

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of a hearing for Proposed Variation 3 – Enabling
Housing Supply to the Proposed Waikato District Plan

SUPPLEMENTARY STATEMENT OF EVIDENCE OF KATRINA ROSE ANDREWS

For the Waikato Regional Council

PLANNING

DATED 27 JULY 2023

INTRODUCTION

1. My name is Katrina Rose Andrews. I am a Policy Advisor in the Strategic and Spatial Planning Team at the Waikato Regional Council (WRC). My qualifications and experience are set out in my Evidence in Chief (EIC) dated 4 July 2023.
2. I repeat the confirmation in my EIC that I have read and agree to comply with the Code of Conduct for Expert Witnesses as set out in the Environment Court Practice Note 2023.
3. Since filing my EIC, I have read and considered the evidence filed on behalf of other submitters, the rebuttal evidence on behalf of Waikato District Council (WDC) and submitters, and parties' legal submissions, where these documents are relevant to the matters addressed in my evidence. I also attended expert conferencing sessions in relation to stormwater.
4. Given the updates that have occurred since I filed my EIC, particularly in relation to stormwater and flood hazard provisions, the purpose of this supplementary statement is to:
 - Briefly summarise the key features of my EIC for the purpose of the hearing for Variation 3 to the Proposed Waikato District Plan ('Variation 3');
 - Record my responses to the section 42A rebuttal evidence, the rebuttal evidence of other experts on behalf of WDC, and the amended set of provisions proposed as a result;
 - Provide brief comments in relation to the recently released National Policy Statement for Indigenous Biodiversity 2023 (NPS-IB); and
 - Provide an evaluation in accordance with section 32AA of the Resource Management Act 1991 (RMA) for the additional provisions recommended in my EIC to recognise the relationship between urban intensification, transport, and climate change within Variation 3 (attached as Appendix A).

INTENSIFICATION, TRANSPORT AND CLIMATE CHANGE

Evidence in Chief

5. Within my EIC and my Statement of Evidence for the Joint Opening Hearing,¹ I outlined that I consider there is strong support within higher-order planning documents for the inclusion of provisions to give effect to national and regional climate change priorities within Variation 3.
6. As demonstrated in national and regional policy, there is a clear relationship between urban intensification, transport, and climate change.² Intensification will have an impact on the transport networks of the urban environments subject to the Medium Density Residential Standards (MDRS), and the design of urban environments in turn impacts upon travel behaviour, as well as the operation of public transport. Ultimately, urban form, growth, and travel behaviour all influence transport's contribution to climate change.

¹ Statement of Evidence of Katrina Andrews for the Waikato Regional Council, 31 January 2023, [statement-of-evidence-of-katrina-andrews---waikato-ipis-joint-opening-hearing.pdf \(waikatodistrict.govt.nz\)](https://www.waikatodistrict.govt.nz/~/media/00000000-0000-0000-0000-000000000000/Statement_of_Evidence_of_Katrina_Andrews_for_the_Waikato_Regional_Council_31_January_2023.pdf)

² EIC, paragraphs 33 – 34.

7. Within my EIC I recommended three new objectives and four new policies for inclusion within the Medium Density Residential Zone 2 (MRZ2) chapter to better recognise the relationship between intensification, transport, and climate change in Variation 3. These provisions were based on notified provisions within Hamilton City Council's (HCC) Proposed Plan Change 12 (PC12) and the section 42A recommended provisions for Waipā District Council's Proposed Plan Change 26 (PC26). Both plan changes include provisions for transport and climate change, recognising that increased residential density will have impacts on transport.

