities would require a resource consent so that the actual or potential effects of the activity can be fully assessed prior to the activity being established. It is recognised however that these activities are activities that will by necessity occur within the Rural zones.</p> <p>The provisions in the Rural Zone do not duplicate the provisions in the NESPF which is the key document that regulates plantation forestry.</p>
<p>6.3 Rakahuri</p> <p>Nga Kaupapa Policy</p> <p>R1.1 Land and water management recognise the importance of the river as a mahinga kai</p>	<p>While these provisions are focused primarily on the river, the interrelationship between land use and the river is acknowledged within the provisions in the Rural Chapter.</p>

IMP Objectives/Policies	Response (Summary)
<p>6.4 Waimakariri</p> <p>Nga Kaupapa Policy</p> <p>WA14.1 Subdivision and development affecting tāngata whenua values and interests</p>	<p>While these provisions are focused primarily on the river, the interrelationship between land use and the river acknowledged within the provisions in the Rural Chapter.</p>

3.5 Any relevant management plans and strategies

The following management plans and strategies prepared under other legislation are relevant to this matter:

The **Waimakariri District Development Strategy** is a document that addresses planning for the future growth of the District. For rural areas, key trends regarding changes to the character of rural areas and the implications of this on existing and future farming activities were addressed. This also is relevant to addressing potential reverse sensitivity issues between urban land uses and rural surrounding land and their management. This strategy identifies that increasing the minimum rural lot sizes in parts of the District should be explored, especially on good quality land to support primary production. It also identified that the Rural Residential Development Plan is to be reviewed for the whole District. This has been done and is addressed below.

The **Waimakariri District Rural Residential Strategy** identifies areas of potential growth for rural residential settlement. This is relevant to the Rural zones only insofar as land currently zoned Rural may in the future be zoned to provide for rural residential development. It also clarifies the process for establishing rural residential development land. This has been incorporated in the District Plan by identifying overlay areas where future Large Lot Residential Zones may be appropriate.

3.6 Any other relevant legislation or regulations

The Crown Minerals Act 1991 provides for activities such as prospecting, exploration and mining allocation and licensing of minerals which are owned by the Crown. The Crown Minerals Act incorporates a permit system that regulates the use of these minerals. These activities are also managed under the Resource Management Act as land use activities. As such, these types of activities are still managed within the Proposed District Plan.

3.7 Any plans of adjacent or other territorial authorities

The District Council is required to have regard to the extent to which the District Plan needs to be consistent with the plans and proposed plans of adjacent territorial authorities under Section 74(2)(c) of the RMA.

The Christchurch District Plan (2016) was written prior to the Planning Standards being applicable. This Plan has identified both rural productive uses and amenity and character of rural areas as key matters driving the provisions for rural areas. It also manages a variety of activities that are either provided for in the zone, provided for subject to managing effects, or discouraged. The Plan has a number of Rural Zones, and those most comparable to the ones proposed in the proposed Waimakariri district plan have density restrictions of one residential unit per four hectares within the Rural Urban Fringe Zone, and one residential unit per 20 hectares in the Rural Waimakariri Zone. With respect to rural residential development this is precluded from being provided within Christchurch City.

Selwyn District Council has recently notified its Proposed District Plan. The approach to the Rural Chapter is to have one zone being the General Rural Zone. However, the Plan has identified eighteen Specific Control Areas that have different density controls. Those most comparable are the Inner Plains and the East Plains area which have a minimum site size of 4ha and 20ha, respectively. This Plan also has an outer plains area with a minimum site size of 40ha and high country areas that have a 100ha minimum site size.

This plan also identifies character and amenity and rural production as key focuses for determining appropriate provisions.

The Operative Hurunui District Plan was written prior to the Planning Standards being applicable. It has one Rural Zone, but does identify some special management areas, including the Hurunui Lakes area. The objectives and policies focus on character and amenity values and providing for primary production activities. This approach is consistent with the approach in the proposed Waimakariri provisions. The density standards are 1 residential unit per 20 ha in the Rural – Hurunui Lakes Area, the Rural – Hanmer Basin Subdivision Management Area and within Outstanding Natural Landscapes and Features, and 1 residential unit per 4 ha in other Rural Zones.

Overall, there is a high level of consistency in the identification of the key drivers for rural provisions amongst all neighbouring district plans being character and amenity values and primary production. It is recognised that Selwyn District and Christchurch City have some rural areas with a lower density (1 residential unit per 40-100ha) and such an approach is not incorporated into the Hurunui District. The potential to have a lower density in some areas was considered. However, given the context of the District having limited areas of hill country, in combination with these areas historically having low levels of development had led to the consideration that having a lower density for some areas currently within the General Rural Zone is not necessary.

4. KEY RESOURCE MANAGEMENT ISSUES

The resource management issues set out in this section have been identified using sources of information including (but not limited to) the following:

- a. Monitoring and District Plan Effectiveness Review of the Operative District Plan.
- b. Internal and external stakeholder consultation.
- c. Issues and Options and '*What's the Plan*' consultation responses.
- d. Review of best practice, and
- e. background reports.

The key issues identified are as follows:

1. The rural zones are the only locations where rural productive activities can occur and the establishment of non-rural activities can adversely affect the ability for rural productive activities to establish and operate.

Within rural areas rural production activities are sought to remain a focus and it is necessary to ensure that there is compatibility between the activities that are able to establish within the area and the management of effects of activities. Rural production activities are reliant on the natural resources that exist in the rural areas. Therefore it is important that rural areas are managed so that rural production activities are enabled.

There are a number of rural production activities that can generate adverse effects on the environment that require management. This includes activities such as intensive farming and quarrying activities. These activities by necessity must occur within rural areas and are appropriate within the rural areas. However, it is important that the adverse effects of these activities are able

to be managed. In the first instance as far as possible any adverse effects should be internalised within the site to the extent practicable so as to minimise adverse effects on adjacent activities.

Within rural areas rural production activities are sought to remain a focus and it is necessary to ensure that there is compatibility between the activities that are able to establish within the area and the management of effects of activities.

The establishment of a range of activities not focused on rural production, including sensitive activities such as residential activities, can have expectations that a higher level of amenity values, such as a quiet environment, be provided than might typically occur in a rural area with a range of productive rural uses occurring. This could include permanent or temporary effects associated with rural activities, including seasonal activities that generate greater traffic, noise, and lighting.

In addition, there are a variety of other activities that establish, and seek to establish, within rural areas. While some of these directly serve primary production activities or are reliant on natural resources within the zone there are a number of activities that could occur in other areas, including urban areas but choose not to.

The establishment of these activities can adversely affect the rural character of the zone and the ability for land to be used for rural production activities. It is the management of compatible and incompatible activities that is a key issue to be resolved within the Rural Chapter.

2. The fragmentation of land can adversely affect the current and future potential for rural productive activities to establish and operate.

For existing and future rural production activities to be provided it is important that the land resource within the rural areas remain available for a range of rural production activities.

The minimum land size required to maintain rural productivity is not necessarily determined by the overall area required to sustain a profitable business. The critical consideration tends to be whether sufficient contiguous land area is required to implement production systems that optimise the performance per hectare. The minimum required land area will alter depending on soil type, climate, topography, access to irrigation and the type and intensity of the farm system.

However, to provide for a range of productive farming systems a minimum productive area of 10-15ha up to 100ha is required. Smaller areas may be sustainable for fresh produce, glasshouses and tunnel houses. However, to sustain the potential for a range of productive uses a larger area is required. This productive area excludes areas for residential units, sheds, access and other domestic based activities. To have a productive area of between 10-15ha a larger lot size is required. This minimum productive area does not accord with 84% of all lots created in the District between 2006 and 2020 being between 4-7.99ha.

Fragmentation of rural land by subdivision into lots that are not sized to sustain a range of productive farming systems is a key resource management issue for the rural area of the District.

3. The character of the rural areas in the District has changed and will continue to change.

There is a greater emphasis occurring on rural lifestyle use of land with a large number of new residential activities established on smaller sites with a minimum of 4 ha. This leads to the character changing from one focused and dominated by rural production to one where the key

character is residential, with associated vegetation around residential units and curtilage areas as well as areas of open grassland and paddocks.

It is evident that on a district-wide basis the ability to subdivide rural land to a minimum site size of 4 ha alters the character of the District away from more extensive rural activities to patterns of housing and built form consistent with a rural lifestyle. While rural production activities may still occur, the more fragmentation of larger parcels that occurs, the more it forecloses the opportunities for a diverse range of rural production activities to establish.

The openness of paddocks used for pastoral farming can change to a more enclosed landscape dominated by residential buildings/structures and planting of trees to provide privacy for their occupants. A reduction in productive rural activities through further subdivision can lead to a domestication of the landscape which then becomes more dominated by man-made structures. The requirement for infrastructure supporting geographically dispersed residential development on smaller lots, such as roads, can add to the impact on the landscape character and rural amenity.

In addition, there are a variety of activities other than rural production that establish within rural areas. While some of these directly serve primary production activities or are reliant on natural resources within the zone, there are a number of activities that could occur in other areas, including urban areas. The establishment of these activities can affect the rural character of the zone.

Inevitably the subdivision pattern (lot size, lot density, extent of subdivision) has a strong influence on the land use activities and land cover patterns and therefore the subsequent rural character of an area. For example, an area dominated by small rural lots is typified by small paddocks, fenced and vegetated boundaries and road frontages, entranceway features and gates, long driveways, residential units and out-buildings. In contrast, larger lots associated with productive farmland are typified by large paddocks, with a lower frequency of boundary planting, fences, buildings and residential units.

A key resource management issue to be addressed is to manage effects of activities so that the character of the rural areas and their amenity values can be maintained, while recognising the need for rural productive activities to operate within the Zone.

4. Change in land use from Rural to accommodate Rural Residential living opportunities must be managed.

Rural residential development is the subdivision and use of land to cater for the needs of those wishing to live within a rural or semi-rural setting, therefore enabling living choices for the people of Waimakariri District.

Rural residential development also efficiently manages the demand for semirural living by identifying 'clustered' locations for development, which helps to manage the balance of rural land for primary production and rural character purposes.

Rural Residential development is provided for within the Large Lot Residential Zone. Providing for new areas of Rural Residential development involves a transition from a Rural Zone to a Large Lot Residential Zone. Potential future locations for Rural Residential development have been identified in the Rural Residential Development Strategy. Until such time as a change in zoning occurs these areas are managed under the Rural Chapter.

The resource management issue to be addressed is managing this land until a change in the zoning to Large Lot Residential has occurred.

5. OVERVIEW OF PROPOSED OBJECTIVES, POLICIES AND METHODS

5.1 Strategic Direction

In the Proposed District Plan, Strategic Direction Objective SD-04 seeks to ensure that outside future urban development areas, rural areas are managed to ensure rural land remains available for productive rural activities. This objective seeks to do this by enabling primary production activities, activities that directly support primary production activities and activities reliant on the natural resources of rural zones, and limit other activities. It also seeks to ensure that primary production activities are not limited by new incompatible sensitive activities occurring within rural areas.

Strategic direction Objective SD-01 addresses the natural environment and while the implementation of this objective is addressed through other chapters, for example sites and areas of significance to Māori, ecosystems and Indigenous biodiversity, natural features and landscapes, many of the natural environment values identified as important are located within the rural environment of the District. This is particularly evident in SD-01(5) which is an integrated approach is taken to subdivision and land use activities that can adversely affect the natural and cultural values of freshwater and coastal areas. Many of the freshwater resources within the District are within the rural environment.

The inclusion of provisions in the Rural Chapter will address these strategic direction objectives by ensuring that rural environments are managed to maintain the ability for primary production activities to establish and operate in rural areas and to manage activities that could impact on the ability for primary production activities to continue. Further, the chapter through recognising natural values seeks to ensure integrated management of natural and physical resources occurs.

5.2 Zone / District-wide Subject

This chapter addresses a Zone chapter that apply across rural areas within the District. The zones contain objectives, policies and rules that provide for and manage activities and establish the outcomes sought for rural areas.

5.3 Proposed Objectives and Policies

The rural provisions contain a suite of revised, updated and expanded objectives and policies to address the issues identified earlier in this report and address the key resource management issues with respect to rural matters identified above.

The proposed objectives and policies are set out in the Rural Zone chapters. Within the Rural Chapters there are two zones, being the General Rural Zone and the Rural Lifestyle Zone³. The two zones reflect the different dominant character that exists within each zone.

The chapter contains two objectives and eight policies that apply across both zones which address the matters such as retaining the potential for land for primary production activities; enabling primary production activities, those activities that support primary production and those activities reliant on a

³ The Rural Lifestyle Zone is a Rural Zone, not a rural residential zone. Rural residential activities are provided for in the Large Lot Residential Zone.

rural environment, including managing the effects of these activities so that the amenity values and character of the areas are maintained. In addition, there are policies that address particular activities where the establishment of these activities, such as certain retail and industrial activities are limited.

Each zone then contains an objective and policy suite that describes the dominant character and outcome sought to maintain that character with each zone.

In addition to the provisions that apply to the Rural Zones it is acknowledged that there is a policy within the Urban Form and Development Chapter, being Policy UFD-P3 that addresses the identification, location and extension of future Large Lot Residential Zone areas, that until rezoned are located within either the General Rural Zone or the Rural Lifestyle Zone.

The matters which the objectives and policies that apply in the Rural Zones are described in the following table:

Objectives
RURZ-01 which applies across all rural zones seeks to describe the predominant land use character being primary production activities and natural environment values where rural openness dominates over built form but recognises two distinct parts of the District with the east having a predominant character of small rural sites and the remainder of the District having a predominant character of larger rural sites
RURZ-02 which applies across all rural zones seeks to identify that the key focus for activities are primary production activities and those activities that directly support primary production, and that have a functional need to be located in the Rural Zones.
GRZ-01 which applies to the General Rural Zone and describes the purpose of the zone being activities contributing to the rural productive economy dominate and fragmentation of land into small rural parcels is restricted.
RLZ-01 which applies to the Rural Lifestyle Zone and describes the purpose of the zone which is to provide for primary production activities and those reliant on the rural environment but recognizing the predominant character is small rural sites.
Policies
RURZ-P1 being a policy applying across all rural zones that describes the key amenity values and character sought within the rural zones
RURZ-P2 being a policy applying across all rural zones which seeks to maintain the availability and life supporting capacity of land in relation to retaining productive potential and maintaining natural environment values.
RURZ-P3 being a policy applying across all rural zones which focuses on activities that support the local rural community
RURZ-P4 being a policy applying across all rural zones which enables conservation activities
RURZ-P5 being a policy applying across all rural zones which provides for minor residential units
RURZ-P6 being a policy applying across all rural zones which describes the management of industrial activity within the zones
RURZ-P7 being a policy applying across all rural zones which describes the management of retail activities within the zones
RURZ-P8 being a policy applying across all rural zones which addresses reverse sensitivity effects
GRZ-P1 being a policy applying to the General Rural Zone that describes the character that is sought to be maintained
GRZ-P2 being a policy applying to the General Rural Zone that seeks to limit further fragmentation of land below 20ha in order to maintain opportunities for primary production activities within the zone
RLZ-P1 being policy applying to the Rural Lifestyle Zone that describes the character that is sought to be maintained
RLZ-P2 being a policy that describes primary production opportunities are to be enabled and residential activities are to be managed within the zone to limit further fragmentation of land below 4ha.

