



Section 32 Evaluation Tuumata Private Plan Change (Plan Change 15)

PREPARED FOR
TGH Ruakura Industrial Development Limited

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Revision Summary

Report prepared by Peter Hall Planning Limited for TGH Ruakura Industrial Development Limited.

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1.0 Introduction

TGH Ruakura Industrial Development Limited is requesting a change to the Hamilton City District Plan to rezone land for industrial use to enable residential, open space and commercial use.

The Plan Change Report prepared by Peter Hall Planning Limited contains a summary of the proposed changes.

This evaluation report has been prepared for the Tuumata Plan Change to fulfil the requirements of Section 32 of the Resource Management Act 1991 (RMA).

2.0 Statutory framework & structure of assessment

2.1 Statutory framework

The statutory framework for this assessment is

Section 32(1)(a) of the RMA requires an evaluation of the extent to which the objectives of the plan change are the most appropriate way to achieve the purpose of the RMA. The purpose of the RMA is to promote the sustainable management of natural and physical resources, as set out in Section 5.

The provisions (policies, rules and other methods) must be examined¹ to determine whether they in turn are the most appropriate way to achieve the objectives by:

- Identifying other reasonably practicable options for achieving the objectives;
- Assessing the efficiency and effectiveness of the provisions in achieving the objectives; and
- Summarising the reasons for deciding on the provisions.

The proposed plan change will amend the operative Hamilton City District Plan (**Operative Plan**). As such, the evaluation of the provisions must relate to both the provisions and objectives of the proposed plan change and the objectives of the operative plan to the extent that they are relevant.²

The assessment of the provisions must identify the benefits and costs of the environmental, economic, social, and cultural effects from the implementation of the provisions. This assessment is also required to assess whether opportunities for economic growth and employment will be provided or reduced.³ As part of this assessment, the RMA requires consideration of the risk of acting or not acting on the basis of uncertain or insufficient information.

This evaluation has been prepared prior to the notification of the plan change. A further evaluation is required under Section 32AA if any changes are made to the plan change.

Section 32(1)(c) requires this evaluation report to contain a level of detail corresponding to the scale and significance of the environmental, economic, social, and cultural effects.

¹ Section 32(1)(b)

² Section 32(3)

³ Section 32(2)(a)

2.2 Structure of assessment

A thematic approach has been taken to the assessment, by grouping the objectives and provisions according to the following topics:

- The strategic outcome: change of zoning from Ruakura Industrial Park and Ruakura Open Space to Tuumata Residential, Ruakura Open Space and Neighbourhood Centre.
- The Structure Plan: the form and layout of future subdivision and development at Tuumata.
- The residential density proposed.
- The form and composition of Residential Development at Tuumata.

Each topic is assessed first in terms of the extent to which the objectives achieve the purpose of the RMA and then by examining whether the provisions in turn are the most appropriate way to achieve the objectives.

3.0 Appropriateness of the objectives

3.1 The Strategic Outcome

The Tuumata Plan Change sets out a new vision for the Ruakura-Tuumata Structure Plan Area to deliver land for housing with a new Neighbourhood Centre, with a supporting infrastructure and open spaces. This proposal would result in a change of land use from its current zoned industrial.

These new strategic outcomes for Tuumata are captured in proposed Chapter 3 Objective 3.7.3.12:

“Objective 3.7.3.12

Development of the Ruakura -Tuumata Structure Plan Area achieves the following outcomes:

- i. *A well-functioning urban environment with a residential neighbourhood and a neighbourhood centre, connected by road, pedestrian and cycle networks and open space.*
- ii. *Quality urban design outcomes.*
- iii. *Integrated, accessible and high-quality public spaces.*
- iv. *Incorporates mana whenua values.*
- v. *Integrated, multi modal and safe transport network that provides travel choices.*
- vi. *Gives effect to The Vision and Strategy - Te Ture Whaimana o Te Awa o Waikato, including through a comprehensive approach to stormwater management”.*

The six facets of the new objective 3.7.3.12 are the most appropriate way to achieve the purpose of the RMA 1991 for the reasons discussed below.

In relation to subpart i. above, “well-functioning urban environments” are prescribed as a mandatory outcome for Tier 1 Councils by the RMA (Objective 1 in section 6, Schedule 3A). As such that outcome is presumed to achieve the purpose of the Act.

The proposed residential zoning will achieve the sustainable use and development purpose being an appropriate use of a scarce urban land resource, at a location shown to be highly suitable for this purpose. This includes by virtue of the relative proximity of Tuumata to the Central City and places of employment (including the Ruakura Superhub), connectivity within and outside of the City, flat land with few development constraints within the urban boundary, ability to be serviced, suitability relative to adjoining land uses and immediate proximity to planned future frequent public transport links.

The rezoning will enable Waikato-Tainui to provide for its social, economic, and cultural well-being by providing return from treaty settlement land shown to be highly suitable for residential development.

The outcomes ensured by the Tuumata Structure Plan and zoning will enable future residents and the Tuumata community to provide for their social, economic, and cultural well-being through the provision of a highly liveable neighbourhood, with open space, options for modes of transport, retail to serve day to day needs and the provision for community facilities and a school. These are expressed above in ii “quality urban design outcomes”, iii “integrated, accessible and high-quality public spaces” and .v “travel choices”.

The proposed Neighbourhood Centre will assist in providing for the social, economic, and cultural well-being of people and communities by providing for the day to day needs of its residential catchment, and with the inclusion of a supermarket in particular will reduce the reliance on the private motor vehicle for such trips. As confirmed in the Formative report the Neighbourhood Centre has been sized, and the composition of activities determined (using the Business 6 zone from the Operative Plan) to mitigate adverse effects on other centres, while still ensuring it meets the Business 6 objective of *“[a] locally based centre that provide[s] services and health-care services capable of meeting the day-to-day needs of [its] immediate neighbourhoods”*.

Other than the land resource, the site has limited other natural resources itself, required to be sustained according to the Act purpose to meet the reasonably foreseeable needs of future generations. Where these are most apparent in the freshwater values of the farm drains, their loss will be offset by the creation of better habitat off-site. The down-stream potential of natural resources (predominantly the health and well being of the Waikato) will be sustained through the management of stormwater quantity and quality that will be assured through the system of swales and ponds and through the controls at source such as requirements for inert building materials.

The Tuumata development will provide for the sustainable use of other natural resources, with its location, density and layout providing for alternatives to the private motor vehicle, thereby limiting greenhouse gas emissions compared to more traditional forms of residential development, and water use reduced through water saving devices required and encouraged by the Plan Change provisions.

The potential of physical resources of the site will be protected through the provision of suitable infrastructure to service the form and density of development proposed and the staging of development according to the provision of new arterial roading and removal of transmission lines.

The incorporation of mana whenua values into the development under iv above will promote cultural well-being from the Act’s purpose. The health and safety of people and communities will be enabled through the outcome of quality urban design outcomes and safe transport network under ii and v respectively, including through methods such as CPTED and the creation of a safe speed travel environment and separate pathways and cycleways.

