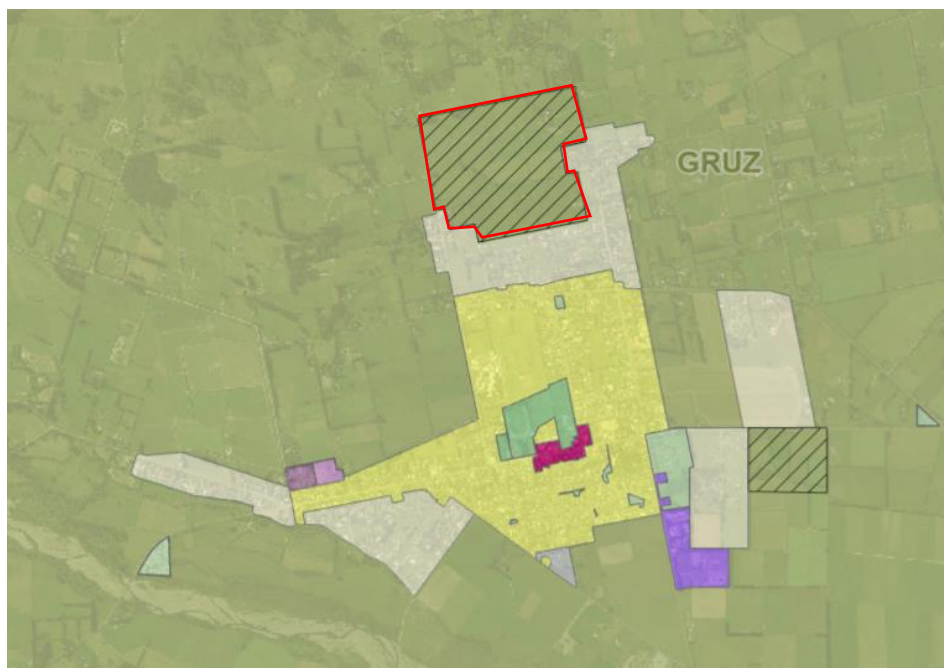


Attachment 6: Section 32 RMA Assessment

25 Ashley Gorge Road: LLRZ

Introduction and RMA requirements

1. Survus (the submitter) is requesting a change to the Proposed Waimakariri District Plan (PWDP) to change the zoning of the application site (the Site – outlined in red below) from General Rural Zone (GRUZ) to Large Lot Residential (LLRZ).



2. This evidence has outlined the background to and reasons for the proposal.
3. No adverse environmental effects are anticipated by the change of zoning, however the potential environmental effects of implementation of the re-zone proposal have been described in the planning evidence.
4. Any change to a plan needs to be evaluated in accordance with section 32 of the Resource Management Act. Section 32 states:

Requirements for preparing and publishing evaluation reports

(1) *An evaluation report required under this Act must—*

 - (a) *examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and*
 - (b) *examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—*
 - (i) *identifying other reasonably practicable options for achieving the objectives; and*
 - (ii) *assessing the efficiency and effectiveness of the provisions in achieving the objectives; and*

(iii) summarising the reasons for deciding on the provisions; and
(c) contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.

(2) An assessment under subsection (1)(b)(ii) must—

(a) identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—

(i) economic growth that are anticipated to be provided or reduced; and

(ii) employment that are anticipated to be provided or reduced; and

(b) if practicable, quantify the benefits and costs referred to in paragraph (a); and (c) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.

(3) If the proposal (an amending proposal) will amend a standard, statement, national planning standard, regulation, plan, or change that is already proposed or that already exists (an existing proposal), the examination under subsection (1)(b) must relate to—

(a) the provisions and objectives of the amending proposal; and

(b) the objectives of the existing proposal to the extent that those objectives—

(i) are relevant to the objectives of the amending proposal; and

(ii) would remain if the amending proposal were to take effect.

5. The Guidance Note on section 32 analysis on the Quality Planning website makes the following statement:

Appropriateness - means the suitability of any particular option in achieving the purpose of the RMA. To assist in determining whether the option (whether a policy, rule or other method) is appropriate the effectiveness and efficiency of the option should be considered:

- *Effectiveness - means how successful a particular option is in addressing the issues in terms of achieving the desired environmental outcome.*
- *Efficiency - means the measuring by comparison of the benefits to costs (environmental benefits minus environmental costs compared to social and economic costs minus their benefits).*

6. In this case it is the appropriateness of rezoning rural land for residential large lot use that needs to be examined.