Response to section 42A rebuttal evidence

8. I note that I drafted the provisions recommended in my EIC to fit within the MRZ2 chapter based on the understanding that, given the limited scope of Variation 3, changes could not be made to the Infrastructure (AINF) chapter of the Proposed Waikato District Plan: Decisions Version (PDP). I understand from the rebuttal evidence on behalf of WDC in relation to amendments proposed to the Natural Hazards and Climate Change (NH) and Water, Wastewater and Stormwater (WWS) chapters of the PDP, that this may not be correct.
9. I am still recommending that these objectives and policies be included within the MRZ2 chapter as I consider they relate to the overall land use outcomes and form of development within the MRZ2. Additionally, the PC12 and PC26 provisions upon which they are based are located within residential zone chapters of these plan changes. However, if the Panel was of the view that any of these objectives or policies would be better included in a district-wide chapter (likely either Infrastructure or Subdivision), wording could be added to specifically apply these to the MRZ2, given the scope of Variation 3.
10. In the section 42A rebuttal evidence,³ Ms Lepoutre provides the following response to the additional provisions recommended in my EIC:

"In principle I agree that the above matters are important considerations and note that they are generally already provided for as follows:

 - i. MRZ2-O3 provides for residential and neighbourhood amenity. This is supported by a range of standards included in the MRZ2.*
 - ii. Provisions relating to the efficient use of land and infrastructure and the transport environment are provided for at a district wide level in the PDP (AINF-O7 and AINF-O8, AINF-P27, AINF-P35). In addition, MRZ2-O2 and MRZ2-P7 also provide for the efficient use of land and infrastructure.*
 - iii. Climate change provisions are provided for at a district wide level within the PDP (SD-O13, AINF-P4)."*
11. Ms Lepoutre concludes that *"On the basis that the broad intent of objectives and policies is already provided for within the PDP, I recommend that the suggested provisions are rejected. If the panel were of a view to accept the recommended objectives and provisions I recommend that Waikato Regional Council be requested to undertake a section 32AA analysis."*

³ Paragraphs 137-139.

12. I have reviewed the existing PDP provisions referenced by Ms Lepoutre and, while I agree that these could be broadly interpreted as encompassing some of the outcomes promoted by my recommended provisions, I consider that in practice, it is unlikely that they would trigger plan users to think specifically about the matters addressed in my proposed amendments.
13. Given the relationship between intensification, transport, and climate change, including the direction in the National Policy Statement on Urban Development 2020 (NPS-UD) that accessibility, supporting reductions in greenhouse gas emissions and resilience to the effects of climate change are essential components of well-functioning urban environments,⁴ I consider that the inclusion of more specific objectives and policies in Variation 3 is warranted.
14. In my opinion, the additional objectives and policies recognise the need to design urban environments in a way that supports reductions in greenhouse emissions as they intensify, such as by supporting lower-emissions transport modes.
15. The one provision where there is a greater degree of overlap with existing provisions is my recommended objective 'Neighbourhood amenity and safety'. I acknowledge that MRZ2-O3 addresses amenity in the MRZ2, however my purpose for recommending an additional objective was specifically to promote the design of medium density neighbourhoods with a level of amenity and safety that support walking, cycling, micromobility and public transport use. I kept my recommended wording broad both for consistency with HCC's and Waipā District Council's equivalent plan changes and because I consider it works well with existing standards which promote Crime Prevention Through Environmental Design principles.
16. However, if the Panel was concerned about having a second objective relating to on-site amenity, my recommended objective could be simplified to:

Recognise amenity values and enhance safety for the transport corridor and public open spaces in the Medium Density Residential Zone 2.
17. Overall, in my opinion, the objectives and policies proposed in my EIC will complement existing objectives and policies relating to land use, transport, and climate change within the PDP and will serve as useful considerations for larger-scale developments requiring resource consent within the MRZ2.
18. I have provided an evaluation in accordance with section 32AA of the RMA in Appendix A to this statement.

STORMWATER MANAGEMENT AND FLOOD HAZARDS

Evidence in Chief

19. To summarise very briefly, my EIC supported the general approach recommended in the section 42A report to respond to the new stormwater and flood hazard information and modelling as far as possible within the scope of Variation 3, subject to specific clarifications and amendments sought to the proposed rules.

