

Attachment D1 - Section 32 Evaluation

D1.1 Introduction

Section 32(1)(a) requires an assessment of *'the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act...'*

It is considered that the proposed PPCR is an appropriate option to achieve the purpose of the Act through the following:

Relevance

The PPCR addresses an important resource management issues which relates to the growth management and land development to provide housing supply within Nelson and the wider region in accordance with the Future Development Strategy. The PPCR will enable the relevant objectives of the National Policy Statement for Urban Development, the Nelson Regional Policy Statement and Nelson Resource Management Plan to be achieved (refer to sections 7.2, 7.6 and 7.8 of the PPCR).

Usefulness

The PPCR will provide for the needs of the community by not only providing housing supply during this period of high growth but also housing diversity in a sustainable manner. Recreational opportunities and transport linkages will be enhanced, ecological values will be enhanced, and cultural values respected. The site is located in close proximity to the City and proposes a sustainable development option which achieves the purpose of the Act.

Reasonableness

The PPCR is considered to be reasonable as the site has been identified within the Future Development Strategy as being appropriate for future growth. The PPCR provides certainty as to how growth within the Nelson region can be achieved in a manner which is consistent with NPS Urban Development. The PPCR also provides for diversity of housing choice to meet the needs of the community. The PPCR seeks to safeguard the life-supporting capacity of air, water, soil and ecosystems through the new Objective, policies and rules thereby achieving the purpose of the Act.

Achievability

The outcomes of the PPCR can be achieved through the commitment of the landowners to sustainable development in a manner which is consistent with the Future Development Strategy and NPS Urban Development.

The PPCR proposes an integrated set of changes to the Nelson Resource Management Plan, including a specific Schedule for the PPCR area. The Schedule will contain rules, information and design requirements for future applications and a Structure Plan to provide a planning framework for future development of the land.

The level of detail included within this analysis has been determined by the PPCR assessment of the scale and significance of the environmental, economic, social and cultural effects anticipated through the PPCR.

None of the new rules within the Schedule proposes to impose a greater or lesser prohibition or restriction on an activity to which a National Environmental Standard applies, the provisions of all relevant NES will remain applicable to the PPCR site.

Consultation has been undertaken with Iwi and other stakeholders through the process of preparing the PPCR. Sections 2.4 and 6.5, along with Attachment C1, summarise the consultation and advice received from Iwi and others. The proposed Schedule includes a requirement that all future resource consent applications for earthworks, discharges, freshwater, comprehensive housing or subdivision within the Structure Plan area are accompanied by a Cultural Impact Assessment.

D1.2 Proposed Objective

In order to provide for the new policy and rule framework it is appropriate to add an additional Objective into Chapter 7 - Residential Zone of the Nelson Resource Management Plan. The objective will clearly illustrate the intent of the Schedule and anticipated superior environmental outcomes to be achieved through the associated policies and rules.

It is proposed to amend Chapter 12 – Rural Zone to refer to the Objective within Chapter 7 rather than adding a specific Objective to Chapter 12.

The following new Objective is proposed for the Chapter 7 – Residential Zone:

Enabling greenfield subdivision and development of the Maitahi / Bayview Area (Schedule X) to contribute to Nelson's urban development capacity in a manner that:

- (a) Provides for a range of residential densities appropriate to different parts of the Maitahi / Bayview area;*
- (b) Gives effect to Te Mana o te Wai and involves Tangata Whenua throughout the subdivision and development process;*
- (c) Enhances ecological and biodiversity values;*
- (d) Minimises the effects of urban development on the freshwater values of the Maitahi River and its tributaries;*
- (e) Results in a well-functioning urban environment;*
- (f) Involves the provision of full servicing infrastructure;*
- (g) Provides for transport connectivity and alternative transport modes;*
- (h) Avoids and mitigates the effects on local landscape values;*
- (i) Enhances recreational opportunities.*

D1.3 Appropriateness of Proposed Objective

Section 5 of the RMA defines the purpose of the Act:

- (1) *The purpose of this Act is to promote the sustainable management of natural and physical resources.*
- (2) *In this Act, **sustainable management** means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while—*
 - (a) *sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
 - (b) *safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
 - (c) *avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

The proposed Objective achieves the purpose the Act through sustainable management of the Maitahi Bayview area in a manner which will provide for the social, economic and cultural well-being of the community and the landowner through provision of additional housing to meet supply and demand requirements.