In addition to the provisions that apply to the Rural Zones, it is acknowledged that there are objectives and policies within the Urban Form and Development Chapter that address land that is either:

- land identified for a change in use and zoning from Rural to Residential – in the case of Development Areas. These areas are identified as Residential Development Areas, or
- identified as potentially suitable for a change in zoning (to occur by way of a plan change) from General Rural Zone or Rural Lifestyle Zone to a Large Lot Residential Zone to accommodate areas of future rural residential development. These areas are identified as Overlay areas.

Within this Section 32 evaluation the provisions applying to Residential Development Areas are not addressed in this document. This is because a decision has already occurred that the zoning will change from being a rural zone to a residential zone and be incorporated as part of an urban area i.e. urban environment. These provisions are not considered further. Within this Section 32 evaluation of the provisions applying to Large Lot Residential Overlay areas, that implement Policy UFD-P3, are considered. These areas, while shown as an overlay for a potential change in zoning to Residential Large Lot, are currently General Rural or Rural Lifestyle Zones.

Policy UFD-P3 describes the circumstances where future Large Lot Residential Development can occur, and identifies the criteria (including and particularly locational criteria) under which a change in zoning can be considered.

5.4 Proposed Methods

The proposed methods within both Rural Zones are the same apart from those relating to the density of residential units on sites. Within the General Rural Zone, residential density is one residential unit and one minor residential unit per 20 ha minimum area of land and within the Rural Lifestyle Zone the residential density is one residential unit and one minor residential unit per 4 ha minimum area of land.

There are rules within each zone providing for permitted activities that are considered appropriate within the zone and effects which can be fully managed through specifying activity standards in combination with achieving compliance with built form standards.

Activities provided as permitted activities are:

- Primary production
- Rural produce retail
- Rural industry
- Domestic animal keeping and breeding
- Farm quarry
- Conservation activities
- Home business
- Recreation activities
- Rural tourism
- Construction or alteration of any building or other structure
- Accessory building or structure
- Residential unit
- Residential activity
- Minor residential unit
- Visitor accommodation
- Rangiora A&P Showground activities (RLZ only)

There are 7 rules within each zone providing for activities as restricted discretionary activities. These activities are considered to be appropriate within rural zones but have effects that require management either on an individual basis or on individual sites, but the effects are able to be well anticipated and are able therefore to be captured within matters of discretion.

The activities provided for are:

- Intensive indoor primary production
- Intensive outdoor primary production
- Farmers' Market
- Bonus residential unit
- Boarding kennels
- Cattery
- Equestrian and ancillary activities and facilities

There are 15 rules providing for activities described as discretionary activities. It is anticipated that a number of these activities are appropriate within rural zones but have a range of effects either individually or cumulatively that require individual management and there may be some sites and locations where the activities are not appropriate. These activities are:

- Emergency services facility
- Veterinary facility
- Mining
- Quarrying activities
- Waste management facility
- Composting facility
- Recreation facilities
- Camping ground
- Wedding and event facility
- Community facility
- Cemetery and funeral related services and facility
- Educational Facility
- Industrial activity
- Sport shooting facility
- Any other activity not specified

There are three rules in both zones providing for non-complying activities which are activities that are not anticipated in the zone and will generally be considered inappropriate. The three activities identified below have direction derived from the CRPS identifying that these activities are not appropriate within rural areas, being:

- Retail activity
- Multi-unit residential development
- Retirement Village

There are also two additional rules within the General Rural zone that reinforce that the development of residential units and minor residential units at a density that does not achieve the specified minimum residential density are non-complying activities. These two non-complying activity rules relating to density are to provide clarity and certainty as to the rules that have immediate legal effect at the time the District Plan is notified. The rules address:

- Residential unit below the minimum residential density standard
- Minor residential unit below the minimum residential density standard

For each zone there are a range of built form standards that apply to activities that are permitted. These standards ensure that the effects of activities are able to be managed so that the character and amenity values of activities occurring within zones are maintained. These are largely a continuation of the current Operative Plan provisions, for example height. In some situations to ensure that the character and amenity values are maintained a new control over the size of any single building provided for as a permitted activity has been introduced.

Matters of discretion have been developed for those activities that are identified as restricted discretionary activities. For these activities there is a high level of confidence that the matters of discretion identified are the only matters that need to be considered when a resource consent application is sought for a specified restricted discretionary activity.

There is one discretionary activity rule that specifies a standard that must be met for the activity to be considered as a discretionary activity. This addresses quarrying activities (not farm quarry). The standard requires that the activity not be within 1km of a residential zone. If it is then the activity is a non-complying activity. This condition is to provide clear direction that quarrying activities are not to result in adverse effects affecting residential activities occurring within residential areas and settlements.

With respect to definitions, where possible the definitions in the National Planning Standards have been used. However, there are some areas where further definitions have been provided as it is identified that the effects being managed are different or require more specific consideration.

In relation to future Large Lot Residential Zone areas the method used in the District Plan is to identify potential areas for consideration to be rezoned as Large Lot Residential Overlay areas. Any change in zoning will need to occur by a different process other than the District Plan as notified and will need to be developed in accordance with an Outline Development Plan that is developed for the Overlay areas.

6. SCALE AND SIGNIFICANCE EVALUATION

Section 32 (1)(c) of the RMA requires that a Section 32 report contain a level of detail that corresponds with the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of the proposed objectives, policies and methods.

The level of detail undertaken for the subsequent evaluation of the proposed objectives, policies and methods has been determined by this scale and significance assessment.

Further, the analysis has to be documented to assist stakeholders and decision-makers understand the rationale for the proposed objectives, policies and methods under consideration.

In making this assessment, regard has been had to a range of scale and significance factors, including whether the provisions:

- (a) Are of regional or district wide significance;
- (b) Involve a matter of national importance in terms of Section 6 of the RMA;
- (c) Involve another matter under Section 7 of the RMA;
- (d) Raise any principles of the Treaty of Waitangi (Te Tiriti o Waitangi) under Section 8 of the RMA;
- (e) Address an existing or new resource management issue;
- (f) Adversely affect people's health and safety;
- (g) Adversely affect those with particular interests including Māori;
- (h) Adversely affect a large number of people;
- (i) Result in a significant change to the character and amenity of local communities;
- (j) Result in a significance change to development opportunities or land use options;
- (k) Limit options for future generations to remedy effects;

- (l) Whether the effects have been considered implicitly or explicitly by higher order documents; and
- (m) Include regulations or other interventions that will impose significant costs on individuals or communities.

Policies and methods have been evaluated as a package, as together they address a particular issue and seek to meet a specific objective.

6.1 Evaluation of Scale and Significance

	Low	Medium	High
Degree of change from the Operative Plan			✓
<p>The provisions seek, as far as practicable, to retain the focus for rural area being for rural production activities existing character of rural areas. The provisions do seek to provide greater certainty of the character and amenity values that are to be achieved within both of the Rural Zones.</p> <p>The provisions that apply in the General Rural Zone do represent a more restrictive regime with respect to residential density and anticipated site size. The provisions decrease the density of residential units and minor residential units to a minimum of 20ha per residential unit and minor residential unit. There are legacy provisions which will provide for residential units and minor residential units to be established on existing sites sized between 4ha and 20ha. This will go some way to ameliorate the impact of the change in density on existing but as yet undeveloped sites between 4-20ha.</p> <p>The provisions applying to the Rural Lifestyle Zone reflect the status quo with respect to the density of residential units and minor residential unit of a minimum of 4ha per residential unit and minor residential unit and therefore do not present the same level of change as applies to the General Rural Zone.</p> <p>With respect to minor residential units, other than the change in density within the General Rural Zone, the provisions applying to minor residential units are less restrictive than the Operative District Plan, in particular the maximum floor area of a residential unit has been increased and the requirement to establish within a specified distance of a residential unit on the site has been removed.</p> <p>The provisions have changed as the Plan is moving from an effect based to an activity based plan. There are a number of activity specific standards that apply to a range of activities. In addition there are some activities identified that will require a resource consent to establish, including some activities that are anticipated to occur in Rural areas. The approach to Large Lot Residential Overlay areas is new. The identification of areas and the provision of a specific policy provides clarity and sets out the expectations for any rezoning proposal on land identified as an Overlay area.</p>			
Effects on matters of national importance		✓	
<p>The proposal relates to the matters in Sections 5, 6, 7 and 8 of the RMA and responds to these matters of national importance are managed through having objective and policy direction and rules that provide for, as permitted activities or through a consent process, activities that are rural in nature or are dependent on the resource in the rural area. Policies and rules are included that are more restrictive for other activities. Relevant matters arising from any National Policy Statements are also addressed to the extent necessary.</p>			

	Low	Medium	High
Scale of effects geographically (local, district wide, regional, national)		✓	
<p>The scale of effects is expected to be district-wide, but primarily within the Rural Zones. The key change in relation to the change to the minimum residential unit density will occur within the General Rural Zone. There are legacy provisions which will provide for residential units and minor residential units to be established on existing sites sized between 4ha and 20ha. This will go some way to ameliorate the impact of the change in density on existing but as yet undeveloped sites between 4-20ha.</p> <p>The scale of effects in relation to the Large Lot Residential Zone overlays relate to specific areas of land within the zones. These areas are consistent with the Waimakariri Rural Residential Development Strategy.</p>			
Scale of effects on people (how many will be affected – single landowners, multiple landowners, neighbourhoods, the public generally, future generations?)			✓
<p>The effects of the provisions will affect all landowners within the rural areas of Waimakariri. The greatest change is for landowners who are within the General Rural Zone, with land sized 8ha and over. Within this zone land is sought to be available to sustain productive rural activities, the consequence of this is that the permissible density of development of residential units and minor residential has been changed. The minimum site size required for a residential unit or minor residential unit to be established has increased from 4 to 20ha relative to the Operative Plan. There are legacy provisions which will provide for residential units and minor residential units to be established on existing sites sized between 4ha and 20ha. This will go some way to ameliorate the impact of the change in density on existing but as yet undeveloped sites between 4-20ha. As at March 2021 there are 1,595 lots 8ha and over in the General Rural Zone. These property owners impacted on to the largest degree by the changes in residential density.</p> <p>Within the Rural Lifestyle Zone the residential density is not changing from that in the Operative Plan. The consequence is that continuing the potential for 4ha residential density to be established.</p> <p>The scale of effects on people in relation to the Large Lot Residential Zone overlays relate to specific areas of land within the zones. These areas are consistent with the Waimakariri Rural Residential Development Strategy.</p>			
Scale of effects on those with specific interests, e.g., Mana Whenua, industry groups			✓
<p>The scale of effects relating to rural zones will impact on all industry groups and sectors with a rural focus or with an interest in the natural resources within rural areas. The use of land and potential implications on other resources will be of interest to Mana Whenua.</p> <p>A key reason for the change in the residential density in the General Rural Zone is to maintain the productive potential of land within the General Rural Zone of the District, which will address matters of particular relevance to rural sector industry groups.</p>			
Degree of policy risk – does it involve effects that have been considered implicitly or explicitly by higher order documents? Does it involve effects addressed by other standards/commonly accepted best practice? Is it consistent, inconsistent or contrary to those?		✓	
<p>The issues that the chapters address have been considered in the Canterbury Regional Policy Statement which sets expectation for rural areas. In particular, the requirement to maintain the production potential of rural land. However, the specific standards that apply to activities are developed on a District basis.</p>			

Low	Medium	High
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There remains some uncertainty, at the time of writing, with the NPSUD interpretation and what this will mean should additional development areas be needed within land in the Rural Zone (in addition to the identified development areas and Residential Large Lot Overlay areas). There is the potential for conflict between the NPSUD and CRPS in relation to the use and development of rural land for rural productive activities. To date, the CRPS has not been fully reviewed to give effect to the NPSUD.

The identification of areas within the Residential Large Lot Overlays are consistent with the approach the CRPS takes to the provision of rural residential development.

Likelihood of increased costs or restrictions on individuals, communities or businesses			✓
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Rural activities are generally sought to be enabled, although some more intensive activities will require resource consent to establish. This is to ensure that the particular site where the activity is proposed is appropriate and to the extent practicable ensure that any adverse effects are managed within the site where the activity will be occurring.

However, for those landowners in the General Rural Zone the change in the residential unit and minor residential unit density standards will result in a more restrictive regime than exists under the Operative Plan. There are legacy provisions which will provide for residential units and minor residential units to be established on existing sites sized between 4ha and 20ha. This will go some way to ameliorate the impact of the change in density on existing but as yet undeveloped sites between 4-20ha. As at March 2021 there are 1,595 lots 8ha and over in the General Rural Zone. These property owners impacted on to the largest degree by the changes in residential density.

There is no change for the Rural Lifestyle Zone where there are approximately 4,359 privately owned rural properties.

There is also likely to be greater restriction on the establishment of business activities that are not directly related to rural activities or reliant on rural resources.

Summary - Scale and Significance

Overall, the scale and significance of the proposal, as it applies to the General Rural Zone is medium to high. This relates to the change in outcome relating to change in the residential unit and minor residential unit density requirement.

The level of change in the Rural Lifestyle Zone is more akin to the Status Quo, with the residential density standard not changing from the current District Plan.

The changes to the provisions relating to activities, other than residential activities, are similar to the status quo. There is a requirement for intensive indoor farming and intensive outdoor farming activities to obtain a resource consent to establish. This is an increase in regulation over the status quo. The objectives and policies are clear that these activities are anticipated in the Rural Zones, but that site specific consideration is necessary to ensure that the effects on the activity are appropriate on the individual sites.

There is also a change in relation to quarrying activities (not farm quarry). Quarrying activities require a consent as a discretionary activity to establish in either Rural Zone, unless proposed to be established within 1000m of a residential zone, in which case the activity is not anticipated and consent would be for a non-complying activity.

The other key change to activities over the status quo relates to differentiating between rural industry and other industry. Rural industrial activities, depending on scale are provided for as permitted activities. Large scale rural industry and other industrial activities require resource consent.

While the Large Lot Residential Zone Overlays and the policy they implement are new in the District Plan the scale and significance is considered to be similar to the status quo. The status quo approach was that future rural residential development be in locations where identified in the Waimakariri Rural Residential Development Strategy. This is the same

Low	Medium	High
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approach proposed. The difference is that the areas in the Rural Residential Development Strategy have been identified as overlay areas within the District Planning maps.

The level of detail in this report corresponds with the scale and significance of the environmental, economic and cultural effects that are anticipated from the implementation of the rural provisions.

