

SECTION 32 REPORT

Proposed Plan Change A

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Part I: Proposed Plan Change

1. Purpose of Report

Tararua District Council (TDC or Council) has prepared Proposed Plan Change A – Residential and Industrial Growth Areas (Proposed PCA or PCA) - to the Operative District Plan for notification under the Resource Management Act 1991 (RMA).

This Section 32 evaluation report has been prepared to accompany Proposed PCA. It summarises the evaluation of alternatives, costs and benefits undertaken by TDC in respect to the proposed District Plan provisions relating to the identified Residential Growth Development Areas (RGDA) and Industrial Growth Development Areas (IGDA).

In summary, TDC must establish that Proposed PCA is the most appropriate way to achieve the purpose of the Act, including an assessment that the proposed changes are the most appropriate means available to achieve the purpose of the Act – when compared against alternative methods available, including doing nothing (the ‘status quo’ option).

More specifically, the intention of this report is to:

- Explain why Proposed PCA is needed;
- Evaluate the objectives against the purpose of the Act;
- Identify the potential options to achieve the objectives;
- Evaluate the efficiency and effectiveness of the options; and
- Record why PCA is the most appropriate way to achieve the objectives of the Proposed PCA and more broadly, the District Plan and RMA.

This report fulfils the requirements of section 32 of the RMA.

2. Proposal and Scope

2.1 Matters in Scope

Proposed Plan Change A involves the rezoning of land to establish new development areas across the four main townships of the district. The purpose of the development areas is to provide additional land to assist in providing for additional housing and industrial development over the next 30 years. The following changes are proposed as part of PCA:

- Rezone existing rural land to residential to create new greenfield residential growth areas in the townships of Dannevirke, Woodville, Pahiatua and Eketahuna for future residential development.
- Rezone existing rural land to industrial to create a new greenfield industrial growth area, to the west of Woodville, for future industrial development.
- Rezone two rural zone areas, containing existing industries being Oringi Business Park and Pahiatua Fonterra Milk Factory, to industrial zone for industrial purposes.
- Introduction of a new development area within the District Plan being the Residential Growth Development Area (RGDA) to establish a new subdivision framework for residential development within these areas. This includes specific objectives, policies and rules addressing the key matters relevant to the RGDA, including enabling housing choice and enabling residential development outcomes within the area.

- Introduction of a new development area within the District Plan being the Industrial Growth Development Area (IGDA) to establish a new subdivision and land use framework for industrial development within these areas. This includes specific objectives, policies and rules addressing the key matters relevant to the IGDA, including enabling industrial growth and industrial development outcomes within the area.

2.2 Matters Out of Scope

PCA does not include a review of the operative Residential or Industrial Zone provisions. PCA is targeted to the rezoning of land for future growth only. PCA also does not include a review of any remaining aspects of the Operative District Plan.

3. Proposed Amendments to the District Plan

3.1 District Plan Provisions

Refer to Appendix 1 for all amendments proposed to the Operative District Plan.

3.2 Planning Maps

Amend zoning maps to reflect the changes set out in this report and illustrated in the maps within Appendix 2. The changes see land zoned Rural changed to a mixture of Residential and Industrial zones.

3.3 Consequential Changes

No consequential changes have been made as a part of PCA, with the plan change limited to additions to the operative plan only.

Part II: Section 32 Report

4. Plan Change Development

4.1 Introduction/Background

The primary focus of PCA is the implementation of the growth direction set in the Tararua District Urban Growth Strategy (TDUGS or Urban Growth Strategy), adopted by Council in May 2024. The Urban Growth Strategy provided significant direction for the wider District Plan Review, including a high-level direction that supports and implements the Council's vision and helps guide Council decision-making to deliver more housing supply and choice, industrial growth, and integrated social, economic and environmental outcomes for the community.

The purpose of the TDUGS is predominantly to provide direction for residential growth within the district over a 30-year time period. The TDUGS also identifies priority areas for land rezoning across the four main townships to provide additional land supply to enable residential growth and provide housing capacity to meet the projected population growth over this time.

The TDUGS also focuses on industrial growth and the projected land requirements to meet industrial demand as the district grows over the next 30 years. The TDUGS identifies the priority areas for industrial growth and the land requirements for rezoning to meet the projected demand.

The assumption has been made that in absence of PCA, there is no change in residential land supply out to 2053 as:

- No greenfield residential developments are planned.
- No infill housing is expected to occur, unless it is the only development option.
- The land within the currently zoned residential land that is vacant, will remain vacant, and is not available for greenfield residential developments.

While intensification (or infill development) will provide some opportunities for housing growth, greenfield land availability is necessary to ensure Council's housing bottom lines are achievable.

PCA seeks to respond to the direction set in the TDUGS through the rezoning of land to provide for the future residential and industrial growth of the district. PCA also recognises current best practices for enabling development, particularly noting the importance of enabling and providing housing choice and housing supply to meet the needs of those who choose to reside within the district.

4.2 Operative District Plan Review

It is noted that the proposed rezonings put forward under this PCA were originally part of the wider full District Plan review commenced by TDC in 2023. The review of the Operative Plan was centred around a complete re-think of the current District Plan framework. The current District Plan is an 'effects based' plan that was made operative in 2012 at a time of low growth in the district. The Plan sought to encourage development through flexible and non-directive planning rules. However, there have been unintended consequences of this now outdated approach.

The District Plan Review concluded that the Operative Plan is not providing for a 'fit for purpose' framework that achieves good development outcomes. Development does not

occur in a cohesive and planned way and there are impacts on the natural and cultural environment that require a more integrated approach. The District Plan does not take a strategic approach to how the district is managed into the future.

Following the District Plan Review, a new Plan was prepared that focused on:

- A new activities-based planning framework that allows for forward thinking and cohesive planning into the future.
- A National Planning Standards compliant e-plan layout that is GIS driven and accessible to the community.
- A consistent District Plan structure that provides for outcomes focused objectives, directive policies and clear and simple rules.

The full District Plan review was in its final stages of preparation when Central Government announced the 'Plan Stop' mandate for Local Government. This prevented the full plan review process from proceeding in its current form.

PCA has arisen out of an exemption application to the Minister seeking to enable the rezoning of additional land in the district to provide for growth as put forward in the TDUGS. The basis for this exemption was that the primary focus of PCA, being to rezone land to provide development capacity across both the residential and industrial sectors, was imperative as no current land supply/capacity exists in these areas. PCA is in line with Central Government direction to provide for ongoing growth over a 30-year period. It is emphasised that no vacant residential, or industrial land, is present at scale within the district. Therefore, there is a priority need to rezone land to meet the projected growth rates outlined by the TDUGS.

The exemption application was granted to TDC, by the minister, which has provided the scope of PCA, as outlined above.