The Objective clearly states the expected positive environmental outcomes for achieving the sustainable development of the land included within the Structure Plan and provides guidance on the matters which the associated policies will seek to achieve.

The Objective will ensure that the associated policies are clear in expressing the intent that development must be undertaken in a manner which avoids, remedies or mitigates any adverse effects from development on the environment.

The purpose of the Plan Change Objective is to provide for increased development opportunities on land which has been identified as being capable of supporting increased density of development within Council's Future Development Strategy. The Objective is also consistent with the NPS-UD to ensure a responsive outcome to housing supply and demand.

D1.4 Evaluation of Potential Options to achieve Objectives of the Plan Change

Section 32(1)(b) requires an assessment of '*whether the provisions in the proposal are the most appropriate way to achieve the objectives.*' subsections (i)-(iii) sets out the requirements for that assessment. There are four potential options identified in relation to future use of the Maitahi Bayview land and Tables 1 – 4 below consider the costs and benefits associated with each option.

The assessment within Tables 1 - 4 relates to the provisions and objectives of the Plan Change and include the following options:

- Option 1:** Status Quo (Rural Zone)
- Option 2:** Apply for resource consent for development
- Option 3:** Await Whakamahere Whakatū Nelson Plan
- Option 4:** Proposed Plan Change to re-zone land in accordance with Structure Plan

The costs, benefits, efficiency and effectiveness and associated risks of each option are set out in the tables below.

Option 1: Status Quo (Rural Zone)

| Table 1: Evaluation of the costs and benefits of Option 1: Status Quo which retains the Rural Zone | | |
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| | Costs | Benefits |
| Environmental | <p>High growth demand could see ad hoc development which does not result in the same high level of positive environmental and community benefits created through the holistic structure plan approach.</p> <p>Lack of certainty about how the land will be used / developed in the future.</p> <p>The reduced development opportunities on the site could leave to higher growth pressures within the City boundaries where certain areas are subject to sea level rise risks. This increased intensification does not provide for housing choice and diversity or take account of increased impacts on urban quality such as amenity, visual and traffic effects.</p> | <p>Reduced built form would result in greater level of open space and retention of existing rural character.</p> <p>The existing environmental qualities enjoyed by local residents would remain unchanged.</p> <p>Greater opportunity for large scale rural activities, although the land does not have high productive values due to soil classifications and topography and cross boundary effects are a consideration.</p> |
| Social | <p>No provision for public access through reserve land, walkway and cycleway linkages.</p> <p>Inability to meet housing demand as the existing planning framework only allows for lower density development which does not meet the supply and demand constraints causing increase house prices which affect local people looking to buy and live within the region.</p> | Nil |
| Cultural | <p>The land may be developed in a low density manner without significant involvement or consideration of cultural values or without full consultation with Iwi.</p> | <p>The lower levels of development would result in lower levels of earthworks which have the potential to affect the quality of the land and water.</p> |
| Economic | <p>The use of the land does not contribute to economic growth due to significantly lower density development.</p> <p>The current land uses provide no economic benefit to either the landowner or the community.</p> <p>Current use of land results in very low levels of employment opportunities.</p> | <p>There is greater retention of soil resources for productive land uses.</p> |

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| <p>Effectiveness</p> | <p>Ineffective method of resolving the issues identified by the Future Development Strategy and within section 4.1 of this PPCR. Doing nothing would be ineffective in addressing the housing choice and growth demand issues within the Nelson Region which have been explored within section 4.1 of the PPCR.</p> |
| <p>Efficiency</p> | <p>The current zoning of the land does not allow for efficient development at a time when demand for growth is high and the opportunity exists to provide for high quality development which provides a positive contribution to the Nelson economy and community.</p> |
| <p>Risk of acting (or not acting if there is uncertain or insufficient information)</p> | <p>There is a risk that if the land is developed for low density rural allotments as permitted under the NRMP, future more appropriate and higher density uses of the land would be compromised by multiple ownership of land which would not allow for a holistic master planned development. Ad hoc development would then reduce the level of land available for public open spaces and result in environmental, social, cultural and economic outcomes which are of lower value to the community.</p> |