7. EVALUATION OF PROPOSED OBJECTIVES

Section 32(1)(a) of the RMA requires the District Council to evaluate the extent to which the objectives are the most appropriate way to achieve the purpose of the RMA. The level of detail undertaken for the evaluation of the proposed objectives has been determined by the preceding scale and significance assessment. Below is an evaluation of the proposed objectives that have been identified as the most appropriate to address the resource management issue(s) and achieve the purpose of the RMA, against those objectives in the operative plan.

7.1 Evaluation of Proposed Objectives

Existing Objective/s (status quo)	Appropriateness to achieve the purpose of the Resource Management Act 1991
<p>The existing objectives that currently apply to rural zones are:</p> <p>Objective 14.1.1 Maintain and enhance both rural production and the rural character of the Rural Zones, which is characterised by:</p> <ul style="list-style-type: none"> a) the dominant effect of paddocks, trees, natural features, and agricultural, pastoral or horticultural activities; b) separation between dwelling houses to maintain privacy and a sense of openness; c) a dwelling house clustered with ancillary buildings and structures on the same site; d) farm buildings and structures close to lot boundaries including roads; e) generally quiet – but with some significant intermittent and/or seasonal noise from farming activities; f) clean air – but with some significant short term and/or seasonal smells associated with farming activities; and g) limited signage in the Rural Zone. <p>Objective 14.2.1 Protect the life supporting capacity of the water resource from the adverse effects of on-site land based sewage treatment and wastewater disposal systems.</p>	<p>Relevance: The objectives relate to resource management issues being the use and development of natural and physical resources within the rural areas of the District.</p> <p>The key resource management issues for the Rural areas are related to rural production and rural character. These both relate directly to the sustainable management focus in the Resource Management Act.</p> <p>Reasonableness: The objectives relate to the District as a whole. While Objective 14.1.1 seeks to maintain and enhance both rural production and the rural character the objective is focussed on rural character, rather than expressing as a primary outcome that the Operative District Plan seeks to ensure rural activities will be the predominant land use in the Rural Zone. The way that character is described is broad and provides little guidance as to the relationship between rural production and the character described. The objective in describing the character can be read to imply that the district has a single rural character, and</p>

Existing Objective/s (status quo)	Appropriateness to achieve the purpose of the Resource Management Act 1991
<p>Objective 14.3.1 Limit the increase in the number of people in the Rural Zones who may suffer noise nuisance from over flying aircraft using Christchurch International Airport.</p> <p>Objective 4.1.1 Maintain and enhance the life-supporting capacity of the land resource in the District.</p>	<p>that if the character is achieved this will also maintain and enhance rural production.</p> <p>This objective has resulted in an outcome where considerable areas within the Rural Zone have been developed as small rural sites sized between 4ha – 7.99ha. While meeting the character as described in sub clauses b)-g) in Objective 14.1.1, it has not overall resulted in the same level of achievement of maintaining rural production and the dominant character of agricultural, pastoral or horticultural activities.</p> <p>This combined with the other objectives which are not focused on rural production or the values of the resource in rural areas for rural productive activities, has resulted in the focus of the rural objectives on rural production and rural activities being diminished in importance.</p> <p>The subject matter of the status quo objectives is not as clear as it could be, with respect to the outcome sought. The objective dealing both with rural production and then describing the dominant character as incorporating many outcomes not related to rural activities or rural production can lead to a continued risk to the establishment of activities and buildings/structures that are not reflective of the existing character and amenity of the District’s rural environment.</p> <p>With respect to Objective 14.3.1 it is reasonable to consider the nature of any limitations in Rural Zones associated with the operation of the Christchurch International Airport. However, once the appropriate rural density requirements and provisions for sensitive activities are established the key issue is one of managing the effect of noise, which would be better addressed within the noise provisions, rather than the rural provisions as it is an issue across a number of zones.</p> <p>The objectives, though not clearly describing the density outcomes needed to achieve the objective, are generally less measurable than the proposed objectives.</p>

Existing Objective/s (status quo)	Appropriateness to achieve the purpose of the Resource Management Act 1991
	<p>Achievability:</p> <p>The two key matters addressed in Objective 14.1.1 relate to maintaining or enhancing both rural production and rural character.</p> <p>While the characteristics described in 14.1.1 b)-g) have been achieved overall the character and the rural productive potential within the District has been changed and as such cannot be considered to have been maintained or enhanced. The subdivision character over the time the current District Plan has been operative has resulted in an increase in the number of smaller rural sites, with many being subdivided to the minimum subdivision size of 4ha. Between 2006 and 2020 over 84% of all lots created by subdivision in the Operative Rural Zone were sized between 4ha-7.99ha. If the time period is reduced to 2017-2020 then the percentage increased to 90% This has changed the character of some areas of the District. In addition, the work done on lot sizes and maintaining rural productive potential has shown that the smaller the lots, the less flexibility is provided for providing for a range of rural productive activities. In the context of the Waimakariri District lots sized between 4-7.99ha do not typically sustain productive potential of land. This does result in some tension with Objective seeking to maintain and enhance both rural production and the rural character of the Rural Zones.</p> <p>There is no evidence showing that the remaining objectives have not been achieved. Objective 14.1.1 the life supporting capacity of land is considered able to be achieved, even with future fragmentation of productive land as the soil resource is not removed with the development of residential units and minor residential units in rural areas.</p>

Proposed Objective/s (All Rural Areas)	Appropriateness to achieve the purpose of the RMA
<p>RURZ-01 Rural Environment</p> <p>An environment with a predominant land use character comprising primary production activities and natural environment values, where rural openness dominates over built form, while recognising:</p>	<p>Relevance:</p> <p>The objectives relate to resource management issues being the use and development of natural and physical resources within the rural areas of the District.</p>

Proposed Objective/s (All Rural Areas)	Appropriateness to achieve the purpose of the RMA
<p>1. the east of the District has a predominant character of small rural sites with a pattern of built form of residential units and structures at more regular intervals at a low level of density compared to urban environments; and</p> <p>2. the remainder of the District, while having a range in the size of rural sites, has a predominant character of larger rural sites with a corresponding density of residential units and built form.</p> <p>RURZ–O2 Activities in Rural Zones Rural Zones support primary production activities, activities which directly support primary production, and activities with a functional need to be located within Rural Zones.</p> <p>GRUZ-O1 Purpose of the General Rural Zone Natural and physical resources and primary production activities which contribute to the District's rural productive economy dominate while fragmentation of land into small rural parcels is restricted.</p> <p>RLZ-O1 Purpose of the Rural Lifestyle Zone Primary production activities and activities reliant on the natural and physical resources of the rural environment occur while recognising that the predominant character is small rural sites with a more intensive pattern of land use and buildings than the General Rural Zone.</p>	<p>The objectives identify that the two key matters that influence the rural areas are the character of the rural zones and the focus of the zones on primary production activities. These both relate directly to the sustainable management focus in the Resource Management Act.</p> <p>The objectives recognise that the predominant character is different between the east of the district and the west. While there are a number of smaller lots within both areas the overall character of the western area of the District is larger lots.</p> <p>The objectives recognise and address the importance of the rural areas of the District both as a lifestyle choice location but also as a working and productive environment on which a large proportion of the District's population is reliant on.</p> <p>Given this, the approach is to recognise the more dominant lifestyle character in the east of the District, but also provide for a range of rural activities and activities reliant on a rural environment within this zone.</p> <p>Within the western part of the District, greater emphasis is placed on maintaining the potential for land to be used for a range of rural productive uses and retain larger site sizes while also providing for a range of activities reliant on the natural resources in the rural areas.</p> <p>The difference in these two zones is related to managing further fragmentation of land into small rural sizes. This is restricted in the General Rural Zone by Objective GRZ-O1, but recognised as being the dominant character within the Rural Lifestyle Zone in Objective RLZ-O1.</p> <p>The proposed objectives identify values that comprise the District's rural character and what values proposals are being assessed against.</p> <p>With respect to noise associated with Christchurch International Airport and the Rangiora Airfield matters relating to noise are managed within the noise chapter. This contains relevant objectives which apply on a District wide basis, irrespective of the zoning. On this basis a specific objective in the Rural Zone</p>

Proposed Objective/s (All Rural Areas)	Appropriateness to achieve the purpose of the RMA
	<p>addressing aircraft noise and potential reverse sensitivity effects is not required.</p> <p>Reasonableness:</p> <p>The objectives recognise the importance of the rural area of the District both as a lifestyle location but also as a working productive environment which a large proportion of the District’s population is reliant on.</p> <p>Given this, the approach is enabling of activities where their location within a rural area is necessary and adverse effects are able to be managed.</p> <p>The objectives enable people to live in the rural area and maintain the potential for a range of rural productive uses, now and in the future to occur. The objectives do this by recognising that within the General Rural Zone for the productive potential of land to be maintained further fragmentation of land into small rural lots needs to be restricted. It is acknowledged that there are a number of lots within the Proposed General Rural Zone that are 7.99ha or less (approximately 757 privately owned lots). However this equates to approximately 6% of the total land area within the zone, with over 84% being lots over 40ha. .</p> <p>The objectives recognise that the district does not have homogenous character, and there is a pattern of more intensive rural lifestyle development predominating in the east of the District within current rural residential zones and small rural lots particularly those at the minimum size (4ha) rural lot sizes.</p> <p>The objectives seek that small lot rural development density does not continue throughout the District, as that may lead to a compromise in relation to the District’s current rural character, and importantly the ability to maintain a range of productive rural activities throughout the District.</p> <p>The objectives seek to be clear that the outcome for rural character in the District:</p> <ul style="list-style-type: none"> Clearly establishes that rural activities are to be the predominant land use, particularly in the west of the District.

Proposed Objective/s (All Rural Areas)	Appropriateness to achieve the purpose of the RMA
	<ul style="list-style-type: none"> • Recognises that rural character is made up of a combination of the type of activities that occur in combination with the built form and land use character associated. • Are more enabling of rural productive activities or activities that have a functional need to be located in the rural area within the District. <p>Achievability: There is a relatively high level of certainty around the subject matter of the objectives. The objectives, particularly those relating to residential density and fragmentation of land are directive. The outcomes sought in the objectives are clear and will be capable of effective implementation.</p> <p>The proposed objectives are clear, measurable and able to be implemented within the ambit of Council's powers, functions, skills and resources.</p> <p>The proposed objectives will aid the Council to carry out its functions for the purpose of achieving the RMA's sustainable management purpose.</p>

Alternative Objective/s – to zone differentiation	Appropriateness to achieve the purpose of the RMA
<p>The key alternative objectives relate to the zone specific objectives.</p> <p>The alternative objectives considered were to firstly not differentiate between the zones and apply the suite of objectives developed for either zone to the entire District. If the only zone to apply was the Rural Lifestyle Zone this is effectively the same as the status quo and therefore has not been evaluated further.</p> <p>Consideration was given to applying the General Rural Objectives District wide. This would through the provisions implementing the objectives have applied a 20 ha minimum site size for the establishment of residential activities across the whole district. This is identified later in this report as Option C.</p>	<p>Relevance: While the alternatives considered would have managed rural areas, given the key issues needing to be addressed being enabling rural production and maintaining character and amenity values of areas, developing more than the two proposed zones having a finer grained differentiation is not necessary in order to address these matters. Given this, providing additional differentiation is not necessary from a relevance perspective.</p> <p>Within the approach of having more than one rural zone there were a range of zones and potential sites sizes within those zones considered. These options, while considered, were not advanced as a detailed consideration of the zones was not considered necessary given the primary issues being managed are retaining primary productive potential and maintaining the character and amenity values.</p>

Alternative Objective/s – to zone differentiation	Appropriateness to achieve the purpose of the RMA
<p>The other alternative considered was to provide greater differentiation between different areas of the District by having additional zone(s), primarily located in the hill country where the character would have been large rural properties with very few buildings within the environment. This is identified later in this report as Option D.</p>	<p>Given these two key focus areas further refinement of the zones would not have better achieved the issues identified to be managed.</p> <p>Reasonableness:</p> <p>With respect to applying a General Rural Zone across the whole rural area the key issue with this approach relates to its reasonableness and achievability in relation to recognising the existing level of fragmentation and level of small rural lots already subdivided in the east of the District. Over 80% of the privately owned rural lots within the Proposed Rural Lifestyle Zone are 7.99ha or below.</p> <p>The two zone approach recognises that the dominant character in the east of the District is smaller lots with a more intensive character. Applying a 20ha or greater site size across the District would not have recognised that there was a different character existing in the eastern part of the Districts rural area.</p> <p>With respect to the alternative of having additional zones in terms of reasonableness and achievability this would have resulted in similar provisions as the General Rural Zone (apart from density) and it was considered overall that the gains in having a larger site size (than 20ha) from a rural productive potential perspective did not warrant the development and complexity associated with a new zone. In addition there is a proportion of the land that may have been subject to a different residential density that is within an identified Natural Feature and Landscape area where further subdivision and the development of residential units is a discretionary activity.</p> <p>Achievability:</p> <p>With respect to applying a General Rural Zone across the whole rural area the key issue with this approach relates to its reasonableness and achievability in that it would not recognise the existing dominant character in the east of the District which is predominantly small (4ha) sites.</p> <p>With respect to the alternative of having additional zones in terms of reasonableness and achievability this would have resulted in similar provisions as the General Rural Zone (apart from density) and it was considered overall that the gains in having a larger site</p>

Alternative Objective/s – to zone differentiation	Appropriateness to achieve the purpose of the RMA
	size (than 20ha) from a rural productive potential perspective did not warrant the development and complexity associated with a new zone. The possibility of having larger site size (over 20ha) was considered for the Lees Valley and other areas of high country. However, there has historically been a low demand for smaller sections in these locations meaning that additional density controls were not considered necessary to achieve the outcomes sought.

7.2 Summary - Evaluation of Proposed Objectives

The proposed objectives are the most appropriate means of achieving the purpose of the Act. In particular, relative to the status quo option, the objectives recognise that there are differences in character within two distinct parts of the rural environment within the District. While still providing for rural productive activities the eastern part of the District has a predominance of smaller sites having a greater lifestyle focus. The west of the District, while still having a number of small sites, has a greater rural production focus and an area of land in larger rural lots. The proposed objectives recognise the difference in character between these areas as well as emphasising the importance of enabling the continuation of establishment of new rural productive activities. Further fragmentation of land below 20 hectares is sought to be avoided in the General Rural Zone so as to retain the potential for a wide range of rural productive activities to occur. The objective seeks to avoid residential units and minor residential units on new sites below the minimum site size.

This differs from the status quo by placing greater emphasis within the General Rural Zone on the potential for land to be used for rural productive activities. The other key difference is that by having two separate zones the key differences in character between the east and the west of the District are recognised and addressed within the provisions.

Having additional zones was not necessary in order to address character and amenity values and would have had only limited implications on retaining productive potential of land. Given this having additional zones is not considered to be the most appropriate.

