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# Proposed Plan Change 21

## Greenbelt Residential Zone and Urban Growth

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### Section 32 Analysis

The purpose of this report is to evaluate the options for the management of the greenbelt residential areas and urban growth opportunities for residential purposes relating to Proposed Plan Change 21.

#### Introduction

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The Horowhenua District Council (HDC) has prepared Proposed Plan Change 21 to the Operative Horowhenua District Plan (“the District Plan”) for notification under the provisions of the Resource Management Act 1991 (“the Act”). This report provides an analysis of the content of the Plan Change, in accordance with the requirements of Section 32 of the Act.

#### Current Provisions in the District Plan

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The current District Plan provisions were developed and adopted at a time when Council was seeking to provide a relatively enabling “hands-off” approach to the management of urban growth and rural-residential subdivision and development.

The current Operative Horowhenua District Plan is based on a discrete set of zones, being:

- Residential 1, 2, 3 and 4 Zones;
- Commercial 1 and 2 Zones;
- Industrial Zone; and
- Rural Zone.

The policy framework in the District Plan encompasses the Residential, Commercial and Industrial Zones in the chapter titled “Urban Environment”. The Rural Zone is covered by the policy chapter called “Rural Environment”. These two chapters identify the significant resource management issues, objectives, policies, methods and anticipated environmental results for the respective areas.

In terms of the rules, each property in the district is identified in one of the above zones. Each Zone has a separate section of rules in the District Plan, which lists the activities (and their activity status) and the applicable standards (e.g. building height, minimum lot size).

There is minimal use of overlays in the District Plan. The only overlays that apply are ‘Highly Versatile Soils’ (Rural Zone only for subdivision standard) and ‘Outstanding Landscapes’ (Rural Zone only for earthworks, roading and subdivision).

The District Plan also includes some general provisions which cover the whole district, including development standards, transportation standards, network utilities and hazardous substances standards. Within these standards, specific reference is made to individual zones.

The sustainable management of urban settlements is a significant resource management issue for the district, particularly the form, shape, and location of urban development. Given this existing issue and the recent trend of an increase in subdivision and development activity in the district, Council initiated the preparation of a Development Plan. The Development Plan establishes a blueprint to manage subdivision and development in the future.

The Development Plan is based on a proactive approach by Council in managing the location, nature and scale of subdivision and development, to ensure it sustainably meets the needs of current and future generations. This approach includes identifying locations suitable for urban growth for the existing urban zones in the District Plan, such as residential. For each of the urban areas in the district, future growth areas have been spatially identified in the Development Plan.

Furthermore, during preparation of the Development Plan, the issue of rural-residential subdivision and development was widely canvassed. In particular, concerns were expressed about the ad-hoc nature and location of rural-residential subdivision, especially large scale proposals. In response to this issue, the Development Plan included provision for “Greenbelt Residential” development areas. The Development Plan which includes a density transect, which is a graduated scale of density moving from high density built development in the centre of an urban area moving through to low density built development on the edges. For the urban areas, the ‘greenbelt residential area’ is the outer most density before the transition to the rural environment.

The key contribution of the District Plan to the wider planning process is to provide an appropriate regulatory framework for the management of urban growth opportunities. In this respect, it is important to ensure the zoning framework provides certainty for future decision making on urban growth.

Given the above overall structure of the District Plan and new direction for managing urban growth as outlined in the Development Plan, a Plan Change is considered necessary for two key reasons –

- First, the current District Plan structure does not make specific provision for the nature and scale of residential development identified as ‘Greenbelt Residential’; in particular, the present structure does not provide an effective level of certainty for the Council and Plan users.
- Second, the current District Plan does not provide an appropriate framework for facilitating the sustainable growth of the urban areas.

Proposed Plan Change 21 has been prepared in collaboration with Proposed Plan Change 20 on managing rural subdivision. The two Plan Changes are interrelated, in that the more restrictive approach to rural subdivision in Proposed Plan Change 20 is balanced by the more enabling subdivision and rezoning provided for in Proposed Plan Change 21. Furthermore, Proposed Plan Change 20 provides an appropriate framework for managing the nature and intensity of subdivision in future urban growth areas not rezoned as part of Proposed Plan Change 21. .

## Proposed Plan Change Provisions

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As detailed in the actual plan change request document, Proposed Plan Change 21 comprises the following amendments:

- A new Greenbelt Residential Zone including the significant resource management issues for the Greenbelt Residential Environment, objectives,

policies, methods and anticipated environmental results and the land use and subdivision rules and standards.

- Introduce a policy framework for managing urban growth.
- Rezoning of specific areas to provide for the urban growth needs of the settlements, including Structure Plans.
- Introduce a Greenbelt Residential Design Guide

## Pre-Consultation

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An extensive consultative process was undertaken throughout the whole District from 2006 onwards that culminated in preparation and adoption of the Development Plan. Following the adoption of the Development Plan in July 2008, the implementation has progressed with the introduction of District Plan Change 21 as one of the first steps.

A focused consultation process was carried out during the development of the Plan Change given the nature of the Change and the earlier consultation. The consultation process involved input from the Rural Stakeholder Group formed as part of the rural subdivision review. In addition, the general public and landowners within the proposed rezoned areas were informed about the Plan Change preparation process and invited to attend a public open day on 12 November 2008. Furthermore, landowners within the Structure Plan areas were also contacted seeking input into this process.

In addition to the above, specific consultation was undertaken with statutory agencies as required under Clause 3 of Schedule 1 of the Resource Management Act 1991 (RMA). This involved:

- The Minister for the Environment
- Department of Conservation
- Muaupoko
- Rangitaane
- Raukawa
- Tukorehe
- Horizons Regional Council
- Kapiti Coast District Council
- Manawatu District Council
- Transit New Zealand
- NZ Historic Places Trust
- Network utility operators

Further consultation will take the form of submissions to the Proposed Plan Change, as part of the formal Resource Management Act notification and submission processes.

## Horowhenua Development Plan (adopted July 2008)

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The preparation of the Horowhenua Development Plan was in response to the increasing level of subdivision and development activity being experienced in the District. In preparing this Plan, Council undertook a significant level of consultation to inform the process and determine the community's aspirations for managing growth. The Development Plan was adopted by Council in July 2008.

The Development Plan applies an overall strategy for managing the nature, location and structure of development in the future. The strategy is based on a set of principles, which will guide future decision making. The key features of this Strategy are:

- Define the location of different types of development clearly so its effects (positive and negative) can be better planned for.
- Encourage a range of housing types and living environments (e.g. townhouses) in specific locations and with a community based format to better meet changing needs;
- Limit development to where infrastructure can be readily expanded/upgraded, has good accessibility to transport connections and will avoid areas of natural hazards;
- Avoid ad-hoc spread of rural-residential development by identifying suitable locations for it and manage the efficiency of it with a new "greenbelt" residential format.
- Protect the natural character of the coastal environment by limiting the expansion of settlements.