Outcome Sought by Submission 250

7. The outcome sought by the submission is to create a residential zoning option in north Oxford that is consistent with the future of the Site foreshadowed by the Council's Rural Residential Development strategy 2019 (**RRDS**) and confirmed by a LLRZ Overlay over the Site in the PWDP. The development will be controlled and managed through

an Outline Development Plan that complies with SUB-P6 and by adopting the PWDP subdivision, development and activity standards for Large Lot Residential zones.

8. Implementation of the proposal will:
 - a) Provide for additional housing and residential land choice in Oxford at densities that complement the character and amenity of the Oxford township, and the surrounding rural land.
 - b) Provide for future subdivision and development that will contribute to the planned growth of Oxford, and support the existing services, amenities and facilities in the town;
 - c) Provide for consolidated development around an existing township in a manner that sustains a compact urban form, contributes to a well-functioning urban area, and enables efficient use of existing and future infrastructure and current land resources as foreshadowed in the District Development Strategy 2018 and the RRDS 2019 strategic planning documents.

Environmental Outcomes – Proposed District Plan Objectives and Policies

9. The PWDP objectives give effect to the purpose of the Resource Management Act 1991 and the PWDP policies in turn give effect to the PWDP objectives. The objectives are the end goals or end states (including environmental outcomes) to be strived for and the policies are the broad strategies to achieve the objectives.¹
10. The proposed large lot residential rezoning has been assessed against the relevant PWDP objectives and policies in Attachment 4 of the planning evidence. It concludes that the requested rezoning is entirely consistent with and meets the outcomes sought by the objectives and policies, including for urban growth and new residential areas.

Identification of options

11. In determining the most appropriate means to achieve the outcomes sought by the submission, a number of alternative options are assessed below.
12. These options are:
 - a) Option 1: status quo/do nothing: do not rezone the Site from GRUZ with LLRZ Overlay to LLRZ.
 - b) Option 2: rezone the whole 51 ha site for large lot residential use as LLRZ.

¹ See PWDP Part 1, HPW Plan Structure

- c) Option 3: resource consent: land use and subdivision consent for ad hoc subdivision through a non-complying subdivision and land use consent for residential use.

| S32 Matter | Option 1: General Rural Zone Status quo | Option 2: Large Lot Residential | Option 3: Resource Consents |
|------------|---|--|---|
| Cost | None to applicant (the submitter) | <p>Time and money cost to applicant for submission and preparation of ODP.</p> <p>Development contributions for Council services.</p> | <p>Time and money cost to applicant to seek noncomplying land use and subdivision consents & discharge consents (unlikely to be approved as residential activity not consistent with the maximum housing density permitted in this part of the Rural Zone i.e. one dwelling per 40 ha). Community cost and uncertainty in not seeing the full scale of possible development at any time.</p> <p>Not an approach that secures sustainable growth and development or an integrated and comprehensive approach to development of Oxford. No overall ODP (as is proposed under Option 2) to ensure an integrated and comprehensive approach to development.</p> |
| Benefit | <p>Ongoing low output rural production on the Site.</p> <p>Maintains existing rural character/amenity/quality of environment.</p> | <p>Additional housing stock contributing to the growth of Oxford as identified in the DDS and RRDS.</p> <p>Builds on existing Oxford urban area providing compact and consolidated urban form.</p> <p>Provides a lot/housing typology in short supply.</p> <p>ODP provides overall plan of integrated land development and integrated transport links and servicing.</p> | <p>Resource consent unlikely to be approved.</p> <p>Benefits as for Option 1.</p> |