8. EVALUATION OF PROPOSED POLICIES AND METHODS

Section 32 (1)(b) of the RMA requires an evaluation of whether the proposed policies and methods are the most appropriate way to achieve the proposed objectives by identifying other reasonably practicable options, assessing the efficiency and effectiveness of the proposed policies and methods in achieving the objectives, and summarising the reasons for deciding on the proposed policies and methods.

The level of detail undertaken for the evaluation of the proposed policies and methods has been determined by the preceding scale and significance assessment.

The assessment must identify and assess the benefits and costs of environmental, economic, social and cultural effects that are anticipated from the implementation of the proposed policies and methods, including opportunities for economic growth and employment.

The assessment must, if practicable, quantify the benefits and costs and assess the risk of acting or not acting if there is uncertain or insufficient information available about the subject matter.

Policies and methods have been evaluated as a package, where appropriate, as together they address a particular issue and seek to meet a specific objective.

8.1 Reasonably practicable options for provisions

In considering reasonably practicable options for achieving the objectives of the proposed Waimakariri District Plan and the relevant higher order directions, the following options for policies and rules / rules have been identified. Taking into account the environmental, economic, social and cultural effects, the options identified have been assessed in terms of their benefits, and costs. Based on that, the overall efficiency and effectiveness of the alternative options was considered.

The options addressed are identified below. The basis of the evaluation is firstly addressing the nature of type of activities provided for within the provisions. Firstly, proposed provisions and the status quo are the alternatives considered. Secondly, the focus is on residential density provided for within the zones, and thirdly the focus is on provisions for future Large Lot Residential Zones.

The options considered are:

Activities:

Option A - Proposed Approach - this has two zones being the General Rural Zone and the Rural Lifestyle Zone each providing for similar activities to occur in the zones.

Option B - Status quo - which is to have one rural zone, providing for the current range of activities.

Residential Density

Option A - Proposed Approach - this has two zones being the General Rural Zone, having a minimum residential density of one residential unit per 20ha and the Rural Lifestyle Zone having a minimum residential density of one residential unit per 4ha. Option B - Status quo - which is to have one rural zone, having a minimum residential density of one residential unit per 4ha.

Option C - One rural zone throughout the District with maximum density of one residential unit per 20ha.

Option D - Having a greater range of maximum residential densities applying within different parts of the District.

Large Lot Residential Zone (Future):

Option A - Proposed Approach - this has a policy addressing considerations for future Large Lot Residential Zones and a mapped overlay showing the spatial extent of future areas.

Option B - Status quo which is to not identify future Rural Residential areas in the District Plan and consider any proposal as a Private Plan Change on a case-by-case basis.

8.2 Evaluation of Proposed Policies and Methods

Option A - Proposed Approach – Activities: Policies and methods (other than those relating to residential density and future Large Lot Residential Zones)	Benefits environmental, economic, social and cultural effects anticipated,	Costs environmental, economic, social and cultural effects anticipated,	Efficiency and Effectiveness	Risk of acting / not acting if there is uncertain or insufficient information about the subject matter of the provisions
<p>These are the proposed policies, rules and methods relating to activities (other than residential units) occurring within both Rural Zones.</p>	<p>Environmental: The provisions seek to establish that the priority land uses within the Rural zones relate to rural productive activities, activities supporting rural productive activities and activities reliant on the natural resources of the rural environment.</p> <p>There will be increased consent requirements for some rural productive activities over the status quo, particularly in relation to intensive farming activities (both indoor and outdoor). While there is a possible cost of resource consents and compliance the provisions seek to make it clear that it is the effects of these activities in the specific location proposed rather than the activities themselves that are the key considerations.</p> <p>When addressing quarrying activities (other than farm quarries) the rules provide clarity that quarrying activities, while anticipated in Rural Zones, are not</p>	<p>Environmental: None Identified</p>	<p>Overall the provisions identify a range of rural and related activities that are considered appropriate on rural land.</p> <p>The approach relating to activities, particularly enabling rural activities is not a significant change from the current approach, other than for intensive farming activities and industrial activities, but is expressed more clearly to improve plan administration and more clearly describe the outcomes sought.</p> <p>In relation to intensive farming (both indoor and outdoor) the policy directly is clear that these activities are expected within Rural Zones but seek that the effects of these activities are able to be considered on a site by site basis. This should provide an effective means of providing for these activities, while managing adverse effects on the environment.</p> <p>When addressing quarrying activities (other than farm quarries) the rules provide clarity that quarrying</p>	<p>Sufficient information is available to act. The risk of not acting would mean that productive rural focussed activities and the economic benefit that brings to the District, would not be provided for.</p> <p>Providing a focus on rural productive activities is identified in the Canterbury Regional Policy Statement as an important outcome for rural areas and addresses a key resource management issue identified for the District.</p> <p>Limitations on non-rural industrial activities is also a matter identified for management within the CRPS.</p>

	<p>to be located within 1000m of a residential zone. This rule implements objectives and policies in other zones, including earthworks and seeks to ensure adverse effects from quarrying activities to not occur in residential zones.</p> <p>There are benefits to the environment as while these activities require consent the reason for this is to manage adverse environmental effects and ensure that the activities are appropriate on the sites where they are proposed.</p> <p>The activities are managed in the same way within each zone. In part this is because while the overall character of the General Rural Zone is larger lots it is recognised that there is a mix of lot sizes where activities may seek to establish and the provisions seek through a consent to ensure that adverse effects are internalised within the site where the activity will take place as far as is reasonable.</p> <p>There is a clear link between the policies and rules and the objectives relating to the focus on rural production activities and</p>		<p>activities, while anticipated in Rural Zones, are not to be located within 1000m of a residential zone. This rule is linked to the implementation of the earthworks objectives and policies.</p> <p>In addition the rules specifying that activities such as shooting ranges and gun club facilities require resource consent to establish provides a clear link to the objectives and policies relating to noise, which is a key aspect of the amenity values within the Rural Zones.</p> <p>Having the same consent requirements within both Rural Zones may mean that some rural activities on large sites, such as intensive farming activities (both indoor and outdoor), require consents when properties are of such a size that any adverse effects can be managed within the site. This may mean that for some properties the cost of obtaining a resource consent may not result in an improved environmental outcome. This could reduce efficiency. However given that within the General Rural Zone there are a range of site sizes, including a number of sites around 4ha in area and there are a range of individual</p>	
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	<p>other activities within the rural environment.</p> <p>The policy direction differentiates between rural industry that is directly related to, services or supports the rural sector and other industrial activities. The policy direction combined with the activity status means consent will be required for non-rural industry to establish in Rural Zones.</p>		<p>circumstances it would be less efficient to develop rules that could be applied as a permitted activity on an individual site basis that are effective.</p> <p>Limitations on non-rural industrial activities is also a matter identified for management within the CRPS. The activity status, in combination with the policy will guide development of both rural and non-rural activity.</p>	
	<p>Economic:</p> <p>The provisions provide direct policy support that the rural environment is for rural productive activities, those activities supporting rural productive activities and those activities reliant on rural resources this provides greater certainty for people undertaking these activities that they are appropriate within a rural environment as long as adverse effects are appropriately managed.</p> <p>The District supports a wide range of rural production systems including extensive sheep and beef farms, intensive pastoral dairy farming, (assisted by irrigation schemes), cropping, processed vegetable growing and some horticulture. Much of the more</p>	<p>Economic:</p> <p>There will be increased consent requirements for some rural productive activities over the status quo, particularly in relation to intensive farming activities. While there is a possible cost of resource consents and compliance the provisions are clear, through policies being enabling of rural productive activities, that it is the effects of these activities in the specific location proposed rather than the activities themselves that are the key considerations.</p> <p>In relation to quarrying activities (other than farm quarries) the clear direction in the rules that these activities are not anticipated within 1000m of a</p>		

	<p>intensively farmed areas are flat, providing versatility in the type of farm system that can be implemented.</p> <p>Being adjacent to the South Island's largest city and in close proximity to both international air and sea-ports, the Waimakariri District is well placed to supply both domestic and international markets with fresh produce, horticultural and arable products. The New Zealand Resource Inventory (NZLRI) classifies Land Classes 1 – 3 to be the most highly productive land in New Zealand, being the most versatile and of highest value for primary production. The District has a high prevalence of Land Classes 1 - 3.</p> <p>The ability for productive rural activities to continue is important and is reflected in the focus of the policies and rules.</p> <p>The provisions will enable the establishment of activities that can only establish and operate within the rural environment. In turn the policy direction will mean that other activities, including for example industrial activities (other than rural industry) should look to</p>	<p>residential zone will mean that potential quarry areas are excluded from being utilised.</p> <p>The scale limits on some activities will generate the need for consents for larger scale activities, this may deter some activities expanding.</p> <p>Having the same consent requirements within both Rural Zones may mean that some rural activities on large sites, such intensive farming activities (both indoor and outdoor), require consents when properties are of such a size that any adverse effects can be managed within the site. This may mean that for some properties the cost of obtaining a resource consent may not result in an improved environmental outcome.</p>		
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	<p>establish in more appropriate zones, within urban areas.</p> <p>Provision for a range of permitted activities related to rural productive land uses provides flexibility in rural land use.</p> <p>There is a clear link between the policies and rules and the objectives relating to the focus on rural production activities and other activities within the rural environment. There is also a clear focus on activities having a direct or functional need to locate within the rural environment which will assist in maintaining the resources and values of rural areas. Other activities are not subject to a direct enabling policy approach.</p>			
	<p>Social: The provisions will enable the establishment of activities that are consistent with the rural environment.</p> <p>The provisions will enable the effects of activities to be considered where these effects may not be able to be managed entirely within the site the activity occurs. This will provide greater certainty for people living in the rural environment that their health and safety is not undermined</p>	<p>Social: Provisions may place potential additional constraints on sensitive activities occurring within Rural areas.</p> <p>The provisions applying to a number of activities, particularly those not directly related to or servicing the rural environment mean that it may be more difficult for these activities to establish in the Rural Zones. This may narrow the nature and</p>		

	<p>Activities that can create reverse sensitivity effects are identified and managed to ensure rural production activities continue to operate now and into the future and do not foreclose on their productive potential. ·</p> <p>There are also other activities, such as shooting ranges and gun club facilities require resource consent to establish provides a clear link to the objectives and policies relating to noise, which is a key aspect of the amenity values within the Rural Zones.</p> <p>Provision for a range of permitted activities related to rural productive land uses provides flexibility in rural land use. ·</p> <p>There is a clear link between the policies and rules and the objectives relating to the focus on rural production activities and other activities within the rural environment.</p>	<p>range of business and services that can be access from the Rural areas in the District.</p> <p>However, in relation to a number of business and industrial activities these are more appropriate located within urban areas.</p> <p>In relation to quarrying activities (other than farm quarries) the clear direction in the rules that these activities are not anticipated within 1000m of a residential zone will mean that potential quarry areas are excluded from potential development. However, from a social perspective it will provide those potential conflicts between different amenity values for quarry areas and residential areas will be managed.</p> <p>Reducing the potential for activities with conflicting expectations for amenity values is also a key reason why activities, such as shooting ranges and gun club facilities are managed through a resource consent process.</p>		
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	<p>Cultural: Requiring resource consent be obtained for intensive indoor and intensive outdoor farming activities is consistent with the approach sought within the Iwi Management Plan and will enable the range of values important to mana whenua to be considered.</p>	<p>Cultural: With the restriction on some activities within the rural area, unless a resource consent is obtained, there may be reduced opportunities for economic development for mana whenua within the Rural Zones as permitted activities.</p>		
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Opportunities for economic growth and employment

The provisions focus on the key activities occurring within Rural Zones being those related to Rural Production and those activities related to or supporting rural production activities. This provides opportunities for rural activities, economic growth and employment associated with these activities.

The rural area is the greatest land use area with 70-75% of the District area (22500ha) being rural farming land. This land supports a range of farming uses including dairy farming, sheep and beef farming and horticulture. These provide a range of economic and employment opportunities within the District. These are activities that require a rural location. If they are displaced by other land uses these activities are displaced from the District. There are no alternative sites within other zones where they can locate. These activities and the economic growth and employment benefits would be lost.

Quantification

Section 32(2)(b) requires that if practicable the benefits and costs of a proposal are quantified.

The evaluation in this report identifies where there may be additional cost(s), and where these might fall. It also where appropriate considers quantification of the properties affected. However, the exact quantification of the benefits and costs discussed is not considered to be practicable given the range of activities addressed in the provisions.

Option less appropriate to achieve the objective

Option B: Activities Status Quo (other than those relating to residential density and Large Lot Residential)	Benefits environmental, economic, social and cultural effects anticipated,	Costs environmental, economic, social and cultural effects anticipated,	Efficiency and Effectiveness	Risk of acting / not acting if there is uncertain or insufficient information about the subject matter of the provisions
	Environmental:	Environmental:		

	<p>The status quo provisions relating to activities provide for a range of rural activities, and activities reliant on a rural environment or supporting rural activities.</p> <p>The status quo provisions also provide for other activities not reliant on a rural location.</p>	<p>The status quo provisions relating to activities provide for a range of activities not reliant on a rural location. This can create greater competition for non-rural land uses to compete with rural land uses within the Rural Zone. While other activities, including industrial activities and commercial activities can occur in other zones rural activities cannot.</p> <p>There is potential for urban activities, including industrial and commercial activities to occur in Rural areas that are not serviced for these types of activities.</p> <p>There are potential reverse sensitivity effects that could result with the number of non-rural activities that are able to establish in Rural areas that may have different amenity and environmental expectations that rural productive activities.</p>	<p>The current provisions lack focus on rural production within the rural zones.</p> <p>The focus of the policies and rules is related to character matters, which does not recognise there are different characters within the District and does not give primacy to rural areas being the location where rural activities can establish.</p> <p>The result is that the rural area comes under greater pressure for non-rural activities, particularly business activities to establish potentially displacing rural activities.</p> <p>This is not considered to be effective or efficient.</p> <p>While there is some consideration of impacts on rural character and reverse sensitivity effects, there is insufficient consideration of the types of activities that are appropriate i.e. those related to primary production. As such the focus of retaining rural areas on primary production has been diminished.</p>	<p>The risk of not acting is that there is a continuing loss of productive land being used for productive rural focussed activities and the economic benefit that brings to the District, along with the loss of character to the rural areas of the District continue to change in a direction away from rural production activities.</p> <p>There are also inefficiencies and potential environmental concerns due to business activities, including industrial and commercial activities not establishing in serviced business zones.</p>
	<p>Economic: Continuation of the status quo provides a level of familiarity for landowners, farmers, neighbours and the community generally.</p> <p>Continuation of the status quo provides flexibility for landowners</p>	<p>Economic: The provisions are lacking with respect to retaining the potential for the ongoing productive use of the rural land resource.</p> <p>The provisions also provide a flexible approach for business</p>		

	with the potential for activities, other than rural productive activities, to be established in rural areas.	activities, including industrial and commercial activities establishing outside of identified business areas.		
	<p>Social: Continuation of status quo provides a level of familiarity for landowners, farmers, neighbours and the community generally.</p> <p>Continuation of the status quo provides greater options for business (commercial and industrial) activities within the Rural Zones.</p>	<p>Social: The provisions do not reinforce focus on the objective on rural uses predominating and the existing character of areas being maintained, particularly in relation to rural productive activities.</p>		
	<p>Cultural: None identified [pending awaiting any specific feedback in response to the continuing consultation]</p>	<p>Cultural: None identified [awaiting any specific feedback in response to the continuing consultation]</p>		

Opportunities for economic growth and employment

The opportunities for economic growth and associated employment that the alternative would provide would be the same as currently exist within the Operative District Plan.