The Development Plan emphasises a more proactive approach for managing future growth in the Horowhenua District. The Plan utilises many of the existing tools Council uses for managing growth (e.g. District Plan, Engineering Standards, Asset Management Plans). This Proposed Plan Change is one of the first steps in amending these tools to reflect the principles and outcomes sought by the Development Plan. The associated rezoned and deferred areas forming part of this Proposed Plan Change respond to the priority setting in implementing the Development Plan, with further implementation over time inline with Council resources.

The Horowhenua Development Plan was an integral part in the preparing Proposed Plan Change 21. The research and consultation associated with this Plan provided the basis for the provisions contained within this Proposed Change. As such it is important that these documents be considered as part of this Section 32 document.

### *Associated Documents/Research*

The following documents were utilised in the preparation of Proposed Plan Change 21:

Horizons Regional Council (1998): Operative Regional Policy Statement

Horizons Regional Council (2007): Proposed 'One Plan' (Regional Policy Statement and Regional Plans)

Horowhenua District Council (1993): Urban Growth Strategy

Horowhenua District Council (1999): Operative Horowhenua District Plan

Horowhenua District Council (2001): Our Environment 2001 – Horowhenua State of the Environment Report

Horowhenua District Council (2006): State of the Environment Report Update on Subdivision and Development. Prepared by Environmental Management Services Ltd.

Horowhenua District Council (2006): Long Term Council Community Plan (LTCCP)  
Horowhenua District Council (2007): Horowhenua Development Plan – State of Play Report  
Horowhenua District Council (2008): Horowhenua Development Plan  
Horowhenua District Council (2008): Structure Plan Report  
Ministry for the Environment (2005): New Zealand Urban Design Protocol  
Ministry for the Environment website ([www.mfe.govt.nz](http://www.mfe.govt.nz))  
Quality Planning website ([www.qp.org.nz](http://www.qp.org.nz))

## Statutory Requirements under the Resource Management Act

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Section 32 requires:

*Consideration of alternatives, benefits and costs*

- (1) *In achieving the purpose of this Act, before a proposed plan, proposed policy statement, change, or variation is publicly notified, a national policy statement or New Zealand coastal policy statement is notified under section 48, or a regulation is made, an evaluation must be carried out by—*
  - (a) *The Minister, for a national policy statement or a national environmental standard; or*
  - (b) *The Minister of Conservation, for the New Zealand coastal policy statement; or*
  - (c) *The local authority, for a policy statement or a plan (except for plan changes that have been requested and the request accepted under clause 25(2)(b) of Part 2 of Schedule 1); or*
  - (d) *The person who made the request, for plan changes that have been requested and the request accepted under clause 25(2)(b) of Part 2 of the Schedule 1.*
- (2) *A further evaluation must also be made by—*
  - (a) *A local authority before making a decision under clause 10 or clause 29(4) of the Schedule 1; and*
  - (b) *The relevant Minister before issuing a national policy statement or New Zealand coastal policy statement.*
- (3) *An evaluation must examine—*
  - (a) *The extent to which each objective is the most appropriate way to achieve the purpose of this Act; and*
  - (b) *Whether, having regard to their efficiency and effectiveness, the policies, rules, or other methods are the most appropriate for achieving the objectives.*
- (3A) *n/a [relates to national environmental standards]*
- (4) *For the purposes of the examinations referred to in subsections (3) and (3A) an evaluation must take into account—*
  - (a) *The benefits and costs of policies, rules, or other methods; and*
  - (b) *The risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods.*
- (5) *The person required to carry out an evaluation under subsection (1) must prepare a report summarising the evaluation and giving reasons for that evaluation.*
- (6) *The report must be available for public inspection at the same time as the document to which the report relates is publicly notified or the regulation is made.*

In summary, a Section 32 evaluation is effectively a two tiered approach and must examine:

- The extent to which each objective is the most appropriate way to achieve the purpose of the Act (i.e. sustainable management); and

- Whether the policies, rules and other methods are the most appropriate for achieving the objective(s).

In doing so, the evaluation is required to “have regard to” efficiency and effectiveness and under Section 32(4) “must take into account” the benefits and costs of policies, rules or other methods and the risk of acting or not acting if there is uncertainty or insufficient information about the subject matter of the policies, rules or other methods.

## Evaluation

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### *Assessment 1 - Appropriateness of the Objectives*

As detailed above, Section 32 (3) (a) requires an evaluation as to the extent to which the objectives are the most appropriate way to achieve the purpose of the RMA, being to promote the sustainable management of natural and physical resources.

For the residential environment and general urban growth provisions, it is proposed to retain the existing objective the District Plan as detailed below:

***OBJECTIVE 8: Sustainable management of the District's natural and physical resources used and developed for urban purposes; and  
Achievement of an appropriate mix of infrastructure services, community facilities, and activities to enable the District's urban areas and townships to function as vibrant attractive communities.***

As the Proposed Plan Change does not involve any change or amendment to the existing District Plan objective, no evaluation has been made in this regard.

For the Greenbelt Residential Zone, new objectives are proposed as part of this plan change as follows:

***OBJECTIVE 6A.2.1: To provide for residential and ancillary activities that maintain and enhance the character and amenity values of the Greenbelt Residential Zone.***

***OBJECTIVE 6A.3.1: To provide for compatible land use activities in the Greenbelt Residential Zone, and avoid or mitigate the adverse effects of activities within the Zone and at the urban and rural zone interfaces.***

***OBJECTIVE 6A.4.1: To ensure areas within the Greenbelt Residential Zone are developed in an efficient and sustainable development pattern responding to the natural and physical resources of the area.***

The need to provide lifestyle choice in residential living environments is a significant resource management issue for the Horowhenua. Lifestyle choice in resident living environments contributes towards the ability of residents to provide for their economic and social wellbeing, which has been used to define the objectives for the Greenbelt Residential Zone.

The objectives and supporting policies focus on sustainable development (and compatible land uses) within the Greenbelt Residential Zone that maintain and enhance the character and amenity values.

The location and extent of the Greenbelt Residential Zones themselves have been identified to provide ready proximity to urban day-to-day services, to enable short trip distances to the centres they relate to, and to provide an urban edge interface with rural areas that limits reverse

sensitivity conflicts and provides for the protection of the wider rural productive land and more open landscape of the District.