The loss of industrial land as a result of the rezoning will achieve the purpose of the Act as a sustainable use of a physical land resource because the City’s industrial land requirements will be able to be sustained for some 30 years before the 60ha land quantum to be rezoned at Tuumata is forecast to be needed. By that time, an alternative industrial land provision on the opposite side of the WEX, as already identified in strategic planning documents, will be able to be zoned and developed for this purpose. This topic is discussed in detail in the Plan Change report.

As set out in the Formative Report, there may be some marginal costs arise as a resulting of converting the Tuumata to residential uses and replacing its (potential) industrial land supply with new supply about 2km east at Ruakura East.

However, the close proximity of the two sites means that any marginal changes in transport costs as a result of the changed location of the industrial zone will be very low, and difficult to assess in the absence of detailed traffic modelling. Use of the Tuumata Block for residential uses would enable residents to benefit from the block’s good accessibility to urban Hamilton, offsetting any increased vehicle kilometres travelled by industrial vehicles. Further, the Ruakura East block would actually be

closer to the Waikato Expressway, and so use of that land for industrial activity instead of the Ruakura-Tuumata Block may reduce industrial vehicle kilometres travelled.

The incorporation of mana whenua values by this objective has proper regard to the relationship of Maaori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga required under RMA section 6(e) as a matter of national importance, the exercise of kaitiakitanga under section 7(a) and to the principles of the Treaty under section 8.

The requirement to give effect to The Vision and Strategy - Te Ture Whaimana o Te Awa o Waikato also has proper regard to these matters, while also recognising the intrinsic values of ecosystems under RMA matter 7(d), the finite characteristics of natural and physical resources under matter 7(g), and the maintenance and enhancement of the quality of the environment under matter 7(f).

Development in accordance with the Structure Plan under this objective also has proper regard to the maintenance and enhancement of the quality of the environment, while also the efficient use and development of resources under RMA section 7(b). In this regard, the maximization of density of residential development and size of the neighbourhood centre has been balanced against site and capacity constraints and the desire for a high quality and very liveable new urban environment. It also takes into account the ethic of stewardship under 7(aa) whereby Plan Change realises the opportunities through development of this special land resource while properly recognising and managing its constraints - taking a long-term view.

Proper regard has been had to the efficient end use of energy under RMA section 7(ba) under this objective, through its reference to the Structure Plan which has a block layout that maximises solar gain and by its integrated, multi modal and safe transport network that provides travel choices reducing the need for private motor vehicle trips compared to traditional forms of residential subdivision

The well-functioning urban environment, the quality urban design and integrated, accessible and high-quality public spaces outcomes sought by the objective have proper regard to the maintenance and enhancement of amenity values as a matter under RMA section 7(c), the efficient end use of energy under 7(ba) and the enhancement of the quality of the environment under 7(f).

3.2 The Structure Plan

The form and layout of future subdivision and development at Tuumata will be guided by both the proposed zoning and the Structure Plan.

The proposed land use outcomes for Tuumata are expressed in Objective 3.7.3.12 which is assessed above.

The Ruakura-Tuumata Structure Plan is referred to in subdivision objective 23.2.8, because with this greenfields development, subdivision will establish the fundamental development block, roading, stormwater management and open space layout for Tuumata. Implementing the subdivision (ie achieving title) will require the construction of these fundamental elements of the Structure Plan. Development will then follow this fundamental subdivision building block.

The Ruakura-Tuumata Structure Plan is also referred to in an amendment to the existing Ruakura Structure Plan objective 3.7.3.3 as follows (shown as underlined):

New urban development within the Ruakura Structure Plan area is serviced by and integrated with the existing and future infrastructure network (Ruakura Strategic Infrastructure – See Figure 2-15 A and B and Figure 2-14A Ruakura -Tuumata Structure Plan)

The Ruakura-Tuumata Structure Plan is also referred to in subdivision objective 23.2.8 as follows:

“Objective 23.2.8

Subdivision contributes to a well-functioning urban environment that is generally consistent with the Ruakura -Tuumata Structure Plan”.

A well-functioning urban environment that is generally consistent with the Ruakura-Tuumata Structure Plan, as required by objective 23.2.8, achieves the purpose of the Act for the reasons discussed below.

The block and transport corridor layout promoted by the Structure Plan, enables people and communities to provide for their social well-being and for their health and safety by allowing for a high degree of connectivity throughout which will encourage walking and cycling, with an internal roading hierarchy that provides for multiple modes and encourages a safe speed environment. It also mitigates adverse effects on the environment from a less permeable and more car-based block layout whereby people would be more reliant on the private motorcar with its associated greenhouse gas emissions, with less options for alternative active modes of transport and recreation, and with a less safe speed environment. The transport corridor layout also mitigates adverse effects on the existing and future planned transport network by limiting points of access to arterial roads, managing access where needed, and providing for a suitable internal roading hierarchy.

The provision of an extensive network of swales and a large wetland on the Structure Plan sustains the potential of natural and physical resources to meet the reasonably foreseeable needs of future generations, by managing the quantity and quality of stormwater and avoiding and mitigating any adverse effects of activities on the environment. In this regard, stormwater management adopts a site-wide approach with collective rather than on site management in recognition of the limited soakage capacity of the soils. It also assists to safeguard the life-supporting capacity of water and ecosystems: in particular, the Waikato and its catchment.

The provision for a future school will enable people and communities to provide for their social, economic, and cultural well-being, with education facilities being a key hub in the community for social and cultural activity, and promotes economic well-being by adding to the attractiveness and therefore value of the neighbourhood for families.

The provision of a neighbourhood park, combined with the swale and wetland network will enable people and communities to provide for their social and cultural well-being and for their health and safety. In this regard the network of open spaces will provide for amenity and recreation opportunities, and be designed to ensure the safety of users.

The location the Neighbourhood Centre enables people and communities to provide for their social, well-being by being in good proximity to all at Tuumata and for the economic well-being of the centre and future owners/tenants itself being on a main arterial in a visible and accessible location.

Adding the Ruakura -Tuumata Structure Plan to the outcome sought by objective 3.7.3.3 that new urban development within the Ruakura Structure Plan area is serviced by and integrated with the existing and future infrastructure network, achieves the sustainable management of natural and physical resources purpose of the RMA. In this regard, existing and planned infrastructure is a physical resource which should be managed in a way to service existing and reasonably foreseen future development. This objective also goes to natural resources, and in particular the health and wellbeing of the Waikato, where sustainable management purpose of the RMA is met by ensuring that Tuumata is properly serviced with three-waters infrastructure in a way that sustains the life-supporting capacity of the river and its catchments.

3.3 Residential Density

The residential density outcome for Tuumata of a range of housing typologies, including three-storey buildings is expressed in the following proposed objective in section 4.2:

“Objective 4.2.15

The Tuumata Residential Precinct and development within it provide for a variety of housing types and sizes that:

- i. respond to housing needs and demand; and*
- ii. are consistent with the neighbourhood's planned urban built character, including 1 to 3 storey buildings.”.*

This density achieves the sustainable management purpose of the Act for the reasons discussed below.

The objective seeks to provide a range of housing typologies, which is implemented in the provisions by enabling housing types from single house through to low-rise apartments. This allows people and communities to provide for their social, economic, and cultural well-being by providing for housing choice and therefore housing to suit different needs and price points. Social well-being is encouraged by providing a more diverse neighbourhood with greater range of ages and household composition than traditional density neighbourhoods.