OPTION A – Proposed Approach – Residential Density	Benefits environmental, economic, social and cultural effects anticipated,	Costs environmental, economic, social and cultural effects anticipated,	Efficiency and Effectiveness	Risk of acting / not acting if there is uncertain or insufficient information about the subject matter of the provisions
<p>Policy and methods relating to residential density and the character of the zones.</p> <p>In particular with:</p>	<p>Environmental: The provisions in the Rural Lifestyle zone reflect the status quo for residential density therefore any environmental benefit or cost is neutral to the status quo.</p>	<p>Environmental: The provisions in the Rural Lifestyle zone reflect the status quo for residential density therefore any environmental</p>	<p>The density changes will result in a reduction in the development potential for landowners within the General Rural Zone. For those properties where subdivision has already occurred the legacy clause</p>	<p>Sufficient information is available to act.</p> <p>The risks from not acting are:</p> <p>a. rural land within the entire District will continue to be subdivided to a</p>

<ul style="list-style-type: none"> • a maximum density of one residential unit and one minor residential unit per 20ha in the General Rural Zone and • a maximum density of one residential unit and one minor residential unit per 4ha in the Rural Lifestyle Zone. • Legacy provisions applying in the General Rural Zone addressing existing lots between 4-7.99ha. 	<p>With respect to the General Rural Zone the minimum area requirements for a residential unit and minor residential unit has been increased from the status quo of 4ha to 20ha. The benefit is that greater level of protection will be provided for the ability to use land within this zone for Rural productive activities.</p> <p>Larger sites will be less affected by sensitive activities occurring on adjacent or nearby properties having expectations for amenity values are not consistent with a working and productive rural environment.</p> <p>This seeks to provide for better and more certainty that the use of rural land for Rural production, which is a finite resource, now and into the future.</p> <p>Decreasing the residential unit density means it is more likely that rural land will reflect rural values which affects production economics.</p> <p>Landowners within the General Rural Zone that have already subdivided will by virtue of the legacy clause be able to utilise the</p>	<p>benefit or cost is neutral to the status quo.</p> <p>However, with respect to rural production potential for those lots greater than 8ha in the Rural Lifestyle Zone there will continue to be the potential for increased fragmentation of rural land, more potential for reverse sensitivity effects for remaining rural activities to occur that places greater challenges for land to be retained for productive rural activities. In the Rural Lifestyle Zone 81% of privately owned rural lots are 7.99ha or below. Further changes could potentially occur on the remaining 19% of land within the zone.</p> <p>With few exceptions, farmland subdivided for lifestyle purposes (7.99ha and below) will have a negative impact on the rural production from that land.</p> <p>With respect to the General Rural Zone the minimum area requirements have been increased and this will have an economic cost on landowners who have not yet subdivided as they will lose subdivision and land use potential below 20 ha.</p>	<p>will continue to allow development on the vacant site as if it were permitted prior to the density change. This change will affect landowners in the General Rural Zone with landholdings of 8ha or more.</p> <p>The provisions in the General Rural Zone decrease the ability to subdivide land to a level more consistent with a rural lifestyle, however, they do not impact on the ability to undertake rural productive activities or other activities that support rural productive uses or are reliant on the natural resources in the rural environment.</p> <p>The provisions are considered to be more effective to achieve the objective than the status quo because they provide a clear expectation that within the General Rural Zone the ability to undertake a wide range of Rural productive activities is sought to be maintained. This should provide greater certainty that Rural productive activities will not be adversely impacted on by non-rural activities establishing which seek different outcomes and amenity values.</p> <p>Within the Rural Lifestyle Zone, the provisions are considered to be</p>	<p>size which reduces the opportunities and range of rural productive land uses that the land can be utilised for.</p> <p>b. There would be a continuing loss of productive land and the economic benefit that brings to the District, along with the loss of character to the rural areas of the District continue to change in a direction more akin to a rural lifestyle area rather than a productive working rural environment.</p> <p>However, there are risks with acting. In particular, the key risk is adversely affecting the value of some properties within the District. Matters relating to effects on value are complicated with many factors influencing value.</p> <p>The change in the density in the General Rural Zone will reduce the flexibility for landowners in utilising their land asset particularly relating to subdividing for rural lifestyle purposes.</p> <p>The degree of change in land value and loss of flexibility is uncertain as each situation and degree of change and implications are unique to each landowner.</p> <p>General analysis as to the implications of this change (note this may be</p>
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	<p>land for the purpose of the subdivided.</p> <p>The provisions relating to character and density will maintain and enhance, where possible, the open space character of the two Rural zones to the benefit of the community</p>		<p>effective because they reflect the existing character of the area and effectively maintain the status quo. However it is recognised that while a range of primary production activities are provided for and enabled within the zone that further subdivision is unlikely to enhance the maintenance of the productive potential of the District</p>	<p>revised if the econometrics work is not completed its still subject to consideration whether this is being done or not) the work completed is deemed adequate.</p>
	<p>Economic: The provisions in the Rural Lifestyle zone reflect the status quo for residential density therefore any environmental benefit or cost is neutral to the status quo.</p> <p>With respect to the General Rural Zone the minimum area requirements for a residential unit and minor residential unit has been increased from the status quo of 4ha to 20ha. The benefit is that greater level of protection will be provided for the ability to use land within this zone for Rural productive activities.</p> <p>Larger sites will be less affected by sensitive activities occurring on adjacent or nearby properties having expectations for amenity values are not consistent with a working and productive rural environment.</p>	<p>Economic: The provisions in the Rural Lifestyle Zone reflect the status quo for residential density therefore any environmental benefit or cost is neutral.</p> <p>Reducing the ability for landowners to subdivide and develop to a density of one residential unit per 4 ha will reduce the options for landowners seeking and economic return on their land by subdividing for rural lifestyle purposes.</p> <p>The change in the minimum residential density will reduce the flexibility for landowners in utilising their land asset particularly relating to subdividing for rural lifestyle purposes.</p>	<p>With few exceptions, farmland subdivided for lifestyle purposes will have a negative impact on the rural production from that land.</p>	

	<p>While the minimum land size required to maintain rural productivity is not solely determined by land area minimum scale is important to maintaining productive potential of land now and in the future. 4ha does not provide a property of a size that provides a range of longer term sustainable productive potential with a productive area (excluding buildings and curtilage areas) a minimum of between 10 to 15-100ha being needed for a range of productive activities.</p> <p>The District supports a wide range of rural production systems including extensive sheep and beef farms, intensive pastoral dairy farming, (assisted by irrigation schemes), cropping, processed vegetable growing and some horticulture. Much of the more intensively farmed areas are flat, providing versatility in the type of farm system that can be implemented.</p> <p>Being adjacent to the South Island's largest city and in close proximity to both international air and sea-ports, the Waimakariri District is well placed to supply both domestic and international markets with</p>	<p>It acknowledged that motivations for subdivision are varied but include subdividing all or parts of property to increase financial security, using subdivision as part of a superannuation scheme, to reduce debt or as part of a succession process. This flexibility will be reduced within the General Rural Zone.</p> <p>As a business, many farming enterprises have a relatively low return on capital invested in land and infrastructure and, therefore, farmers may see it as important that their asset value is protected or enhanced. Subdivision to 4ha titles could enhance the overall farm value given the future opportunity to subdivide for lifestyle properties, this will not be available to those in the General Rural Zone.</p> <p>A change in minimum lot size to 20ha in the General Rural Zone could reduce land values as the potential to subdivide and take advantage of higher land values achieved for lifestyle property development would diminish. When land is subdivided for lifestyle properties the value per hectare generally rises significantly.</p>		
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	<p>fresh produce, horticultural and arable products.</p> <p>The New Zealand Resource Inventory (NZLRI) classifies Land Classes 1 – 3 to be the most highly productive land in New Zealand, being the most versatile and of highest value for primary production. The District has a high prevalence of Land Classes 1 - 3.</p> <p>As with other districts in the Canterbury region, the Waimakariri District has significant areas of flat, highly productive land that enables high productivity per hectare, diversity in what is produced and often supports the more extensive lower producing land classes by finishing the livestock to acceptable market weights. Once this land is subdivided and developed for lifestyle properties, the effect on productive potential is almost invariably irreversible. The land will not be available for future commercial farming.</p> <p>Some of the rural production systems undertaken on LUC 1 -3 cannot be efficiently transferred to other land classes and therefore a conversion of this highly productive land to Lifestyle properties would either curtail these systems or</p>	<p>A reduction in equity could impact a landowners ability to invest both on farm or in another enterprise if they are not able to borrow further funds.</p>		
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	<p>make them significantly less efficient.</p> <p>Small lifestyle properties (less than 8ha) are not usually capable of sustaining many rural production systems in the General Rural Zone and will generally impact negatively on the rural production per hectare including for the following reasons:</p> <ul style="list-style-type: none"> • Insufficient management expertise such as crop husbandry, grazing management, irrigation, soil nutrient management and agricultural business management; • A significant area of lifestyle properties is used for houses, buildings, grounds and non-productive activities such as grazing horses and ponies; • Insufficient business size to invest in the best infrastructure and technologies; • Insufficient land size to grow the best crops and to implement a suitable cropping rotation; • Reduced re-grassing resulting in poorer producing and lower quality pastures. Re-grassing is generally not undertaken as often on a lifestyle property due to; 			
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	<ul style="list-style-type: none"> ○ Lack of a cropping and re-grassing programme; ○ Lack of management expertise; and ○ The high cost of preparing and re-grassing small paddocks. ● Grazing management on small lifestyle properties is often poor given the lack of paddocks, livestock numbers and management expertise. <p>Continued development of rural land into small rural lifestyle holdings can lead to conflict with regards to what are acceptable practises. Some agricultural practises, such as operating large machinery after hours, could be deemed unacceptable by a neighbouring lifestyle property owner. However, curtailing these activities could impact on the farm's productivity.</p> <p>There are benefits in that there will be clear expectations within the District Plan is to density and character outcomes for the Rural zones. In particular the key focus of the General Rural Zone is that it is dominated by rural production activities.</p>			
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	<p>The legacy clauses in the General Rural Zone enabling existing lots between 4 and 20ha to be developed will lessen the impact of the density change for sites that are existing, or where subdivision has already occurred, but is yet to be completed.</p>			
	<p>Social: The provisions in the Rural Lifestyle zone reflect the status quo for residential density therefore any social benefit or cost is neutral.</p> <p>With respect to the General Rural Zone the minimum area requirements have been increased.</p> <p>The social benefit is that greater level of protection will be provided for the ability to utilise land within this zone for Rural productive activities providing greater future proofing of the ability for Rural productive land to be used for productive purposes within the District contributing positively to the sustainability of rural activities within the District.</p> <p>There are benefits in that there will be clear expectations within the District Plan as to density and character outcomes for the Rural zones.</p>	<p>Social: The provisions in the Rural Lifestyle zone reflect the status quo for residential density therefore any social benefit or cost is neutral.</p> <p>With respect to the General Rural zone the minimum area requirements have been changed to a 20ha minimum.</p> <p>Reducing the ability for landowners to subdivide and develop to a density of one residential unit per 4 ha in the General Rural Zone will reduce the options for landowners to subdivide their land by subdividing for rural lifestyle purposes.</p> <p>It acknowledged that motivations for subdivision are varied but include subdividing all or parts of property to increase financial security, using subdivision as part</p>		

	<p>The legacy clauses in the General Rural Zone enabling existing lots between 4 and 20ha to be developed will lessen the impact of the density change for sites that are existing, or where subdivision has already occurred, but is yet to be completed.</p>	<p>of a superannuation scheme, to reduce debt or as part of a succession process. This flexibility will be reduced within the General Rural Zone.</p> <p>As a business, many farming enterprises have a relatively low return on capital invested in land and infrastructure and, therefore, farmers may see it as important that their asset value is protected or enhanced. Subdivision to 4ha titles could enhance the overall farm value given the future opportunity to subdivide for lifestyle properties, this will not be available to those in the General Rural Zone.</p> <p>A change in minimum lot size to 20ha in the General Rural Zone could reduce land values as the potential to subdivide and take advantage of higher land values achieved for lifestyle property development would diminish. When land is subdivided for lifestyle properties the value per hectare generally rises significantly.</p> <p>A reduction in equity could impact a landowners ability to invest both on farm or in another</p>		
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		<p>enterprise if they are not able to borrow further funds.</p> <p>The change in density within the General Rural Zone may reduce the range of living environments available within the District. Enabling continued subdivision of land to 4ha in the Rural Lifestyle Zone may create greater pressures on existing rural production activities occurring within the zone, with potential for increased number and proximity of neighbours who may have different amenity expectations.</p>		
	Cultural:	Cultural: With the restriction on density within the General Rural Zone, there may be reduced opportunities relating to residential development in the General Rural Zone for mana whenua, reducing the range of living environments available.		

Opportunities for economic growth and employment

Rural land supports a range of farming and productive uses including dairy farming, sheep and beef farming and horticulture. These provide a range of economic and employment opportunities within the District. These are activities that require a rural location. If they are displaced by other land uses these activities are displaced from the District. There are not alternative sites within other zones where they can locate. These activities and the economic growth and employment benefits would be lost.

The land within the Rural Lifestyle Zone is approximately 32,753 ha of land being approximately 15% of the total land within the District. The land within the General Rural Zone covers 150,760ha of land accounting for approximately 68% of the total land within the District. When considering previous subdivision patterns between 2017 and 2020 over 90% of all lots created have been sized between 4ha-7.99ha.

Four hectares of land is not sufficient to provide for a range of primary productive activities. Changing the density of residential units in the General Rural Zone to a minimum of 20ha per residential unit is considered necessary to retain opportunities for primary productive related growth and employment. This type of economic activity can only be derived within the Rural areas of the District. If productive rural activities are displaced by more lifestyle activities the rural productive activity does not have an alternative location to establish. While a density of one residential unit per 4ha is retained within the Rural Lifestyle Zone this is reflective of the predominant character that exists within this zone. It is acknowledged that this may continue to undermine the ability for land within this zone to be used for rural productive activities. However, the opportunity for these activities to continue is provided for as is clearly setting out that the amenity expectations for this area is that of a Rural Zone with a range of rural activities occurring. It is acknowledged that there are a number of small rural lots 7.99ha or below in the General Rural Zone. While privately owned properties of this size equate to 57% of all lots in the General Rural Zone this equates to 6% of the land area within the zone. In the General Rural Zone 84% of all privately owned rural lots are over 40ha in area.