4.3 Overview and Purpose

Population growth in Tararua District creates both opportunities and challenges for the future. With a strong economic base and industries that are looking at opportunities to diversify, this growth is expected to continue. The District Plan needs to be able to manage this growth and the changing economy sustainably now and into the future.

Tararua District has begun to experience increased growth levels, and it does not appear to be slowing down. People across the country are seeking opportunities to move their families here, attracted by the wide-open spaces and the lower cost of living compared to the bigger regional centres. TDC is experiencing increased inquiries regarding development opportunities. This has recently been enhanced by the completion of the new (Te ahu a Turanga Highway) road connection to Palmerston North City and the wider Manawātū region and the proximity to other regional centres such as Hawke's Bay, Wairarapa and Greater Wellington.

The district's population is projected to increase by up to an estimated 3,400 people over the next 30 years based on the high growth projection, and up to 4140 based on the aspirational scenario.

TDC intends, and is encouraged by the NPS-UD, to provide housing capacity to cater for the increasing population. PCA is part of the strategic planning response to assist in providing the necessary housing and industrial capacity through land release and development of greenfield urban growth areas.

The purpose of PCA is to rezone land across Dannevirke, Woodville, Pahiatua and Eketahuna to enable additional housing capacity through residential development involving

promoting housing choice. This is supported by additional industrial land to cater for ongoing industrial development demand within the district at sites in Dannevirke, Woodville and Pahiatua. This is consistent with the identification of the growth locations identified under the TDUGS and the associated land supply and housing capacity, and industrial demand, for each area.

The rezoning of land under Proposed PCA includes approximately 116 hectares across these four townships to provide residential development capacity for the population growth. PCA also includes approximately an additional 40 hectares to provide for industrial growth. Overall, PCA provides the potential to create approximately 1,700 new residential lots and capacity for industrial development at scale, over the next 30 years.

The proposed rezoning areas are depicted in the maps within Appendix 2.

PCA also seeks to amend the District Plan by introducing the RGDA and IDGA frameworks to support development of the greenfield areas and proposes additions to the plan framework (zoning, objectives, policies, rules and methods) to implement the intended spatial, environmental and urban design outcomes.

4.4 PCA Direction

After several decades of low growth, the population of Tararua District has begun to grow and is projected to continue to do so moving forward. The Council anticipates the population of the district to increase by approximately 3,300 people (high growth scenario) over the next 30 years. The number of households will increase even faster as the average household size is projected to decrease. If predictions are accurate, the district will need 1800 new dwellings over this time period with higher growth rates expected between now and 2038.

Proposed PCA seeks to implement the growth direction for the district as set out in the TDUGS, adopted by Council in May 2024. The primary focus of PCA is to implement the residential and industrial growth recommendations of the TDUGS through rezoning of land. PCA is focused on two main zoning changes as outlined below.

Firstly, PCA seeks to rezone new greenfield residential growth areas in the townships of Dannevirke, Woodville, Pahiatua and Eketahuna for future residential development and inserts accompanying provisions (objectives, policies, and rules) into the District Plan.

PCA also seeks to rezone a new greenfield industrial growth area, to the west of Woodville, for future industrial development and inserts accompanying provisions (objectives, policies, and rules) into the District Plan.

Lastly, PCA seeks to rezone two areas, containing existing industries, for industrial purposes and inserts accompanying provisions (objectives, policies, and rules) into the District Plan.

The purpose of PCA is to primarily provide for additional housing supply across the district, to assist in meeting the growth projections for Tararua over the medium to long-term period. Proposed PCA seeks to provide for additional housing supply through comprehensively planned and coordinated development of the new development areas.

In addition, the secondary purpose of PCA is to provide for additional industrial growth within the district, to also help meet the growth projections for Tararua over the medium to long-term period. PCA seeks to enable additional industrial development in the district that is both co-ordinated and undertaken in a planned manner.

The areas identified for rezoning in PCA, are those identified within the TDUGS as future residential and industrial growth areas. Enabling development within these areas will assist in addressing the existing capacity constraints within the existing residential and industrial

zoned areas and contribute toward increasing the supply of land within the district to accommodate the projections identified within the TDUGS.

In summary, Proposed PCA seeks to:

- a. Rezone approximately 115Ha of Rural land across Dannevirke, Woodville, Pahiatua and Eketahuna to Residential land.
- b. Rezone approximately 40Ha of Rural land in Dannevirke, Woodville and Pahiatua to Industrial land.
- c. Insert related provisions to manage the subdivision and development of these areas, into the District Plan.

The policy frameworks have been developed with a specific lens toward managing the growth and development of the areas being rezoned. The current operative plan provisions are not currently set up to manage greenfield development, at scale, in a manner that would ensure the overall success of the growth areas to provide the capacity and supply needed to meet the projected demand.

Development within both the RGDA's and IGDA's is required to occur in a well-planned and co-ordinated manner. PCA places emphasis on the need for development to appropriately consider the future development of the wider areas, is supported by adequate infrastructure, appropriately considers and manages stormwater, and overall achieves good design outcomes.

The RGDA is focused on subdivision only, for the above reasons, with the operative plan provisions for the Residential Management Area considered to be sufficient to manage land use across these locations. Further, the remaining chapters and provisions of the operative plan will also apply to the land, for all matters relating to the subdivision and development of these residential areas.

The IGDA is focused on subdivision primarily, to ensure the elements outlined above are achieved. Furthermore, specific land use provisions have also been included to manage activities that seek to locate in these areas. The current operative provisions for the industrial management area enable a wide range of activities to occur in this zone. This has resulted in a significant number of non-residential activities taking up valuable industrial land. The purpose of the IGDA land use provisions is to limit permitted activities to industrial only, with a small provision for ancillary activities. This is to protect the integrity of the IGDA growth area to serve its purpose of providing for industrial growth within the district.

4.5 Growth/District Context

The nationally projected growth for Tararua District estimates an 8.6% increase in the population over the next 10 years, increasing from the current population of 19,050 to 20,981, under the high growth scenario. This growth is expected to be sustained through the next 30 years, reaching an estimated 23,200 people by 2053.

These numbers include a change in the age demographics, with an estimated increase of the over 65 years age bracket to become 26% of the total population, an additional 1,387 people. However, this is largely a result of the increasing age of the existing population, and it is anticipated that overall population growth within Tararua District is more likely to be driven by younger families moving here from other regions within the country.

Most of the population growth is anticipated within the towns, moving from 57% of the population to 74% living in urban areas. The majority of population growth is anticipated between 2025 and 2040.

An Overview of the Tararua District

Tararua District Council is one of seven territorial authorities for the Tararua-Whanganui Region. We are the third largest district by land mass in the country, encompassing an area of 4,364.65 km² along with an extensive roading network to match that includes 1,187km sealed roads and 772 km unsealed roads, 525 bridges and large culverts, 1842km drains and channels and 119km footpath.