The identification of a specific zone recognises the increasing demand for rural living in the Horowhenua, and the need to provide a residential choice for people wanting the opportunities that come with larger areas of open space and a semi-rural context. The Greenbelt Residential Zones are located at the urban edge and provide a residential choice for people wanting the opportunities that come with larger areas of open space and a semi-rural context. The opportunities include for example larger sized gardens, small scale productive activities, and a relatively open outlook.

As an interface area, there is potential for amenity conflicts at the boundaries of the zone, as well as within the Greenbelt Residential Zone itself. This potential incompatibility can include, for example, activities creating traffic movement and the generation of odours and dust and the effects of the use of agricultural sprays, or noise from farm machinery and bird scaring devices used by adjoining activities in the Rural Zone. Alternatively, rural residential activities may adversely affect adjoining activities by restricting their operations through complaints, or through their associated practices, such as the planting of trees, the use of agricultural sprays, or the provision of havens for pests. The objective seeks to achieve a balance of providing for an appropriate range of activities, whilst ensuring the quality of the environment and amenity values are maintained and enhanced consistent with Part 2 of the Act.

Within the above context, the Council wants to ensure that new subdivision and development undertaken within the greenbelt residential areas are of a high standard, particularly in a connected and structured manner. This approach is based on Structure Plans being prepared for each area, which fully take into account the requirements of Part 2 of the Act, including to promote the development of integrated, liveable, diverse and sustainable communities.

These objectives are considered the most appropriate way of stating the intent of the Greenbelt Residential Zone in achieving the purpose of the RMA. In broad terms, therefore the Council is providing for new living opportunities to promote the ongoing development of the district but within the bounds of areas on the periphery of existing settlements. These areas are well connected to existing transport routes and infrastructure, and contained development in these localities is considered to be fully consistent with the sustainable management purpose of the RMA under Part 2 of the Act.

## *Assessment 2 - Appropriateness of policies, rules and other methods for achieving the Urban Environment and Greenbelt Residential Zone objectives*

The evaluation is required to “have regard to” efficiency and effectiveness and under Section 32(4) “must take into account” the benefits and costs of policies, rules or other methods and the risk of acting or not acting if there is uncertainty or insufficient information about the subject matter of the policies, rules or other methods.

In considering the options for inclusion on the Plan Change, there are three key matters to be considered:

1. Whether the existing **zonings** provide the most appropriate framework for efficiently and effectively achieving the objectives for the Greenbelt Residential areas. If so, which zoning, or if not, would a new zoning be appropriate.
2. The need to provide for the **ongoing use of the land** in the urban growth areas, while not jeopardising the future development opportunities for the residential use and development; and
3. The need to manage **future subdivision and development** in the urban growth areas in a manner that is integrated and sustainable, and which effectively and efficiently avoids, remedies or mitigates the adverse effects on the environment.

Taking each component in turn, the principal options for zonings, ongoing land use and future subdivision and development in the District Plan is discussed below, with the comparative advantages and disadvantages of each option identified.

### **1. Zoning**

The Operative District Plan is based on a set of discrete zones, being Residential, Commercial, Industrial and Rural. The policies and rules for the Residential Zones and the Rural Zone recognise that these two environments have different predominant land uses, as well as different characters and amenity values. However, they do make provision for managing the interface at the zone boundaries.

The ‘Greenbelt Residential’ area is described in the Development Plan is:

*Greenbelt residential can meet the demand for rural lifestyle blocks while maintaining the open rural production land that is a valued quality of the district. Single detached house can be clustered together with a common vegetation belt (preferably native planting) that also functions as a public access easement. This vegetation belt will be defined by an easement coordinated by a structure plan. The lots have a semi rural character with dense planting and views to the larger rural surrounds, while utilising the benefits of proximity to town.*

This description recognises that the Greenbelt Residential area has components of both the Rural and Residential zones in the Operative District Plan. Given this description, there are three principal options for zoning within the District Plan.

1. Introduce a Residential 5 Zone (forms part of the existing “Urban Environment”).

An option is to add a fifth Residential Zone which would form part of the overall Urban Environment policy framework in the District Plan. Some refinement of the Urban Environment chapter policies and supporting text would be required to recognise the density and nature of development. A separate Residential 5 Zone rule chapter would

be added to specifically manage the activities and development standards for the new Zone. This approach would have the advantage of Plan users being familiar with a similar structure and its application. In addition, the residential use component of the Greenbelt Residential Area would align with the overall policy framework for the Urban Environment. However, some of the Urban Environment policies for the other residential zones may be incompatible with that envisaged for the new Residential 5 Zone, given the different land uses and character and amenity values being sought. Examples include the higher density of built development and the limited range of non-residential activities.

2. Introduce a Rural 2 Zone (forms part of the existing “Rural Environment”)

Similar to the option above, except the new second Rural Zone would form part of the overall Rural Environment policy framework in the District Plan. This option would also require refinements to the existing policies, as well as having a standalone rules chapter. Similar advantages and disadvantages apply as with Option 1, except the policies for the Rural Environment may provide for activities and development which may be incompatible with the outcomes sought for the Greenbelt Residential Area.

3. Introduce a Greenbelt Residential Zone

A third option is the introduction of a complete new Zone to the District Plan. This new Zone would have a standalone policy framework for managing land use, subdivision and development in the identified Greenbelt Residential areas. In addition, a separate Greenbelt Residential Zone rule chapter, which would list activities and the applicable performance standards. This approach would have the advantage of Plan users being familiar with the overall approach of a standalone chapter, as well as ensuring the specific rules apply to a defined area (zone). A disadvantage with this approach is adding a new Zone which does not “fit” the existing policy framework (i.e. you are either part of the Rural or Urban Environments), and adds another suite of provisions which may duplicate parts of the residential or rural zone rules.

4. Introduce a Greenbelt Residential Overlay, and apply to either one of the existing Residential Zones or the Rural Zone

Another option is using one of the existing zones as the basis for the greenbelt residential area (i.e. either Residential or Rural Zones), and apply an ‘overlay’ which has specific policies and rules which supersede the underlying zones. This approach would have the advantage of Plan users being familiar with the District Plan as all existing Zones and no new Zones are added. However, overlays are not regularly used in the District Plan, so Plan users may have difficulty in applying this technique. In addition, there may be some conflicts between the outcomes being sought for the underlying zone and the overlay, in terms of land use and the amenity and character of the greenbelt residential areas.