While there are a range in minimum productive area for different land uses from 10 hectares to 15 hectares up to 100 hectares, 20 hectares is the minimum residential density and subdivision site size for the General Rural Zone that has been identified as providing the greatest opportunity for a range of productive uses while seeking to minimise the use of that land in the General Rural Zone for Rural Lifestyle purposes. The range of production activities and the relationship to site size is as set out in table 1 below.

Table 1: Minimum Area by Land use

Production System	Minimum Productive Area (Hectares)
Speciality Small Seeds (e.g. Carrot)	10 - 15
Horticulture (e.g. Apples)	10 - 15
Vegetables (e.g. Potatoes)	15 - 20
Dairy Support and Dairy	20 - 40
Mixed Cropping/Livestock	20 - 40
Intensive Breeding Finishing	40
Extensive Breeding and Finishing	100

It is recognised that the minimum productive areas in ha identified above are the areas required for the rural activity itself and is exclusive of any buildings, housing or curtilage areas.

Quantification

Section 32(2)(b) requires that if practicable the benefits and costs of a proposal are quantified.

The evaluation in this report identifies where there may be additional cost(s) and benefit(s), and where these might fall. It also where appropriate considers quantification of the properties affected. However, the exact quantification of the benefits and costs discussed is not considered to be practicable given the range of influences and circumstances that exist in determining quantified costs and benefits.

Options less appropriate to achieve the objective				
Option B: Status Quo – Residential Density - One zone throughout the District with maximum residential density of one residential unit per 4ha	Benefits environmental, economic, social and cultural effects anticipated,	Costs environmental, economic, social and cultural effects anticipated,	Efficiency and Effectiveness	Risk of acting / not acting if there is uncertain or insufficient information about the subject matter of the provisions
	<p>Environmental: There is flexibility for those rural production activities that can be viable on sites less than 4ha.</p>	<p>Environmental: With few exceptions, rural land subdivided for lifestyle purposes (less than 10ha) will have a negative impact on the rural production from that land.</p> <p>With respect to rural production potential for those lots greater than 8ha there will continue to be the potential for increased fragmentation of rural land, more potential for reverse sensitivity effects for remaining rural activities to occur that places greater challenges for land to be retained for productive rural activities. Within the area covered by both the Proposed Rural Lifestyle Zone and General Rural Zone 69% of privately owned rural lots are 7.99ha or below. Further changes could potentially occur on the remaining 31% of land within the zone.</p>	<p>The focus of the policies and rules do not recognise there are different characters within the District. The result is that it would be possible for the whole of the rural area in the District to be subdivided and developed to a density of one residential unit per 4 hectares with no rural activity occurring and still achieve the stated objective. This is not considered to be effective or efficient.</p> <p>While the objective and policy identify that rural production is sought to be maintained 4ha is not a size that is flexible for a range of rural productive activities. The rules relating to density do not work to achieve rural production.</p>	<p>The risk of not acting is that the character of the rural areas of the District continue to change in a direction more akin to a rural lifestyle area rather than a productive working rural environment.</p> <p>The risk of not acting is that the ability to use land for productive rural activities in the Waimakariri District is undermined.</p>

		<p>4ha is not a size that is flexible for a range of rural productive activities.</p> <p>Continued development of rural land into small rural lifestyle holdings can lead to conflict with regards to what are acceptable practises. Some agricultural practises, such as operating large machinery after hours, could be deemed unacceptable by a neighbouring lifestyle property owner. However, curtailing these activities could impact on the farm's productivity.</p>		
	<p>Economic: The current subdivision potential for all rural land in the District will be maintained.</p> <p>This provides landowners with flexibility as to how they realise the value of the land, either by selling as a farming activity or further subdividing.</p> <p>Retaining the status quo density will maintain the flexibility for landowners in utilising their land asset particularly relating to subdividing for rural lifestyle purposes.</p>	<p>Economic: The current approach does not strongly focus on rural productive activities. The continuation of rural lifestyle dominated development in all of the rural areas may continue to impact on the ability to undertake rural activities, making obtaining land for farming within Waimakariri District less viable. It would be anticipated that the pattern of subdivision, whereby in the period 2006 to 2020 84% of all lots crated are below 7.99ha.</p> <p>Providing for continued 4ha subdivision at the levels currently seen will mean that opportunity</p>		

	<p>It acknowledged that motivations for subdivision are varied but include subdividing all or parts of property to increase financial security, using subdivision as part of a superannuation scheme, to reduce debt or as part of a succession process. This flexibility will be maintained with the status quo.</p> <p>As a business, many farming enterprises have a relatively low return on capital invested in land and infrastructure and, therefore, landowners may see it as important that their asset value is protected or enhanced. Subdivision to 4ha titles could enhance the overall farm value given the future opportunity to subdivide for lifestyle properties.</p> <p>A change in minimum lot size to 20ha in the General Rural Zone could reduce land values as the potential to subdivide and take advantage of higher land values achieved for lifestyle property development would diminish. When land is subdivided for lifestyle properties the value per hectare generally rises significantly.</p> <p>A reduction in equity could impact a landowners ability to invest both</p>	<p>for future generations to farm within the Waimakariri District may be reduced.</p> <p>While the minimum land size required to maintain rural productivity is not solely determined by land area minimum scale is important to maintaining productive potential of land now and in the future. 4ha does not provide a property of a size that provides a range of longer term sustainable productive potential with a productive area (excluding buildings and curtilage areas) a minimum of between 10 to 15-100ha being needed for a range of productive activities.</p> <p>Retaining a 4ha residential unit density will retain flexibility for landowners in utilising their land asset particularly relating to subdividing for rural lifestyle purposes.</p> <p>It acknowledged that motivations for subdivision are varied but include subdividing all or parts of property to increase financial security, using subdivision as part of a superannuation scheme, to reduce debt or as part of a</p>		
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	<p>on farm or in another enterprise if they are not able to borrow further funds.</p>	<p>succession process. This flexibility will be maintained.</p>		
	<p>Social: This provides landowners with flexibility as to how they realise the value of the land, either by selling as a farming activity or further subdividing.</p> <p>Increasing the population in Rural areas can provide enhanced social contact and assist in retaining rural services and facilities.</p> <p>It acknowledged that motivations for subdivision and development are varied but include subdividing all or parts of property to increase financial security, using subdivision as part of a superannuation scheme, to reduce debt or as part of a succession process. By retaining a 4ha residential unit density flexibility will be maintained.</p>	<p>Social: The continuation of rural lifestyle dominated development in all of the rural areas may continue to impact on the ability to undertake rural activities, making obtaining land for farming within Waimakariri District less viable.</p>		
	<p>Cultural: Current opportunities relating to residential development in the District for mana whenua, will be retained.</p>	<p>Cultural: Continued fragmentation of land may intensify land use occupation and impact on the retention of the life supporting and productive capacity the natural soil and land resource.</p>		

Opportunities for economic growth and employment

The opportunities for economic growth and associated employment that the alternative would provide would be the same as currently exist within the Operative District Plan.

Quantification

Section 32(2)(b) requires that if practicable the benefits and costs of a proposal are quantified.

The evaluation in this report identifies where there may be additional cost(s) and benefit(s), and where these might fall. It also where appropriate considers quantification of the properties affected. However, the exact quantification of the benefits and costs discussed is not considered to be practicable given the range of influences and circumstances that exist in determining quantified costs and benefits.

<p>Option C – Residential Density One zone throughout the District with maximum residential density of one residential unit per 20ha</p>	<p>Benefits environmental, economic, social and cultural effects anticipated,</p>	<p>Costs environmental, economic, social and cultural effects anticipated,</p>	<p>Efficiency and Effectiveness</p>	<p>Risk of acting / not acting if there is uncertain or insufficient information about the subject matter of the provisions</p>
	<p>Environmental: Fragmentation of rural land will be further reduced.</p> <p>The benefit is that greater level of protection will be provided for the ability to use land within this zone for Rural productive activities.</p> <p>Larger sites will be less affected by sensitive activities occurring on adjacent or nearby properties having expectations for amenity values are not consistent with a working and productive rural environment.</p> <p>This seeks to provide for better and more certain use of rural land for</p>	<p>Environmental: None identified</p>	<p>The approach is not particularly effective as it fails to recognise the existing character that has developed in the eastern part of the district.</p> <p>This will impact on the efficiency and effectiveness of the provisions as the character described for areas with a 20 hectare minimum size does not reflect the existing character within the Rural Lifestyle Zoned area, meaning that the provisions will have been undermined before they are even operative.</p>	<p>There is not considered to be uncertain or insufficient information about the subject matter.</p>

	<p>Rural production, which is a finite resource, now and into the future.</p> <p>Decreasing the residential unit density means it is more likely that rural land will reflect rural values which affects production economics.</p> <p>Landowners that have already subdivided will by virtue of the legacy clause be able to utilise the land for the purpose of the subdivided.</p> <p>The provisions relating to character and density will maintain and enhance, where possible, the open space character Rural Zone to the benefit of the community.</p> <p>Decreasing the residential unit density means it is more likely that rural land will reflect rural values which affects production economics.</p> <p>Reducing the ability to develop rural land into small rural lifestyle lots may reduce conflict with regard to what are acceptable rural practises. Some agricultural practises, such as operating large machinery after hours, could be deemed unacceptable by a neighbouring lifestyle property</p>			
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	owner. However, curtailing these activities could impact on the farm's productivity.			
	<p>Economic Larger sites will be less affected by sensitive activities occurring on adjacent or nearby properties having expectations for amenity values are not consistent with a working and productive rural environment.</p> <p>While the minimum land size required to maintain rural productivity is not solely determined by land area minimum scale is important to maintaining productive potential of land now and in the future. 4ha does not provide a property of a size that provides a range of longer term sustainable productive potential with a productive area (excluding buildings and curtilage areas) a minimum of between 10 to 15-100ha being needed for a range of productive activities.</p> <p>The District supports a wide range of rural production systems including extensive sheep and beef farms, intensive pastoral dairy farming, (assisted by irrigation schemes), cropping, processed</p>	<p>Economic: A greater number of landowners will be affected by a change in density, without resulting benefits on maintaining the character of the environment, particularly where the predominant character is already small rural holdings.</p> <p>Reducing the ability for landowners to subdivide and develop to a density of one residential unit per 4 ha will reduce the options for landowners seeking and economic return on their land by subdividing for rural lifestyle purposes.</p> <p>The change in the density will reduce the flexibility for landowners in utilising their land asset particularly relating to subdividing for rural lifestyle purposes.</p> <p>It acknowledged that motivations for subdivision are varied but include subdividing all or parts of property to increase financial</p>		

	<p>vegetable growing and some horticulture. Much of the more intensively farmed areas are flat, providing versatility in the type of farm system that can be implemented.</p> <p>Being adjacent to the South Island's largest city and in close proximity to both international air and sea-ports, the Waimakariri District is well placed to supply both domestic and international markets with fresh produce, horticultural and arable products.</p> <p>The New Zealand Resource Inventory (NZLRI) classifies Land Classes 1 – 3 to be the most highly productive land in New Zealand, being the most versatile and of highest value for primary production. The District has a high prevalence of Land Classes 1 - 3.</p> <p>As with other districts in the Canterbury region, the Waimakariri District has significant areas of flat, highly productive land that enables high productivity per hectare, diversity in what is produced and often supports the more extensive lower producing land classes by finishing the livestock to acceptable market weights. Once this land is subdivided and developed for</p>	<p>security, using subdivision as part of a superannuation scheme, to reduce debt or as part of a succession process. This flexibility will be reduced in all rural areas.</p> <p>As a business, many farming enterprises have a relatively low return on capital invested in land and infrastructure and, therefore, farmers may see it as important that their asset value is protected or enhanced. Subdivision to 4ha titles could enhance the overall farm value given the future opportunity to subdivide for lifestyle properties, this will not be available.</p> <p>A change in minimum lot size to 20ha could reduce land values as the potential to subdivide and take advantage of higher land values achieved for lifestyle property development would diminish. When land is subdivided for lifestyle properties the value per hectare generally rises significantly.</p> <p>A reduction in equity could impact a landowners ability to invest both on farm or in another</p>		
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	<p>lifestyle properties, the effect on productive potential is almost invariably irreversible. The land will not be available for future commercial farming. Further fragmentation of land would be significantly reduced.</p> <p>Some of the rural production systems undertaken on LUC 1 -3 cannot be efficiently transferred to other land classes and therefore a conversion of this highly productive land to Lifestyle properties would either curtail these systems or make them significantly less efficient.</p> <p>Additional small lifestyle properties would not be provided for. These are not usually capable of sustaining many rural production systems and will generally impact negatively on the rural production per hectare including for the following reasons:</p> <ul style="list-style-type: none"> • Insufficient management expertise such as crop husbandry, grazing management, irrigation, soil nutrient management and agricultural business management; • A significant area of lifestyle properties is used for houses, buildings, grounds and non- 	<p>enterprise if they are not able to borrow further funds.</p> <p>The change in the density will reduce the flexibility for landowners in utilising their land asset particularly relating to subdividing for rural lifestyle purposes. It acknowledged that motivations for subdivision are varied but include subdividing all or parts of property to increase financial security, using subdivision as part of a superannuation scheme, to reduce debt or as part of a succession process. This flexibility will be reduced.</p>		
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	<p>productive activities such as grazing horses and ponies;</p> <ul style="list-style-type: none"> • Insufficient business size to invest in the best infrastructure and technologies; • Insufficient land size to grow the best crops and to implement a suitable cropping rotation; • Reduced re-grassing resulting in poorer producing and lower quality pastures. Re-grassing is generally not undertaken as often on a lifestyle property due to; <ul style="list-style-type: none"> ○ Lack of a cropping and re-grassing programme; ○ Lack of management expertise; and ○ The high cost of preparing and re-grassing small paddocks. • Grazing management on small lifestyle properties is often poor given the lack of paddocks, livestock numbers and management expertise. <p>Continued development of rural land into small rural lifestyle holdings can lead to conflict with regards to what are acceptable practises. Some agricultural practises, such as operating large machinery after hours, could be deemed unacceptable by a</p>			
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	<p>neighbouring lifestyle property owner. However, curtailing these activities could impact on the farm's productivity.</p> <p>There are benefits in that there will be clear expectations within the District Plan as to density and character outcomes for the Rural zones. In particular that rural production activities are dominant.</p> <p>The legacy clauses could enable existing lots between 4 and 20ha to be developed will lessen the impact of the density change for sites that are existing, or where subdivision has already occurred, but is yet to be completed.</p>			
	<p>Social: Larger sites will be less affected by sensitive activities occurring on adjacent or nearby properties having expectations for amenity values are not consistent with a working and productive rural environment. This will contribute positively to the sustainability of rural activities within the District.</p> <p>There are benefits in that there will be clear expectations within the District Plan as to density and character outcomes for the Rural zones.</p>	<p>Social: A greater number of landowners will be affected by a change in density, without resulting benefits on maintaining the character of the environment, particularly where the predominant character is already small rural holdings.</p> <p>Reducing the ability for landowners to subdivide and develop to a density of one residential unit per 4 ha will reduce the options for landowners seeking and</p>		

