

Before an Independent Hearings Panel

The Proposed Waikato District Plan (Stage 1)

IN THE MATTER OF the Resource Management Act 1991 (**RMA**)

IN THE MATTER OF hearing submissions and further submissions on the Proposed
Waikato District Plan (Stage 1):
Topic 25 – Zone Extents

**PRIMARY EVIDENCE OF RENEE LOUISE FRASER-SMITH
ON BEHALF OF VAN DEN BRINK LIMITED**

17 February 2021

1. SUMMARY OF EVIDENCE

- 1.1 My full name is Renee Fraser-Smith. I am a town planner.
- 1.2 I am providing planning evidence in relation to the proposed rezoning sought by Van Den Brink Ltd ("**VDB**") of the land at Ryders Road in Tuakau for a "Business Zone".
- 1.3 I have reviewed the urban design merits of the submission on the basis of relevant District and Regional planning directives (objectives and policies) and assessed the submission in terms of the logic and merit of re-zoning.
- 1.4 Having considered the relevant planning documents and utilising the Framework tool set by Council Section 42A Hearing Report for Topic 25 I consider that the rezoning should be approved as it is consistent with the relevant objectives and policies, higher order planning documents and is both effective and efficient in achieving the purpose of the Resource Management Act 1991 ("**RMA**").

2. INTRODUCTION

- 2.1 My full name is Renee Louise Fraser-Smith. I am an independent planning consultant and currently hold the position as Senior Planner with Tollemache Consultants Limited. I confirm that I have the qualifications and expertise set out in **Attachment 1**.
- 2.2 I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note and that I agree to comply with it. I confirm that I have considered all material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.

Scope of evidence

- 2.3 This evidence provides a planning assessment of the rezoning proposal addresses:
- (a) A summary of the Rezoning Proposal (including a section 32AA Assessment provided as Attachment 3);
 - (b) Background and Council Section 32 Reports relevant to the rezoning;
 - (c) Other statutory and non-statutory documents;
 - (d) The Section 42A Framework Report;
 - (e) Conclusion.

3. SUMMARY OF RE-ZONING PROPOSAL

3.1 VDB made submissions¹ to the Proposed Waikato District Plan (“**PWDP**”) seeking that all land identified in **Attachment 2** to my evidence be rezoned from Industry Zone to Business Zone. These properties are zoned Business in the Operative Waikato District Plan (Franklin Section) (“**OWDP**”), and arguably by their location form part of the Tuakau town centre and therefore should not be down-zoned without any statutory assessment by Council to an inferior Industry Zone. These properties include the following and total an area of approximately 1.66 hectares:

- (a) 18 Ryders Road Tuakau, which is legally described as Part Lot 2 DP 15077);
- (b) 11 Ryders Road Tuakau which is legally described as Lot 1 DP 335349 and Allotment 142 Parish of Tuakau;
- (c) 10 (A and B) Ryders Road Tuakau which is legally described as Part Lot 4 DP 11274, and Section 1 SO 70292;
- (d) 1 Harrisville Road Tuakau which is legally described as Part Allotment 12 Parish of Tuakau

¹ Submitter 633

3.2 VDB has specific interest in 18 Ryders Road from which it currently operates a poultry processing facility and has obtained the necessary resource consents for this activity.

24 Ryders Road

3.3 Submission 366 also sought to extend the rezoning to 24 Ryders Road which is legally described as Lot 5 DP 419916 and comprises an area of approximately 0.77 hectares.

3.4 24 Ryders Road is utilised as part of the overall VDB Ryders Road properties. VDB have resource consent which allows the existing dwelling to be used for office and administration functions, and has previously held resource consent to utilise the paddocks as a car park and storage area.

3.5 While part of this site is subject to flooding, the existing business uses and its relationship to the Ryders Road properties (and proximity to the town centre) make it an ideal opportunity to increase the supply of Business Zoned land immediately adjoining the town centre and railway line (including the future Tuakau train station).

Reasons for re-zoning of the Properties

3.6 For ease of future reference I will refer to the above properties as being the **"Ryders Road properties"**.

3.7 The PWDP has not sought to zone additional business or industrial land in Tuakau, even though the predicted population growth is significant, as evident from the large areas in Tuakau shown for residential growth. Consequently, the potential self-sufficiency of Tuakau for retail, commercial services and employment activities will be reduced as the population grows and will remain reliant on many day-to-day retail and commercial needs from Pukekohe. This is not effective or efficient resource management, nor does it promote the wellbeing of the local community.

