

Appendix 7: Section 32 RMA Assessment for Proposed District Plan Submission: West Melton West

Introduction and RMA requirements

1. Marama Te Wai Ltd (the submitter) is lodging a submission on the Proposed Selwyn District Plan to change the zoning of the submission site from General Rural Zone (Specific Control Area 1 Inner Plains) and Large Lot Residential to General Residential Zone.
2. The submission has outlined the background to and reasons for the requested submission.
3. The amendments to the Proposed Plan are outlined in the submission. No adverse environmental effects are anticipated by the change of zoning, however the potential environmental effects of implementation of the submission have been described in the relevant sections of the submission.
4. Any change to a plan needs to be evaluated in accordance with section 32 of the Resource Management Act. Selwyn District Council has also required submitters for re-zoning submissions to prepare a section 32 assessment in support of the submission.
5. 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 1.2ha of General Rural land for Residential General that needs to be examined.

Objective of the Submission to the Proposed District Plan

7. The objective of the submission is to change the zoning of the application site in the Proposed District Plan from General Rural Zone and LLR to General Residential Zone in a controlled and managed way through a development Plan and by adopting, as far as possible, proposed planning zones and subdivision, activity and development standards.
8. Accepting the submission will:
- a) Provide for short term additional housing and residential land choice in West Melton at General Residential standards that generally achieve the target of 12 households/ha. Such densities will be managed by a Development Plan and will complement the immediately adjoining residential land without compromising the character or amenity of that land;
 - b) Provide for urban development of West Melton township in a manner that enables efficient use of existing and future infrastructure and current land resources.

Environmental Outcomes – District Plan Objectives and Policies

9. The Proposed Selwyn District Plan (PSDP) objectives give effect to the purpose of the Resource Management Act and the PSDP policies in turn give effect to the PSDP 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 residential rezoning has been assessed against the relevant District Plan objectives and policies. It concludes that the requested rezoning is entirely consistent with and meets the outcomes sought by the objectives and policies, except with respect to Urban Growth. However, the UG policies are out of step with the higher order document, the NPS-UD.

Identification of options

11. In determining the most appropriate means to achieve the objectives of the submission, a number of alternative planning options are assessed below.
12. These options are:
 - a) Option 1: status quo/do nothing: Do not rezone the Site.
 - b) Option 2: submission to rezone the whole site for urban residential use zoned General Residential.
 - c) Option 3: re-zone as Large Lot Residential
 - d) Option 3: resource consent: ad hoc land use and subdivision consent for subdivision through non-complying subdivision and land use consents for residential use.

¹ See PSDP Part 1, HPW Plan Structure

S32 Matter	Option 1: Do nothing: Rural Zone	Option 2: Standard Residential Zone	Option 3: Large Lot Residential	Option 4: Consents
Cost	<p>None for submitters.</p> <p>On-going costs for landowners with lifestyle activities managing effects of adjoining residential land uses.</p>	<p>Time and money cost to submitter for submission processes and technical reports.</p> <p>Servicing costs to be funded by developer.</p> <p>Contributes some potential commuter traffic to Greater Christchurch (but site is accessible to public transport services).</p> <p>Additional traffic in and around West Melton.</p> <p>Loss of some low productivity rural land</p> <p>Loss of rural outlook for properties at current urban boundary</p>	<p>Time and money cost to submitter for submission processes and technical reports.</p> <p>Less efficient use of the scarce resource of land so close to an existing, growing urban centre</p> <p>Less efficient development proposal affecting price of sections.</p> <p>LLR 'duplicates' the proposed densities for the other West Melton plan changes</p> <p>Contributes some traffic potential commuter traffic to Greater Christchurch from a portion of the anticipated households (but site is accessible to public transport services)</p>	<p>Time and money cost to submitters to seek one-off non-complying land use and subdivision consents. Consents unlikely to be approved as exceed the permitted Rural zone dwelling density standards & policy requires higher densities to be 'avoided'.</p> <p>Community cost and uncertainty in responding to ad hoc applications and not seeing the full scale of possible development at any time.</p>
S32 Matter	Option 1: Do nothing: Rural Zone	Option 2: Standard Residential Zones	Option 3: Large Lot Residential	Option 4: Consents
Benefit	<p>Retains existing lifestyle character and amenity.</p>	<p>Additional housing stock with consistency in housing typology. Contributes to the growth of West Melton. Contributes to meeting demand in face of very limited supply.</p> <p>Provides higher density housing than currently provided at West Melton, adding to the diversity of section and house sizes and price points.</p>	<p>Lesser volume of housing stock contributing to the growth of West Melton.</p> <p>Development Plan provides overall plan of integrated land development for smaller site.</p>	<p>No rezoning required.</p> <p>Benefit to individuals that succeed (but successful applications unlikely).</p>

