

ATTACHMENT B: s32AA evaluation

Table 1: Rezoning Proposal

The specific provisions sought to be amended	Assessment of the efficiency and effectiveness of the provisions in achieving the objectives of the Proposed Waikato District Plan (PDP)	
The rezoning proposal	<p>The rezoning proposal (as it relates to the property at 115 Whangarata Road, Tuakau (the site)) is to rezone the site to a combination of Residential Zone and Industrial Zone. The site is Rural Zone and Industrial Zone in the Operative Waikato District Plan (ODP) and only Industrial Zone in the Proposed Waikato District Plan (PDP). No site specific provisions are proposed.</p> <p>A concept plan for the site showing the relief sought is provided in Attachment A.</p>	
Relevant objectives of the PDP	PDP objective	Assessment
	1. Growth occurs in defined growth areas (1.5.2(a))	<p>The site is partially zoned as an ‘urban environment’ zone in ODP and is fully zoned as one in the PDP. No change to the site being an urban environment is sought, however, the zones comprising this environment are.</p> <p>The site is contiguous with the urban area of Tuakau. In the PDP, the land on both sides of the site is an urban zone with the barrier between rural and urban land use being Whangarata Road.</p> <p>The possible density for residential development significantly increases under the rezoning proposal given the zoning in the ODP and PDP do not enable these types of outcomes.</p> <p>Tuakau is an existing ‘urban community’. The suitability of the land for the zoning sought has been considered in separate technical reporting previously prepared for Plan Change 16 (PC16) – Tuakau Structure Plan (2017). Other general commentary on the suitability of the land is provided in the reporting commissioned by Council for PC16.</p>
	2. Urban development takes place within areas identified for the purpose in a manner which utilises land and infrastructure most efficiently. 1.12.8(b)(i)	
	3. Promote safe, compact sustainable, good quality urban environments that respond positively to their local context. 1.12.8(b)(ii)	
	4. Focus urban growth in existing urban communities that have capacity for expansion. 1.12.8(b)(iii)	

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	<p>6. Protect and enhance green open space, outstanding landscapes, and areas of cultural, ecological, historic, and environmental significance. 1.12.8(b)(vi)</p>	<p>The PDP planning maps do not identify any overlays across the site relating to landscape, cultural, ecological or historical matters.</p> <p>The concept plan for the site shows the stream corridor that bisects the site being restored to become an open space area. This is considered a logical response to the primary natural feature on the site.</p> <p>The planning maps for Stage 2 of the PDP do not identify any natural hazards present on the site.</p>
	<p>7. Future settlement pattern consolidated in and around existing towns and villages in the district and in 'defined growth areas' (1.5.1(b); 1.12.3(a); 1.12.3(c); 4.1.2(a); 5.3.8)</p>	<p>The site is located in Tuakau which is an identified growth area. In addition, the site specifically adjoins the urban area of Tuakau.</p>
	<p>8. Urban growth areas are consistent with Future Proof Strategy for Growth 2017 (4.1.3(b))</p>	<p>The site is located within the settlement pattern of Tuakau as per the current version of the Future Proof Strategy (FPS).</p>
	<p>9. Industry is only to be located in identified Industrial Zones and the industrial strategic growth nodes of (i) Tuakau; (ii) Pokeno; (iii) Huntly; and (iv) Horotiu (4.1.6)</p>	<p>The site is located in the urban area of Tuakau which is an industrial strategic growth node. There is also adjoining land to the west which has an Industrial zoning in both the ODP and PDP.</p>
	<p>11. Maintain sufficient supply of industrial land within strategic industrial nodes to meet foreseeable future demands, having regard to the requirements of different industries to avoid the need for industrial activities to locate in non-industrial zones (4.6.3(a))</p>	<p>The rezoning proposal does not seek to identify additional industrial land. Alternatively, a more nuanced approach to the zoning of the site is sought which would provide both Industrial Zone and Residential Zone land.</p>
	<p>12. Maintain activities within specific sites containing lawfully established industrial activities that are not immediately adjacent to towns or villages (4.6.5(a))</p>	<p>The site does not contain a lawfully established industrial activity and the site is within urban Tuakau.</p>
	<p>13. Infrastructure can be efficiently and economically provided (4.1.3(a))</p>	<p>As the site is firmly located within the urban area of Tuakau, there is an existing infrastructure network to</p>