3.8 The Ryders Road properties are in close proximity to the Tuakau town centre and, with redevelopment, can provide good commercial opportunities to support the residential growth projected for this area.

4. BACKGROUND AND COUNCIL SECTION 32 ASSESSMENTS

- 4.1 The Ryders Road properties are zoned "Business Zone" under the OWDP. This same zone was applied to the land east of Ryders Road (Dominion Road) and to the land south of the railway line and has since formed the "Tuakau Town Centre".
- 4.2 From my comparison of the OWDP and the PWDP zonings the zoning extents in the Town Centre area are relatively the same, with some distinction between "Business Town Centre" applying to land south of the rail line and "Business" applying to land north of the rail line and east of Ryders Road. Instead of applying the same zoning pattern as the remainder of the Tuakau Business area, the Ryders Road properties has been amended in the PWDP to "Industrial Zone".
- 4.3 I have noted that the area of "up zoning" from the OWDP occurs for approximately 0.47 hectares of OWDP zoned open space on George Street which is has been rezoned to Business Zone. Notwithstanding this, the PWDP proposes to **decrease** the available area of Business Zoned land in the town centre by approximately 1.14 ha at the same time as the residential population is predicted by Waikato 2070 to increase by 40%.
- 4.4 The application of the "Industry Zone" by the PWDP effectively constitutes a down zoning of the Ryders Road properties, and has removed their potential to continue to into the future the provision of retail, services and employment activities associated with the town centre (as was provided during 2010 on the eastern side of Dominion Road). This downzoning is not supported by any technical information notified with the PWDP nor is it supported by any section 32 assessment. In this respect the downzoning reflects the opposite of the zoning advice provided by Dr Davey in the Section 42A Report for Topic 25, where it is not appropriate to zone a site based on its existing activities.
- 4.5 The Section 32 Report Part 2 "Industrial Zone & Heavy Industrial Zone" in section 1.4 identifies that there were different ways across the district of managing industrial activities, particularly in the Franklin Section where industrial activities were enabled in several zones, including the Business Zone. However, this is not then used as any form of justification for the applied zonings.

- 4.6 Further Section 1.5 of that Section 32 Report identifies that although withdrawn the 2014 Tuakau Structure Plan documentation was considered in development of the PWDP and was included as Appendix 2 to that report.
- 4.7 Notably, the 2014 Tuakau Structure Plan identified the Ryders Road properties as being within the “Business Zone boundary” and does not raise any change to that zoning and does not identify a need to rezone this portion of the Business Zone for industrial activities.
- 4.8 Similarly, the Section 32 Report for Business and Business Town Centre does not address any specific reasons or criteria for application of the Industry zone, and the down zoning of the Ryders Road properties. The Section 32 refers to the 2018 Character Statements, for which there is a relevant Tuakau statement provided as Appendix 11 to the Section 32 Report.
- 4.9 The character statement makes no reference to any need to rezone the Ryders Road properties, and conversely Figure 2 of the statement includes the Ryders Road properties as being part of the Town Centre, with a gateway planned for the Harrisville Road/Oak Road intersection adjacent to 1 Harrisville Road.
- 4.10 I note that section 2.1.1 of the Business Zones Section 32 identifies that there is some “additional business land” re-zoning in Tuakau based on the Structure Planning. From my review of the PWDP zonings and comparison of the OWDP zonings and having noted previously only one minor area of change, this statement in the section 32 appears to be incorrect and the opposite is the case. The PWDP promotes, without statutory assessment, the reduction in the size of the town centre by at least 1 hectare. The noted change in paragraph 4.3 of my evidence is not shown on the Structure Plan, and neither did the 2014 Tuakau Structure Plan identify any additional business zone areas². All the relevant documents I have identified above lead to a conclusion that the integrated planning undertaken by Council should retain the Business Zone for the Ryders Road properties.