Option 2: Apply for resource consent for development

| Table 2: Evaluation of the costs and benefits of Option 2: Apply for resource consent to develop site | | |
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| | Costs | Benefits |
| Environmental | <p>It is unlikely that a single suite of resource consent applications would be issued for development across the entire site considering the scale and size of the development.</p> <p>The lack of integration between different resource consents for particular areas of the site could result in a lack of cohesion between the environmental outcomes for each stage of development.</p> | <p>Comparable environmental benefits could be achieved to those proposed through the PPCR process, however, it is possible these benefits may be of lower value if the resource consent was not holistic in its approach to developing the site.</p> |
| Social | Nil | <p>There would be social benefits associated with the increased housing provided by development created through the resource consent process.</p> |
| Cultural | Nil | <p>Cultural Values would need to be considered through the resource consent process, however, there are no greater benefits to cultural values than through options 3 & 4.</p> |
| Economic | <p>The current planning framework does not support the level of development proposed by the PPCR which would lead to applications being notified resulting in increased costs (financial and time) for every stage of the development.</p> | <p>In the short-term obtaining a resource consent for one stage of development could be more cost effective, however, the applicant is committed to a long term holistic approach to development of the site.</p> |
| Effectiveness | <p>Applying for resource consent for such a large area of land would be complex and likely result in inefficient process as the different constraints are fully considered.</p> | |
| Efficiency | <p>Inefficient use of Council staff time in processing multiple different resource consent applications for different stages and the potential for a lack of consistency between different applications for stages.</p> | |
| Risk of acting (or not acting if there is uncertain or insufficient information) | <p>There is a risk that if resource consent is sought for development of the land it does not have such high level overarching environmental outcomes due to the complexities of establishing a single resource consent application for development of a site with multiple zones and different constraints. Applying for resource consent within the current planning framework has an uncertain risk of outcome.</p> | |

Option 3: Await Whakamahere Whakatū Nelson Plan

| Table 3: Evaluation of the costs and benefits of Option 3: Waiting for the Whakamahere Whakatū Nelson Plan to become operative | | |
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| | Costs | Benefits |
| Environmental | The timeframe and outcome of the WWNP becoming operative are outside the control of the Requestor, in the meantime there is a cost to the community through continually rising the housing prices due to lack of supply. There is also a cost to the Requestor as the delay is likely to increase the environmental costs of undertaking the development. | Nil |
| Social | The WWNP is some years away from becoming operative and with a lack of more immediate action to increase housing supply there are increase housing costs which impact on the wellbeing of the community and potential displace residence who would prefer to be located close to Nelson City Centre. A shortfall in housing supply affects community resilience and wellbeing. | |
| Cultural | It is unclear whether Iwi would be afforded the same level of involvement through the process of development of the land as the PCCR proposes. | Council will undertake all necessary Iwi consultation through the Plan Change process. |
| Economic | There may be economic costs to the region associated with the timeframe for the rezoning and subsequent development of the land associated with waiting for the WWNP to become operative. | For the Requestor there could be positive economic benefits as the majority of the cost for the WWNP would be borne by Council. |
| Effectiveness | The early indications are that the WWNP would result in comparable outcomes for use of the site as is proposed by this PCCR, however the uncertain timeframe for the WWNP result in an ineffective outcome as the lack of housing supply requires more immediate and urgent attention. | |
| Efficiency | Due to the uncertainty around timing of the WWNP with Central Government indicating an overhaul of the RMA which may impact on the draft WWNP waiting for this outcome would be an inefficient use of time when housing demand is at a critical level. | |
| Risk of acting (or not acting if there is uncertain or insufficient information) | The risk of waiting for the WWNP is that the housing crisis may worsen, costs for development may escalate and the more immediate benefits derived from option 4 (PCCR) are reduced. There are also uncertain levels of information at this stage as to the manner in which the WWNP will deal with development on the site and how that development may be completed through the planning framework within the WWNP. | |