		<p>Development Plan provides overall plan of integrated land development.</p> <p>Facilitates a more competitive local land and housing market.</p> <p>Implements NPS-UD.</p> <p>Provides more households to support township services/amenities and facilities.</p> <p>Economic benefit to Council from larger rating base through additional properties being added upon subdivision.</p>		
S32 Matter	Option 1: Do nothing: Rural Zone	Option 2: Standard Residential Zones	Option 3: Large Lot Residential	Option 4: Consents
Efficiency/ Effectiveness	<p>Application site remains an amenity/lifestyle block bounded by urban land with LLR lots at the urban/rural interface.</p> <p>West Melton's housing needs are not met. An undersupply of residential land capacity.</p>	<p>Utility services can be efficiently provided by the Council and funded by developer.</p> <p>Effective as it utilises low productivity rural land in a location undergoing rapid urbanisation.</p> <p>Effective in providing for the needs and well-being of landowners according to respective aspirations.</p> <p>Effective in meeting West Melton's housing needs in an appropriate location, including for higher density residential development than is currently supplied or proposed by other plan change proposals.</p> <p>Implements the NPS-UD.</p>	<p>Utility services can be efficiently provided by the Council, and funded by the developer</p> <p>Less effective and efficient than Option 2 because cannot achieve the same residential yield to meet West Melton's housing needs or development scale and efficiencies.</p>	<p>Least effective and efficient as outcomes from consent processes are uncertain, and potentially un-coordinated and lack proper planned integration with the township utilities.</p>

Risks of Acting or Not Acting

13. Zoning under the Proposed District Plan has to be robust enough to last the statutory life of the Plan (10 years), and the NPS-UD also requires that at the end of 10 years the Council is assured that there will be a sufficient supply of appropriately zoned land beyond that point. The risk of not acting in 2020 to re-zone sufficient urban zoned land, and to provide security of land supply over that timeframe, is that West Melton will continue to experience the present day issues of uncatered-for demand, undersupply of serviced land, and a lurch in land and house prices.
14. The risk is that if necessary decisions are not taken today then the sustainable growth and development of West Melton over the foreseeable planning period is uncertain. Not re-zoning sufficient land that can support appropriate housing typologies to meet the needs of a range of household needs is not meeting the purpose of the Act, nor meeting the Council's obligations to sustainably manage the natural and physical resources of the Selwyn District for present and future generations, or the requirements of the NPS-UD 2020.
15. The submitter has commissioned a number of reports: soil contamination, geotechnical, and servicing reports to inform and shape the development proposal. An ITA can be supplied if required.
16. There is no risk that a decision will be made in an absence of expert advice and appropriate technical solutions for servicing and design.
17. All these inputs to the proposal mean there is little, if any, uncertain or missing information in relation to this proposal.
18. It is therefore considered that there are no significant risks of acting to accept the submission.

Summary of s32 evaluation

S32 Evaluation	Option 1: Do nothing: Rural Zone	Option 2: Standard Residential Zones	Option 3: Large Lot Residential	Option 4: Consents
Objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act	✗	+	±	✗
Whether the provisions in the proposal are the most appropriate way to achieve the objectives	✗	+	±	✗

Benefits	+	++	+	×
Costs	×	++	++	±
Risks	+	×	±	++

Key

×: does not achieve the matter, negative effect

+: does achieve the matter; positive effect

++: significant positive effect

±: neutral in relation to the matter

Overall Assessment

19. Based on the above assessment, it is concluded that the submission to re-zone the Site from Rural Zone to Residential General is the most appropriate method for achieving the objectives of the proposal, than the other alternatives also considered above.
20. Option 2 to re-zone the whole site GRZ is the most appropriate given:
 - a) The proposal adopts a Proposed District Plan zone, and development and activity standards. This ensures continuity of District Plan anticipated environmental outcomes and urban amenity for West Melton and adjoining residential areas;
 - b) Will be consistent with, and give effect to, the relevant proposed District Plan objectives and policies;
 - c) There is no additional cost to the Council in re-zoning the Site as proposed as required upgrades to services will be funded by the developer and there is understood to be existing capacity in the road network to accommodate the traffic effects;
 - d) The proposed Development Plan provides an overall plan of integrated land development.
21. The adoption of the Residential Zone in the proposal is considered to be appropriate to achieve the long term sustainable growth and development of West Melton.
22. The economic, social and environmental benefits of the proposal outweigh the potential costs.
23. The overall efficiency and effectiveness of the proposal is high, in comparison the alternative options which are low (Options One and Four) or low to moderate (Option Three).
24. The proposal is considered to be the most appropriate, efficient and effective means of achieving the purpose of the Resource Management Act 1991.