Our district's northwest boundary runs along the top of the Ruahine Range; its south-east boundary is the Pacific Ocean. We extend north of Mount Bruce to south of Norsewood and out to the east coast as far as Herbertville, Akito, Cape Turnagain and to the rural communities of Pongaroa, Ormondville and Weber.

Although our land mass is large, our population numbers are comparatively small. Tararua District has a population of 19,050 spread across the four main town centers of Dannevirke (5680), Woodville (1710), Pahiatua (2860) and Eketāhuna (590) and out to our rural communities and villages. The low population numbers are a reflection of the agricultural land use, with around 95% of Tararua's 400,000 hectares being farmed. A lot of the flat land surrounding our townships and rural villages is comprised of highly productive and versatile soils. The Tararua District has a reputation for producing high quality stock. Sheep, beef and dairy are the most significant types of farming, representing 90% of all holdings and accounting for 99% of total stock units. Forestry, including carbon forestry, is a growing industry and there are now more than 13,000 hectares planted in pinus radiata.

Our District has two Iwi, Rangitāne o Tamaki nui-ā-Rua and Ngāti Kahungunu ki Tāmaki nui-a-Rua, who represent their many hapū with their own whenua and awa tributaries, have both signed deeds of settlement with the New Zealand Government and have partnership agreements with Tararua District Council. These memoranda of partnership recognise the relationship and responsibility of Council to support iwi aspirations and hopes for the future of their whānau. These relationships are important for the continued successful management of our whenua, awa and communities.

Tararua is home to four primary towns: Dannevirke, Woodville, Pahiatua, and Eketāhuna, along with several smaller communities throughout the district. It boasts strong connectivity to both the south and north, positioning Wellington and Hawkes Bay within a manageable driving distance. Additionally, Palmerston North, a significant provincial city, is close enough for daily commuting, allowing Tararua residents to enjoy the district's lifestyle without compromising on career opportunities. This connectivity has been significantly improved by the completion and opening of Te Ahu a Turanga – Tararua Manawatū Highway. We also cross or include numerous other infrastructure assets of national and regional importance. State Highways 1, 2, 54 and 56, the North Island Main Trunk Railway and Palmerston North to Gisborne Railway, multiple national electricity grid lines, fibre broadband backbone cables, and the national gas distribution pipelines.

Tararua District is categorised as non-tiered urban environments across and although we are experiencing population growth our town centers fall short of the population requirements. Stats NZ and Infometrics projects growth for the Tararua District to increase by 8.6% over the next 10 years and this growth is expected to be sustained over the next 30 years, reaching an estimated 22,356 people by 2053.

Tararua District Council have prepared a plan stop exemption application for Plan Change A – Growth Rezoning for the Minister's review and approval. This plan change is to provide for growth in our District by enabling rezoning of our Residential and Industrial areas for Dannevirke, Pahiatua, Woodville and Eketāhuna. The Plan Change A exemption application is to provide for the rezoning of residential and industrial land across the four main town centres of Tararua District. We want to capitalise on the opportunity that our new highway Te Ahu a Turanga - Manawatū Tararua Highway presents to Tararua District.

Plan Change A seeks to implement directions signaled in Tararua District Council Growth Strategy 2053. This aligns with government priorities as there is a desire to increase the available supply of suitable land for residential and industrial purposes and to provide additional and affordable homes and more lately to stimulate economic growth and development. Whilst Tararua District Council does not qualify as a Tier 1, 2 or 3 urban environment under the National Policy Statement on Urban Development, with none of our urban environment's housing at least 10,000 people, we aim to be proactive in this space and achieve best practice in planning for the growth and development of our communities.

Tararua is pragmatic in its approach and actively encourages development, it has an outdated, permissive District Plan that encourages housing development and imposes no development contributions. TDC has included this context as a reminder that we are one of many smaller districts with characteristics, issues and planning approaches which are different to the main centres and growth areas of New Zealand (e.g. Auckland, Hamilton, Tauranga, Wellington, Christchurch, Selwyn, Queenstown, and Dunedin). It is therefore important that the future planning system does not take a 'one-size-fits-all' approach whereby detailed and costly requirements intended to address issues seen in the larger centres are unnecessarily imposed on smaller rural councils with much smaller ratepayer and funding bases.

The Built Environment

The Tararua District contains four main towns, (Dannevirke, Woodville, Pahiatua and Eketāhuna) and three villages (Pongaroa, Norsewood and Ormondville), along with the coastal settlements of Ākitio and Herbertville. The district is predominantly rural with strong connections to the local towns and community settlements.

The majority of the district's built environment is centred around these townships and settlements. These environments, in particular the four main towns, consist of a central commercial area surrounded by residential environments.

On average, there are currently 2.34 people per household in Tararua District. This number has been projected by Stats NZ and research company Infometrics to stay relatively stable during the next 30-50 years (increasing only slightly to 2.5). This reflects national trends in declining natural population growth and an increase in the aging population. Although there is increasing demand for housing, resulting in some intensification of family units, this is offset by a growing population base of single or double-person households.

The area of commercial and industrial land that is anticipated to be occupied will increase by 56 hectares at an annual growth rate of 1.2 percent. These predictions result in an additional 43 hectares of industrial land required by 2053. In rural Tararua, occupied industrial land is expected to grow at 1.6 percent per annum resulting in an additional 31 hectares of occupied industrial land by 2053. An additional 13 hectares of commercial land will be required by 2053. Seven hectares will be needed in Dannevirke, three in Pahiatua, and one hectare each in Woodville and Eketāhuna.

The Economy

Business and Economic Research Ltd (BERL) were commissioned by Council to inform its Growth Strategy in 2024. A district wide forecast based on the StatsNZ high population growth scenario, and the results of the 'latest business as usual' forecast from BERL's national computable general equilibrium ("CGE") model.

District level forecasts were then distributed across Tararua District's four main centres and a combined rural area. Current land use and occupancy data was provided by the Council

for commercial and industrial land. Future occupancy of commercial and industrial land was then estimated assuming the ratios of Full Time Equivalents ("FTE"s) per hectare for each industry will remain constant over the forecast period.

Under this scenario, GDP generated in Tararua District is forecast to grow by \$378 million from 2022 and reach \$1.208 billion by 2053 (an average annual increase of 1.2 percent). GDP growth is forecast to be led by rural Tararua District which will see GDP increase by \$188 million to reach \$631 million by 2053. Dannevirke is expected to grow by \$109 million at an annual growth rate of 1.2 percent. The greatest proportional growth is expected in Woodville and Eketāhuna where the average annual growth rate over the period is anticipated to be 1.6 percent.

The number of full-time equivalent employees (FTEs) is forecast to grow by 1,367 from 2022 to 2053, at an annual growth rate of 0.6 percent. Rural Tararua District and Dannevirke are expected to see the greatest increase in the total number of FTEs, at 480 and 468 respectively.