⁴ NPS-UD, Policy 1.

20. I did, however, raise concerns about the inability to fully respond to the new rapid flood hazard modelling and the recommendations within the Te Miro Water report and Mr Boldero's evidence within the scope of Variation 3, and therefore strongly recommended that WDC undertake a future variation or plan change to address this.
21. In my EIC, I also noted that WRC has an appeal against the PDP relating to the natural hazards provisions. This seeks to apply the rules for the Flood plain management area to all areas at risk of flooding in a 1% AEP flood event, rather than just those currently mapped within the PDP. The process of resolving this appeal is running concurrently with the Variation 3 process.

Process since evidence was filed

22. I attended expert conferencing on stormwater on 11 July 2023 and the subsequent session focused on the drafting of provisions on 13 July 2023. These sessions resulted in some agreement between experts on key issues relating to the provisions for stormwater and flood hazards, as recorded in the two resultant Joint Witness Statements.
23. Following expert conferencing, I have read the rebuttal evidence on behalf of WDC and submitters, as well as parties' legal submissions where they relate to stormwater and flooding matters. I note that Ms Huls and Ms Hill have recommended a range of changes to the proposed provisions following conferencing and consideration of submitters' evidence.

Response to Katja Huls' rebuttal evidence

24. At paragraphs 12 and 13 of her rebuttal evidence, Ms Huls responds to submitter evidence seeking a consistent approach to flood hazards in the PDP. As summarised above, my EIC expressed concern about the inability to fully respond to the new flood hazard modelling and the recommendations within the Te Miro Water report and Mr Boldero's evidence within the scope of Variation 3 and strongly recommended that WDC undertake a further variation or plan change to respond to this at a district-wide level.⁵
25. The reason for my view is that due to the scope of Variation 3 and limitations in line with the *Waikanae* decision, I understand that it is not possible to introduce new flood mapping within the existing Medium Density Residential Zone of the four towns, or to disenable the existing development right of one permitted residential unit and one minor residential unit per site within the current General Residential Zone, despite some of these sites now being within a new mapped high risk flood area. This does not align with the relevant provisions of the Waikato Regional Policy Statement (WRPS), particularly the direction to avoid development in high risk flood zones.⁶
26. However, I wish to highlight that my position differs from that of the other submitters addressed in this section of Ms Huls' rebuttal, in that while I strongly support WDC undertaking a further variation or plan change to comprehensively address stormwater and

⁵ EIC, paragraphs 66-68.

⁶ WRPS, HAZ-O1, HAZ-P1, HAZ-P2, HAZ-M6, HAZ-M7, HAZ-M10 and HAZ-M11.

flood hazards across the district, in the meantime, I strongly support Variation 3 responding to the new modelling and stormwater information as far as possible.⁷

27. I agree with the experts for WDC that the addition of provisions to reduce the risk of inappropriate development within the flood plain as far as possible within the scope of Variation 3 is warranted. In my opinion, waiting for a future process to act on the new flood hazard information would not give effect to the relevant objectives, policies, or methods of the WRPS.
28. This is particularly so given that the preparation of a future variation or plan change is subject to a WDC resolution and would take time to prepare and progress through the RMA Schedule 1 process. I share the concerns of the experts for WDC that waiting for a future plan change could lead to adverse effects in the interim that are extremely difficult to reverse.⁸
29. In her rebuttal, Ms Huls addresses specific amendments recommended in my EIC in relation to the naming and configuration of the Stormwater Constraints Overlay, the need for consistent terminology where the rules refer to the overlay, rules for residential units within the overlay, matters of discretion for subdivision, and the absence of a minimum floor level requirement for the new mapped areas in the previous set of provisions.⁹
30. Ms Huls' responses address the clarifications sought in my EIC in regard to the proposed overlay and generally accept my recommended amendments to associated rules, albeit in a different form due to the proposed shifting of the majority of the new stormwater and flood hazard rules from the MRZ2 to the NH chapter.
31. I note from Ms Huls' rebuttal evidence that inclusion of the provisions within the NH chapter was originally discounted (in error) due to the limited scope of Variation 3 but that due to the way the Stormwater Constraints Overlay was ultimately mapped, she now supports these rules being included in the NH chapter.¹⁰ I rely on WDC as to the scope to include these changes within the NH chapter. Provided there is scope, I agree that the proposed provisions are better suited to the NH chapter. I will comment further on the updated set of provisions recommended by Ms Huls below.
32. I first note that, at paragraph 34 of her rebuttal, Ms Huls states that my EIC requested that flood hazards be included as a non-statutory layer. This is similarly stated in the section 42A rebuttal evidence.¹¹
33. I am unsure why the experts for WDC have interpreted my evidence in this way. As mentioned above, my EIC supported the general approach proposed by WDC, subject to specified clarifications and amendments to rules; this includes support for the addition of the Stormwater Constraints Overlay to the planning maps.