	<p>The legacy clauses in the General Rural Zone enabling existing lots between 4 and 20ha to be developed will lessen the impact of the density change for sites that are existing, or where subdivision has already occurred, but is yet to be completed.</p>	<p>economic return on their land by subdividing for rural lifestyle purposes.</p> <p>The change in the density will reduce the flexibility for landowners in utilising their land asset particularly relating to subdividing for rural lifestyle purposes.</p> <p>It acknowledged that motivations for subdivision are varied but include subdividing all or parts of property to increase financial security, using subdivision as part of a superannuation scheme, to reduce debt or as part of a succession process. This flexibility will be reduced in all rural areas.</p> <p>As a business, many farming enterprises have a relatively low return on capital invested in land and infrastructure and, therefore, farmers may see it as important that their asset value is protected or enhanced. Subdivision to 4ha titles could enhance the overall farm value given the future opportunity to subdivide for lifestyle properties, this will not be available.</p>		
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		<p>A change in minimum lot size to 20ha could reduce land values as the potential to subdivide and take advantage of higher land values achieved for lifestyle property development would diminish. When land is subdivided for lifestyle properties the value per hectare generally rises significantly.</p> <p>A reduction in equity could impact a landowners ability to invest both on farm or in another enterprise if they are not able to borrow further funds.</p> <p>The change in the density will reduce the flexibility for landowners in utilising their land asset particularly relating to subdividing for rural lifestyle purposes. It acknowledged that motivations for subdivision are varied but include subdividing all or parts of property to increase financial security, using subdivision as part of a superannuation scheme, to reduce debt or as part of a succession process. This flexibility will be reduced.</p> <p>The change in density may reduce the range of living</p>		
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		environments available within the District.		
	Cultural: None identified	Cultural: With the restriction on density there may be reduced opportunities relating to residential development in the General Rural Zone for mana whenua, reducing the range of living environments available.		

Opportunities for economic growth and employment

The opportunities for economic growth and associated employment that the alternative would provide would be to provide for rural productive potential to be retained, however, it would result in a loss of opportunity for the development of further small rural lots in any rural area of the District.

Quantification

Section 32(2)(b) requires that if practicable the benefits and costs of a proposal are quantified.

The evaluation in this report identifies where there may be additional cost(s) and benefit(s), and where these might fall. It also where appropriate considers quantification of the properties affected. However, the exact quantification of the benefits and costs discussed is not considered to be practicable given the range of influences and circumstances that exist in determining quantified costs and benefits.

Option D Residential Density – Having a greater range of minimum residential unit densities applying within different parts of the District.	Benefits environmental, economic, social and cultural effects anticipated,	Costs environmental, economic, social and cultural effects anticipated,	Efficiency and Effectiveness	Risk of acting / not acting if there is uncertain or insufficient information about the subject matter of the provisions
	Environmental: Areas of different character and nature can be distinguished from other areas and if necessary specific provisions can be developed for these areas.	Environmental: None identified	<p>The approach of providing greater differentiation within the zones and having different density requirements was considered. In particular this was considered in light of the character report that was undertaken by Boffa Miskell which identified a number of character areas.</p> <p>When considering the key character matters applying to the Waimakariri District the key issue identified related to whether development in the rural zone reflected more of a rural character or a rural lifestyle character. This was the key differentiation with respect to character.</p> <p>The other key driver for the Rural areas related to rural production potential. The information relating to rural production options identified that there were a range of factors in determining appropriate property</p>	There is not considered to be uncertain or insufficient information about the subject matter.

			<p>sizes, however key was that those properties less than 10ha did not provide flexibility in rural production potential.</p> <p>While acknowledged that some rural productive activities can occur on smaller properties in general a minimum property size of between 10 to 15ha was required. This property size excluded any area associated with buildings and curtilage. From a production perspective there was a clear differentiation between properties of a lifestyle size and properties with rural productive options.</p> <p>These two key drivers being character and rural production both pointed to the key factor for determining density in the Rural areas to be whether the character was a rural lifestyle character or a rural activity character. This lead to the key determinant being to differentiate between those areas that were predominantly lifestyle and those predominantly rural. This leads to a minimum of two zones being needed.</p> <p>Consideration was then given to whether a finer grained differentiation was efficient or effective. From a rural productive</p>	
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			<p>potential perspective there are a wide range of factors that lead to determination of what sized property is appropriate. This includes soil type, water availability, level of infrastructure investment, type of farming systems. Factors vary property to property and area to area meaning it was not likely effective to provide more fine grained differentiation on rural production grounds as this would have to occur on a site by site basis.</p> <p>With respect to character, there is the potential to have different densities applying to different character areas. When the elements of rural character were considered in combination with provisions in the Proposed Plan, (such as Natural features and landscapes and Coastal environment) finer grained differentiation of rural character was not needed. Given this establishing different densities based on different character areas would have increased complexity of the Rural provisions without consequential environmental, economic, social or cultural benefits being realised. This would not be an effective approach.</p> <p>Further differentiation of character is not necessary in order to achieve the objectives of maintaining rural</p>	
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			productive potential and maintaining character and amenity values.	
	Economic: None identified	Economic: Greater complexity is introduced into the Plan through having additional provisions that must be considered and implemented.		
	Social: None identified	Social: Greater complexity is introduced into the Plan through having additional provisions that must be considered and implemented.		
	Cultural: None identified	Cultural: None identified		

Opportunities for economic growth and employment

The opportunities for economic growth and associated employment that the alternative would provide are not greater than any of the other options.

Quantification

Section 32(2)(b) requires that if practicable the benefits and costs of a proposal are quantified.

The evaluation in this report identifies where there may be additional cost(s) and benefit(s), and where these might fall. It also where appropriate considers quantification of the properties affected. However, the exact quantification of the benefits and costs discussed is not considered to be practicable given the range of influences and circumstances that exist in determining quantified costs and benefits.

Option A – Preferred Approach - Future Large Lot Residential specifically addressed	Benefits environmental, economic, social and cultural effects anticipated,	Costs environmental, economic, social and cultural effects anticipated,	Efficiency and Effectiveness	Risk of acting / not acting if there is uncertain or insufficient information about the subject matter of the provisions
	<p>Environmental: The Policy and identification of land in an overlay will promote the integrated management of natural and physical resources, particularly through requiring an Outline Development Plan be prepared.</p>	<p>Environmental: The development opportunity facilitated by the policy and land identified in an overlay, once rezoned, will result in a loss of the rural character and amenity that is associated with the current rural land use of these areas.</p> <p>However, this change is anticipated by the Rural Residential Development Strategy. The policy identifies the constraints that must be overcome.</p>	<p>While costly to prepare a private plan change to rezone land from a Rural zone to Large Lot Residential Zone the policy and overlay does provides clarity that a land use change is expected.</p> <p>Any rezoning, facilitated through the policy and overlay, will provide additional rural residential development capacity and opportunity.</p> <p>While the ability to proceed with a rezoning proposal will be dependent on the financial position of individuals and organisations - the inclusion of the policy and overlay clearly signals that the intent is for the land to be able to have a change of zoning to facilitate rural residential development in the form of a Large Lot Residential Zone.</p>	<p>There is not considered to be uncertain or insufficient information about the subject matter.</p> <p>The Waimakariri Rural Residential Development Strategy has considered the appropriateness of rezoning land from rural to provide for rural residential development. The policy and spatial overlay provide greater clarity as to the areas for proposed rezoning in the form of a Large Lot Residential Zone and the matters that are to be considered.</p> <p>Detailed consideration of any constraints will be undertaken at the time of any rezoning proposal.</p> <p>The Overlay identifies the location where the rezoning could occur and the policy guides the constraints that are to be addressed at the time of any rezoning.</p>
	<p>Economic: Residential development opportunities will be increased. With resulting economic development associated with new</p>	<p>Economic: Rural land will be lost from potential primary productive uses. However, this change is anticipated by the Rural</p>		

	<p>rural residential development opportunities.</p> <p>While costly to prepare a private plan change to rezone land from a Rural zone to Large Lot Residential Zone the policy and overlay does provides clarity that a land use change is expected.</p> <p>While the ability to proceed with a rezoning proposal will be dependent on the financial position of individuals and organisations - the inclusion of the policy and overlay clearly signals that the intent is for the land to be able to have a change of zoning to facilitate rural residential development in the form of a Large Lot Residential Zone.</p>	<p>Residential Development Strategy. The policy identifies the constraints that must be overcome.</p> <p>There is potential that the overlay and the policy will not be responsive enough to facilitate additional rural residential development if site specific constraints cannot be overcome or if landowners do not take up the opportunity to rezone the land.</p> <p>While costly to prepare a private plan change to rezone land from a Rural zone to Large Lot Residential Zone the policy and overlay does provides clarity that a land use change is expected.</p> <p>While the ability to proceed with a rezoning proposal will be dependent on the financial position of individuals and organisations - the inclusion of the policy and overlay clearly signals that the intent is for the land to be able to have a change of zoning to facilitate rural residential development in the form of a Large Lot Residential Zone.</p>		
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	<p>Social: Residential development opportunities will be increased. This will facilitate housing choice within Waimakariri District.</p>	<p>Social: There is potential that the overlay and the policy will not be responsive enough to facilitate additional rural residential development if site specific constraints cannot be overcome or if landowners do not take up the opportunity to rezone the land. This then would not facilitate housing opportunities.</p>		
	<p>Cultural: None identified</p>	<p>Cultural: None identified</p>		

Opportunities for economic growth and employment

The opportunities for economic growth and associated employment that the alternative would provide is to make it clear where opportunities for further rural residential development in the form of Large Lot Residential zoning may be realised. This will provide additional residential development opportunities within the District.

Quantification

Section 32(2)(b) requires that if practicable the benefits and costs of a proposal are quantified.

The evaluation in this report identifies where there may be additional cost(s) and benefit(s), and where these might fall. It also where appropriate considers quantification of the properties affected. However, the exact quantification of the benefits and costs discussed is not considered to be practicable given the range of influences and circumstances that exist in determining quantified costs and benefits.

Option B – Less Preferred Approach - Future Large Lot Residential not specifically addressed	Benefits environmental, economic, social and cultural effects anticipated,	Costs environmental, economic, social and cultural effects anticipated,	Efficiency and Effectiveness	Risk of acting / not acting if there is uncertain or insufficient information about the subject matter of the provisions
	Environmental: None identified	Environmental: While the opportunity for further rural residential areas will be enabled through the provisions of the CRPS and the Waimakariri Rural Residential Development Strategy the specific matters to achieve integrated management are not contained in the District Plan. This will continue the status quo approach where the Operative District Plan does not provide direction as to the key matters any rezoning needs to address. This means that each plan change undertaken is not provided with guidance within the Operative Plan as to how development should proceed. This has resulted in a number of site specific provisions being developed with every Plan Change application.	Preparation of a private plan change to rezone land from a Rural zone to Large Lot Residential Zone is costly. For land within the Greater Christchurch Area rural residential development is only consistent with the CRPS when the locations are identified in a Rural Residential Development Strategy. The Waimakariri Rural Residential Development Strategy shows the general location for future rural residential areas. However, this is not as spatially specific as the overlay shows. This provides less certainty to individual landowners whether their land is anticipated for future rezoning or not. Any areas proposed to be rezoned would be evaluated against the CRPS rather than the District Plan. This approach may be as effective in addressing integrated management as the policy identifying the matters to be addressed, in combination with a spatial overlay would be.	There is not considered to be uncertain or insufficient information about the subject matter. The Waimakariri Rural Residential Development Strategy has considered the appropriateness of rezoning land from rural to provide for rural residential development. It has identified general areas that may be suitable, but these are less specific than the overlay areas that would be identified in the Proposed District Plan. Detailed consideration of any constraints will be undertaken at the time of any rezoning proposal.

			This is identified as being less effective and efficient than including both a policy and a spatial overlay.	
	<p>Economic: Residential development opportunities will be increased. With resulting economic development associated with new rural residential development opportunities.</p> <p>While the opportunity for further rural residential areas will be enabled through the provisions of the CRPS and the Waimakariri Rural Residential Development Strategy the specific matters to achieve integrated management are not contained in the District Plan.</p>	<p>Economic: Rural land will be lost from potential primary productive uses. However, this change is anticipated by the Rural Residential Development Strategy. The policy identifies the constraints that must be overcome.</p> <p>While the opportunity for further rural residential areas will be enabled through the provisions of the CRPS and the Waimakariri Rural Residential Development Strategy the specific matters to achieve integrated management are not contained in the District Plan.</p> <p>This will continue the status quo approach where the Operative District Plan does not provide direction as to the key matters any rezoning needs to address. This means that each plan change undertaken is not provided with guidance within the Operative Plan as to how development should proceed. This can increase the cost for both the</p>		

		<p>applicant and the Council as there is no clear direction provided within the District Plan on how future areas should be developed.</p>
	<p>Social: Residential development opportunities will be increased. This will facilitate housing choice within Waimakariri District. While the opportunity for further rural residential areas will be enabled through the provisions of the CRPS and the Waimakariri Rural Residential Development Strategy the specific matters to achieve integrated management are not contained in the District Plan.</p>	<p>Social: While the opportunity for further rural residential areas will be enabled through the provisions of the CRPS and the Waimakariri Rural Residential Development Strategy the specific matters to achieve integrated management are not contained in the District Plan.</p> <p>This will continue the status quo approach where the Operative District Plan does not provide direction as to the key matters any rezoning needs to address. This means that each plan change undertaken is not provided with guidance within the Operative Plan as to how development should proceed. This can create different expectations for the applicant, the Council and the community as to what an appropriate outcome is as clear direction is not provided within the District Plan on how future areas should be developed.</p>

	Cultural: None identified	Cultural: None identified	
Opportunities for economic growth and employment			
The opportunities for economic growth and associated employment that the alternative would still enable rural residential development in the form of Large Lot Residential zoning to occur but there would not be clear direction as to the location of future areas and the matters to be addressed.			
Quantification			
Section 32(2)(b) requires that if practicable the benefits and costs of a proposal are quantified.			
The evaluation in this report identifies where there may be additional cost(s) and benefit(s), and where these might fall. It also where appropriate considers quantification of the properties affected. However, the exact quantification of the benefits and costs discussed is not considered to be practicable given the range of influences and circumstances that exist in determining quantified costs and benefits.			