² However there is a zoning discrepancy between the 2014 Structure Plan maps and the ODP maps in relation to 57 George Street that may have led to some confusion about whether there is land being “re-zoned”,

5. OTHER GROWTH PLANNING DOCUMENTS

- 5.1 I have reviewed the more recent growth planning documents for Tuakau such as the 2017 Blueprint and Waikato 2070 and have noted that these documents have not provided any guidance or justification for this land to be excluded from the town centre activities and growth.

6. SECTION 32AA

- 6.1 As the proposal seeks to make changes to the notified PWDP a section 32AA evaluation is required to be undertaken in accordance with section 32 (1)-(4).
- 6.2 The evaluation must examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of the RMA under subsection 32 (1)(a), and whether the provisions in the proposal (i.e. policies, rules and other methods) are the "most appropriate" way of achieving the objectives under section 32(1)(b).
- 6.3 The section 32AA evaluation must also consider the efficiency and effectiveness of a proposal, taking into consideration benefits and costs and the risk of acting or not acting.
- 6.4 A section 32AA evaluation has been undertaken as is appended to my evidence as **Attachment 3**.

7. SECTION 42A FRAMEWORK REPORT

- 7.1 The officer 42A reports for zoning extents³ was notified to submitters as a "Framework Report." It outlines a framework for submitters to use and to guide future 42A authors (for the rezoning proposals) and utilises a three lens approach.

³ Section 42A Report Hearing 25 Zone Extents prepared by Dr Mark Davey dated 19 January 2021

Lens One: Assessment of Relevant Objectives and Policies in the PWDP

- 7.2 Having reviewed the relevant objectives and policies listed in the framework (and specifically Appendix 2 being the Matrix of relevant objectives and policies as applicable to a rezoning in a scenario “Industrial zone to Business Zone)”. I am of the opinion that the proposed rezoning is consistent with the relevant PWDP objectives and policies.
- 7.3 The strategic objectives and specifically 1.5.2(a) and 1.12.8.(b)(ii) seek to ensure growth occurring in defined growth areas and promote quality urban environments. The rezoning occurs on land which has an operative Business Zone and has been identified in all growth reporting pre-dating the notification of the PWDP as business land and forming part of the Tuakau town centre. Thus the rezoning would promote development in an existing urban area and is consistent with legitimate expectations for redevelopment under the OWDP provisions.
- 7.4 With regard to strategic objective 1.12.8(b)(i) which promotes utilising land and infrastructure efficiently, the Ryders Road properties (including 24 Ryders Road) are located adjacent to the existing town centre and have existing connections for infrastructure servicing. Furthermore, growth planning for Tuakau and infrastructure identifies a future rail station and bus station approximately 400m east (from 18 Ryders Road) on the opposite side of Harrisville Road. Thus, the Ryders Road properties are ideally located to maximise the planned public transport infrastructure and are more conveniently located to this infrastructure than the southern parts of the notified town centre zoning along George Street. The Ryders Road properties are the only areas of underutilised land in large land parcels with these locational attributes. It would be inefficient and ineffective of the PWDP to down-zone land that can contribute to opportunities for higher density development adjoining a future train station and the existing mainstreet of the town centre.
- 7.5 The rezoning generally equates to the same extent of land that was previously zoned for Business under the OWDP. With reference to the features listed in objective 1.12.8(b)(vi), the sites do not contain any outstanding landscapes or areas of cultural, historic or environmental significance. There is a stream which forms the northern boundary of the Ryders Road properties. Setbacks and

planting for this feature are addressed by the PWDP methods/rules in Chapter 17. The Stage 2 hazard mapping also does not show any identified hazards, although the site at 24 Ryders Road is flood prone making it unsuitable for further residential development.

- 7.6 The location of the Ryders Road properties adjacent to the existing Town Centre (and up until notification of the PWDP forming part of what was considered the Tuakau business area) is better suited to retaining its function under the OWDP as a business zone rather than the PWDP approach of rezoning to Industry. The rezoning would allow redevelopment to occur on the land which is consistent with and supports a business centre and which would complement the Town Centre, thus meeting policies 4.5.3, 4.5.4. Furthermore, as a Business Zone the Tuakau Town Centre Character Statement would apply for all future development proposal thus ensuring development met policy 4.5.19.
- 7.7 With regard to 4.6.3(a) and 4.6.5(a) Tuakau has a specific node for industrial activities to the south east of the town which is currently under development and does not need to retain the Ryders Road properties as Industrial. I do not consider this rezoning back to Business Zone as affecting the supply of industrial zoned land. Neither do I consider that the Ryders Road properties should be maintained consistent with their current industrial activities.
- 7.8 The rezoning is consistent with policy 4.1.3(a) as the rezoning occurs in a location where there is existing infrastructure services as this is not a new growth cell or growth location.
- 7.9 Overall, I consider that the rezoning would better meet the relevant objectives and policies of the PWDP.