The planned urban built character of predominantly three-storey buildings expressed in this policy achieves the dual purpose of the RMA 1991 by enabling a density and household yield which makes efficient use of a scarce land resource, while recognising the physical resource constraints of the site and its locality. Specifically, the 1100-1300 houses enabled by this density is within the wastewater and traffic infrastructure constraints of the site, before significant additional expenditure would be required to increase capacity. As such, the density set at Tuumata sustains the potential of these physical resources to meet the reasonably foreseeable needs of future generations.

To reach this conclusion, the suitability of higher densities were tested for Tuumata during the development of the Plan Change. This included the option of 5 levels within a 400m walking catchment of a larger 10,000m² suburban centre which presented a total yield of 1700 dwellings, and the option of 5-level density only immediately adjacent the Neighbourhood Centre. The former option could not be supported by the current or planned wastewater network and would require the costly upgrading of transport infrastructure, including an additional lane on a section of Wairere Drive and up-sizing of the roundabout. The latter option provided limited additional real capacity with a yield of 1300 dwellings.

The three-storey building density sought by this objective avoids and mitigates adverse effects of activities on the environment. In particular, the building height provides an appropriate transition to the adjoining generally single storey Fairfield Downs neighbourhood to the north. As noted above, it is also set to avoid adverse effects on infrastructure capacity.

The three-storey building height provides for a building form that can be constructed without lifts, allowing for walk-up housing typologies, therefore minimising construction and on-going building maintenance costs and administrative complexities. In doing so, the density enables economic well-being of communities.

Finally, the density provides for the wellbeing and health of future residents, allowing for a reasonable degree of access to daylight and sunlight and provision of and access to outdoor living space, compared to higher density living.

3.4 The Form and Composition of Residential Development at Tuumata

The objectives that will guide the form and composition of residential development at Tuumata are as follows:

“Objective 4.2.16

Development in the Tuumata Residential Precinct is undertaken in a manner to ensure a well-functioning urban environment, and is coordinated with the provision of infrastructure and services”.

“Objective 4.2.17

Residential dwellings within the Tuumata Residential Precinct are designed and developed to create an attractive and safe urban environment, providing a high level of amenity:

- i) On site for residents;*
- ii) On adjoining sites; and*
- iii) For the transport corridors and public open spaces”.*

“Objective 4.2.18

Residential development in the Tuumata Residential Precinct incorporates sustainable features and technologies”.

Objective 4.2.16, through ensuring development is coordinated with the provision of infrastructure and services, achieves the purpose of the Act by enabling appropriate development, while avoiding, and mitigating adverse effects on infrastructure and services capacity.

Objective 4.2.17, by requiring a high level of on site, off site and neighbourhood amenity, achieves the purpose of the Act by enabling people and communities to provide for their social and cultural well-being and for their health and safety, and by avoiding and mitigating adverse effects of on amenity values.

Objective 4.2.19, by the incorporation of sustainable features and technologies, achieves the purpose of the Act by assisting to sustain the potential of natural (predominantly water) resources to meet the reasonably foreseeable needs of future generations.

Objective 4.2.6 and 4.2.7 apply by virtue of the operative Objectives and Policies: Residential Zones. These objectives ensure residential activities are the dominant activity and non-residential activities are compatible. These existing objectives will continue to apply and achieve the purpose of the Act by allowing non-residential activities in the Tuumata Residential Precinct. This will enable people and communities to provide for their social, economic, and cultural well-being and mitigate adverse effects on the environment such as adverse effects on liveability and travel time were these activities not provided for in the zone. The objectives also seek to mitigate adverse effects of such activities on the residential amenity values of the zone.

4.0 Appropriateness of the Provisions to Achieve the Objectives

This section evaluates whether the provisions of the Tuumata Plan Change (ie the policies, rules and other methods) are the most appropriate way to achieve its objectives.

In addition, there are objectives of the Operative Plan that would remain if the Plan Change were to take effect that are relevant to the evaluation of the provisions in this section.

There is no risk of acting/not acting in relation to the provisions which implement the relevant objectives because there is not uncertain or insufficient information as a result of the evaluations done for Tuumata by the technical experts (as attached to the Plan Change report).

4.1 Relationship of the Provisions to the Objectives

The relationship of the provisions to the proposed new and existing objectives of the Operative Plan is set out in the tables below for each topic.

Topic 1: The Strategic Outcome		
Proposed or Existing Plan Objective	Proposed Plan Change Policy	Proposed Plan Change Method
New Objective 3.7.3.12 Development of the Ruakura -Tuumata Structure Plan Area achieves the following outcomes:...	3.7.3.13a “...in general accordance with the Ruakura -Tuumata Structure Plan Figure 2-14A”.	<ul style="list-style-type: none"> • Rule 3.7.4.1 (land use and development at Tuumata in general accordance with the Structure Plan) • Rule 3.7.4.2 and 3.7.4.3.1 (removal of Land Development Plans) • Proposed changes to zoning maps
	3.7.3.13b “...open spaces is provided in accordance with the Council's Open Space Provision Policy”	<ul style="list-style-type: none"> • Proposed changes to zoning maps to zone Open Space • Provision of Indicative location of Neighbourhood Park on the Structure Plan • Rule 23.6.15 b: a neighbourhood park generally in the location identified on the Ruakura-Tuumata Structure Plan Figure 2-14A shall be vested. • Proposed subdivision assessment criterion N15b whether the subdivision provides a comprehensive and connected Open Space network which includes being in accordance with the Council's Open Space policy. • Proposed assessment criterion N16d relating to the provision of a Public Plaza in the Neighbourhood Centre.
	3.7.3.13c “...Neighbourhood Centre meets the daily needs of residents and is accessible to the immediate and wider community”.	<ul style="list-style-type: none"> • Proposed changes to zoning maps to zone 1.8ha Neighbourhood Centre. • Application of Operative Plan Business 6 zoning (as proposed to be amended). • Proposed provision in the of up to 6000m² GFA as a permitted activity retail, food and beverage etc categories. • Proposed provision of a supermarket up to 3500m² as a permitted activity. • Provision of a drive-through as a restricted discretionary activity. • Assessment Criteria N16a-N16d on urban design outcomes for the