8.2 Summary - Evaluation of Proposed Policies and Methods

Overall, it is considered that the proposed provisions are the most effective and efficient to achieve the objectives.

The policies and rules focus on the key matters addressed in the Objectives, being retaining the potential of rural areas for rural productive activities and maintaining the difference in character and amenity values between two distinct parts of the District. The character of the rural areas is made up of a combination of built form and activities. The proposed provisions recognise that there is a different predominant rural residential character in the east of the District to the west and reflects this through providing two rural zones.

9. SUMMARY

This evaluation has been undertaken in accordance with s32 of the RMA in order to identify the need, benefits and costs and the appropriateness of the proposed approach having regard to its effectiveness and efficiency, relative to other means to achieve the purpose of the RMA.

The evaluation demonstrates that the proposed approach is the most appropriate option as:

- (a) It gives effect to the relevant immediately dominant statutory documents, which in turn reflect the purpose of s5 of the RMA;
- (b) It aligns with the approach that is being utilised by adjacent authorities, particularly with the focus on rural productive activities and maintaining character and amenity values of areas; and
- (c) The objective, policies, rules, standards, definitions and matters of discretion provide a framework to enable activities, structures and buildings to occur that rely on or support the natural resources existing within the rural areas, but for those that could have an adverse effect, a clear resource consent assessment process is identified. The rules for non-complying activities clearly identify activities that are not considered to appropriately fit within the rural environment.

Appendix 1.

Detailed Table of Consultation and Feedback Received

Table 1

Date	Group	Subject Matter	Feedback and response
2016	<i>District Development Strategy 'Your Early Thoughts' Survey (2016)</i>	Management of the District's rural area including rural density and rural residential development, and small settlements	<p>This survey sought preliminary thoughts relating to rural land use, further subdivision and the development of small holdings. It also sought preliminary thoughts relating to rural residential development.</p> <p>The most frequent comment made by submitters relating to Rural areas related to a wish to restrict further subdivision of rural land / small holding development and 'lifestyle' blocks (i.e. 4ha lots). This and other similar feedback have contributed to the approach of having a rural zone where the minimum residential density standard is increased in size.</p> <p>Views relating to rural residential areas were mixed. There is thought to be greater demand for 1 to 2 hectare lots particularly if small holdings are to be limited in the future, which many submitters advocated for. Rural residential areas could develop into villages that serve as community hubs and are appropriately serviced.</p> <p>This has helped to reinforce the need for further rural residential development in the District.</p>
2017	District Development Strategy submissions	Options regarding the management of the District's rural area were addressed including:	<p>Feedback</p> <p>Common themes in feedback summarised as:</p> <ul style="list-style-type: none"> • Of all the submissions received for the District Development Strategy, 'increase the minimum lot size in the rural zone from the current 4ha' was the second most common submission point made. • The key theme was generally greater support for increasing the minimum lot size in the Rural Zone than increasing it in only parts of the zone.

		<ul style="list-style-type: none"> • land use and subdivision of rural land; • density of development rural land and • consideration of residential development, and small settlements. 	<ul style="list-style-type: none"> • Only two submitters specifically expressed their wish to retain status quo of rural lot sizes. <p>This and other similar feedback have contributed to the approach of lowering the density within the General Rural Zone to one residential unit per 20 ha.</p> <p>Feedback provided through public submissions in relation to rural residential development generally:</p> <ul style="list-style-type: none"> • Showed a greater support for extending the existing rural residential area, or a combination of both extending and intensifying existing rural residential areas • Suggested a number of locations for new rural residential development <p>This has helped to mandate a review of the 2010 Rural Residential Development Plan and has provided a number of potential locations to investigate as part of that review. Feedback has also reinforced the strategy to extend and intensify existing rural residential areas.</p>
September November 2017	Community Issues and Options consultation	<p>Land use and subdivision of rural land, threats to ongoing primary production, rural character and amenity.</p> <p>Management of rural residential subdivision and development; options for identifying new rural residential zoned land.</p>	<p>Feedback</p> <p>Common themes in feedback summarised as:</p> <ul style="list-style-type: none"> • Larger minimum lot size required for rural production • Limit zone to rural production • Concentrate non-rural activities in other zones • Support for preventing further residential and rural-residential development due to potential incompatibility with rural zone activities and values • Better protection and maintenance of rural amenity • Better prevention and management of reverse sensitivity • Control activities that attract birds near airports/airfields • Limit location of trees near overhead lines. <p>Note that some comments also asked for ability to further subdivide land into smaller lots near towns but balance that with larger lot size elsewhere.</p>

			<p>In relation to rural residential development submissions sought a concentration of rural residential development on the urban fringe or around nodes or clusters of existing rural residential activity, as well as smaller lots for rural residential activity. This has helped to mandate a review of the 2010 Rural Residential Development Plan and has reinforced the approach to extend existing rural residential areas as well as intensify existing rural residential zones.</p> <p>This and other similar feedback have contributed to the approach of having two rural zones with different density standards and identifying areas where rural land may be used for further rural residential development in the form of rural zoned land being enabled to be rezoned to Large Lot Residential.</p>
2018	Inquiry by Design Workshops	Identification of potential new areas for rural residential activity	<p>Two brainstorming sessions were held with key staff, external stakeholders and Councillors to map potential areas for rural residential activity in the District.</p> <p>This has helped to create a 'long list' of location options that were then further tested through a criteria assessment and internal review. Ultimately, this culminated in five key areas being included for public feedback in the draft Rural Residential Development Strategy: Swannanoa, Oxford, Ashley/Loburn, Ohoka and Gressons Road. This has formed the basis of the Large Lot Residential Overlay areas.</p>
2018/19	WDC Technical Advisory Group	Servicing, roading, greenspace, planning and other aspects of rural residential growth areas	<p>This group of Council staff from various departments including greenspace, assets, roading, planning and policy met regularly to inform the development of draft locations for further rural residential activity, communication and engagement, servicing implications, and a number of other matters.</p> <p>This has resulted in clear alignment of content for a draft and final Rural Residential Development Strategy and consequential implementation matters, and internal expert advice.</p> <p>In relation to Rural Zones and activities this has helped inform the provisions.</p>

March 2019	Community Boards Workshops	Briefings to the Community boards to assist Boards to prepare submissions	Workshops were held with all Community Boards on the background and content of the draft Rural Residential Development Strategy at the outset of public consultation. This assisted the Boards to prepare their submissions to the draft Strategy.
March-April 2019	Draft Waimakariri Rural Residential Development Strategy public submissions	Five proposed growth areas for rural residential activities (Swannanoa, Oxford, Ashley/Loburn, Ohoka, Gressons Road) together with specific growth directions for public feedback.	<p>Submissions to the draft Strategy generally revealed:</p> <ul style="list-style-type: none"> • Support for the expansion of Ashley/Loburn and Swannanoa rural residential zones • Opposition for expanding Ohoka for further rural residential activity • Equal support and opposition for expanding Oxford for rural residential activity • Support from the key landowner at Gressons Road, but some reservations from existing landowners north of Gressons Road • Alternative areas proposed for rural residential activity <p>This has resulted in excluding Ohoka as a growth area in the final Strategy. Specific growth directions for the other proposed areas where underlying landowners voiced opposition were deleted and only growth directions that had support from underlying landowners were included in the final Strategy.</p> <p>The hearing panel considered in detail all alternative locations proposed in submissions and excluded them from a final Strategy for a number of key reasons (generally they met one or more of the original assessment criteria for excluding proposed growth areas, e.g. flooding).</p>
April-May 2019	District Plan Review 'What's the Plan?' (2019)	Management of density in the District's rural areas, including provision of rural residential activity and rural production matters.	<p><i>Do you support the protection of rural production?</i></p> <p>Twenty-four respondents provided comments relevant to this question.</p> <p>Respondents unanimously supported the protection of rural production.</p> <p>Respondents believed that the protection of rural production should be a key focus and that it was important to avoid the potential for reverse sensitivity.</p> <p>Two respondents supported protection of rural production on a conditional basis, maintaining that it should only be allowed on versatile soils or land suitable for intensive farming.</p>

			<p>This and other similar feedback have contributed to the approach of have two rural zones with different density standards.</p> <p><i>Do you agree that maintaining rural character is important? Is it more important in some areas than in others? If so, why?</i></p> <p>Twenty-four respondents provided comments relevant to this question.</p> <p>Respondents unanimously agreed that maintaining rural character was important, although some believed the definition of rural character was subjective, multi-faceted, and difficult to define.</p> <p>Other views around rural character were mixed, with one respondent suggesting that 2 hectare and 4-hectare blocks could enhance the value of the rural zone, while others suggested that it was important to protect rural areas from residential development to avoid reverse sensitivity.</p> <p><i>Based on character, land use, and the potential for future production should the rural zone be split into more than one zone? At present, there is a one zone (four hectare minimum) approach across the rural area of the District.</i></p> <p>Twenty-four respondents provided comments relevant to this question.</p> <p>The views of respondents were wide-ranging but mostly supported the establishment of two separate rural zones for residential and rural activities.</p> <p>Some respondents favoured increasing the minimum lot size to 20 hectares or more and locating rural residential areas closer to existing towns.</p> <p>Respondents wanted productive soil protected from residential activities and believed that any residential activities in the rural zone should be located on less productive soil.</p> <p><i>What combination of zoning options would work best for the District? Where?</i></p> <p>Sixteen respondents provided comments relevant to this question.</p> <p>Respondents favoured introducing smaller lot sizes to prevent the development of 4-hectare sites.</p>
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			<p>Lower density sites were also sought close to foothills, clustered together, and close to townships as opposed to being scattered throughout the rural zone.</p> <p><i>Other comments on Rural Lot Size and Development</i></p> <p>Avoiding residential development on highly productive land.</p> <p>Feedback through submissions indicated general support for increasing the minimum lot size in the District’s rural zone and offsetting the demand for small holdings with providing more rural residential areas, closer to existing towns. Some specific locations for rural residential activity were also proposed.</p> <p>This has contributed the mandate to review the 2010 Rural Residential Development Plan and providing more areas for rural residential activity in areas that can be serviced in order to protect the Rural Zone from further small holding subdivision.</p>
December 2019	Waimakariri Irrigation and Dairy New Zealand	Meeting to discuss a variety of District Plan topics, including rural matters	<p>Rural activities in rural areas are topics of interest. It is important for rural activities to be able to continue and managing reverse sensitivity matters.</p> <p>This feedback has contributed to ensuring the focus for rural zones is on enabling rural production activities.</p> <p>In relation to zoning this feedback has informed consideration of decreasing the density within the Rural area. This has been incorporated into the Proposed Plan in relation to the General Rural Zone, but not within the Rural Lifestyle Zone. The feedback received recognised that there are both benefits and dis-benefits to any change in density with respect to the ability for landowners to make decisions on their land use options.</p>

December 2019	Federated Farmers and Horticulture New Zealand	Meeting to discuss a variety of District Plan topics, including rural matters	<p>Rural activities in rural areas are topics of interest.</p> <p>Noting that horticulture can be productive on smaller lots, but market gardens need larger areas. Preliminary feedback is that growers favour an increased lot size of 20 hectares minimum to be productive.</p> <p>Feedback that productive potential and avoiding reverse sensitivity is important as rural areas are the only zones these activities can go into.</p> <p>This and other similar feedback have contributed to the approach of having two rural zones with different density standards. Decreasing the density has been incorporated into the General Rural Zone and not the Rural Lifestyle Zone in recognition of the predominant character that exists within each zone.</p> <p>This feedback has contributed to ensuring the focus for rural zones is on enabling rural production activities.</p>
June 2019 - ongoing	Update emails/letters to immediately affected landowners within the rural residential growth areas (LLRZ Overlays), and associate responses to queries via email, phone and meetings	Draft LLRZ Overlays and process for release of land	<p>Following the adoption of the final Rural Residential Development Strategy, staff drafted the LLRZ Overlays based on known underlying landowner support and wrote to these directly affected landowners with information and details about the process from here including pathway to the release of the land for rural residential activity.</p> <p>This has resulted in directly affected landowners being aware of the process required for their land to be rezoned to LLRZ to enable rural residential development. Staff have given preliminary advice to groups of landowners and consultants on draft Outline Development Plans and technical information required to rezone and have advised them to submit on the Proposed District Plan.</p>
2019-2020	Ngāi Tūāhuriri Rūnanga (through Mahaanui Kurataiao)	Rural Character	Feedback sought to ensure linkages are provided with chapter addressing Sites and Areas of Significance to Maori. The linkages between chapters have been retained, particularly in the topics addressed in objectives and policies and in the assessment matters.

		<p>Integrated nature of land and water</p>	<p>Feedback identified that links between water and land are important. It also sought to ensure policy is directed at achieving the objective and being consistent with provisions relating to intensive farming and effects of land use on water quality and quantity.</p> <p>Where possible the provisions seek to address integrated management of land and water resources. Specific focus is provided for in the rules and the assessment matters associated with intensive farming activities.</p>
		<p>Irrigated land</p>	<p>The advice received identified that the Iwi Management Plan has a policy seeking any convergent irrigated land use be subject to a resource consent (IMP 5.3 policy WM 7.4).</p> <p>It is acknowledged that the effects of irrigation on nutrient loading and water quantity are managed through the Land and Water Regional Plan but it is noted that the effects on other values are not. The activity standard addressing potential impacts on biodiversity values is supported but it is considered as necessary for additional values and matters of discretion to be included including sites and areas of significance.</p> <p>Provisions and in particular assessment matters have been added to ensure that where relevant activities need to address matters of relevance to sites in areas of significance to Maori.</p>
		<p>Rural Industry</p>	<p>The feedback identified that while there is a limit on the scale of activity relating to the number of people employed, there is no limit relating to the actual size or scale of the activity that could occur.</p> <p>Consideration has been given relating to the scale of activity and built form. This has included considering where the appropriate distinction lies between activities that are permitted or which require resource consent to establish. Further clarity is provided in the provisions to distinguish rural industry from other industry. This includes having standards addressing the scale of any rural industry provided as a permitted activity.</p>

		Quarrying activities	Feedback identified that consideration of the implications of quarrying activities on sites and areas of significance to Maori and significant indigenous biodiversity would be consistent with IMP 5.4 policies P11.2 MP 13.2. Relevant matters of discretion have been included for quarrying activities.
		Planting of species of exotic trees that may create wilding tree issues	<p>The feedback recognised that providing for planting of tree species that may create wilding tree issues as non-complying rather than prohibited is identified as being generally consistent with the intent of IMP 5.4 policy 15.2.</p> <p>The limitation on plant pest species is addressed as district wide matter.</p>
		Integration of provisions with MR 873	<p>The feedback identified that it is important that appropriate consideration and if necessary, exemptions are given for land in MR873 if general rural provisions apply.</p> <p>The linkages between rural zones and the Kainga Nohoanga Special Purpose Zone have been carefully considered to ensure that duplication or unnecessary limitations on land within MR 873 are removed because of any rural zone provisions.</p>