Option 4: Proposed Plan Change to re-zone land in accordance with Structure Plan

| Table 4: Evaluation of the costs and benefits of Option 4: Plan Change to re-zone the land in accordance with the Structure Plan | | |
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| | Costs | Benefits |
| Environmental | <p>The rezoning of rural land to residential will see some loss of rural productive land, however, the supporting Productivity Assessment does not consider the land to be of high productive value and so any loss is not significant.</p> <p>Increased development may result in increased traffic effects, although the location of the development and the walkways and linkages proposed allow for cycle and pedestrian access to the City Centre thereby reducing reliance on car travel.</p> <p>The increased density of development will result in a change in the existing landscape values associated with the site.</p> | <p>Enables a development which fully takes account of existing environmental resources, amenities and constraints to provide a positive environmental outcome through enhanced biodiversity, esplanade and riparian management and water quality.</p> <p>The Structure Plan has been specifically designed to maintain and enhance landscape values by positioning development in a manner which maintains or enhances key landscape features and values.</p> |
| Social | <p>The development will result in a change to the environment of those living close to the site and there may be some short term effects associated with undertaking the physical works to facilitate the development.</p> | <p>The provision of public open space including reserves, walkways and linkages will allow for improved community recreational opportunities thereby enhancing the wellbeing of the community.</p> <p>The sub-collector road will provide improved connectivity and an alternative transport route for those seeking to access the City Centre.</p> <p>The range of zoning and density types will provide for housing choice to meet the demands of future generations as demand for difference housing typology has become more varied with population changes.</p> |
| Cultural | <p>Nil</p> | <p>The PPCR proposes that Iwi will be involved throughout the development process and this will be enabled through the proposed Schedule framework.</p> |

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| | | Full consideration will be given to protecting cultural values associated with the site including archaeological areas of importance. |
| Economic | Nil | <p>The development will provide for economic growth for the City through provision of additional land for housing supply at a time when housing demand is far outstripping supply and unaffordability is rising. This has a consequential effect on the economic prosperity of the City as a whole.</p> <p>The development will be undertaken over many years, in stages, and will result in creation of jobs in a variety of sectors – construction, design, engineering, cultural and environmental roles.</p> <p>The development will increase the Council’s rating base bringing more revenue into the Council.</p> |
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| Effectiveness | <p>The PPCR is an effective method of ensuring a holistic development over the entire site and to positively contribute to housing supply within Nelson. The PPCR will also effectively enhance the local environment through provision of open spaces, walkways and linkages and improved biodiversity which all contribute to community wellbeing.</p> <p>The PPCR will also effectively address house price affordability through increasing supply of housing and providing for higher density smaller allotments which provide housing choice.</p> | |
| Efficiency | <p>The Structure Plan process is a highly efficient manner of prescribing the future development and environmental outcomes for the site in a manner which is clear and avoids ambiguity.</p> | |
| Risk of acting (or not acting if there is uncertain or insufficient information) | <p>By not acting (option 1 – status quo) there is a risk that the housing crisis in the region deepens and the community is adversely effects through continued increase in the cost of housing and restricted economic growth.</p> | |

D1.5 Summary and Conclusions of the Different Options

Option 1

This option relates to the 'Status Quo' which involves doing nothing.

There are significantly greater costs associated with this option as it will result in a much lower density of development which does not have the high levels of positive environmental benefits associated with option 4 (Plan Change). Furthermore, the status quo option does not actively contribute to alleviating the housing supply and demand crisis in the region and does not align with the Nelson Tasman FDS or NPS-UD.

As the site has already been earmarked for future development potential in the FDS and urgent action is required to address growth demands Option 1 is not considered an appropriate option to achieve the purpose of the Act as it does not involve sustainable management of the site.