| | | | |
|------------------------------|--|--|--|
| | | <p>Certainty regarding proposed servicing.</p> <p>Opportunity for landscape and ecological enhancement associated with the Council drains.</p> <p>Creating a quality residential environment, including attractive offroad walkway and green links.</p> | |
| S32 Matter | Option 1: General Rural Zone Status quo | Option 2: Large Lot Residential | Option 3: Resource Consents |
| Efficiency/ Effectiveness | <p>The Site remains low productivity rural land.</p> <p>Development occurs elsewhere around Oxford or elsewhere in the district in a manner that does not achieve compact and consolidated development; or the District Plan makes very limited provision for LLR development, and the Council does not meet its requirement under the NPS-UD to provide capacity to meet housing demand.</p> <p>Fails to deliver on DDS/RRDS proposals.</p> | <p>Large lots enable efficient and effective servicing including from Council restricted public water supply and sewerage system.</p> <p>Effective as it utilises a relatively small block of rural land surrounded on all sides by roads and Oxford township on southern edge.</p> <p>Shape of the site enables a rational and effective lot layout while providing for the ecological values of the two Council drains. The roads provide an appropriate buffer use to neighbouring rural and urban land.</p> <p>Comprehensively provides for extension of the township as foreshadowed in RRDS.</p> | <p>Least effective as outcomes from consent processes are uncertain, and potentially un-coordinated and lack proper planned integration with the township community water and sewage schemes.</p> <p>Consents unlikely to be granted so not effective in securing residential outcomes..</p> <p>Difficult to create an integrated and logical roading network through ad hoc, unco-ordinated consents.</p> <p>Will not effectively protect Ashley Gorge Road and limits managed access to local roads.</p> |
| Risk | <p>Site is used for permitted rural activities that potentially conflict with adjoining residential activities.</p> <p>Likely continuation of low impact farming activities as at present will not give rise to</p> | <p>None.</p> <p>Submitter supports the Council's strategic intentions for the Site and will make the land available for large lot development as soon as it is rezoned.</p> <p>Dealing with the whole block ensures a subdivision design that will avoid</p> | <p>Consenting risk. Environmental outcomes uncertain and not integrated with delivery of community water supply and sewage systems and efficient roading options.</p> <p>Consents are not granted and the application site remains</p> |

| | | | |
|--|----------------------------------|--|--|
| | adverse effects on urban Oxford. | reverse sensitivity effects, provide for best on-site amenity and reduce ineffective/ inefficient design risk by use of the ODP. | as low productivity rural land frustrating strategic and community growth proposals. |
|--|----------------------------------|--|--|

Summary of s32 evaluation

| S32 Evaluation | Option 1: General Rural Zone Status quo | Option 2: Large Lot Residential | Option 3: Resource Consents |
|--|---|---------------------------------------|--------------------------------|
| Objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act | ± | + | × |
| Whether the provisions in the submission are the most appropriate way to achieve the outcomes | × | ++ | × |
| Benefits | ± | ++ | × |
| Costs | - | + | + |
| Risks | - | + | xx |

+ positive, - negative, x – neutral

Overall Assessment

13. Based on the above assessment, it is concluded that the submission proposal is the most appropriate method for achieving the purpose of the Resource Management Act 1991, and the objectives and policies of the Proposed District Plan for Residential Zones and Urban Growth. Option 2 to re-zone the Site as LLRZ is the only option consistent with the outcomes being sought by the applicant (the submitter).
14. Option 2, being to rezone the Site, is the only response to the clear strategic intention signalled in the DDS/RRDS. The identification of the whole 51 ha of the Site and the adoption of the proposed ODP is the only way to provide a scale of development that supports, and logical site boundaries to facilitate, co-ordinated, integrated and comprehensive development that sits well with the Proposed Plan's objectives of securing compact and consolidated urban forms in any re-zoning.
15. Option 2 to re-zone the Site as LLRZ is the most appropriate:
 - a) It adopts a proposed zone in the PWDP.
 - b) It can be developed consistent with the subdivision, development and activity standards of the LLRZ.
 - c) It ensures continuity of anticipated environmental outcomes and urban amenity for Oxford worked through and agreed upon in the DDS/RRDS process.

- d) It will be consistent with and give effect to the Proposed District Plan objectives and policies for Residential Zones and Urban Growth.
 - e) It is a logical extension to the developed and developing residential land adjoining the Site while achieving a compact, efficient urban form contributing to a well-functioning urban environment that has no adverse effect on the adjoining GRUZ land.
 - f) It will help take away pressure on isolated rural land elsewhere in the General Rural Zone for one-off bids for lifestyle development.
 - g) There is no additional cost to the Council in re-zoning the Site as there is capacity (to be confirmed) in the town water supply, and reticulated wastewater system. Stormwater can make use of existing Council drains for off-site disposal working in tandem with stormwater detention areas.
 - h) The proposed ODP provides certainty of the final form and disposition of the re-zoned area including its proposals for roading, future linkages for pedestrian and vehicular traffic.
16. The re-zone to LLRZ is considered to be the most appropriate way to achieve the long term sustainable growth and development of Oxford.
 17. The economic, social and environmental benefits of the outcomes sought by the submission outweigh the potential costs.
 18. The overall efficiency and effectiveness of the re-zone outcome is high, in comparison the alternative options which are low (Option 1 and 3).
 19. The proposed rezoning is considered to be an appropriate, efficient and effective means of achieving the purpose of the Resource Management Act 1991.