		Neighbourhood Centre and at B Design and Layout (Appendix 1.2).
	3.7.3.13d <i>“...reflect and celebrate the history and whakapapa of tangata whenua”</i>	<ul style="list-style-type: none"> Assessment Criteria N15biv and v for subdivision (including open space and streets) Assessment Criterion N16d ii on the design of the Neighbourhood Centre plaza.
	3.7.3.13e <i>“...give effect to the outcomes in The Vision and Strategy - Te Ture Whaimana o Te Awa o Waikato through...”</i>	<ul style="list-style-type: none"> Rule 3.7.4.4.4 and 3.7.4.4.5 Stormwater and Water Conservation Measures at Tuumata. The stormwater network on the Structure Plan Subdivision assessment criterion N15g requiring stormwater management to give effect to Te Ture Whaimana. Subdivision assessment criteria N15r to N15w on stormwater management
	3.7.3.13f <i>“...prioritise the movement of pedestrians and cyclists over vehicles, incorporate the principles of CPTED...”</i>	<ul style="list-style-type: none"> Rule 3.7.4.1 (land use and development at Tuumata in general accordance with the Structure Plan) Subdivision rules and criteria as detailed below. Proposed subdivision assessment criterion N15b whether the subdivision provides a comprehensive and connected transport network including being consistent with CPTED and a safe speed environment.
Proposed Amendment to Objective 3.7.3.3 Serviced by and integrated with the existing and future infrastructure network		<ul style="list-style-type: none"> Rule 3.7.4.2 and 3.7.4.3.1 (removal of Land Development Plans) Rule 3.7.4.3.6 i and ii (staging in relation to the construction of the Fifth Ave Extension and ETC) Rule 23.6.15 a: A maximum of 430 residential lots prior to Fifth Ave extension connecting to the Eastern Transport Corridor. Subdivision assessment criteria N15r to N15w on stormwater management
Existing Objective 3.7.3.4 An integrated and efficient pattern of land use and transportation		<ul style="list-style-type: none"> Rule 3.7.4.1 (land use and development at Tuumata in general accordance with the Structure Plan) Rule 3.7.4.3.6 i and ii (staging in relation to the

		construction of the Fifth Ave Extension and ETC)
Existing Objective 3.7.3.5 Development maintains or enhances indigenous biodiversity values and mitigates adverse effects on indigenous biodiversity.		<ul style="list-style-type: none"> Subdivision assessment criteria N15p Where land development to implement the subdivision will cause loss of significant habitats of indigenous fauna, require that unavoidable adverse effects on such habitat are remedied or mitigated. Proposed subdivision assessment criterion N15b whether the open space network has provision for habitat and lighting does not deter bat movement.
Existing Objective 25.7.2.4 Efficient operation, maintenance and upgrade of the existing electricity transmission network and to enable the establishment of new electricity transmission resources.		<ul style="list-style-type: none"> Rule 3.7.4.3.6 iii new buildings in the National grid yard until the lines and support structures are removed.

Topic 2: The Structure Plan

Proposed Plan or Existing Plan Objective	Proposed Plan Change Policy	Proposed Plan Change Method
Amendment to Objective 3.7.3.3 New urban development within the Ruakura Structure Plan area is serviced by and integrated with the existing and future infrastructure network		<ul style="list-style-type: none"> Rule 3.7.4.1 (land use and development at Tuumata in general accordance with the Structure Plan - including layout of stormwater assets) Rule 3.7.4.3.6 i and ii (staging in relation to the construction of the Fifth Ave Extension and ETC) Rule 3.7.4.3.6 iii development in relation to the removal of the transmission lines.
New Objective 23.2.8 Subdivision contributes to a well-functioning urban environment that is generally consistent with the Ruakura - Tuumata Structure Plan.	23.2.8a <i>"Subdivision creates a block pattern that enables an integrated, well-connected neighbourhood that encourages walking and cycling by:...."</i>	<ul style="list-style-type: none"> Rule 23.7.9b i.-iv Maximum block length and perimeter Assessment criteria N15c - f on block pattern and alignment Assessment criteria N15h - j on avoiding rear lots, managing rear lanes and minimising cul-de-sacs
	23.2.8b <i>"Subdivision enables the creation of a safe and attractive urban environment with a high level of amenity by:...."</i>	<ul style="list-style-type: none"> Full subdivision rule set Subdivision is a restricted discretionary activity to be assessed against C - Character and Amenity and N15- Ruakura - Tuamata Structure Plan Subdivision.

	23.2.8c "Create high amenity streets by designing the transport corridor to..."	<ul style="list-style-type: none"> Rule 23.7.9c vi Compliance road cross sections shown on Ruakura-Tuumata Structure Plan Figure 2-14B Rule 23.7.9c vii and viii Minimum width for pedestrian/cyclist access ways through a block Subdivision assessment criteria N15m general compliance with road width and design.
	23.2.8d "Minimise vehicle access being provided across separated cycleways or shared paths...."	<ul style="list-style-type: none"> Rule 23.7.9c v Compliance with vehicle crossing separation requirements Subdivision assessment criterion N15o effects of crossings
	23.2.8e "Require rear lanes to be designed, and limit their length, to create low vehicle speeds..."	<ul style="list-style-type: none"> Rule 23.7.9c i.-iv Rear lane standards Assessment criterion N15g on rear lanes
	23.2.8f "Encourage the consolidation of vehicle crossings...."	<ul style="list-style-type: none"> Rule 23.7.9c v Compliance with vehicle crossing separation requirements
	23.2.8g "Require subdivision to provide for areas of open space that are...."	<ul style="list-style-type: none"> Rule 23.6.15 b: a neighbourhood park generally in the location identified on the Ruakura-Tuumata Structure Plan Figure 2-14A shall be vested. Rule 23.7.9d minimum standards for the neighbourhood park.
	23.2.8h "Enable larger lots, including super lots..."	<ul style="list-style-type: none"> No maximum lot size Subdivision criterion N15k and l on large lots to enable future development and super lots being adequately provided with access and allow efficient subsequent subdivision.
	23.2.8i "Enabling subdivision around residential development..."	<ul style="list-style-type: none"> Rule 23.3e x Subdivision for the purpose of the construction and use of residential units that are a permitted activity or have an approved land use consent in the Tuumata Residential Precinct is a controlled activity.

Topic 3: Residential Density

Proposed or Existing Plan Objective	Proposed Plan Change Policy	Proposed Plan Change Method
New Objective 4.2.15	4.2.15a "Enable a variety of housing typologies with a mix of densities	<ul style="list-style-type: none"> Rule 4.15.1 Activity Status Table for Tuumata:

<p>"Objective 4.2.15</p> <p>The Tuumata Residential Precinct and development within it provide for a variety of housing types and sizes that:</p> <p>i. respond to housing needs and demand; and</p> <p>ii. are consistent with the neighbourhood's planned urban built character, including 1 to 3 storey buildings.”.</p>	<p>within the zone, including 1, 2 and 3-storey attached and detached residential units”</p>	<ul style="list-style-type: none"> - 1 to 3 single dwellings, duplex dwellings, Tuumata residential terrace dwellings and Tuumata residential apartment dwellings on a site a permitted activity - 4 or more Tuumata residential terrace dwellings and Tuumata residential apartment dwellings on a site a RDA. - Structure Plan layout to facilitate this density.
	<p>4.2.15b “Enable housing to be designed to meet the day-to-day needs of residents”.</p>	<ul style="list-style-type: none"> • Rules 4.15.3.2 - 4.15.3.13
	<p>4.2.15c “Provide for developments not meeting permitted activity status, while encouraging high-quality developments”</p>	<ul style="list-style-type: none"> • Rule 4.15.1 Activity Status Table for Tuumata: Single dwellings, duplex dwellings, Tuumata residential terrace dwellings and Tuumata residential apartment dwellings where they infringe one or more of the standards are a restricted discretionary activity. • Assessment criteria at N17 applying to design and layout at Tuumata.