The Natural Environment

The Tararua has a rich biodiversity, including some special plants and species that are unique to the district. Historically, the dominant indigenous forest species of inland Tararua were typically a range of podocarps in the hill country, and rimu and tawa on the plains. Wetlands were also dominant features of the plains. Human settlement has resulted in most of the indigenous vegetation being significantly reduced or heavily modified, through clearance of large areas of vegetation, drainage of wetlands, and the introduction of exotic species, including pests.

Today, while little deliberate modification takes place, the main threats to indigenous forests are stock browsing and plant and animal pest infestation. The district comprises of a range of landscape features, including the mountain ranges, prominent skylines, rolling landscapes, coastal margins, escarpments, and plains and lowlands. Subdivision, land use and development over time have changed modified these landscape features. The lowlands and plains have been developed and support the urban areas and higher intensity primary production.

Elsewhere, there is has been limited modification, with sparse open space and little development. There remain several landscapes and features that are unmodified and have been identified as containing outstanding natural value or are of a special amenity value.

Infrastructure

Three waters infrastructure (water supply, wastewater, and stormwater) is essential to support growth. The Councils' plan for funding and investment for growth related infrastructure over a 10-year period is set out in its long-term plans. It is noted that under the government water services reform, the Councils' three waters assets and functions will transfer to a new water services entity. Wairarapa–Tararua's new regional water services organisation, Waiti Waters, has now been officially launched.

While the assets and functions will transfer to a new entity (Waiti Waters), the issues for three waters, in particular issues associated with supporting and accommodating growth will still exist.

The following issues have been identified with respect to three waters infrastructure provision in the district:

- Investment and planning are required for three waters to meet medium to long term growth needs.
- Renewals programmes for aging pipes and increasing treated water capacity is ongoing.
- Renewal work on wastewater infrastructure in the urban areas is required, as well as improving and enhancing the performance of the wastewater treatment plants.
- An ongoing renewal programme is required to maintain levels of service for water supply. An additional trunk main and new reticulation will be required for new growth areas identified in the Urban Growth Strategy.
- The district has an aging wastewater reticulation system.
- Increased growth is likely to impact on the current stormwater approach which is primarily through discharge to ground or road reserves. In some areas across the district, flooding has become an increased hazard, particularly in areas located close to waterways. The topography in these neighbourhoods means that water cannot be absorbed as quickly, and as a result localised flooding occurs. Overall, the district is likely to face medium to long-term stormwater capacity issues without further investment and planning.

Transportation

The district's land transport systems move people, goods and services throughout the Tararua District and to and between neighbouring districts. The economic and social well-being of the Tararua District relies upon an efficient and effective land transport network. The way in which the transport network operates and is managed is intrinsically linked to the use of land adjacent to the network.

The need to move goods and people in a safe and efficient manner can lead to conflict with land development and the demand for access to land. It is necessary to ensure that an integrated approach is taken to ensure that the transport network, land use and development can co-exist and not unduly affect one another.

Tararua District's transport network encompasses state highways, local roads, rail, cycleways and footpaths. Good management and maintenance of roads, and the rail network, including level crossings is important to ensure they can transport goods, services and people efficiently and safely.

State highways form part of the national network of highways with State Highway 2 being the primary highway corridor connecting the Tararua District to Central Hawkes Bay to the north and the Wairarapa to the south and State Highway 3 providing a connection to the Manawatu in the west. For state highways, the through-traffic function generally takes precedence over access and local traffic functions.

The New Zealand Transport Agency Waka Kotahi (NZTA), is the road controlling authority for state highways. The Tararua District Council manages and maintains all other public roads in the district, including paper roads.

Key Development Trends

The key recent trends are as follows:

- There is limited investment occurring in the existing town centres.

- Residential development within the existing urban areas is low as there is limited supply of vacant land. People are seeking larger lot sizes in the rural area rather than infill opportunities.
- There is some vacant industrial land, however this is often constrained by infrastructure capacity.
- There have been high levels of rural-lifestyle development that have occurred on an ad-hoc basis across the rural area.
- Traditional urban activities are spreading to rural areas, impacting the future viability of rural activities and the productive potential and soil versatility of rural land.
- The operative District Plan does not provide a framework to ensure good design outcomes are achieved as a high number of subdivision applications are assessed as Controlled Activities.

This is how growth has occurred in the District to date. In the absence of residential land, or in light of infrastructure constraints, the only option for development has been self-serviced rural-residential development. It is recognised that the NPSHPL largely put an end to that option.

These trends have resulted in the following state of the environment outcomes, which are impacting the urban form and development of the district:

- The town centres face several constraints in relation to ongoing investment in buildings.
- There is continued outward pressure for expansion.
- Increased pressure on infrastructure from growth and development.
- Poor urban form outcomes and unconnected communities.
- Increased pressure on rural roads and community desire for upgrades.

Resource Consent Trends

A high-level assessment has been made of resource consents granted over the last 5 years to determine key trends for subdivision and land-use applications.

Resource consent applications have declined 43% since 2022/23, driven primarily by reduced subdivision activity, though the rate of decline slowed markedly in 2025/26 and Dannevirke's rural area recorded its first increase in the period. Urban subdivision has weakened across all towns. Land use and other consent volumes have stabilised. Despite these fluctuations, 100% of applications were processed within statutory timeframes in every year, with processing volumes exceeding intake in 2025/26.

Historically, the majority of subdivision applications have been applied for in the Rural Management Area. The large number of rural subdivision consents being processed continues to result in the fragmentation of the rural environment.

The majority of subdivision applications TDC receives are for controlled activity consents.

Similar to subdivision data, land use consent data shows a high number of consents being sought in the rural environment area. This indicates a high degree of development is continuing within the rural environment, which ultimately results in the loss of rural productive land and reverse sensitivity effects.

It is expected that land use development should primarily be focused within the residential and commercial zones. The residential zones show small numbers of land use consents, with the commercial and industry zones showing very few land use consents.

Conclusion

When reviewing the current land supply across the four main townships, the land currently zoned residential does include a number of vacant sections spread sporadically across each area. These pockets have remained vacant for some time and have not been subject to any development. Therefore, whilst there is a small amount of land available within the existing towns, the question is one of whether the current owners will develop the land. Based on the current and historic situation, the answer appears to be no. What is observed, is that there is no vacant residential land, at scale, to provide for comprehensive greenfield development to occur, with the majority of land being located in an 'infill' context.

For each of the four main towns, unless further land is zoned residential, it is concluded that no further additional supply of residential land is available for comprehensive development, and that infill housing would need to be developed to enable further population growth. The assumption has been made that in absence of PCA, there is no change in residential land supply out to 2053 as:

- No greenfield residential developments are planned.
- No infill housing is expected to occur, unless it is the only development option.
- The land within the currently zoned residential land that is vacant, will remain vacant, and is not available for greenfield residential developments.