## Analysis

OPTIONS	EFFECTIVENESS & EFFICIENCY	BENEFITS	COSTS
<b>Residential 5 Zone</b>	This zoning would be effective in developing residentially focussed areas, but would be ineffective in seeking the balance with open space and small scale primary production activities. As the outcomes for the Greenbelt Residential Areas do not fully align with the Urban Environment objectives, and in some cases would be incompatible, a Residential Zone would not be the most efficient or effective technique for achieving these objectives.	<ul style="list-style-type: none"> <li>Provides a continuation of the existing District Plan structure which has a level of familiarity for Plan users.</li> <li>Recognises residential development is a key component of the Greenbelt Residential Areas and provides a high level of certainty for this type of activity.</li> </ul>	<ul style="list-style-type: none"> <li>Residential Zone may not provide flexibility in the nature and intensity of activities planned for Greenbelt Residential areas.</li> <li>High intensity of residential activity and development may result in adverse effects on infrastructure and character resulting from over development.</li> </ul>
<b>Rural 2 Zone</b>	This zoning would be effective in developing rurally focussed areas, but would be ineffective in providing for the level of residential development anticipated. As the outcomes for the Greenbelt Residential Areas do not fully align with the Rural Environment objectives, and in some cases would be incompatible, a Rural Zone would not be the most efficient or effective technique for achieving these objectives.	<ul style="list-style-type: none"> <li>Provides a continuation of the existing District Plan structure which has a level of familiarity for Plan users.</li> <li>Recognises rural activities are a component of the Greenbelt Residential Areas and provides a high level of certainty for this type of activity.</li> </ul>	<ul style="list-style-type: none"> <li>Rural Zone may not provide the level of flexibility anticipated for the intensity and nature of residential development planned for Greenbelt Residential areas.</li> <li>A lower intensity of residential activity and development may result in the capacity of the Greenbelt Residential areas being achieved, resulting in the inefficient use and development of land.</li> </ul>
<b>Greenbelt Residential Zone</b>	This zoning would be effective in providing a specific zone with a balance between residential and rural/open space land uses. There may be variations for Greenbelt Residential areas for different settlements, which may not effectively be managed in a single zone.	<ul style="list-style-type: none"> <li>A focused Zone with the resource management issues, objectives, policies and methods for the Greenbelt Residential areas.</li> <li>Recognition that the Greenbelt Residential areas are between the existing Rural Environment and Urban Environments described in the District Plan.</li> </ul>	<ul style="list-style-type: none"> <li>May not recognise the local variances for Greenbelt Residential areas in different settlements.</li> <li>New section to the Plan may create some uncertainty for Plan users in initially applying a new Zone.</li> <li>Duplication of Plan provisions, with repetition of a full suite of provisions already addressed in the rural and urban zones.</li> </ul>
<b>Greenbelt Residential Overlay</b>	This overlay would supplement one of the existing zones (either Residential or Rural) and vary the particular provisions for this area (either more or less stringent). However, this overlay could be ineffective in that the outcomes sought between the underlying Zone of the overlay were in conflict.	<ul style="list-style-type: none"> <li>A focused overlay would have targeted provisions for a defined area providing a higher level of certainty.</li> <li>Recognition that the Greenbelt Residential areas have different outcomes to the underlying zone.</li> </ul>	<ul style="list-style-type: none"> <li>May not recognise the local variances for Greenbelt Residential areas in different settlements.</li> <li>Overlay is not a commonly used technique in the Plan, and may create some uncertainty for Plan users in initially applying an overlay.</li> </ul>

The above analysis identifies that the existing Rural Environment and Urban Environment policy frameworks and associated Zone rule chapters do not provide the most effective or efficient structure for introducing the nature, form and intensity of development planned for the Greenbelt Residential areas. A new Zone is preferred compared to an Overlay, as the Overlay would still be encapsulated within the policy framework for either the Rural or Urban Environments. Therefore, the most efficient and effective approach is for the introduction of a new Greenbelt Residential Zone, as this recognises there is a “gap” in the existing policy and rules in providing

an appropriate framework for managing the particular character and amenity values sought for these areas.

## 2. Ongoing Land Uses

In the identified urban growth areas there are a range of existing land uses, predominantly, primary production activities. Some of the growth areas are held by one landowner, while other areas have multiple landholdings. In managing the change from a predominantly rural environment to an urban and greenbelt residential environments, care is required to balance the needs of the existing land use activities while not reducing the future development opportunities. As an area changes over time, there may be different amenity expectations between the existing and new owners and occupiers in the urban growth areas.

The fragmentation of land is one particular issue which can reduce the possible future development and land use opportunities anticipated for urban growth areas. Therefore, the planning process must focus on assessing the existing or proposed activities on the land and the longer term implications on district growth of the subdivision of land, to ensure any potential adverse effect is avoided. The options are:

1. Do Nothing (Rural Zone continues to apply)

This option would mean the existing Rural Zone provisions would continue to apply unchanged until an area was rezoned either Residential or Greenbelt Residential. This rezoning would occur when Council notified a Plan Change or when a landowner lodged a Private Plan Change request to rezone. In the interim period, the Rural Zone provisions would continue to apply, including the permitted land uses activities as well as the minimum performance standards, including subdivision. The advantage of this option is that landowners would continue to manage and develop land as a rural area, with the resultant land use and character. The key disadvantage of this option is that the outcomes sought for the Rural Zone differ from the outcomes for the urban growth areas in the future, and this could lead to future land use and amenity conflicts. In addition, the current Rural Zone subdivision standards could result in further fragmentation of land, which could reduce the ability to effectively and efficiently manage the development as an urban growth area.

2. Rezone all urban growth areas and apply new land use rules and standards

A second option is to rezone all the identified land as “Residential Zone” or “Greenbelt Residential Zone” as part of this Plan Change and apply a suite of rules and standards to manage land use, development and subdivision. These rules could include a distinction between provisions that apply to existing activities (i.e. pre development of Residential or Greenbelt Residential) and new future activities (i.e. post development Residential and Greenbelt Residential). The ‘pre Residential’ and ‘pre Greenbelt Residential’ provisions would seek to future proof the area to ensure no new activities developed or subdivision undertaken that could diminish its future opportunities as urban growth area. The ‘post Residential’ and ‘post Greenbelt Residential’ provisions would provide the framework for managing the nature, scale and intensity of development and subdivision to achieve the outcomes sought for the area. Deferred zoning may be one technique applied in this option.

An advantage of this option is that it provides a high degree of recognition that particular areas have been identified for change. However, a disadvantage is the potential costs on landowners in these areas, such as limiting options for the

expansion or change in land use activities, as well as the costs of seeking resource consents for a range of activities.

3. Rezone some urban growth areas now and apply new land use rules and standards and retain other areas as Rural Zone

Similar to the option above, except that only high priority areas would be rezoned as Residential or Greenbelt Residential through this Plan Change. An assessment would be required to determine the high priority areas for rezoning, such as consideration of infrastructure planning and available land supply. For the areas rezoned, similar advantages would apply as in Option 2, while similar advantages and disadvantages for Option 1 would apply to the areas retained rurally zoned. Deferred zoning may also be applied in this option.