Topic 4: Form and Composition of Residential Development

Proposed or Existing Plan Objective	Proposed Plan Change Policy	Proposed Plan Change Method
<p>New Objective 4.2.16</p> <p>Development in the Tuumata Residential Precinct is undertaken in a manner to ensure a well-functioning urban environment, and is coordinated with the provision of infrastructure and services.</p>	<p>4.2.16a “... be generally consistent with the Ruakura -Tuumata Structure Plan”.</p>	<p>Rules and criteria requiring subdivision and development to be generally in accordance with the Structure Plan.</p>
	<p>4.2.16b “...able to be adequately serviced by three waters and transport infrastructure”.</p>	<p>Rules and criteria requiring the implementation of stormwater management and provision of infrastructure (including transport) commensurate to development.</p>
<p>New Objective 4.2.17</p> <p>Residential dwellings within the Tuumata Residential Precinct are designed and developed to create an attractive and safe urban environment, providing a high level of amenity:</p> <p>i) On site for residents;</p> <p>ii) On adjoining sites; and</p> <p>iii) For the transport corridors and public open spaces.</p>	<p>4.2.17a “All residential buildings... shall have...” [amenity provision as set out in the policy]</p>	<ul style="list-style-type: none"> • Rule 4.15.3.2 Building Coverage • Rule 4.15.3.3 Permeability and Landscaping • Rule 4.15.3.4 Building Height • Rule 4.15.3.5 Height in Relation to Boundary • Rule 4.15.3.6 Building Setbacks • Rule 4.15.3.7 Boundary Fences and Walls • Rule 4.15.3.8 Public Interface • Rule 4.15.3.9 Outlook Space

		<ul style="list-style-type: none"> • Rule 4.15.3.10 Outdoor Living Area • Rule 4.15.3.11 Waste Management and Service Areas • Rule 4.15.3.12 Storage Areas • Rule 4.15.3.13 Accessory Buildings, Vehicle Access and Vehicle Parking
	4.2.17b "Tuumata residential terrace dwellings and Tuumata residential apartment dwellings, where more than 4 per site are provided, shall have additional on-site and off-site amenity by...." [amenity provision as set out in the policy]	<ul style="list-style-type: none"> • Proposed assessment matters and criteria at N17
	4.2.18b "Home-based businesses must..." [provisions to protect amenity as set out in the policy]	
	4.2.18c "Non-residential activities must only serve the local residential area..."	
	4.2.18d "Community facilities (including Schools) and community support activities (including managed care facilities and residential centres) must ..." [provisions relating to scale and function as set out in the policy]	

4.2 Assessment of Options and their Efficiency and Effectiveness

4.2.1 Topic1: Strategic Outcomes

Options to Achieve the Objectives

The objectives relating to the strategic outcome of a new vision for the Ruakura-Tuumata Structure Plan Area to deliver land for housing with a new Neighbourhood Centre, with a supporting infrastructure and open spaces, are set out in 3.1 above.

The options to achieve these objectives are:

- Option A: Residential, Open Space with Suburban Centre (10,000m²)
- Option B: Residential, Open Space with Neighbourhood Centre (6,000m²) (the Plan Change option)
- Option C: Residential and Open Space Only (no Centre)
- Option D: Residential Only with no Open Space Zoned (no Centre)

Efficiency and Effectiveness to Achieve the Objectives

Option A: Residential, Open Space with Suburban Centre (10,000m²)

Option A provides opportunities to increase economic growth and employment, with the development of a 10,000m² Suburban Centre. Overall, these benefits of the full rezoning at Tuumata are similar to Option B below. Option A also provides for social well-being of future residents to a similar extent to Option B below in that the Suburban Centre will provide for a range of community activities, and the

balance of the Plan Change area would have the same quantum of Open Space and recreation opportunities, plus the option for a school.

Option A has slightly greater potential costs and risks than Option B as identified by the Formative Report with an earlier estimate identifying a direct retail impact on the nearest centre of Five Cross Roads of 12%. While this is still assessed to be a minor effect, it is a greater effect than Option B which has the smaller centre, and where there are impacts on other centres potentially goes to economic and social effects. Costs and environmental effects associated with infrastructure (including transport and three waters) are similar to Option B in that the traffic and services requirements of the larger centre have previously been assessed by Stantec and BBO to be able to be accommodated (subject to Fifth Ave being connected to the ETC, as with Option B).

The principal area where Option A is less efficient and effective than Option B in meeting the objectives is in relation to objective 3.7.3.12, where a scale of development is sought to be supported by a neighbourhood centre only. Within the hierarchy of the District Plan, this is a centre that mainly serves the needs of its immediate neighbourhoods. A suburban centre will potentially have a greater reach and therefore not achieve this outcome as effectively.

Option B: Residential, Open Space with Neighbourhood Centre (6,000m²) (the Plan Change option)

A full evaluation of the environmental, social, economic and social effects of Option B has been provided in the Plan Change report and is not repeated here.

The key differences to the other options evaluated here are the size of the centre (as discussed with option A above), whether to have no centre (as evaluated below under Option C) and to have no open space zoning (Option D).

Option B gives rise to economic benefits as evaluated by Formative. The proposed Neighbourhood Centre would support between 150 and 250 workers (depending on the mix and nature of the stores). Those workers would then spend at other businesses on their breaks and contribute to the vibrancy, sustainability, ongoing development and function of the Neighbourhood Centre.

The retail component of the Neighbourhood Centre would reduce the need to travel for Tuumata households therefore providing social benefits of proximity to a centre and reducing travel emissions.

As with Option A, Option B gives rise to environmental benefits including improvement in water quality from the site and the creation of a high-amenity neighbourhood.

Option B (as in general terms so the other options) stimulate activity during the construction phase. Formative state that construction would likely involve the employment of Hamilton and Waikato residents on site, with increased earnings for employees, the construction and site preparation firms engaged in the work, and for other businesses in the economy through indirect and induced spend in the economy.

The primary costs of Option B (as they are with the other options), beyond normal land development costs (roads, opens space, services etc), are the costs associated with the construction of the Fifth Ave Extension and the ETC. These costs are shared and do not all fall on Tuumata however in that the construction of these roads provides opportunities for land development elsewhere at Ruakura.

The opportunity costs of Option B come from that only 34% of the site is developable land, with the balance 33% as roads/cycleways/footpaths and 30% open space, with 3% Neighbourhood Centre. Other than the footprint of the Centre, this is essentially the same with Option A and C, albeit with a slightly larger footprint (5%) for the Suburban Centre under Option A.

The principal area where Option B is more efficient and effective than Option A in achieving the objectives is in relation to objective 3.7.3.12, where a scale of the centre development is sought directly gives effect to that objective.

A subset of this option is the zoning of the land beneath the transmission lines as residential in this Plan Change rather than deferring that until after they are removed (post 2026) and rezoning it as open space in the meantime. This proposed approach is efficient in that it uses one rather than two plan changes to rezone Tuumata and maximises land for the purpose. This also recognises that a considerable percentage of the land has already been set aside for open space in the Plan Change. It is effective in that, in the meantime, the existing Operative Plan transmission corridor and proposed Chapter 3 provisions apply and protect the transmission lines (including access for their removal) and manage their effects.