Lens Two: Alignment and consistency with higher order documents

- 7.10 Lens two of the Rezoning Framework addresses high order documents.
- 7.11 As the framework report identifies, the PWDP has been prepared to specifically give effect to the Waikato Regional Policy Statement ("**WRPS**") and generally seeks the same outcomes. As such the Framework report identifies that the WRPS objectives and policies do not need to be considered exhaustively.

7.12 The WRPS contains specific principles in section 6A which local authorities should have regard to when preparing, reviewing or changing regional plans, district plans and development planning mechanisms such as structure plans, town plans and growth strategies. Consistency with these are outlined below:

- (a) The rezoning meets a)-c) and i) as it occurs in an existing urban area in proximity to the existing town centre supporting a compact urban form and is not for greenfield growth and does not alter any distinction between rural and urban areas.
- (b) The rezoning meets d) to g) as it will occur on land already zoned and only seeks to change the nature of the urban zoning, thus infrastructure is already in place and the zoning occurs on land which has previously been zoned for business use. It will not compromise the safe, efficient and effective operation and use of infrastructure.
- (c) With regard to h) and j) the Ryders Road properties are not located near any of the features identified.
- (d) With regard to k), l) and t) there is a stream which forms the northern boundary of the proposed zone. Setbacks and planting for this feature are addressed by the PWDP methods/rules in Chapter 17.
- (e) m), n), p), r) and s) relate to sustainable and low impact design and impacts on the Waikato River. These features can be addressed by the PWDP methods and/or adherence to requirements of the relevant engineering standards for Waikato and any requirements of a stormwater discharge consent held for Tuakau by WDC.
- (f) The rezoning meets o) and is considered to be a better outcome resulting in less potential reverse sensitivity effects (odour, noise, visual) on neighbouring land than the notified Industrial zone.
- (g) q) effects on tangata whenua values are addressed by the PWDP methods/rules.

- 7.13 The Vision and Strategy for the Waikato River / Te Ture Whaimana applies to all activities in the Waikato River catchment. As the rezoning occurs on land already identified for business activities in the OWDP the implementation of and consistency for activities to meet the Vision and Strategy are generally dealt with by the PWDP objective, policies and methods. This is also relevant to the Waikato-Tainui Environmental Plan.
- 7.14 Consistency with the growth strategies and other growth documents has been addressed previously in my evidence. In summary, the rezoning is not contrary to any of these documents and conversely the notified PWDP zoning is also not anticipated by any of these documents.
- 7.15 In respect to the NPS-UD, the reduction in the extent of Business Zoned land in Tuakau's town centre does not give effect to the relevant objectives and policies. The result is to reduce the Business Zone in the town centre by 1.14 ha. These being larger sites that can accommodate larger scale retail, commercial and residential activities, the effect is that as Tuakau grows it will be able to provide less of its residents' future needs.
- 7.16 Each of the sites is larger in size, and compared to the vacant land in the mainstreet of the town centre, the Ryders Road properties provide better opportunities to accommodate, for example, medium format retail and commercial buildings, along with business activities that may require a larger area of car parking because of their operational requirements. The Council's approach of only zoning the mainstreet and existing developed commercial areas as Business, may limit the potential for additional retail and commercial activities to locate there because of the size of each title and its fragmented ownership.

Lens 3: Assessment against best practice planning guidance

- 7.17 Notably this step is only to be taken for proposals which are consistent with Lenses 1 and 2. The matters to be addressed under this section are outlined below.
- (a) Economic costs and benefits are considered;

These have been considered as part of the Section 32AA in **Attachment 3**.

- (b) Changes should take into account the issues debated in recent plan changes;

There are no relevant recent plan changes which have addressed this portion of land.