While intensification (or infill development) will provide some opportunities for housing growth, greenfield land availability is necessary to ensure Council's housing bottom lines are achievable. Currently, there are no greenfield areas available in the district for additional housing development or expansion of the existing residential areas. Therefore, land for greenfield development must be zoned for Council to achieve its housing bottom lines.

Four major residential growth locations are proposed as part of PCA as outlined earlier in this report. PCA is intended to provide land for greenfield development across both the short to medium term and the medium to long-term. It is expected that more than half of the planned capacity under PCA will be used over the next ten to fifteen year period as higher population growth is projected over this period also. The uptake of development capacity may differ depending on market conditions and this will be investigated through regular updates. The estimated uptake of the growth areas is based on the following assumptions:

- Existing demand for greenfield growth currently exceeds supply and is anticipated to do so for short to medium term until the new growth areas are realised.
- Development can leverage existing water and wastewater network infrastructure in the short-term.
- Where existing infrastructure is not in place, upgrade/extension options exist to provide for growth in each of the locations.
- Land ownership is favourable, which reduces complexity that exists in other growth locations, where aggregation will be required to facilitate development.

4.6 Why Dannevirke?

Dannevirke is located on a flat river terrace, approximately 60km drive north from Palmerston North and 100km drive south from Hastings.

The entrances to Dannevirke are well defined by topography. From the south, after passing the Dannevirke Golf Club and a few commercial/industrial properties, the road dips to cross

over the Makirikiri Stream, before rising up into the main street. Similarly, from the north, the road dips to cross the Mangatera Stream before reaching the terrace.

The town is also strongly defined to the east by a relatively steep escarpment feature, the land dropping away to the Mangatera Stream as it winds its way southward to the Manawatū River. To the west, the topography gently rolls upward in elevation, across Adelaide Road, to another elevated terrace which extends to the foothills of the Ruahine Ranges.

The Palmerston North to Napier railway line forms the spine of the town, with State Highway 2 forming a gentle boomerang shape. The main commercial zone is located in the southern half of the town, with the residential area extending several kilometres northward.

Dannevirke is the most linear of the four towns, with a tail of residential development extending nearly 6km northwards from the central commercial area. Council owned parks and reserves are scattered through this area, and Dannevirke High School is somewhat centrally located, west of the railway line. Three public primary schools are relatively evenly spread through town.

The existing Industrial Zone largely extends southward, but is well connected to the centre of town by Miller Street. SH2 passes through the centre of town, and the Dannevirke Railway Station is one block from the commercial centre.

The Oringi Industrial Estate is located approximately 10km to the south of town.

Dannevirke has historically had a relatively compact urban form, however in more recent years commercial activity has tended to stretch in a linear manner south along SH2. Key constraints to new development in Dannevirke are the topography, with the steep escarpment to the east, and the gentle landform changes to the north and south providing natural containment boundaries. Therefore, the most logical expansion of the town is to the west.

Further, the wastewater facility is located at the southern end of the township. Increasing development at the northern end would require significant upgrading of pipe networks, and likely the installation of pumping stations.

There is an opportunity to promote new residential development close to Dannevirke's CBD in order to retain a compact urban form, promoting walking and cycling opportunities. Keeping the zoning in the southern end of town also favours the existing water infrastructure, particularly in regard to wastewater management.

It is recognised that some of the land between the existing urban boundary and Adelaide Road has already been developed, and there are some restrictions due to topography and waterways, therefore requiring an allowance for an overall greater area than the capacity requirements. It is considered that there will also be opportunities, through detailed design, to enhance and better manage the waterways and that they could become important public open space.

4.7 Why Woodville?

Woodville has a somewhat neat grid arrangement, contained within an area that is approximately 1.5km by 1.5km. State Highway 2 and State Highway 3 intersect in the middle of the town, and the Palmerston North to Napier railway line intersects with the Wairarapa Line immediately to the south. Te Ahu a Turanga: Manawatū Tararua Highway is to the west of town and provides a key connection route to Palmerston North City.

The topography of the town is essentially flat, although it drops in elevation slightly to the south and west, and rises gently in the north. A notable feature of Woodville is the Racing Club, located to the north of the town.

Woodville has a relatively compact form, with the majority of residential areas being within 2km of the commercial centre. A single primary school is located on SH2, and four recreational reserves are spread evenly through the east west axis of the town.

The industrial area is relatively small but is ideally located to the south of town by the rail sidings, with an easy connection to SH2, however is subject to flood hazard risks.

Woodville is considered to be in the best location to fully realise the benefits of Te Ahu a Turanga: Manawatū Tararua Highway, providing a faster, safer connection to Palmerston North. It is also ideally placed at the intersections of SH2 and SH3, with the addition of excellent rail connectivity. These attributes are reflected in the growth aspirations for the town. This is also the rationale for locating the proposed greenfield industrial site to the west of the Woodville township.

It is noted that Woodville is located adjacent to a large and relatively severe flood hazard area. In addition to the low-lying areas around the Manawatū River, the west side of town is subject to a large catchment area that extends well into the Ruahine Ranges to the north.

Residential expansion within Woodville is therefore logical to occur to the north, and growing in this direction allows the retention of a compact urban form. The ideal expansion area for Woodville is to infill the flatter land within the square formed by Pinfold and Sowry Roads. This keeps the town centre compact and promotes walking opportunities.

This area is generally flat and whilst there are flood management requirements that need to be considered as the land is developed, these can be adequately managed through future consenting processes. Beyond this area, rural residential development can then transition into the broader rural zone.

4.8 Why Pahiatua?

Pahiatua is also located on a relatively flat terrace, adjacent to the Mangatainoka River which runs northward on the western edge of the town. To the east is a series of low, rolling hills which have historically bordered the town, but in more recent years are housing lifestyle properties.

The town is relatively compact, with the Commercial area almost central in both the north/south and east/west alignments. State Highway 2 runs through the centre of the town and is a relatively unique feature due to its directional separation. Various public recreational facilities are located in the wide island between the north and south lanes. Although there is a small tail of residential development to the south of the centre. Two primary schools are located east and west of the centre, and Tararua College is located in the southwest. All schools are located within 2km of the town's residential areas.

A small industrial area is not well serviced or connected, but industrial activity also happens on commercial and residentially zoned land along SH2. A milk processing factory is also located approximately 3km to the west.

Residential expansion of Pahiatua is possible to either the north or to the south of the existing urban expanse. Growth to the north is the preferred option because analysis indicates that mitigating flood and stormwater in this area is likely to be more economical. The biggest challenge for urban expansion in Pahiatua is the flood hazard areas, which restrict most development to the west and south. Topography to the east of the town also makes efficient suburban development more challenging.