⁷ EIC, paragraphs 65 and 70.

⁸ Section 42A Rebuttal Evidence, paragraph 58; Statement of Rebuttal Evidence of Katja Huls, paragraph 13; Statement of Rebuttal Evidence of Andrew Boldero, paragraph 9(e).

⁹ Statement of Rebuttal Evidence of Katja Huls, paragraphs 14-17 and 21-23.

¹⁰ Statement of Rebuttal Evidence of Katja Huls, paragraph 11.

¹¹ Section 42A Rebuttal, paragraph 60.

34. I agree with the benefits of non-statutory flood mapping identified by Ms Huls.¹² However, for the purpose of Variation 3, I am supportive of maps produced as a result of the Te Miro Water modelling being included in the PDP. In my view, decisions on how best to manage changes/updates to flood modelling, including storage of mapping in Council GIS or other systems, would be best made at a district-wide level, either through the PDP appeals process or a future variation or plan change.
35. As noted in my EIC, I am not an expert on stormwater or flood modelling and therefore rely on the expertise of Mr Boldero and the independent peer review process to ensure the new maps are accurate.

Response to amended provisions

36. I have reviewed the amended set of provisions provided as Appendix A to the section 42A rebuttal evidence in light of the discussions had in conferencing and the evidence and rebuttal evidence filed on behalf of WDC and submitters. The following paragraphs record my responses to these amended provisions.

Residential units and associated standards

37. The most recent set of provisions recommended by WDC shift the rules for residential units within the Stormwater Constraints Overlay into the NH chapter. I support these new proposed rules (NH-R26A - C). These rules are more consistent with the existing rules for flood hazard areas in the PDP and better give effect to objectives and policies in both the WRPS and NH chapter of the PDP. They also address the concern expressed in my EIC about the absence of a minimum floor level rule in the previous set of provisions.
38. I also support the proposed new rule NH-R26E, which requires resource consent for earthworks for two or more residential units in the Stormwater Constraints Overlay. I understand this rule will help to manage some of the adverse effects of infilling within the flood plain identified by Mr Boldero.
39. I understand that in response to the evidence on behalf of other submitters about the usefulness of setbacks and building coverage for managing stormwater effects, Ms Huls now considers that setbacks and building coverage could be the same as the MDRS, provided the NH rules are amended to ensure that building platforms are located outside of the flood plain and that stormwater management measures are considered appropriately.¹³ The amended provisions accordingly no longer contain different setback or building coverage standards for buildings within the Stormwater Constraints Overlay.
40. My support for the standards originally proposed by WDC to manage adverse stormwater and flooding effects of intensification were in reliance on the evidence of Mr Boldero. Therefore, if the stormwater experts agree that stormwater and flooding effects can be appropriately

¹² Statement of Rebuttal Evidence of Katja Huls, paragraph 35.