- (c) Changes to zone boundaries are consistent with the maps in the plan that show overlays or constraints;

The proposed zone change has taken into account the mapped overlays. Notably there are no overlays relevant to the site.

- (d) Changes should take into account features of the site;

These sites are already subject to an urban zoning. The rezoning only seeks to modify the zoning from Industry Zone to Business Zone (which is consistent with the operative zone).

- (e) Zone boundary changes recognise the availability or lack of major infrastructure;

Attachment 5 to the Officers Framework Report confirms that bulk infrastructure for water and wastewater has been provided by Watercare for the Tuakau Town Centre.

- (f) There is adequate separation between incompatible land uses;

The rezoning is considered to be a better outcome resulting in less potential reverse sensitivity effects (odour, noise, visual) on neighbouring land than the notified Industrial zone.

Specific methods are proposed to mitigate potential reverse sensitive effects are addressed by the PWDP methods in Chapter 17.

- (g) Zone boundaries need to be clearly defensible;

The zone boundaries generally match the existing boundaries.

- (h) Zone boundaries should follow property boundaries;

The boundaries align with existing property boundaries.

- (i) Generally, no “spot zoning”;

The rezoning is considered to be a better outcome than the notified Industrial zone. As a small “island” of Industrial zone disconnected from the remainder of the Tuakau Industrial area the notified zoning effectively creates a spot zoning. The rezoning to Business Zone is considered to be more consistent with the adjacent and adjoining Business Town Centre zoning.

- (j) Zoning is not determined by existing resource consents and existing use rights, but these will be taken into account;

The notified PWDP zoning appears to have taken the existing resource consents as justification for the notified zoning. As above the rezoning to Business Zone is considered to be a superior outcome.

- (k) Roads are not zoned;

Noted.

8. CONCLUSIONS

- 8.1 Having considered the matters identified in the Framework Report, I consider that the re-zoning proposal can meet each of the three “lenses” and is consistent with the relevant PWDP policy framework, higher order documents and is the most appropriate way to achieve the purpose of the RMA.

Renee Louise Fraser-Smith

17 February 2021

Attachment 1:

Renee Fraser-Smith: Qualifications and Experience

My full name is Renee Louise Fraser-Smith. I have been practicing as a planner for 13 years in the Auckland Region.