Another subset of this option is the identification of open space as both zoned and indicative as is proposed with the Plan Change. The alternative of zoning all potential open space is not adopted because of the need to apply zoning according to cadastral or some other method that is able to be surveyed. The wetland and the arterial road buffer strips satisfy this requirement in that they can be measured in relation to roads (and in relation to the wetland the centreline of the transmission line). The precise position of the neighbourhood park and neighbourhood centre plaza and the swales, are dependent on a final roading and block layout which will only be determined at subdivision stage and, as such, are shown indicatively on the Structure Plan and/or referred to in provisions.

Option C Residential and Open Space Only (no Centre)

Option C has the economic benefit of providing for additional residential land. Under this option assuming the 1.8ha of Neighbourhood Centre land under option C was swapped out for residential, and applying the same density yield of 50 dwellings/ha net, then some additional 90 dwellings could theoretically be constructed (noting that roading needs would likely reduce this amount). Applying a higher density of 100 dwelling/ha net in a higher density scenario would give an additional 180 dwellings.

These economic benefits are weighted against the social, cultural and environmental costs of not having a centre, which in turn have an economic cost. The main environmental costs come from the need for residents to travel to the nearest-most neighbourhood centre and supermarket, which are at least 1.2km in distance from Tuumata and likely at different locations, therefore beyond a comfortable walking distance and necessitating more private car use and transport emissions. Wider costs would arise whereby Tuumata would be a less safe and attractive (and therefore potentially less used) hub for future frequent public transport, as it has been identified in the policy documents discussed in the Plan Change Report, if that hub were not adjacent to a centre. Also, with no centre, the benefit of 150-250 workers being supported on site would not be realised. Social and cultural costs come from not having a centre to potentially house community activities (as are provided for in the Business 6 zone which is proposed to apply).

Option C would not be effective nor efficient in achieving the relevant objectives because it would not achieve a well-functioning urban environment with a neighbourhood centre (a close and accessible centre being a feature of a well-functioning environment) nor would it encourage quality urban design outcomes as Option A and B, with its lack of community focus and poor support of a future PT hub. For this reason also, it is less able to deliver an integrated, multi modal and safe transport network that provides travel choices, which is another outcome sought by the relevant objectives.

Option D : Residential Only with no Open Space Zoned (no Centre)

Option D maximises Tuumata for residential development only. As a theoretical scheme, this would dedicate 33% of the land for roads as it is in Option B, on the assumption that the same basic block pattern and permeability is desirable, with the full 66% balance provided for residential development. This would yield a theoretical 2300 dwellings (based on 50 dwellings/ha net).

The environmental costs of this option would outweigh the economic benefits of additional return, such that it would not be sustainable. The comparatively large percentage of the site at Tuumata dedicated to open space and stormwater management is necessary to manage both stormwater

quantity (peak flow) and quality: these being important considerations to the health and well-being of the Waikato. Reliance on narrow roadside swales, on-site soakage or having no wetland will not achieve this outcome following the work done by BBO in their Sub-Catchment ICMP. The yield under this option also exceeds the capacity of wastewater for Tuumata and would rely on considerable expenditure on roading improvements to support, as has been determined by Stantec.

Option D does not achieve the relevant objectives, including quality urban design outcomes, integrated, accessible and high-quality public spaces and giving effect to The Vision and Strategy - Te Ture Whaimana o Te Awa o Waikato, including through a comprehensive approach to stormwater management.

Summary of the Reasons

Option B is preferred because it most efficiently and effectively achieves the objectives compared to the other options evaluated. Its main costs of loss of developable land (and therefore dwelling yield and return) are necessary costs to manage environmental effects and achieve the outcomes sought by the objectives. Option B has a slightly lesser retail impact on other centres than Option A, however it will still provide a centre that meets the social and cultural needs of residents and still give rise to the positive benefits that come from a close and accessible centre for the new neighbourhood at Tuumata.

4.2.2 Topic 2: The Structure Plan

The objectives relating to the Ruakura-Tuumata Structure Plan and achieving its outcomes through subdivision and development are set out in 3.2 above.

The options to achieve these objectives are:

- Option A: Reliance on the Ruakura Structure Plan Only
- Option B: Ruakura-Tuumata Structure Plan with Land Use and Subdivision Controls (the Plan Change option)
- Option C: Structure Plan with Land Development Plan

Efficiency and Effectiveness to Achieve the Objectives

Option A: Reliance on the Ruakura Structure Plan Only

The existing Structure Plan for Ruakura shows a basic level of detail for Tuumata, following its assumed industrial park use. Nevertheless some structure plan elements are shown which remain relevant irrespective of its land use being an "L" shaped collector road between Fifth Ave Extension and the ETC, the construction of the Fifth Ave Extension and the ETC and a basic network of pedestrian and cycle links.

Option A has future development guided by those key elements only, without the finer-grained transport connections, stormwater management and indicative block layout as shown on the proposed Ruakura-Tuumata Structure Plan shown and assessed in Option B. Option A assumes that that land use on the existing Structure Plan would change to that now proposed, but otherwise the details would stay the same.

Option A arguably has the benefit of providing greater development flexibility, allowing the 'fine grained' decisions to be made at subdivision and land use stage. That can sometimes mean less costs, with simpler consenting requirements. Equally however, in providing less mapped direction it provides less certainty and would likely require greater discretion at resource consents stage in order to ensure subdivision and development met the strategic objectives discussed in Topic 1 above. With greater discretion comes greater consenting costs.

Option A is somewhat effective in achieving the objective of ensuring that new urban development within the Ruakura Structure Plan area is serviced by and integrated with the existing and future infrastructure network. This is because the key Strategic Infrastructure is shown already on the Ruakura Structure Plan, and this in combination with a rule set requiring its provision would achieve a degree of integration.

Where Option A fails is in achieving a well-functioning urban environment, as sought by the relevant objectives here. It is neither efficient nor effective in this regard, providing limited direction and not at the necessary scale. The finer grain of detail is the building block of a well-functioning environment, including the indicative block layout, and with that the network of roads, cycleways and footpaths and open space to serve a residential rather than industrial neighbourhood.

Option B: Ruakura-Tuumata Structure Plan with Land Use and Subdivision Controls (the Plan Change option)

Option B has the Ruakura-Tuumata Structure Plan and a policy and rule set that guides future land use. This includes rules requiring staging according to the provision of arterial roads and detailed policies and subdivision rules and criteria relating to block layout, road design, open space and stormwater infrastructure as set above.

General adherence to the Ruakura-Tuumata Structure Plan is required by these provisions. "General adherence" is an efficient and effective way to achieve the objective because it ensures the outcomes of the Structure Plan will be met, while avoiding lengthy and costly resource consent processes were the provisions to require strict adherence at this time - prior to detailed design work being undertaken.

The methods proposed to ensure the Structure Plan area is serviced by and integrated with the existing and future infrastructure network will be effective because they set an overall density based on the MDRS (and in turn yield) and include triggers for the provision of new arterial roads above a prescribed number of lots (430 residential lots and prior to the Neighbourhood centre). These methods are easily measured trigger points to ensure that the overall density of development and its staging aligns with the provision of infrastructure. With these methods comes the opportunity lost of limiting land development to the density proposed (instead of higher densities), restricting development until roading is provided and the cost of providing and maintaining that roading. These costs are discussed above where it is concluded that they are necessary to support the development proposed, while managing environmental and infrastructure capacity effects.