Option 2

This option relates to applying for resource consent for development of the site. This option is not an efficient or effective process considering the scale and complexities of the site would make it unlikely a single suite of resource consents could effectively approve development over the entire site. A staged approach to resource consent approval is likely to have higher economic costs both in terms of the physical cost of obtaining consent and in relation to timing of the development. Likewise, this process would potentially result in a less cohesive development with poorer environmental outcomes and a higher degree of uncertainty for surrounding landowners.

Although the PPCR will not override the need for future resource consents for the detailed subdivision and development on the site the overarching principals proposed through the Structure Plan will provide the planning framework for a holistic development of the site to ensure high quality environmental outcomes.

This option is not considered appropriate due to the scale of the development and complexities involved with developing a large site with multiple zones.

Option 3

This option involves waiting for the draft Whakamahere Whakatū Nelson Plan to become operative. This option isn't considered appropriate as there is still a high level of uncertainty as to the timing and outcome of the WWNP, particularly as central Government has indicated an overhaul of the RMA.

The Nelson region is in the midst of a housing crisis exacerbated by a shortfall of housing supply and so timing of development is critical to meet the needs of the community. This PPCR seeks to actively progress development on the site and as such this option is not considered appropriate.

Conclusion

Taking into account the full range of costs and benefits associated with options 1-3 it is considered that **Option 4 is the preferred option** to meet the purpose of the Act and provide sustainable development on a site which has already been identified by Council as suitable for urban expansion and growth.

Option 4 allows for meeting the needs of the community to ensure their economic, social and cultural wellbeing.

D1.5 Assessment of the Appropriateness of the PPCR against the relevant existing objectives of the Residential, Rural, Suburban Commercial Zones and District Wide Objectives of the NRMP:

Chapter 5 – District Wide

| Objective | Evaluation |
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| <p>DO1 Tangata Whenua</p> <p>DO1.1 Maori and resources <i>Management of natural and physical resources that recognises the needs of Maori communities and enables them to provide for their social, economic, and cultural well being and their health and safety.</i></p> | <p>All eight Iwi have been consulted with during the PPCR process and provision has been made for continued involvement of Iwi to ensure that the cultural wellbeing of Maori are activity considered during the future subdivision consenting process. The PPCR ensures appropriate management of natural and physical resources on the site to enable Maori communities to provide for their social, economic and cultural wellbeing.</p> |
| <p>DO2 Natural hazards</p> <p>DO2.1 natural hazards <i>An environment within which adverse effects of natural hazards on people, property, and the environment are avoided or mitigated.</i></p> | <p>The PPCR is supported by an assessment on geotechnical constraints for development on the site as well as the flood hazard in the Valley floor area. Further assessments will be required to consider the specific details of development in relation to natural hazards.</p> |
| <p>DO5 Natural Values</p> <p>DO5.1 natural values <i>An environment within which natural values are preserved and enhanced and comprise an integral part of the natural setting.</i></p> | <p>Enhancement of natural values is an important aspect of the PPCR with the Structure Plan proposing enhanced natural values through improved biodiversity corridors, water quality and ecological values as well as esplanade reserves and riparian margins.</p> |
| <p>DO6 Riparian and coastal margins</p> <p>DO6.1 riparian and coastal margins <i>Riparian and coastal margins where natural character, public access, natural functions, landscapes, heritage values, water quality and ecological values are protected and enhanced.</i></p> | <p>The PPCR is supported by comprehensive assessments on both terrestrial and freshwater ecology. Preservation and enhancement of natural and ecological values are at the heart of the Structure Plan and the PPCR seeks to ensure positive environmental outcomes from the development of the land.</p> |
| <p>DO9 Landscape</p> <p>DO9.1 landscape <i>A landscape that preserves and enhances the character and quality of the setting of the city and in which its landscape components and significant natural features are protected.</i></p> | <p>The PPCR is supported by a detailed Landscape Assessment which has actively informed the Structure Plan to ensure that landscape values are not only preserved but also enhanced through appropriate positioning of differing densities of development and protection of natural features whilst maintaining the landscape qualities which contribute to the character and quality of setting of the City.</p> |
| <p>DO10 Land transport</p> <p>DO10.1 land transport system</p> | <p>The PPCR is supported by a detailed Traffic Assessment and consultation with NZTA has been undertaken. The Structure Plan proposes an Indicative sub-collector link road to create transport</p> |