## Analysis

OPTIONS	EFFECTIVENESS & EFFICIENCY	BENEFITS	COSTS
<b>Do Nothing (Rural Zone)</b>	This option would be efficient in continuing to apply the same provisions until such time that an area is ready for development as a Residential or Greenbelt Residential area. However, the existing provisions would not be effective in managing land use, development and subdivision in a manner that would achieve the objectives for the Residential and Greenbelt Residential areas long-term. It may result in pressure for other areas to be rezoned, potentially resulting in an ad-hoc urban form and inefficient provision of infrastructure.	<ul style="list-style-type: none"> <li>▪ Provides certainty to existing landowners that wish to continue to expand and develop their property for rural purposes.</li> <li>▪ Provides flexibility in using and developing properties for rural purposes.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Significant level of change could occur in terms of land use, development and subdivision which could limit the future development opportunities for a sustainable and integrated Residential and Greenbelt Residential areas.</li> <li>▪ Lack of certainty for land owners and developers in converting rural land to urban use. It is important for long term planning and development that appropriate zonings apply.</li> <li>▪ Unduly constraining urban growth, potential introducing economic and social costs on the community.</li> <li>▪ Ad-hoc urban growth may result in less efficient provision of infrastructure, potentially resulting in higher maintenance costs.</li> </ul>
<b>Rezone all areas to Residential or Greenbelt Residential Zone</b>	Applying the Residential or Greenbelt Residential Zone to all the identified urban growth areas in the Development Plan would be effective in giving statutory effect to the growth areas. The land has been identified as being suitable for residential development, therefore, rezoning the land would effectively provide for this use and development. However, as the growth areas provide for a 20 year planning period, the zoning of all areas at one time may result in the inefficient development of the Residential and Greenbelt Residential areas, with a dispersed supply of land.	<ul style="list-style-type: none"> <li>▪ Provides a level of certainty to landowners wishing to develop their land for Residential or Greenbelt Residential purposes in the short term.</li> <li>▪ An efficient plan change process by undertaking the rezoning in one process, compared to repeat processes over a number of years.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Costs to subdividers and Council in providing infrastructure to service a large area in the short term.</li> <li>▪ Some existing activities could be limited from expanding or developing in the short term when Residential or Greenbelt Residential area may not occur for a number of years.</li> </ul>

OPTIONS	EFFECTIVENESS & EFFICIENCY	BENEFITS	COSTS
Rezone some areas Residential or Greenbelt Residential and retain others as Rural Zone	This option would be effective in balancing the needs of existing and future land use and development opportunities. The rezoning of areas based on the provision of infrastructure and available land supply would efficiently use the land resource by only rezoning land as required.	<ul style="list-style-type: none"> <li>▪ Prioritise the provision of infrastructure to areas for future rezoning.</li> <li>▪ Areas rezoned have available infrastructure and would provide a supply of land for future development.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Some uncertainty for landowners as to the timing of the rezoning.</li> <li>▪ Costs of undertaking plan changes for the rezoning of land as infrastructure is provided or land supply reduces.</li> </ul>

The above analysis identifies that the phased rezoning would be the most efficient and effective approach to managing the existing land use activities. The Development Plan is based on a 20 year planning period, while the District Plan is anticipated to have a planning period of 10 years.

The most appropriate approach is for the Plan Change to identify priority areas based on the provision of infrastructure and current land supply. For high priority areas, where the provision of infrastructure is readily available and there are constraints on the current land supply, areas have been rezoned as part of the Plan Change. Deferred zoning has been applied to lower priority areas, where there are infrastructure capacity constraints and/or a surplus in the current available land supply.

### 3. Future Subdivision and Development

The Horowhenua Development Plan represents a shift in urban growth management to a more proactive approach by Council. The Development Plan provides a comprehensive evaluation of the strategic directions for managing growth and the selection of the appropriate growth locations.

This Plan Change would partly give effect to this new direction by providing a statutory framework for the residential and greenbelt residential areas only. The implementation plan within the Development Plan signals that a Structure Plan would be a requirement for the urban growth areas to ensure a sustainable and integrated development area is achieved. The Structure Plan would be prepared for the identified urban growth areas in advance of residential and greenbelt residential development to ensure that a sufficiently detailed and evaluative process is undertaken in determining the specific layout and design of the growth areas.

An issue is whether the Council or private landowners should initiative and/or undertake the structure planning process. Council and the private sector may have different priorities, therefore, it needs to be determined how best to manage these priorities.

The options are:

1. Do Nothing

The do nothing option would rely on each individual subdivision application being assessed against the minimum performance standards for subdivision and development, such as minimum lot size and minimum shape factor. These standards reflect the anticipated character for the respective Zone. However, a variation on this option is to refine the existing standards to better reflect the outcomes sought for the residential and greenbelt residential areas. This option is likely to continue the existing pattern and scale of subdivision which could potentially lead to more inefficient fragmentation of the land resource, and is unlikely to address all of the problems identified above.

2. Council Initiated Structure Plans

A second option is that the Council would initiate and prepare a Structure Plan for each urban growth area. This structure plan process could occur in conjunction with the rezoning of an area to residential or greenbelt residential or at a later date. Any structure plan process would involve input from landowners and other interested parties. The Structure Plans would be incorporated into the District Plan by way of future Plan Change.

The Council would determine the timing of the Structure Plan process, and would be dependent on available resources. This process may not be enabling for the community that may wish to pursue development opportunities prior to Council being in a position to advance a Structure Plan.

3. Private Sector Initiated Structure Plans

Similar to the above option, except the Structure Plans would be prepared by the private sector. The Structure Plans would be incorporated into the District Plan via the Private Plan Change process which would be initiated by requests from the private sector.

This option would provide flexibility for the private sector in the timing of the preparation of the Structure Plan. However, as a Structure Plan would cover a whole urban growth area, different landowners in these growth areas may have different aspirations for the future of their land. Therefore, potential exists for conflict to arise in the Structure Plan preparation process.

4. Development Concept Plans (via resource consent applications)

A Development Concept Plan (DCP) is similar to a Structure Plan, in that it identifies the overall structure and layout for the urban growth area. The DCP would be prepared by the private sector and assessed by Council through the resource consent process. A DCP could apply to the whole urban growth area (being one or more landowners) or could apply to part of the growth area provided it demonstrated how it would integrate with any potential development on the adjoining land.

This option would have similar advantages and disadvantages to option 3 above. However, the potential conflict in aspirations between landowners within a growth area can be better managed through a Development Concept Plan process.