Subdivision sets out the building blocks for subsequent development and requiring it to adhere to the provisions as set out above to ensure a well-functioning environment is an efficient and effective way to achieve the relevant objective here.

The policies and rules which require a connected block pattern and maximum block length and perimeter, combined with the avoidance of rear lots and minimisation of cul-de-sacs, create roading costs - both construction and ongoing maintenance. In addition, the requirement for general adherence to the Tuumata road cross sections and the provision of cycleways and footpaths create greater costs than traditional subdivision. The Tuumata Concept Plan has been designed to adhere to these provisions, and so in developable land terms, this equates to 22.3ha or 33% of the site being set aside for roads, which in part is a lost opportunity for development (noting at some percentage of roading is always required to serve a subdivision). This very permeable block pattern and provision for multiple transport modes is necessary to achieve the connectivity outcomes also sought by the objectives here, which area a key plank of a well-functioning urban environment, and will result in considerable amenity, environmental, and health and safety benefits.

The policies and rules also require the provision of open space at subdivision stage, in general accordance with the Structure Plan and meeting the specified standards for the Neighbourhood Park. That is the most efficient time to secure open space because only at that stage will be the surveyed block and road pattern be established, which the open space will connect to and its boundaries be

defined by. It is effective because conditions can be placed on subdivision consents requiring the surveying, construction to an agreed standard, and vesting of open space prior to title for a particular subdivision stage. The Plan Change methods will work in conjunction here also with the Private Development Agreement. As with roading there is development opportunity lost with provision of open space. At Tuumata, if the land set-aside for stormwater management is added, this equates to some 30% and comes with the cost of its construction and maintenance. As discussed above these are necessary costs for the provision of a well-functioning urban environment. In addition, this quantum of open space is necessary for the management of stormwater at Tuumata, whereby the work done by BBO has concluded that this site-wide approach of utilising large swales and a large new wetland is necessary given the flat and poor soakage ground conditions. As such the open space will give rise to considerable social, amenity and health benefits for future residents, as well as being necessary to improve the quality of urban stormwater from the site in the manner set out in the Sub-Catchment ICMP.

Larger lots are provided for in the rule set, including at a super-lot scale. This is an efficient and effective way to achieve the relevant objectives because it recognises that for a block as large as Tuumata, a typical precursor to lot-grained subdivision is the subdivision into superlots. The provisions requiring general adherence to the Structure Plan, plus the base subdivision requirements for lots to have legal and physical access, will ensure that superlots achieve the integration outcomes sought by the objectives.

The provisions also enable subdivision around consented residential subdivision as a controlled activity. This activity status is consistent with the MDRS, with matters of control added to ensure the amenity outcomes for residential development remain when the land is subdivided post land use consent (namely that the future subdivision ensures compliance with the development standards for the zone).

The proposed methods allow for a one-step consent process to achieve subdivision, as opposed to the two-step process with the Land Development Plan added as analysed below in Option C. As such, has less consenting cost, time and risk, while still ensuring the outcomes of integration and well-functioning environment will be met.

Option C: Structure Plan with Land Development Plan

This two-step consenting method is the same as the status quo at Ruakura, whereby a Land Development consent is the necessary precursor to subdivision and development. The Land Development Consent approves all land development aspects being earthworks, provision of roading, open space and infrastructure and vegetation removal. These are matters dealt with by either subdivision consents or by other rules in the District Plan and so this is an unnecessary consenting step. The approach to date at Ruakura has been to run the LDP and subdivision consent concurrently, with typically the same or very similar information included in both and conditions imposed. Lastly LDPs as a method are not used in Plan Change 5 for Peacocks and are proposed to be removed from the plan wholesale by Plan Change 12 on the basis they impose unnecessary consenting costs and time. This rationale applies also to Tuumata, with the LDP method being neither efficient nor effective, and in fact unnecessary to achieve the objectives, compared to the provision set proposed in Option B.

Summary of the Reasons

Option B is preferred because is most efficiently and effectively achieves the objectives compared to the other options evaluated. Option A arguably has the benefit of providing greater development flexibility, with no or limited rules allowing the 'fine grained' decisions to be made at subdivision and land use stage. However, having this lesser level of certainty compared to the provision set under Option B would require greater discretion at resource consents stage, and therefore consenting time and risks in order to ensure subdivision and development met the objectives. It would less likely

achieve these objectives. Option B combines a requirement for general adherence with the Structure Plan with a policy and rule set which directly implements to proposed objectives. Option C is discounted because it would impose unnecessary consenting costs and time and set Tuumata apart in this regard, where LDPs are being abandoned as a method elsewhere for greenfield development in the City.

4.2.3 Topic 3: Residential Density

The objectives relating to residential density are set out in 3.3 above. The question of whether the 3-level density proposed for the Tuumata Residential Precinct achieves the purpose of the Act is evaluated in that section, where it is concluded that it does compared to theoretically higher densities. The provisions enable a variety of housing typologies with a mix of densities within the Tuumata Residential Precinct, including 1, 2 and 3-storey and provide for developments not meeting permitted activity status, while encouraging high-quality developments.

The relevant objective here is that development in the Tuumata Residential Precinct maximises the use of land by providing a range of housing typologies that are consistent with the neighbourhood's planned urban built character including three-storey buildings.

This section assesses whether the provisions proposed are the most efficient and effective way to achieve this objective compared to an alternative option.

The options to achieve these objectives are:

- Option A: Permitted 3-level residential development with consent assessment of 4+ residential units (the Plan Change option).
- Option B: All residential development permitted at Tuumata.

An option C of requiring resource consent for 3-level residential development is not evaluated because that would not accord with the MDRS.

Option A: Permitted 3-level residential development with consent assessment of 4+ residential units (the Plan Change option)

The residential density modelled and assessed for Tuumata has been derived from applying a 3-level density on average across the net site area (allowing for realistic unders and overs and variation in housing types). As such the provision of this density as a permitted activity, while meeting the requirements of the MDRS, will also be an efficient and effective way of achieving the relevant objective here. Because the effects of this density on roading and service has been assessed, and able to be accommodated, it will not give rise to adverse effects on these services that cannot be mitigated (including through the roading triggers discussed above).

The requirement to obtain resource consent for 4+ residential units does impose consenting costs and time, compared to Option B assessed below where all development is permitted. These costs are off-set to a degree by the allowance in the rule set for such applications to be dealt with on a non-notified basis, thereby removing third party involvement and associated time, costs and consenting risks in the circumstances specified and by targeting the matters of discretion. The requirement to obtain a restricted discretionary consent for 4+ residential units assists the Council to ensure that on-site and off-site amenity effects are managed through an assessment of design. The assessment matters here are limited to the design of the building in relation to site context, public realm, site layout access, external appearance, landscaping and waste management, with certain criteria targeted only to apartments and terraces, and so are relatively limited in their scope, so as to not impart wholesale discretion and its associated cost and consenting risk.