¹³ Statement of Rebuttal Evidence of Katja Huls, paragraph 47.

managed via other standards, then I am not opposed to the MDRS for setbacks and building coverage being applied across the MRZ2.

41. I support the retention of the 70% minimum impervious surface standard for the MRZ2 (within MRZ2-S10) as agreed in the Joint Witness Statement, and both new matters of discretion (c) and (d) in the amended version of this provision.
42. I also support the recommended amendments in response to the expert evidence on behalf of Fire and Emergency New Zealand and Hynds; being an advice note to MRZ2-S1, SUB-R153 and SUB-R154 relating to network connections and an additional matter of discretion relating to Catchment Management Plans for those standards relevant to stormwater management. I consider these will serve as helpful prompts for plan users, including planners processing resource consent applications.

Subdivision

43. Similar to the residential unit rules, the amended provisions shift rules for subdivision within the Stormwater Constraints Overlay to the NH chapter. I support this change, as this format better aligns with the existing rules for subdivision within flood hazard areas in the PDP.
44. Ms Huls' recommended amendments do however retain an amended list of matters of discretion for SUB-R153. This list was generally agreed upon in expert conferencing and I agree with Ms Huls' recommendation to retain this for SUB-R153, as stormwater management is an important consideration for all subdivision. I also support the additional matter of control (g) recommended for SUB-R154 in response to my EIC.
45. I note that in her rebuttal evidence, Ms Huls now recommends that the use of a minimum lot size may not be the most effective way of managing stormwater effects. Rather than imposing a minimum lot size restriction within the Stormwater Constraints Overlay, the amended provisions include new rule NH-R26D which requires the provision of a building platform (exclusive of yards) entirely outside the Stormwater Constraints Overlay.
46. I acknowledge the merits of the building platform approach identified by other submitters, as well as the difficulties in drafting a clear rule for the previous minimum lot size approach. I also note that subdivision within the overlay would require resource consent under NH-R26D regardless and support the matters of discretion recommended by Ms Huls, which are reflective of agreement reached in conferencing.
47. My support for the 450m² minimum lot size within the overlay as originally recommended by WDC was in reliance on the evidence of Mr Boldero, which identified concerns with the absence of a minimum lot size requirement in the MDRS.¹⁴ I understand that this included concerns about providing space for significant overland flow paths and stormwater management.¹⁵ I therefore ultimately defer to the stormwater experts as to whether NH-R26D is sufficient to manage adverse stormwater and flooding effects associated with

¹⁴ As stated in paragraph 78 of my EIC.

¹⁵ Statement of Evidence of Andrew Boldero, paragraph 37.

intensification. From a planning perspective, I consider the proposed rule is clear and workable for plan users.

WWS-R1A

48. I also support proposed new rule WWS-R1A requiring the preparation of a Stormwater Management Plan for development of four or more residential units or subdivision creating four or more lots in the MRZ2.
49. I consider this rule is clear and will help to ensure that larger developments are supported by appropriate stormwater management systems, including through the requirement to demonstrate compliance with the relevant comprehensive stormwater discharge consent and the Regional Infrastructure Technical Specifications.

Conclusion on Stormwater Management and Flood Hazards

50. Overall, I **support** the amended provisions proposed by the experts for WDC in relation to stormwater and flood hazards. These address the clarifications and amendments sought in my EIC and I consider they give better effect to the WRPS than the previously proposed provisions. In my view, they are also clearer and more workable for plan users.
51. I continue to recommend that WDC undertake further work to comprehensively respond to the new rapid flood hazard modelling and the full suite of recommendations made within the Te Miro Water report and Mr Boldero's evidence, through a future variation or plan change, to ensure that the PDP gives effect to all relevant provisions of the WRPS.

NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY

52. The NPS-IB was gazetted on 7 July 2023 and comes into force on 4 August 2023.
53. Under section 75(3) of the RMA, Variation 3 must give effect to any national policy statement, including in the NPS-IB.
54. I note that Significant Natural Areas (SNAs) are identified as a qualifying matter in Variation 3 and that the existing rules relating to SNAs and vegetation clearance will continue to apply. Additionally, Clause 3.10 of the NPS-IB will apply to resource consent applications for subdivision, use or development within or affecting any SNA mapped in the PDP.
55. As noted in my letter in response to the Panel's Direction #19, WRC has an appeal against the PDP relating to identification of SNAs. The NPS-IB will be a relevant consideration in resolving this appeal.
56. I have not had an opportunity to undertake a comprehensive review of the implications of the NPS-IB for plan changes at this point in time. However, given that Variation 3 relates to enabling development within the relevant residential zones of the four towns (subject to qualifying matters), I consider that the implications of the NPS-IB for Variation 3 are limited. The NPS-IB will be of greater relevance to the resolution of appeals on the PDP.

CONCLUSION

57. I **support** all recommendations of the section 42A authors which accept WRC's submission points and align with the relief sought through the WRC further submission.
58. I continue to **recommend** additional provisions to recognise the relationship between urban intensification, transport, and climate change within Variation 3.
59. I **support** WDC's general approach to respond to the new stormwater and flooding information as far as possible within the scope of Variation 3 and **support** the amended provisions for stormwater and flood hazards recommended in the rebuttal evidence of the experts for WDC.
60. I continue to recommend that WDC undertake further work to comprehensively respond to the new rapid flood hazard modelling and the full suite of recommendations made within the Te Miro Water report and Mr Boldero's evidence, through a future variation or plan change.



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Appendix A – Section 32AA Evaluation

Introduction

The purpose of this appendix is to provide an evaluation of additional objectives and policies to recognise the relationship between intensification, transport, and climate change within Variation 3, in accordance with section 32AA of the RMA.

Recommended Provisions

My EIC recommended that the following objectives and policies be inserted into the MR22 chapter of Variation 3.

MR22 – Oxx Neighbourhood amenity and safety

Recognise amenity values and enhance safety in the Medium Density Residential Zone 2, including:

- (a) On site for residents;*
- (b) On adjoining sites, and*
- (c) For the transport corridor and public open spaces.*

MR22 – Oxx Comprehensive design and development

Encourage developments that are comprehensively designed, co-ordinated with infrastructure provision and integrated with the transportation network, including multi-modal transport options.

MR22- Oxx Climate change

Residential development incorporates sustainable features, technologies and methods to minimise the effects of climate change and reduce greenhouse gas emissions.

MR22 – Pxx Vehicle crossings

- (1) Limit the number of vehicle crossings to prioritise pedestrian and cyclist safety and amenity on public roads or publicly accessible spaces used to give access to development.*
- (2) Ensure vehicle crossings are minimised on road frontages where narrow dwellings are proposed and where shared paths and separated cycle ways are located.*

MR22 – Pxx Tree canopy

Promote the establishment and maintenance of a continuous tree canopy along transport corridors to improve amenity for corridor users and adjoining land use, minimise the urban heat island effects of urban intensification, enhance biodiversity and ecological function, provide summer shade to make the corridors more comfortable for walking, cycling, and micro-mobility during hotter weather, and store carbon.

MR22 – Pxx Comprehensive design and development

Ensure that housing developments of four or more residential units are comprehensively designed, including:

- (a) Being appropriately serviced and co-ordinated with infrastructure provision and integrated with the transport network;*
- (b) Where appropriate providing for multi-modal transport options and providing for links with existing road, pedestrian and cycleways; and*

(c) Retaining existing trees and landscaping within the development where this is practical.

MRZ2 – Pxx Climate change

(1) Ensure development implements methods and technologies to minimise the effects on climate change, including:

- (a) Locating land uses and densities in such a way as to support walking, cycling, micromobility and public transport
- (b) Providing for electric mobility and its associated charging infrastructure.

(2) Reduce embodied greenhouse gas emissions and operational greenhouse gas emissions.