## Analysis

OPTIONS	EFFECTIVENESS & EFFICIENCY	BENEFITS	COSTS
<b>Do Nothing</b>	Land use and subdivision rules and standards would provide a baseline for the area, but may not be effective in creating an integrated or sustainable form of development in the urban growth areas. The existing policies do not provide an effective framework for guiding development as anticipated by the community in the Development Plan. Inefficient process for assessing applications in the urban growth areas.	<ul style="list-style-type: none"> <li>▪ Provides certainty to existing landowners that wish to continue to expand and develop their property for rural purposes.</li> <li>▪ Provides flexibility in using and developing properties for a how subdivisions are designed and constructed.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Significant level of change could occur in terms of land use, development and subdivision which could limit the future development opportunities for a sustainable and integrated urban growth area.</li> <li>▪ Lack of certainty for land owners and developers in converting rural land to urban use. It is important for long term planning and development that appropriate zonings apply.</li> </ul>
<b>Council initiated Structure Plans</b>	Structure Plans would be effective in achieving the outcomes of an integrated and sustainable form of development in the urban growth areas. However, the timing for preparing the Structure Plans could result in the inefficient use and development of the land, prior to the initiation of a Structure Plan.	<ul style="list-style-type: none"> <li>▪ High level of certainty about the form and layout for the growth areas.</li> <li>▪ Inclusive process for all landowners and interested parties, ensuring a coordinated approach for the whole growth area.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Potential for ad-hoc development prior to the preparation of the Structure Plan, resulting in further land fragmentation.</li> <li>▪ Time delays and costs in preparing Structure Plans, which may unduly limit development opportunities.</li> </ul>
<b>Private sector initiated Structure Plans</b>	Structure Plans would be effective in achieving the outcomes of an integrated and sustainable form of development in the urban growth areas. However, they may be ineffective if agreement is not reached with all landowners in a growth area on the preparation of a Structure Plan.	<ul style="list-style-type: none"> <li>▪ High level of certainty about the form and layout for the growth areas.</li> <li>▪ Provides flexibility for landowners to pursue development opportunities as appropriate.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Potential for difficulties in landowners reaching agreement and working together to prepare a Structure Plan.</li> <li>▪ Costs on the private sector for the preparation of the Structure Plans, especially the Private Plan Change process.</li> </ul>
<b>Development Concept Plans</b>	Development Concept Plans would be effective in achieving the outcomes of an integrated and sustainable form of development in the urban growth areas. However, they may be ineffective if provision is not made in how they "fit" with other parts of a growth area.	<ul style="list-style-type: none"> <li>▪ High level of certainty about the form and layout for the growth areas.</li> <li>▪ Provides flexibility for landowners to pursue development opportunities as appropriate.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Potential for some difficulties in landowners reaching agreement and working together to prepare a Development Concept Plan.</li> <li>▪ Costs on the private sector for the preparation of the Development Concept Plans, including the resource consent application process.</li> </ul>

During consultation in the preparation of this Proposed Plan Change, the inefficiencies and potential conflicting aspirations of landowners in the urban growth areas, it was concluded that private sector initiated Structure Plans and Development Concept Plans would not be the most effective approach of achieving the objective of integrated and sustainable urban growth. Therefore, the most appropriate approach is facilitated by Council initiated Structure Plans, recognising these would be prepared as resources were available.

### *Assessment 3 – Evaluation of the rules and methods within the Greenbelt Residential Zone and Residential Zone*

The proposed plan change introduces a number of rules to achieve the objectives of the Greenbelt Residential Zone.

#### **Land Use Rules and Methods**

Having determined that it is appropriate to introduce a new Greenbelt Residential Zone with its own objectives and policies, an evaluation of the land use rules and methods is required, in particular, for the nature, density and character of the greenbelt residential areas. These rules and methods include the nature of permitted land use activities, the size and scale of buildings, and the amenity expectations for the Greenbelt Residential Zone requires further consideration and assessment. These detailed provisions form part of this Plan Change. In considering whether, having regard to their efficiency and effectiveness, the proposed Greenbelt Residential Zone provisions are the most appropriate for achieving the objective under Proposed District Plan Change 21, the Council evaluated three main options. These were:

1. Effects based rules

This approach provides for all activities as permitted, subject to compliance with specified standards. Matters addressed in the standards relate too, but are not limited to height, setbacks, site coverage, noise, odour, storage, servicing, and signs.

2. Listing of activities with a focus on residential activities

This approach involves listing specific activities as permitted, controlled, limited discretionary or discretionary (i.e. activity status). The more compatible the activities with the character and amenity values of the Greenbelt Residential Zone, the more enabling the activity status. For example, activities which are compatible include residential activities which are provided for as a permitted activity (i.e. do not require resource consent), while incompatible activities, such as industrial activities would be a discretionary activity (i.e. require a resource consent).

3. Listing of activities with a broad range of permitted activities

Similar to the above option, except the list of permitted activities would be broader, and include a greater range of permitted activities (i.e. activities that do not require resource consent).

This option would provide greater flexibility in land use opportunities. However, with the greater range of land uses, there is increased potential for amenity conflicts between the activities.

## Analysis

OPTIONS	EFFECTIVENESS & EFFICIENCY	BENEFITS	COSTS
Effects Based Rules	All land uses are permitted unless they contravene a performance standard or require consent under a specific rule. The focus of managing uses in the Greenbelt Residential Zone is on the effects of the use, and not the activity itself. However, the character and amenity values of the Greenbelt Residential areas are sensitive from a range of activities, therefore, providing for all activities may not be the most effective approach.	<ul style="list-style-type: none"> <li>Large number of activities are permitted and do not require consent.</li> <li>Certainty that a range of residential and other activities can establish and operate in the area.</li> </ul>	<ul style="list-style-type: none"> <li>Costs of complying with permitted activity standards.</li> <li>Some uses may cause adverse effects which are not managed by permitted activity standards, and detract from the character and amenity values.</li> </ul>
Listing of Activities focusing on residential activities	Activities that are compatible with the character and amenity of the Greenbelt Residential Zone are listed as permitted activities. As the Greenbelt Residential environment is potentially sensitive to the effects from a number of activities, listing appropriate activities is an effective and efficient approach.	<ul style="list-style-type: none"> <li>Protects the character and amenity values of the greenbelt residential areas.</li> <li>Certainty that only a limited range of non-residential activities can establish and operate in greenbelt residential areas.</li> </ul>	<ul style="list-style-type: none"> <li>Some uses may be restricted from establishing in greenbelt residential areas.</li> <li>Costs of applying for resource consent for specific activities.</li> </ul>
Listing of Activities with a broad range of permitted activities	Permitting a wider range of activities would potentially increase the number of activities that may result in adverse effects on the character and amenity of the Greenbelt Residential Zone. As the Greenbelt Residential environment is potentially sensitive to the effects from a number of activities, listing more permitted activities would be a less effective and efficient approach to the option above.	<ul style="list-style-type: none"> <li>Potentially protects the character and amenity values of the greenbelt residential areas.</li> <li>Certainty in that a range of non-residential activities can establish and operate in greenbelt residential areas.</li> </ul>	<ul style="list-style-type: none"> <li>Some uses may be restricted from establishing in greenbelt residential areas.</li> <li>Costs of applying for resource consent for specific activities.</li> </ul>