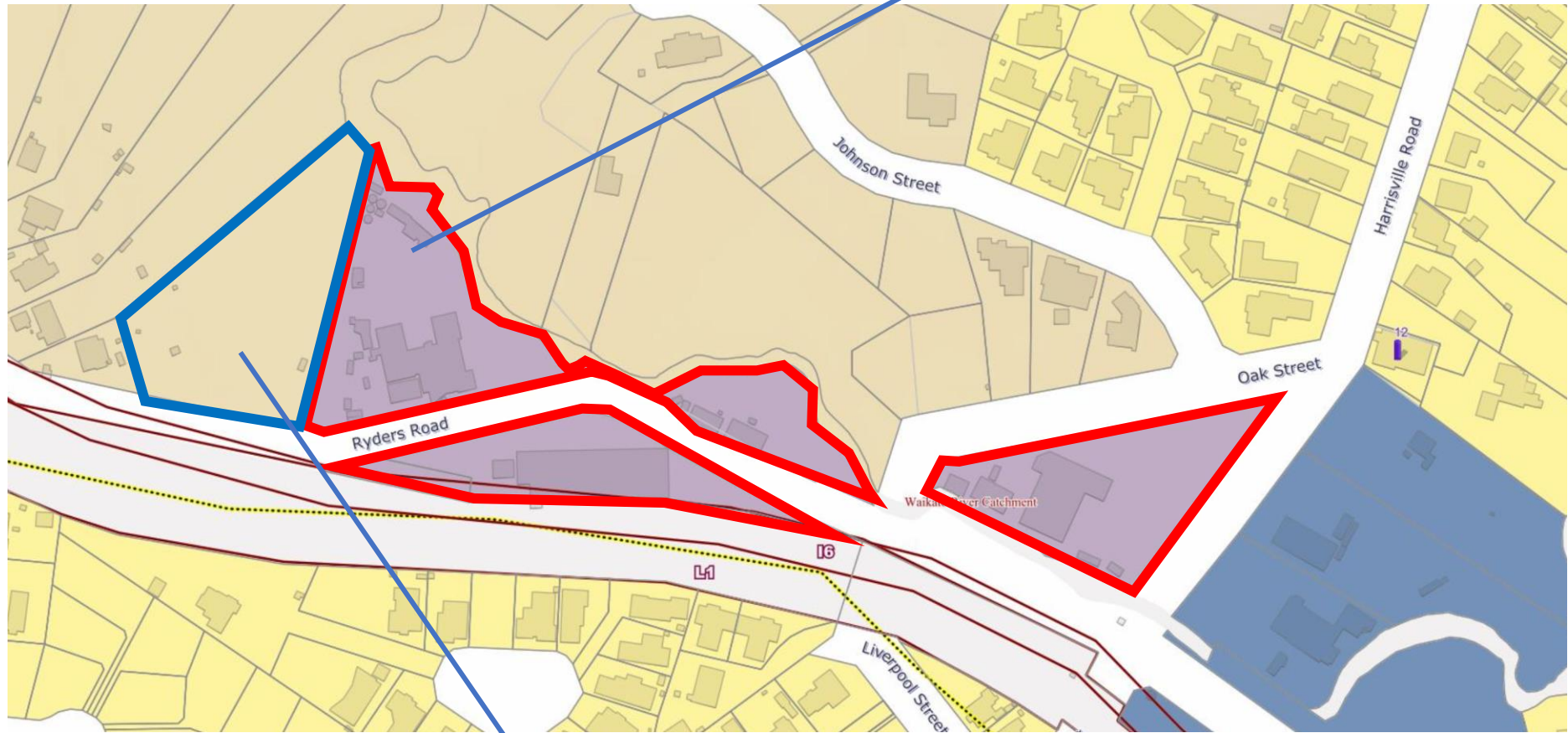
I have held positions as Planner with Auckland Council and Harrison Grierson and Senior Planner with Harrison Grierson and CivilPlan Consultants. I currently hold the position of Senior Planner with Tollemache Consultants Limited.

I hold a Bachelor of Arts Degree Double Majoring in History and Political Studies, and a Masters of Planning Practice with Honours. I am a full member of the New Zealand Planning Institute.

I have experience covering a wide range of land use and subdivision planning matters on behalf of local authorities and private entities in New Zealand. During that time I have been involved with many aspects of resource management including preparation and lodgement of resource consent applications, processing of resource consents, resource consent hearings, submissions, preparation of plan changes / plan variations and presentation of evidence in respect of a plan changes and a notice of requirement.

Attachment 2

Rezone from Industry to Business Zone



Rezone from Village to Business Zone

Attachment 3 - RMA 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	Rezone the properties at Ryders Road (as shown in Attachment 3) from Light Industry to Business Zone. Rezone 24 Ryders Road (also shown in Attachment 3) from Village Zone to Business Zone.
Relevant objectives of the PDP	The key objectives and policies of the PWDP relevant to the rezoning are: Objective 1.5.2(a) Objective 1.12.8.(b) Policy 4.1.3 Policy 4.5.5 and 4.5.4 Policy 4.5.19 Policy 4.6.3 Policy 4.6.5
Scale and significance of the rezoning proposal	<p>The rezoning involves approximately 2.369 hectares of land held in five titles (which is not a significant scale of development). 1.66 hectares is zoned under the OWDP as "Business Zone" while the remaining 0.77 is zoned village. However, resource consents are in place for the 0.77 hectares to be utilised for accessory activities associated with activities occurring on Business Zone land.</p> <p>The proposal has relatively significant implications as the Ryders Road properties are in close proximity to the Tuakau town centre and, with redevelopment, can provide good commercial opportunities to support the residential growth projected for this area. Furthermore, the sites already have adequate servicing, and are in an optimal location to benefit from future transport projects (including the planned train station).</p> <p>All the relevant growth documents for Tuakau (2014 Structure Plan, 2018 Character Statements, Waikato 2070) have identified the main 1.66 hectares as Business Zone and forming part of the Tuakau Town Centre. Thus the rezoning would promote development in an existing urban area and is consistent with legitimate expectations for redevelopment under the OWDP provisions.</p>