Reasonably Practicable Options

The following options were identified:

- Option 1 – Insert additional objectives and policies into Variation 3 relating to transport and climate change in the context of housing intensification.
- Option 2 – Status quo. Under this option, additional objectives and policies would not be added to Variation 3, instead existing objectives and policies in the PDP and Variation 3 would be relied upon.

Assessment of Options

Option 1 - Insert additional objectives and policies into Variation 3	
Costs	Benefits
<p><u>Environmental</u> No environmental costs identified.</p> <p><u>Social and Economic</u> The new provisions would create additional matters to consider for development proposals requiring resource consent. Actions to achieve consistency with the objectives and policies may add financial costs to development.</p> <p><u>Cultural</u> No cultural costs identified.</p>	<p><u>Environmental</u> Additional objectives and policies would promote development that includes methods to minimise the effects of climate change and reduce greenhouse gas emissions, such as by supporting lower emissions transport modes. If development achieved consistency with the objectives and policies, this would lead to environmental benefits from reduced greenhouse gas emissions.</p> <p><u>Social and Economic</u> The additional objectives and policies would promote the creation of urban environments that have higher levels of accessibility and support walking, cycling, micromobility and public transport use. This would have the benefit of providing greater transport mode choice for residents.</p> <p><u>Cultural</u> The above environmental benefits may have indirect cultural benefits, by promoting urban environments that support reductions in</p>

	greenhouse gas emissions and minimise the effects of climate change.
<p>Efficiency and effectiveness</p> <p>The new objectives and policies would prompt the consideration of specific methods to support positive transport outcomes and reduce greenhouse gas emissions in development proposals. Only those proposals that trigger a rule requiring resource consent with a relevant matter of discretion would be required to assess the objectives and policies. This would likely only include larger-scale developments within the MRZ2. The addition of new objectives and policies would however recognise the importance of the link between urban form, transport and climate change as urban areas intensify.</p>	
<p>Option 2 - Status quo</p>	
<p>Costs</p>	<p>Benefits</p>
<p><u>Environmental</u></p> <p>Existing objectives and policies within Variation 3 and the PDP may not prompt consideration of specific methods that support alternative transport modes and reductions in greenhouse gas emissions as urban areas intensify. This may lead to development patterns which are reliant on car use and do not support reductions in greenhouse gas emissions, and therefore contribute to climate change.</p> <p><u>Social and Economic</u></p> <p>If existing objectives and policies do not prompt specific consideration for methods that support alternative transport modes in medium density residential development, this may result in development patterns that limit transport mode choice for residents.</p> <p><u>Cultural</u></p> <p>No cultural costs identified.</p>	<p><u>Environmental</u></p> <p>No environmental benefits identified.</p> <p><u>Social and Economic</u></p> <p>Existing broader objectives and policies relating to transport and climate change may provide greater flexibility (and therefore potentially less financial cost) in how specific development proposals are designed to meet these provisions.</p> <p><u>Cultural</u></p> <p>No cultural benefits identified.</p>
<p>Efficiency and effectiveness</p> <p>Existing objectives and policies relating to the relationship between land use, transport and climate change are broader in nature than the proposed additional objectives and policies. These may not prompt consideration of specific measures that contribute to positive transport outcomes and emissions reduction as urban areas intensify.</p>	

Summary

Overall, costs associated with adding the new objectives and policies relating to transport and climate change in the context of housing intensification are limited to economic costs for development proposals. Whereas, prompting consideration of methods that support transport mode shift and emissions reduction in larger-scale development proposals may lead to a range of environmental, social, and economic benefits.

The new objectives and policies would assist with giving effect to national and regional policy direction on climate change, including the direction within the NPS-UD in regard to creating well-functioning urban environments that have good accessibility, support reductions in greenhouse gas emissions and are resilient to the likely current and future effects of climate change (Objective 1, Objective 8, and Policy 1).