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| <p><i>A land transport system that is safe, efficient, integrated and context responsive, and that meets the needs of Nelson in ways that are environmentally, socially and economically sustainable.</i></p> | <p>connections which are safe and efficient and meet the needs of the community. Additional walkways and linkages are proposed to allow for alternative transportation options.</p> |
| <p>DO13 Soil erosion and sedimentation</p> <p>DO13.1 soil erosion and sedimentation <i>An environment where the adverse effects of accelerated soil erosion are avoided, remedied or mitigated.</i></p> | <p>This Objective is not entirely relevant at this stage and will be more relevant at resource consent stage when earthworks will be managed with appropriate erosion and sediment control measures.</p> |
| <p>DO13A Urban Design</p> <p>DO13A.1 recognising the local context <i>Subdivision and development that reflects, and creates positive relationships with, our local environment, heritage and urban context.</i></p> <p>DO13A.2 improving connections <i>Subdivision and development in urban areas that creates interconnected structures and spaces to ensure that all people find urban areas easy to get around, and connected natural environment networks that support native biodiversity.</i></p> <p>DO13A.3 creating high quality public space <i>Buildings, reserves and roads that are created as part of subdivision and development result in quality public spaces that are beautiful and inspiring, provide for and enable social, cultural, economic and environmental wellbeing and enhance amenity values.</i></p> <p>DO13A.4 providing for diversity <i>Subdivision and development that provides for a range of choices in housing types, neighbourhood types, compatible employment opportunities and leisure and cultural activities.</i></p> <p>DO13A.5 sustainable places & communities <i>Urban development that meets the community's current needs without compromising future needs.</i></p> <p>DO13A.6 urban design process <i>Sustainable management of Nelson's urban resources achieved through quality urban design processes. These processes holistically manage urban systems and interconnections rather than focusing on the effects of individual activities.</i></p> | <p>The Structure Plan provides for high quality urban design which accords with these Objectives.</p> <p>The provisions of the Structure Plan combined with the proximity of the site to the City Centre and the opportunities available through this propose will ensure that future development is undertaken in a sustainable manner which meets the needs of both current and future generations within the region. The Structure Plan is a recognized and appropriate method of ensuring a holistic approach to development on such a large site where urban design outcomes and intertwined with positive environmental outcomes.</p> <p>The differing zonings and density levels proposed will provide housing choice and diversity. Significant public open space, walkways, linkages and reserve areas are proposed across the site to complement and enhance the built development. The Structure Plan provides for improved connectivity through road links as well as other walkways and informal linkage options to facilitate a range of transport options and support natural biodiversity.</p> <p>The Structure Plan is entirely consistent with the Urban Design Objectives.</p> |