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		service the site. Upgrades and extensions can be provided as necessary.
	14. Encourage higher density housing and retirement villages to be located near to and support commercial centres, community facilities, public transport and open space (4.1.5(a))	<p>The intention to provide for higher density housing is acknowledged. It is understood that Kāinga Ora – Homes and Communities (Kāinga Ora) have submitted for the introduction of a Medium Density Residential Zone (MDRZ). In their amended zoning map, the MDRZ has been applied to land adjoining the site to the north-west.</p> <p>For the site specifically, it is in close proximity to the Business/Business Town Centre of Tuakau and therefore, accommodating Residential Zone would be beneficial in this respect.</p>
	15. (a) Subdivision, use and development within the rural environment where: (i) High class soils are protected for productive rural purposes; (ii) productive rural activities are supported, while maintaining or enhancing the rural environment; (iii) urban subdivision use, productive rural activities are supported and development in the rural environment is avoided (5.1.1(A)(i)(ii)(iii); 5.3.8)	The site is identified as part Rural Zone in the ODP but is entirely Industrial Zone in the PDP.
	16. Rural character and amenity are maintained 5.3.1 (a), 5.3.4 (a) (b)	The site is identified as Industrial Zone in the PDP.
	17. Effects on rural character and amenity from rural subdivision (a) Protect productive rural areas by directing urban forms of subdivision, use, and development to within the boundaries of towns and villages. (5.3.8(a))	The site is identified as part Rural Zone in the ODP but is entirely Industrial Zone in the PDP.
	18. (b) Ensure development does not compromise the predominant open space, character and amenity of rural areas. (5.3.8(b))	The site is identified as part Rural Zone in the ODP but is entirely Industrial Zone in the PDP.

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	19. Ensure subdivision, use and development minimise the effects of ribbon development. (5.3.8(c))	The site is identified as part Rural Zone in the ODP but is entirely Industrial Zone in the PDP.
	20. Subdivision, use and development opportunities ensure that rural character and amenity values are maintained. (5.3.8(e))	The site is identified as part Rural Zone in the ODP but is entirely Industrial Zone in the PDP.
	21. Subdivision, use and development ensures the effects on public infrastructure are minimised. (5.3.8(f))	The site is identified as part Rural Zone in the ODP but is entirely Industrial Zone in the PDP.
	22. Meets district wide rules and any relevant overlays	The site is not subject to any of the overlays contained in the PDP. As for consistency with district wide rules, this can be assessed at consenting stage when development is proposed.
Scale and significance of the rezoning proposal	<p>Comments on the scale and significance of the rezoning proposal are provided below:</p> <ul style="list-style-type: none"> - The spatial extent of the proposal is limited to a single site that is 23.61ha in size. - The proposal is at least of local significance given the residential capacity the site could add to Tuakau. - A broad assessment of the proposal against the higher order documents is provided in the planning evidence to which this evaluation is an attachment. - The anticipated outcomes from the proposal are considered to generally align with the existing environment. The site is located at the confluence of Residential Zone and Industrial Zone land and is sought to be accommodate a combination of these two land uses. As such, there is consistency with the proposal and what already exists in the environment. - Section 6 of the RMA is addressed in the planning evidence to which this evaluation is an attachment. - The Integrated Transport Assessment (ITA) for the Tuakau Structure Plan recognises issues with connectivity/integration in this area. To resolve this, a number of indicative new road connections are proposed and have been picked up in the concept plan to provide better connectivity to the surrounding network. Further investigations/modelling in this respect can take place at the development stage. - As the site is within the urban area of Tuakau there is servicing infrastructure in the vicinity. Upgrades and extensions can be further investigated at the development stage. - The proposal does not limit the future development planned for Tuakau. Instead, the proposal positively contributes to the growth of Tuakau by providing additional land for residential development whilst retaining some land for industrial growth. 	

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Other reasonably practicable options to achieve the objectives (alternative options)	Alternative 1: Rezone the entirety of the site as Residential Zone.

NOTE: The status quo option (do nothing) is not considered to be a reasonably practicable option given the current stage of the District Plan review process. Therefore, it has not been assessed as an alternative.