It is anticipated in any event that the majority of developments at Tuumata, in the initial stages at least, will be single house and duplex, and these are able to be built as a permitted activity where

they occur on a site subdivided to a residential scale, thereby avoiding the consent costs discussed above.

Option B: All residential development permitted at Tuumata

Option B has the benefit of less consenting costs than Option A where 4+ units are proposed. This option achieves the objective here of maximising the use of land, however it is less effective in achieving the other Tuumata Residential Precinct objectives of a well-functioning urban environment and an attractive and safe urban environment. In this regard the potential variation in size and form of developments with 4+ units, and particularly terrace and apartment housing typologies, means that managing their effects and ensuring positive outcomes for on-site and off-site amenity is better suited to a restricted discretionary assessment as in Option A.

Summary of the Reasons

Option A is preferred because it most efficiently and effectively achieves the objectives compared to Option B. While it has greater consenting costs compared to Option B, these will not apply to what will be expected to be the majority of the development at Tuumata. These consenting costs are offset by the amenity outcomes achieved, the limited scope of matters of discretion and the application of non-notified activity status to such applications.

4.2.4 Topic 4: Form and Composition of Residential Development

The objectives relating to residential density are set out in 3.4 above. These seek that residential dwellings within the Tuumata Residential Precinct are designed and developed to create an attractive and safe urban environment, providing a high level of amenity. They also provide for non-residential activities in the zone and require incorporation of sustainable methods.

The options to achieve these objectives are:

- Option A: MDRS methods plus additional amenity and environmental controls (the Plan Change Option)
- Option B: MDRS methods only with only

The incorporation of the MDRS development controls is common to both options here as that is a base requirement and an outcome for the Plan Change is to be consistent with the MDRS. The essential difference between these options is whether to apply additional controls on amenity and environmental outcomes than those that apply to residential activities under the MDRS.

Option A MDRS methods plus additional amenity controls (the Plan Change option)

The MDRS controls are not evaluated here as they are specified in the RMA 1991 and are presumed to give effect already to the mandatory objectives in its Schedule 3A.

Additional controls may be applied provided they are not more restrictive than the MDRS. The Plan Change proposes the following additional controls on matters not covered by the MDRS and therefore are not more restrictive:

- Standards relating to non-residential activities in the zone.
- Urban trees - requirement for each unit to have a specimen tree according to the standards specified.
- Different setbacks from internal lanes, boundary fences and walls.
- Maximum height and minimum permeability requirements for fences and walls.
- Pedestrian access requirements from streets.
- Rules requiring the provision of waste management and services areas for residential and non-residential activities.
- Storage area requirements requiring storage be provided for apartments.

- Rules for accessory buildings, vehicle access and vehicle parking (where provided) relating to terraces and units.

Non-residential activities are provided for in the Tuumata Residential Precinct where they are compatible with residential amenity values by way of the General Residential Zone. They are intended to support the residential function of the neighbourhood through the provision of community and small-scale retail and service activities. This provision has positive social, cultural, economic and environmental benefits, including by allowing an appropriate level of economic activity to occur within the neighbourhood (eg home occupations) and provide accessibility and convenience for residents. The activity status proposed for these activities and the standards proposed to apply on matters of scale and operating hours to certain activities recognises that, without such regulation, the fundamental purpose of the zone could be lost with residential amenity compromised and the zone ceasing to be 'well-functioning'. They are concluded therefore to be both efficient and effective methods. While consenting costs may eventuate for non-residential activities that are either specified as restricted discretionary or discretionary, they will only apply to those particular activities which will not be common in the zone. The provision for more typical activities such as home occupation as permitted activities will avoid such costs in the majority of cases.

The urban tree requirement will give rise to positive effects of minimising the urban heat island effects, enhancing biodiversity and ecological function, providing summer shade and storing carbon. This requirement will not result in loss of buildable land on residential sites other than a specified 3m unobstructed diameter, with trees able to occupy the 20% landscape area or elsewhere on a site where planted in a tree pit. While imposing an additional cost on development, this is not significant being in the order of \$300 per tree for the required 80L PB size at time of planting.

The proposed rules imposed on setbacks from internal lanes, boundary fences and walls deal with circumstances not covered by the MDRS setback controls. The requirement for garages to be setback 5m from the transport corridor (road) recognises that garages may still be provided (notwithstanding they are no longer required to be provided) and that garages adjoining the front boundary of a site pushes vehicle manoeuvring into the street and risks garage doors dominating the streetscape. The new provisions here also allow side and rear yards to be reduced to the extent specified where the written consent of neighbours is proposed. This approach avoids triggering consents and associated costs for relatively minor infringement to the setback rules. Lastly, new rules apply to setback from internal accessways in recognition of the need to avoid building encroachments to ensure their proper functioning and the amenity function that such lanes can have where they serve multiple units.

The maximum height and minimum permeability requirements for fences and walls are intended to assist with creating an attractive and safe environment and passive surveillance to achieve safe streets and public open spaces. In this respect they provide targeted and measurable methods, that recognise that fencing and walls will be provided with development and as such achieve the objectives relating to off-site amenity and safety.

The pedestrian access requirements from streets apply to terrace housing and apartments to assist with creating an attractive and safe environment and also to align with CPTED principles. They will not apply to the majority of development at Tuumata where that is anticipated to be single housing and duplex. In any event these controls impose little additional costs, being a standard feature of modern higher density residential design (requiring pedestrian access from a transport corridor to the front door of each residential unit, or to the single front door and lobby of an apartment building).

Rules requiring the provision of waste management and services areas for residential and non-residential activities are designed to ensure the costs of waste management are borne on-site and not transferred to the public realm with for example clutter of rubbish bins on roads and berms.

The storage area requirements have been simplified from the PC12 version to more efficiently deal with the amenity need, specifying storage requirements apply to apartments only, with other housing types more than able to provide storage within each dwelling.

The rules for accessory buildings, vehicle access and vehicle parking (where provided) relate to terraces and apartments only, to prevent these dominating the streetscape.

Overall, the additional controls are concluded to impose limited additional costs, are simple to comply with without triggering consents and achieve a good level of additional amenity benefit.

Option B: MDRS methods with only

The counter option here is to not employ the additional controls proposed under Option A, and rely only on the MDRS methods.

While this would reduce some complexity of compliance (fewer controls, easier compliance), reduce the risk of consents where compliance could not be achieved, and remove the costs of providing for trees, on-site waste management and storage and setbacks as specified above, they would transfer other costs to the public realm and be less efficient and effective in achieving the objectives.

Summary of the Reasons

Option A is preferred because it most efficiently and effectively achieves the objectives compared to Option B. While it has greater consenting and compliance costs compared to Option B, these are not significant and the provisions readily able to be complied with in most cases. Option A gives rise to greater positive benefits outlined above compared to Option B.

5.0 Conclusions

Following this analysis above, it is concluded that the objectives of the Plan Change are the most appropriate way to achieve the sustainable management purpose of the Act, and the provisions of the Plan Change the most appropriate way to achieve those objectives, having regard to their efficiency and effectiveness and the reasonably practicable alternative options.