Overall, it is considered listing activities with a focus on residential activities is the most effective and efficient approach to achieving the objectives for the Greenbelt Residential Zone. The character and amenity values of the Greenbelt Residential Zone are potential sensitive to a range of activities, therefore, it is appropriate to limit the nature of activity to a set list, with a focus on activities of a residential nature. If non-residential activities are proposed, the resource consent process provides an efficient and effective assessment process for determining whether the effects of a particular proposal would be compatible with the character and amenity values of the Zone.

### Subdivision rules and methods

As discussed above, having determined that it is appropriate to introduce a new Greenbelt Residential Zone with its own objectives and policies, an evaluation of the subdivision rules and methods is required. In considering whether, having regard to their efficiency and effectiveness, the proposed Greenbelt Residential Zone provisions are the most appropriate for achieving the

objective under Proposed District Plan Change 21, the Council evaluated four main options. These were:

1. No minimum standards

This option would set no minimum or maximum thresholds for subdivision, such as minimum lot size, minimum road frontage and building area requirements.

2. Minimum standards only

This approach involves applying a suite of minimum standards to establish the desired subdivision outcomes for the Greenbelt Residential Zone. These standards could include minimum lot size, minimum road frontage and building area requirements. In addition, there could be variation in the standards based on the activity status (i.e. controlled, limited discretionary, discretionary or non-complying). Controlled activity would be the base activity status to ensure each subdivision was subject to an assessment via the resource consent process.

3. Design Guidelines only

This approach is similar to option 1, in that no minimum standards would apply. However, a design guideline for managing subdivision in the Greenbelt Residential Zone would apply. The base activity status for assessing compliance with the design guideline would be limited discretionary activity, to provide an effective approach to managing the design of the subdivision. This option would provide greater flexibility in subdivision opportunities. Conversely, there would be less certainty in the assessment process.

4. Minimum standards and Design Guidelines

This option is a combination of options 2 and 3, where minimum standards and design guidance would both be used to achieve the outcomes for the Greenbelt Residential Zone. Minimum standards would be used to provide a base level through controlled activity, with requirements including minimum lot size, shape factor and building area requirements. In addition, design guide would also be applied in assessing subdivision applications to ensure appropriate design of all subdivisions.

## Analysis

OPTIONS	EFFECTIVENESS & EFFICIENCY	BENEFITS	COSTS
<b>No Minimum Subdivision Standards</b>	Lack of specificity with no performance standards would be a highly ineffective method for the management of subdivision in the Greenbelt Residential Zone. No standards could result in poor lot design and layout which degrades the character and amenity values in the Greenbelt Residential areas. This method would have low efficiency in achieving the objectives for the Zone, given the potentially high variation in the subdivision design.	<ul style="list-style-type: none"> <li>▪ High level of flexibility and certainty for subdividers in the design and layout of subdivisions.</li> <li>▪ High level of certainty in obtaining resource consent for subdivisions.</li> <li>▪ High number of properties are potentially subdividable.</li> </ul>	<ul style="list-style-type: none"> <li>▪ High potential for adverse effects on the character and amenity values in the greenbelt residential areas.</li> <li>▪ Resultants lots may not be suitable for a range of land uses in the Zone, reducing the potential usability and efficient use of this land resource.</li> <li>▪ Conflicts between neighbouring activities due to inappropriately sized and shaped lots.</li> <li>▪ Low costs in applying for resource consent.</li> </ul>
<b>Minimum Subdivision Standards only</b>	Minimum standards are effective in establishing a base level for the character and amenity values for the Zone. Standards also ensure the efficient and effective utilisation of the land resource by ensuring new lots are appropriately sized and shape for a range of potential future land uses.	<ul style="list-style-type: none"> <li>▪ Protects the character and amenity values of the greenbelt residential areas.</li> <li>▪ Provides for the efficient utilisation of the land resource.</li> <li>▪ Certainty for subdividers, community and Council as to the nature and intensity of subdivision.</li> <li>▪ Some flexibility in the design of subdivision within the limits of the performance standards.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Some land may be restricted from being subdivided, where they cannot comply with the minimum standards.</li> <li>▪ Costs of applying for resource consent for all subdivisions, with potentially higher costs for subdivisions that do not comply with the minimum standards.</li> <li>▪ Less flexibility where minimum standards are set overly high, and potentially less efficient utilisation of the land resource.</li> <li>▪ Regimented design based on strict compliance with minimum standards can result in poor quality subdivision layout and environmental qualities.</li> </ul>
<b>Design Guide only</b>	Design guides are effective in managing the qualitative design aspects of a subdivision. Design guides can provide clear direction on the outcomes being sought for the Zone, and are effective at communicating this at individual property and local area level. Design guides can also contribute to the efficient subdivision of the land resource, by outlining efficient subdivision patterns and design outcomes.	<ul style="list-style-type: none"> <li>▪ Protects the character and amenity values of the greenbelt residential areas, and potentially results in improved quality of subdivision design and land development.</li> <li>▪ High degree of flexibility for subdivision design, and the promotion of innovative design solutions.</li> <li>▪ Provides for the efficient utilisation of the land resource.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Costs on Council of preparing design guidelines.</li> <li>▪ Potentially higher costs of applying for resource consent, given the qualitative nature of the assessments.</li> <li>▪ Long-term, potentially lower community costs resulting from better planning and design (enhanced further by the application of structure plans).</li> </ul>

OPTIONS	EFFECTIVENESS & EFFICIENCY	BENEFITS	COSTS
<b>Minimum standards and design guide</b>	<p>The combination of minimum standards and design guides is effective in managing the quantitative and qualitative aspects of subdivision design.</p> <p>The quantitative minimum standards provide a base level of maintaining the character and amenity values for the Zone, as well as the efficient utilisation of the land resource. The qualitative design guide provide effective direction for the design and outcomes being sought for the Zone.</p>	<ul style="list-style-type: none"> <li>▪ Protects the character and amenity values of the greenbelt residential areas, and potentially results in improved quality of subdivision design and land development.</li> <li>▪ A degree of flexibility in subdivision design, and potentially provides for innovative design solutions.</li> <li>▪ Provides for the efficient utilisation of the land resource.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Costs to Council of preparing design guidelines.</li> <li>▪ Potentially higher costs of applying for resource consent, given the qualitative nature of the assessments.</li> <li>▪ Long-term, potentially lower community costs resulting from better planning and design (enhanced further by the application of structure plans).</li> <li>▪ Some land may be restricted from being subdivided, where they cannot comply with the minimum standards.</li> <li>▪ Potentially less flexibility where minimum standards are set overly high, and potential less efficient utilisation of the land resource.</li> </ul>