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| <p>DO14 Subdivision and development</p> <p>DO14.1 city layout and design <i>Subdivision and development that recognises and is appropriate to the natural characteristics of the City and is consistent with principles of high quality urban design and the orderly and efficient use of land.</i></p> <p>DO14.2 amenity value <i>The amenity values of the built environment shall be maintained or enhanced through the subdivision and development processes.</i></p> <p>DO14.3 services <i>The provision of services to subdivided lots and developments in anticipation of the likely effects and needs of the future land use activities on those lots within the developments and the development potential of other land in the Services Overlay.</i></p> <p>DO14.4 network utilities <i>Efficient use of network utilities infrastructure while avoiding, remedying, or mitigating the adverse effects of utilities on their surrounding environments.</i></p> <p>DO14.5 community services and facilities <i>Appropriate provision for community services and facilities in the district.</i></p> | <p>The Structure Plan provides the overarching guide for how development will be undertaken on the site. With the Schedule providing the rule framework and assessment criteria for specific future development.</p> <p>It is at future subdivision stage when the subdivision and development Objectives will be most relevant. However, the PPCR enables development which will be consistent with these Objectives through measures which protect amenity values, promote high quality layout which recognizes the importance of the natural character and features of the site.</p> <p>The Structure Plan includes provision for commercial and community services and through the extended Services Overlay services will be appropriately managed.</p> |
| <p>DO15 Peripheral urban expansion</p> <p>DO15.1 urban form <i>An urban form in which intensive development is not detached from existing urban boundaries and which avoids or mitigates adverse effects on ecological, recreational, cultural, community and amenity values.</i></p> | <p>The site is located approx. 2.6km from Nelson Cathedral (approx. 3.5 minute car drive) and so is considered to border the existing urban boundary. The provision of higher density development within the valley floor area recognizes that this area is closest to the City Centre.</p> <p>The FDS has already identified the site as being appropriate for urban expansion which it is acknowledged in the FDS and Intensification Action Plan as being necessary to supplement housing supply in addition to intensification of urban land.</p> |
| <p>DO16 Zones</p> <p>DO16.1 management of resources by location <i>Management of the natural and physical resources of Nelson in a way that responds to the varying resource management issues and the varying actual and potential effects of use, subdivision, development, and protection arising in different parts of the District.</i></p> | <p>The Structure Plan proposes differing zoning and densities within those zones to enable a range of development opportunities. This is considered an efficient and sustainable management of this substantial land resource which is located on the edge of the City Centre.</p> <p>The PPCR proposes a variety of measures through the Structure Plan and Schedule which will</p> |

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| | manage the actual and potential effects of development within each of the proposed zones. |
| <p>DO17 Activities in the beds of rivers and lakes, and in wetlands</p> <p>DO17.1 Effects of activities and structures in the beds and margins of rivers and lakes in the natural environment <i>Activities, works or structures within the beds of lakes and rivers and their margins, and in wetlands, are undertaken or constructed in a way which avoids, remedies or mitigates adverse effects on freshwater bodies and their associated uses and values.</i></p> <p>DO17.2 Effects of activities and structures in the beds of rivers and lakes on infrastructure <i>Activities, works or structures within the beds of lakes and rivers and their margins undertaken or constructed in a way which avoids, remedies or mitigates adverse effects on lawfully established network utility operations.</i></p> | The PPCR does not change any of these provisions and future subdivision development and associated resource consents will be consistent with these objectives. |
| <p>DO18 Freshwater abstraction and instream flows</p> <p>DO18.1 maintaining and enhancing flows and levels <i>Flow regimes and water levels within the region's water bodies maintained, and enhanced where necessary, to ensure a water level which:</i></p> <ul style="list-style-type: none"> <i>a) provides for natural, intrinsic, cultural, and spiritual values, including aquatic ecosystems, natural character, native fishery habitats, existing trout and salmon habitats, and recreational values, and</i> <i>b) provides for a range of uses, in particular reasonable domestic and stock water use and fire fighting, and</i> <i>c) provides for the adequate dilution of contaminants arising from natural sources. while preserving the life-supporting capacity (the mauri) of the water.</i> <p>DO18.2 underground flows and levels <i>Water levels and flows within the region's groundwater sufficient to maintain a range of uses and sustain underground aquatic life, and groundwater levels and flows are enhanced where uses and values have been degraded as a result of modified levels or flows.</i></p> | The PPCR does not change any of these provisions and future subdivision development and associated resource consents will be consistent with these objectives. |