The existing flood modelling and analysis indicates that wherever urban expansion is undertaken, it will be necessary to develop flood protection and mitigation schemes, including

potentially constructing stormwater infrastructure that conveys stormwater from the east of town to the river on the west, and includes upgrades to the Huxley waterway.

In addition, residential activity in the northern area remains close the centre of town, with good existing connectivity.

4.9 Why Eketāhuna?

Unlike the other towns, Eketāhuna is located largely in a valley floor and on old river terraces formed by the Makakahi River, and is effectively split in two by the river, this forming a deep gorge in a generally southwest to northeast alignment. Therefore, growth within Eketāhuna is considered to be relatively easily managed due to the historical layout of the town, particularly on the western side.

The Commercial centre is located along State Highway 2, which follows the river for several kilometres both to the north and south of the town. Through the town, the road forms a gentle curve shape which adds interest to the arrangement of shops and businesses.

Residential expansion can naturally take place on the western side flat terrace, as well as potentially just to the northeast of the town centre.

4.10 Conclusion

The expansion of the residential areas for each of the four towns has considered the existing constraints, in particular of the existing infrastructure, as well as the restrictions on growth from Government policies (such as natural hazards and highly productive land), or the physical limitations of the landscape surrounding our towns (in particular storm and flood water).

The development of PCA has also considered how best to respond to the existing urban form, location of existing community facilities, and the existing urban character. Considering these factors in combination, the approach to identifying the locations for residential urban expansion considered the following:

- Avoiding known flood inundation areas, or where necessary consider whether appropriate protection measures can be installed.
- Favouring development areas that minimise the impacts on the existing Council infrastructure network, particularly in regard to water supply and wastewater management.
- Ensuring that there is available space to provide for well designed, connected communities, factoring in recreational spaces, green networks, stormwater management, and connectivity to existing community facilities.
- Minimising, where possible, encroachment onto land that is known to be highly productive.
- Promotion of compact urban form rather than lineal spread, to help reduce impacts on roading networks and to promote walking and cycling opportunities.
- Ensuring development can be serviced with electricity and telecommunications, but development avoids a buffer corridor either side of National Grid transmission lines.
- Ensuring that the land is suitable for development, that the topography is workable.
- Avoid land that has significant cultural, landscape or ecological value.

4.11 Supporting Information

In considering and preparing Proposed PCA, TDC has either completed or commissioned technical reports and supporting documents. In some instances, existing studies and assessments have also been relied on.

A list of the studies, assessments and existing data/information that have been considered and informed PCA are as follows, and are included in Appendix 3 to this report:

- Industrial, Residential and Projection analysis completed by BERL.
- Tapuata Stream Flood Assessment completed by River Edge Consulting.
- Existing Horizons (Manawatu-Wanganui Regional Council) Flood modelling for Woodville and Pahiatua
- Highly Productive Land Assessment of proposed rezonings completed by EcoAgrilogic.
- Infrastructure capacity, optioneering and feasibility study completed by Rationale.
- Agribusiness Study completed by Journeaux Economics.

PCA has also been informed by the Tararua District Urban Growth Strategy, which was prepared and adopted in 2024 as a direct input to future planning processes. The TDUGS was deliberate in its assessment and level of detail to provide a basis for the wider district plan review, and now PCA. Each of the townships was robustly assessed with the growth recommendations informed by technical information on natural hazards, population and growth projections, natural features, connectivity, infrastructure provision, roading, soils and maintaining a compact urban form. Therefore, the outcomes and assessment undertaken as part of the TDUGS process has been heavily relied upon for the purposes of PCA. Due to the recency of the information, for efficiency and cost purposes, additional technical reporting was not considered necessary in this instance, other than those studies referred to above. The outcomes sought by PCA are therefore a direct representation of the outcomes presented in the TDUGS, and are directly informed by the technical information that supported the TDUGS document and process.

5. Statutory and Policy Context

5.1 Part 2 of the Resource Management Act

Section 5 sets out the purpose of the RMA, which is to promote the sustainable management of natural and physical resources. In achieving this purpose, authorities need also to recognise and provide for the matters of national importance identified in Section 6, have particular regard to other matters referred to in Section 7 and take into account the principles of the Treaty of Waitangi referred to in Section 8.

Under Section 5(2), sustainable management means managing the use, development, and protection of natural and physical resources to enable people and communities to provide for their social, economic and cultural wellbeing and for their health and safety.

Therefore, this report assesses if Proposed PCA is the most appropriate way to achieve the purpose of the RMA.

5.2 Section 32

Section 32 outlines the requirements for preparing and publishing evaluation reports. The evaluation report focuses only the changes proposed under PCA.

Section 32 of the RMA –

- (1) *“An evaluation report required under this Act must -*
- (a) examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and*
 - (b) examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by -*
 - (i) identifying other reasonably practicable options for achieving the objectives; and*
 - (ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and*
 - (iii) summarising the reasons for deciding on the provisions; and*
 - (c) contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.*
- (2) *An assessment under subsection (1)(b)(ii) must -*
- (a) identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for -*
 - (i) economic growth that are anticipated to be provided or reduced; and*
 - (ii) employment that are anticipated to be provided or reduced; and*
 - (b) if practicable, quantify the benefits and costs referred to in paragraph (a); and*
 - (c) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.*
- (5) *The person who must have particular regard to the evaluation report must make the report available for public inspection –*
- (a) as soon as practicable after the proposal is made (in the case of a standard, regulation, national policy statement, or New Zealand coastal policy statement); or*
 - (b) at the same time as the proposal is notified.*
- (6) *In this section, –*
- objectives** means, –
- (a) for a proposal that contains or states objectives, those objectives:*
 - (b) for all other proposals, the purpose of the proposal*
- proposal** means a proposed standard, statement, national planning standard, regulation, plan, or change for which an evaluation report must be prepared under this Act
- provisions** means, –
- (a) for a proposed plan or change, the policies, rules, or other methods that implement, or give effect to, the objectives of the proposed plan or change;*
 - (b) for all other proposals, the policies or provisions of the proposal that implement, or give effect to, the objectives of the proposal.”*

5.3 Section 74: Purpose and Matters to be Considered within District Plan

Section 74 of the RMA requires that where a district plan is changed, it must be changed in accordance with its functions under section 31, the purpose of the Act in section 5 and the other matters under sections 6, 7 and 8. The following section provides an overview of the relevant requirements and matters that need to be considered by district councils and district plans.

Functions of District Councils – Under section 31 of the Act, the functions of district councils include the establishment, implementation and review of objectives, policies and methods to achieve integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district.

Purpose of District Plans – Under section 72 of the Act, the purpose of district plans is to assist local councils in carrying out their functions in order to achieve the purpose of the Act.

Preparation of District Plans – Section 73 states that there must be one district plan at all times. It must be prepared by the Council in a manner set out in Schedule 1 of the Act.