During consultation in the preparation of this Proposed Plan Change, the combination of minimum standards and design guides was determined as the most appropriate approach for achieving the objectives for the Greenbelt Residential Zone. Minimum standards establish an appropriate baseline for subdivision in the Greenbelt Residential Zone to maintain the character and amenity values, whilst also providing a level of certainty. Design guidelines are an effective tool in the planning and design of subdivisions, improving the overall quality of subdivision to achieve the outcomes sought for the Greenbelt Residential Zone.

*Assessment 4 – Evaluation of the areas to be rezoned in achieving the Urban Environment and Greenbelt Residential Zone objectives*

**Planning Map Changes**

As discussed above, it is proposed to rezone land identified in the Horowhenua Development Plan as being suitable for residential development. These areas have been identified based on a number of criteria as detailed in the Development Plan. As discussed above, alternative urban growth areas were considered as part of the Development Plan process.

In terms of this Proposed Plan Change, the areas to be rezoned provide for the immediate future residential needs of each settlement. The urban growth areas with deferred zoning provide for the longer term future residential needs, with the deferral removed once the infrastructure and structure planning work has been completed for these areas.

## Analysis

OPTIONS	EFFECTIVENESS & EFFICIENCY	BENEFITS	COSTS
<b>Do Nothing (Rural Zone)</b>	This option would be efficient in continuing to apply the same provisions until such time that an area is ready for development as a Residential or Greenbelt Residential area. However, the existing provisions would not be effective in managing land use, development and subdivision in a manner that would achieve the objectives for the Residential and Greenbelt Residential areas long-term. It may result in pressure for other areas to be rezoned, potentially resulting in an ad-hoc urban form and inefficient provision of infrastructure.	<ul style="list-style-type: none"> <li>▪ Provides certainty to existing landowners that wish to continue to expand and develop their property for rural purposes.</li> <li>▪ Provides flexibility in using and developing properties for rural purposes.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Significant level of change could occur in terms of land use, development and subdivision which could limit the future development opportunities for a sustainable and integrated Residential and Greenbelt Residential areas.</li> <li>▪ Lack of certainty for land owners and developers in converting rural land to urban use. It is important for long term planning and development that appropriate zonings apply.</li> <li>▪ Unduly constraining urban growth, potential introducing economic and social costs on the community.</li> <li>▪ Ad-hoc urban growth may result in less efficient provision of infrastructure, potentially resulting in higher maintenance costs.</li> </ul>
<b>Rezone all areas to Residential or Greenbelt Residential Zone</b>	Applying the Residential or Greenbelt Residential Zone to all the identified urban growth areas in the Development Plan would be effective in giving statutory effect to the growth areas. The land has been identified as being suitable for residential development, therefore, rezoning the land would effectively provide for this use and development. However, as the growth areas provide for a 20 year planning period, the zoning of all areas at one time may result in the inefficient development of the Residential and Greenbelt Residential areas, with a dispersed supply of land.	<ul style="list-style-type: none"> <li>▪ Provides a level of certainty to landowners wishing to develop their land for Residential or Greenbelt Residential purposes in the short term.</li> <li>▪ An efficient plan change process by undertaking the rezoning in one process, compared to repeat processes over a number of years.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Costs to subdividers and Council in providing infrastructure to service a large area in the short term.</li> <li>▪ Some existing activities could be limited from expanding or developing in the short term when Residential or Greenbelt Residential area may not occur for a number of years.</li> </ul>
<b>Rezone some areas Residential or Greenbelt Residential and retain others as Rural Zone</b>	This option would be effective in balancing the needs of existing and future land use and development opportunities. The rezoning of areas based on the provision of infrastructure and available land supply would efficiently use the land resource by only rezoning land as required.	<ul style="list-style-type: none"> <li>▪ Prioritise the provision of infrastructure to areas for future rezoning.</li> <li>▪ Areas rezoned have available infrastructure and would provide a supply of land for future development.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Some uncertainty for landowners as to the timing of the rezoning.</li> <li>▪ Costs of undertaking plan changes for the rezoning of land as infrastructure is provided or land supply reduces.</li> </ul>

The above analysis identifies that rezoning some areas now and applying a deferred zoning to the other urban growth areas would be the most efficient and effective approach in achieving the urban environment and Greenbelt Residential Zone objectives. The Development Plan is based on a 20 year planning period, while the District Plan is anticipated to have a planning period of 10 years.

The most appropriate approach is for the Plan Change to identify priority areas based on the provision of infrastructure and current land supply. For high priority areas, where the provision of infrastructure is readily available and there are constraints on the current land supply, areas have been rezoned as part of this Plan Change. Deferred zoning has been applied to lower priority areas, where there are infrastructure capacity constraints and/or a surplus in the current available land supply.

### *The Risk of Acting or Not Acting*

The evaluation under section 32 must consider the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the proposed District Plan approach. In this case, it is considered that there is sufficient information available. Issues relating to urban growth have been assessed as part of the Development Plan process which involved the collection and analysis of a wide range of information which influences the urban growth of the Horowhenua.

### **Conclusion**

Overall, the staging and deferred rezoning of urban growth areas is the preferred option for managing the scale, nature and rate of residential subdivision and development. This option ensures that areas which are rezoned have been sufficiently planned and the ability to be serviced in a manner that would achieve the outcomes for the area. Structure Plans ensure development in the urban growth areas is undertaken in an integrated and connected way.

The introduction of a new Greenbelt Residential Zone is considered the most appropriate approach for managing this type of residential environment. It provides an effective transition between the urban and rural environments, recognising the different characteristics and qualities that are anticipated for these areas. The objectives for the Greenbelt Residential Zone are considered to be the most appropriate way to achieve the purpose of the Act, in that they provide for the living and lifestyle opportunities to enable the community to provide for its economic, social and cultural wellbeing, while efficiently utilising natural and physical resources in the localities.

Comparing the various options for achieving the objectives in the District Plan, the amendments to the District Plan in Proposed Plan Change 21 are considered the most effective and efficient policies, rules and other methods in providing for residential living opportunities, managing the interface between urban and rural zones, and establishing an efficient and sustainable development pattern for urban growth areas.