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| <p>DO18.3 providing for water abstraction <i>Provided that objectives DO18.1 and DO18.2 can be met, allocate water for abstraction in a way which:</i></p> <ul style="list-style-type: none"> • <i>provides a reliable supply under normal flow conditions, and</i> • <i>is equitably distributed between all water users while taking into account the priority uses of fire fighting, reasonable domestic use (including reticulated urban domestic use), and reasonable stock water use, and</i> • <i>provides for and promotes efficiency in water use.</i> <p>DO18.4 diversion of water <i>The natural functioning of ecosystems is not disrupted by the diversion of surface water.</i></p> | |
| <p>DO19 Discharges to freshwater & freshwater quality</p> <p>DO19.1 highest practicable water quality <i>All surface water bodies contain the highest practicable water quality.</i></p> <p>DO19.2 contamination of groundwater <i>Contamination of groundwater is avoided to ensure the highest practicable water quality.</i></p> | <p>The planning framework will ensure future development maintains the highest practical water quality and contamination of ground water is avoided. The applicant is committed to improving water quality through the ecological and environmental measures proposed through the PPCR.</p> |
| <p>DO20 Freshwater Management</p> <p>DO20.1 integrated water management <i>A management approach that integrates the expertise of relevant statutory authorities and manawhenua iwi and other stakeholders in the community, and recognises the responsibilities they have for the protection and use of freshwater resources.</i></p> | <p>Iwi have been consulted through the PPCR process and will continue to be involved in the development of the site. The PPCR is supported by an assessment of freshwater ecology and the applicant recognizes and has a significant respect for their responsibilities in relation to management of freshwater to ensure this valuable resource is protected and enhanced wherever possible.</p> |

Chapter 7 – Residential Zone

| Objective | Evaluation |
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| <p>RE1 Living style <i>The option of a diversity of residential styles based on the differing characteristics of areas of the city, and differing community needs.</i></p> | <p>Within the proposed Residential zone there are a variety of densities proposed to provide a diversity of living options to meet the differing needs of the community (high density to lower density). The Structure Plan positions the different density areas in appropriate locations to reflect the existing characteristic of the city – high density development on the valley floor closer to the City Centre with lower density development on the hill slopes.</p> |
| <p>RE2 Residential Character <i>An environment that is principally residential in character.</i></p> | |
| <p>RE3 Streetscape, landscape and natural features</p> | |

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| <p><i>Attractive streetscapes, and the maintenance and enhancement of those significant public views, natural features, and landscapes that contribute to Nelson's character and setting.</i></p> | <p>The future specific subdivision designs will ensure developments have appropriate residential character and maintain and enhance the natural amenity features and values of the site. This will be controlled through the Structure Plan and Schedule.</p> |
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Chapter 9 – Suburban Commercial Zone

| Objective | Evaluation |
|--|---|
| <p>SC1 Consolidation <i>Suburban commercial centres which enable the immediate or wider community to meet their needs, and which help reinforce community identity and focal points with due consideration to the appropriateness of development on any site.</i></p> | <p>The Structure Plan proposes a specific location for the Suburban Commercial Zones which ensure they are accessible and meet the needs of the future community which will develop on the site. The location is appropriate to ensure there are no adverse effects on neighbouring areas but that the facilities are accessible.</p> |
| <p>SC2 Amenity and adverse effects <i>Suburban commercial centres which have a high level of on site amenity, and which do not have significant adverse effects on neighbouring areas or on the safe and efficient operation of the road network.</i></p> | |

Chapter 12 – Rural Zone

| Objective | Evaluation |
|---|--|
| <p>RU1 Protect resources and capacities <i>Land used in a manner which will protect the life-supporting capacity, versatility and availability of land, soil, rock, aggregate, other natural resources, and ecosystems. Management must therefore be in a responsible manner which will sustain the potential of resources to meet the reasonably foreseeable needs of future generations.</i></p> | <p>The PPCR is supported by a Productivity Assessment which does not consider the land to have high productive values. The current planning framework does not require retention of land for productive purposes over a significant part of the site. The topography and soil quality are such that the land is more suited to grazing than any intensive productive or horticultural activities.</p> <p>The PPCR seeks positive environmental outcomes which will offset future development and provide enhanced natural and landscape values for future generations.</p> |
| <p>RU2 Rural character <i>Maintenance or enhancement of an environment dominated by open space and natural features.</i></p> | <p>The Structure Plan proposes a development which will maintain rural open space and character on the upper slopes through lower density development which is successfully integrated with natural features and landscapes.</p> |
| <p>RU3 Protection of amenity <i>Recognize and maintain the local rural amenity experienced within the Rural Zone including the local noise environment.</i></p> | |