Matters to be Considered by Territorial Authorities – the matters to be considered by a district council when preparing or changing its district plan are set out in section 74 of the Act. This requires councils to act in accordance with its functions under section 31, the provisions of Part 2, and its duty under section 32.

6. National Direction

There are ten National Policy Statements that have legal effect under the RMA. They are:

- National Policy Statement for Natural Hazards 2026
- National Policy Statement for Infrastructure 2025
- National Policy Statement for Indigenous Biodiversity 2023
- National Policy Statement for Highly Productive Land 2022
- National Policy Statement on Urban Development 2020
- National Policy Statement for Freshwater Management 2020
- National Policy Statement for Renewable Electricity Generation 2011
- New Zealand Coastal Policy Statement 2010
- National Policy Statement for Electricity Networks 2008
- National Policy Statement for Greenhouse Gas Emissions from Industrial Process Heat 2023

The National Policy Statements that are relevant for PC-A are discussed in more detail below.

National Policy Statement on Urban Development 2020

The NPS-UD came into effect on 20 August 2020.

The objectives of the NPS-UD seek to achieve the following:

- a. Well-functioning urban environment that enable people to provide for their social, economic, and cultural well-being, and for their health and safety, now and into the future;
- b. Planning decisions that improve housing affordability;

- c. Enable more people to live in areas of an urban environment that are near centres, employment, well served by public transport or there is a high demand for housing;
- d. Recognition that urban environments and amenity values change overtime;
- e. Planning decisions take into the principles of the Treaty of Waitangi;
- f. Decisions on urban development are integrated with infrastructure and planning decisions, strategic over the medium and long term, and responsive;
- g. Local authorities have robust and up to date information about their urban environments and use it to inform planning decisions;
- h. Urban environments support reductions in greenhouse gases and are resilient to the effects of climate change.

Proposed PCA gives effect to the NPS-UD as far as it is relevant to the plan change. As outlined in this report, PCA will provide essential greenfield land to provide and enable the continued growth of the Tararua District. Currently there is no 'zoned' greenfield land available for either residential or industrial growth and development. Therefore, PCA will assist with providing development capacity to meet the expected housing demand. The development capacity that PCA enables will be supported by an accompanying policy and rule framework that adopts a comprehensive planning approach. This is to ensure that as development occurs, a well-functioning urban environment is established in areas adjacent to existing urban environments where there is demand for housing.

The Tararua District Plan is encouraged to provide sufficient capacity and flexibility to accommodate a wide range of current and future land uses and activities to meet the needs of communities. The PCA provisions enable a range of housing choice and densities within the residential area which are consistent with the intent of the objectives set out in the NPS-UD.

The new development areas will support components of a well-functioning urban environment, including by:

- Enabling a variety of housing choices across the zone, including a variety of densities, and development that maintains a compact urban form and promotes connectivity with the existing urban areas and townships.
- Promoting good accessibility between housing, jobs, community services and open spaces by enabling more people to live in accessible locations in close proximity to the existing town centres.
- Supporting the competitive operation of land and development markets by providing a broadly enabling zone framework and providing flexibility for the market to take up those opportunities.

The proposed provisions, to accompany the new growth areas, include flexibility to ensure the plan and the areas can respond to changing housing needs, and types over time.

Policy 1 of the NPS-UD states that the matters listed are a "minimum", suggesting that the Council has the ability to create their own definition of a well-functioning environment that reflects the particular values and qualities of the place. In the Tararua context, a key part of a well-functioning urban environment will be the visual quality and cohesiveness of neighbourhoods. The existing neighbourhoods have low density single-family homes, and this will change slowly over time in areas as new residential development occurs. The PCA provisions provide for this change but does so in a way that places good design principles at the forefront, to ensure that the District Plan supports the creation of enduring, functional and quality places for people.

The Proposed PCA includes zoning changes and additions to provide additional housing capacity.

The Tararua District is not a tier 3 local authority area, and therefore Policy 5 does not directly apply. That said, NPS-UD Clause 1.5 strongly encourages local authorities to implement these obligations.

PCA provides for additional housing capacity and includes a plan framework to manage development without specific restrictions. Instead, it places emphasis on coordinated growth and good design principles at the forefront of the process, to ensure that development creates enduring, functional and quality places for people.

PCA will encourage the development of a variety of densities within the Residential Zone than what has previously been provided for. This will result in change in the built character within these areas over time and enhance the current values currently enjoyed by some residents, related to the spacious and suburban qualities of the existing neighbourhoods.

PCA will enable however, a different set of outcomes to be realised over time as development occurs, when compared to those currently associated with existing environments.

PCA includes provisions that will acknowledge existing values and enable development that will enhance existing urban environments.

National Policy Statement for Freshwater Management 2020:

Every territorial authority must include objectives, policies, and methods in its District Plan to promote positive effects, and avoid, remedy, or mitigate adverse effects (including cumulative effects), of urban development on the health and well-being of water bodies, freshwater ecosystems, and receiving environments. PCA proposes to include provisions which reinforce the importance of providing for adequate stormwater management, including ensuring careful consideration is given to alternative and integrated approaches to the management of stormwater run-off.

National Policy Statement for Natural Hazards 2026:

The principal objective of the NPS-NH, relevant to PCA, is that:

Natural hazard risk to people and property associated with subdivision, use and development is managed using a risk-based proportionate approach.

Furthermore, Policy 4 of the NPS-NH states:

Where subdivision, use or development, including any associated mitigation measures, will create or increase significant natural hazard risk on other sites, that risk must be avoided or mitigated using an approach that is proportionate to the level of natural hazard risk.

The areas for rezoning under PCA have been informed by existing natural hazard information held by Council, and Horizons Regional Council, for the district as a whole. This includes the following information, relevant the PCA:

- GNS Fault hazard mapping
- Liquefaction Mapping
- Flood modelling and mapping

These data sources were considered through the development of the Tararua District Urban Growth Strategy, as outlined above, and the formulation of the areas suitable for future growth. Through this process the areas identified were assessed in terms of their natural hazard risk. This can be found in the TDUGS document appended to this report. Each of the

growth areas put forward are considered to be the most appropriate locations to avoid natural hazard risks whilst providing for future growth.

The main natural hazard consideration is flood risk for any future growth due to the low-lying nature of the townships and their proximity to rivers, waterways and overland flow paths. The proposed rezonings were confined to areas with no, or minimal, flood risk. The flood modelling available, held by Horizons Regional Council, was used to ensure any future growth can be located in areas where flood risks can be avoided, or appropriately mitigated.

The main focus of the NPS is on managing subdivision and development of land for housing purposes. The development provisions under PCA, and within the existing plan, allow for the consideration of natural hazards as part of development proposals. The development process is constructed in a manner that ensures natural hazard risk is an important consideration of any resource consent proposal, and the consideration of such by the Council. This includes all forms of natural hazard risk.