Table 2A: Benefits and Costs Analysis of the Rezoning Proposal

Rezoning Proposal: Rezone the site to a combination of Industrial Zone and Residential Zone		
	Benefits	Costs
General	There are no identifiable general benefits.	There are no identifiable general costs.
Environmental	<p>The proposal seeks that the natural watercourse which connects to the Kairoa Stream be reinstated which will return the watercourse (which I understand is currently piped) to a more natural state. (the watercourse in question is identified on the concept plan in Appendix A).</p> <p>A reduction in the amount of Industrial Zone that is provided avoids potential adverse effects generated from these activities to the nearby watercourses e.g., the discharge of contaminants or leaching of contaminants into the ground.</p>	The high class soils underlying the site will be lost (although this is accepted as the being part of the direction for the future of the site given the OWDP and PWDP zoning).
Social	Reinstatement of the watercourse creates the opportunity for informal open spaces to be created that can be used by residents of the surrounding Residential Zone areas and workers at the Industrial	There are no identifiable social costs.
Economic – General	Additional residential growth would create a greater contribution to the local economy.	There is the potential that reverse sensitivity effects may arise if the relationship between the Residential Zone land and the nearby Industrial Zone land is not

		well managed. This could adversely affect the operations of established businesses in the locality.
Economic Growth	The proposal bolsters the supply of additional Residential Zone land in Tuakau whilst retaining some of the Industrial Zone land identified in the PDP.	There are no identifiable economic growth costs.
Employment	Jobs will be created through development of the Industrial Zone section of the site. This area totals approximately 4.5ha. Construction jobs will be created during future development stages if the rezoning sought is realised.	Industrial Zone land is in demand and the proposal reduces the amount of Industrial Zone land from that identified in the PDP.
Cultural	The cultural benefits from the proposal are derived from the reinstatement of the stream to its natural state which aligns with the general thrust of Te Mana o te Wai and the importance of freshwater.	There are no identifiable cultural costs.

Table 2B: Benefits and Costs Analysis of Alternative 1

Alternative 1: Rezoning the entirety of the site as Residential Zone		
	Benefits	Costs
General	There are no identifiable general benefits.	Without a portion of Industrial Zone land to function as a buffer, residential development on the site could be exposed to a higher level of adverse effects.
Environmental	The proposal seeks that the natural watercourse which connects to the Kairoa Stream be reinstated which will return the watercourse (which I understand is currently piped) to a more natural state. (the watercourse in question is identified on the concept plan in Appendix A). A reduction in the amount of Industrial Zone that is provided avoids potential adverse effects generated from these activities to the nearby watercourses e.g., the discharge of contaminants or leeching of contaminants into the ground.	The high class soils underlying the site will be lost (although this is accepted as the being part of the direction for the future of the site given the OWDP and PWDP zoning).

Social	The proposal bolsters the supply of additional Residential Zone land in Tuakau whilst retaining some of the Industrial Zone land identified in the PDP.	There are no identifiable social costs.
Economic – General	Additional residential growth would create a greater contribution to the local economy.	There is the potential that reverse sensitivity effects may arise if the relationship between the Residential Zone land and the nearby Industrial Zone land is not well managed. This could adversely affect the operations of established businesses in the locality. This would be augmented by having the site fully zoned Residential.
Economic Growth	This additional Residential Zone land could provide a significant amount of more residential capacity (some 4.5ha).	
Employment	Construction jobs will be created during future development stages if the rezoning sought is realised.	Employment created from the development of the Industrial Zone land is lost.
Cultural	There are no identifiable cultural benefits.	There are no identifiable cultural costs.

Table 3: Evaluation of the proposal

Reasons for the selection of the preferred option	<p>On the balance of the costs and benefits from the two options, it is considered that the original rezoning proposal provides a better option for the following reasons:</p> <ul style="list-style-type: none"> - The site is located close to the Tuakau Town Centre and therefore lends itself to a predominantly residential use as this allows residents to sustainably use the services, amenities and employment opportunities on offer. - The provision of Industrial Zone is a logical response to the site being located adjoining an area of this zoned land. Furthermore, it is openly acknowledged that such land is in demand.
Extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of the RMA	With regards to the purpose of the RMA, the rezoning proposal contains both the housing and employment aspects which full rezoning of the site to Residential Zone does not. It is important that employment opportunities are balanced with residential opportunities and this is the case with the rezoning proposal.
Assessment of the risk of acting or not acting if there is uncertain information about the subject matter of the provisions	Further information on the interface between the site and the surrounding industrial land uses would better reveal the scale of effects. Although this has previously been assessed in noise/air quality work done for PC16.

Conclusion

In conclusion, the rezoning proposal is considered as the best way for achieving the objectives of the PDP for the following reasons:

- Employment growth is provided for in the Industrial Zone area;
- Residential growth is provided for; and
- The site is in an existing urban area and is in close proximity to the Tuakau Town Centre.