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)
Other reasonably practicable options to achieve the objectives (alternative options)	<p>Alternative 1: Rezone to a residential or village zone</p> <p>This is not considered as appropriate as the proposed rezoning. While residential may be a viable use in proximity to the town centre, a rezoning of this nature would not be an efficient use of land in this location as the Ryders Road properties are in an optimal location to provide for growth of the town centre as well as to maximise investment in infrastructure and future planned transport.</p>
	<p>Alternative 2: Do nothing option</p> <p>This is not considered as appropriate as the proposed rezoning. These properties are zoned Business in the OWDP, and arguably by their location form part of the Tuakau town centre and therefore should not be down-zoned to an inferior Industry Zone. Furthermore, Tuakau has a specific node for industrial activities to the south east of the town which is currently under development and does not need to retain the Ryders Road properties as Industrial. I do not consider this rezoning back to Business Zone as affecting the supply of industrial zoned land.</p>

Table 2: Benefits and Costs Analysis of the Rezoning Proposal

Rezoning Proposal: Rezone Ryders Road properties to Business Zone		
	Benefits	Costs
General	The rezoning occurs in an existing urban area in proximity to the existing town centre supporting a compact urban form and does not alter any distinction between rural and urban areas. The sites are already provided with infrastructure servicing.	Other effects may result from redevelopment of the sites – however these could occur in a status quo situation under the notified zoning, and in general area already able to be managed by methods in the PWDP.
Environmental	The rezoning is considered to be a better outcome resulting in less potential reverse sensitivity effects (odour, noise, visual) on neighbouring land than the notified Industrial zone.	
Social	The rezoning enables future expansion of town centre and business activities which provide for social wellbeing activities	
Economic Growth	Each of the sites is larger in size, and compared to the vacant land in the mainstreet of the town centre, the Ryders Road properties are able to provide better opportunities to accommodate, for example, medium format retail and commercial buildings, along with business activities that may require a larger area of car parking because of their operational requirements. This will support the economic growth of the town centre.	Initial perceived loss of industrial zoned land and loss of economic growth associated with industrial land uses.
Employment	Both the notified Industry zone and the proposed Business zone would enable opportunities for employment.	
Cultural	Potential effects on tangata whenua values are addressed by the PWDP methods/rules.	

Table 3: Evaluation of the proposal

<p>Reasons for the selection of the preferred option.</p>	<p>The Ryders Road properties are in close proximity to the Tuakau town centre and, with redevelopment, can provide good commercial opportunities to support the residential growth projected for this area. Furthermore, the properties are ideally located to maximise the planned public transport infrastructure and are more conveniently located to this infrastructure than the southern parts of the notified town centre zoning along George Street.</p> <p>The Ryders Road properties are the only areas of underutilised land in large land parcels with these locational attributes to enable commercial growth for the town centre.</p> <p>Any perceived loss of industrial land is not considered significant, as Tuakau has an existing large area zoned for industrial land uses to the south-east, and the 1.66 hectare “loss” is not considered to negatively affect the overall supply of industrial land in Tuakau. The notified zoning effectively only creates a small “island” of industrial zone disconnected from the main industrial hub.</p>
<p>Extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of the RMA.</p>	<p>The proposed rezoning fits with the PWDP objective and policy framework including promoting a compact urban form and in a location where development can maximise investment of existing and planned infrastructure.</p> <p>The sites do not contain any outstanding landscapes or areas of cultural, historic or environmental significance.</p> <p>For these reasons the rezoning is considered to be the most appropriate way to achieve the purpose of the RMA.</p>
<p>Assessment of the risk of acting or not acting if there is uncertain information about the subject matter of the provisions.</p>	<p>The PWDP has not sought to zone additional business or industrial land in Tuakau, even though the predicted population growth is significant, as evident from the large areas in Tuakau shown for residential growth. Consequently, the potential self-sufficiency of Tuakau for retail, commercial services and employment activities will be reduced as the population grows and will remain reliant on many day-to-day</p>

	retail and commercial needs from Pukekohe. This is not effective or efficient resource management, nor does it promote the wellbeing of the local community.
Conclusion	Overall the proposed rezoning will be efficient and effective in achieving the objectives of the PWDP as demonstrated in the tables above.