Overall, there are no significant natural hazard risks present within any of the proposed rezoning areas that prevent them from being developed for housing and/or industrial development. Therefore, PCA is not considered to be contrary to the intent of the NPS-NH and the direction set by the document.

National Policy Statement for Highly Productive Land 2022:

The National Policy Statement for Highly Productive Land 2022 (“NPS-HPL”) came into force on 17 October 2022 and was amended in December 2025. The NPS-HPL can be read with assistance from the guidance documents (National Policy Statement for Highly Productive Land - Guide to implementation) published by the Ministry for the Environment.

The areas proposed for rezoning under PCA are identified as containing versatile soils as defined by the NPS-HPL. This being land that is LUC Class 1, 2 and 3 soils under the Land Use Capability system. The following is an assessment of the appropriateness of PCA given the policy direction and provisions of the NPS-HPL and the intent of PCA to rezone rural land to an urban zoning.

Firstly, it is highlighted that the sole objective of the NPS-HPL is:

Highly productive land is protected for use in land-based primary production, both now and for future generations.

The following policies are also considered relevant to PCA:

Policy 1: Highly productive land is recognised as a resource with finite characteristics and long-term values for land-based primary production.

Policy 5: The urban rezoning of highly productive land is avoided, except as provided in this National Policy Statement.

The policy framework of the NPS-HPL is clear in its direction when considering the rezoning of Highly Productive Land. In particular, Policy 5 of the document directly relates to the rezoning of highly productive land to urban use, as set out above.

Clause 3.6(4) of the NPS-HPL addresses this policy, directing that the rezoning of land can only occur where all the three tests in Clause 3.6(4) are met.

Clause 3.6(4) of the NPS-HPL states:

(4) Territorial authorities that are not Tier 1 or 2 may allow urban rezoning of highly productive land only if:

- (a) the urban zoning is required to provide sufficient development capacity to meet expected demand for housing or business land in the district; and*

- (b) *there are no other reasonably practicable and feasible options for providing the required development capacity; and*
- (c) *the environmental, social, cultural and economic benefits of rezoning outweigh the environmental, social, cultural and economic costs associated with the loss of highly productive land for land based primary production, taking into account both tangible and intangible values.*

In considering PCA, this report must consider the matters set out in Clause 3.6(4).

Furthermore, in addition to Clause 3.6(4), Clause 3.6(5) of the NPS-HPL also states:

Territorial authorities must take measures to ensure that the spatial extent of any urban zone covering highly productive land is the minimum necessary to provide the required development capacity while achieving a well-functioning urban environment.

Therefore, the above policy context provides the basis for assessing the appropriateness of the rezoning of land from rural to an urban zoning.

Clause 3.6(4)(a)

In order for it to be considered appropriate to rezone highly productive land to urban, it must be demonstrated that the additional land is needed to provide sufficient “development capacity” under the NPS-UD. This includes being plan enabled, has access to infrastructure and is feasible and reasonably expected to be realised.

As outlined earlier in this report, the District is projected to grow over the next 10 years and beyond, with this growth split between the four main townships of the district. Currently, there is no vacant land, at scale, to meet the projected growth and associated demand for housing over this time period. Therefore, in order to adequately provide for growth within the district, additional land is required to be rezoned to enable further development. For the purposes of PCA, the district is not considered to contain any existing development capacity across these locations. Thus, it is considered that the proposed rezonings under PCA meet this test and provide sufficient development capacity to meet expected demand for housing or business (in this instance industrial business) land in the district.

It is emphasised here that growth within the district as a whole, occurs across the different township locations with different types of housing required to fill demand. Therefore, there is a need to provide for distributed growth opportunities across the four main townships. As a result of the NPS-HPL, the supply of rural land for rural-lifestyle development has been reduced. This is due to the high presence of versatile soils throughout the district and the NPS-HPL challenging the appropriateness of further fragmenting this land through subdivision. Lifestyle development, for a long time, filled the growth provision gap for the Tararua District with minimal infrastructural cost.

This further reinforces the need to provide for growth in multiple areas as demand exists across the district as a whole, with housing sought in all four contexts respectively.

The development areas under PCA are considered to be feasible and reasonably expected to be realised. The additional greenfield land will provide for additional housing capacity and choice within the district. The proposed development growth areas are logical extensions of the existing residential areas in each township. This enables the extension of existing infrastructure networks, including roads and piped networks into these areas.

Clause 3.6(4)(b)

In terms of clause 3.6(4)(b) of the NPS-HPL, there is suitable information to demonstrate that there are no other “reasonably practicable and feasible options” for providing the required development capacity. There are challenges to providing for growth within the existing urban areas, in particular the residential areas of each township. This is due to no current greenfield land being available in each of the localities. Furthermore, infill development typologies are not sought after in the district with the demand remaining for new standalone homes on larger sections. Therefore, infill development is not a pattern commonly associated with the townships in the district with development patterns and housing typologies representing stand-alone residential dwellings on larger allotments. Houses are also observed to be generally located in central locations within the allotments further restricting infill potential.

As outlined in this report, there is housing demand across the district with the proposed greenfield development sought by PCA being the most likely option to achieve efficient development (in terms of supply of housing within the district) than alternative options available. Each of the proposed areas has been investigated as part of the development of the TDUGS, which provides assessment and recommendations with regard to each of the townships. In each location, the growth areas put forward are considered to be the most appropriate location due to their proximity to the existing urban areas, existing road networks, existing infrastructure and amenities and represent a logical extension of the existing urban areas of each town. Furthermore, as outlined above, each area has been confined to locations clear of any natural hazard risks.

It is noted that the vast majority of land surrounding Dannevirke, Woodville and Pahiatua contains highly productive land and is zoned rural. Therefore, there is no alternative rural zoned land that is not defined as highly productive which could provide a reasonable alternative. Furthermore, the property sizes within the proposed rezoning areas are predominantly less than 4 hectares. This presents current patterns of extensive land fragmentation that significantly limits the feasibility of land-based primary production, as the small parcel sizes restrict the potential to scale up to viable agricultural or horticultural operations.

As outlined in the TDUGS, each of the growth locations has been well-considered in terms of their extent and location. Each of the growth locations have been informed by a combination of an assessment of the natural land features, natural hazard risks, infrastructure and proximity to the exiting urban areas.

In all four locations (Dannevirke, Woodville, Pahiatua and Eketahuna), the areas included in PCA for rezoning are considered to be in the only locations available for a logical expansion of the existing residential areas based on these factors. Also, as outlined above, avoiding high-class soils is somewhat unachievable and unrealistic in this case due to the presence of these soils at the fringes of all of the townships.

In locations, the growths areas consist of land that is best placed for connectivity to existing infrastructure, maintains a compact urban form and avoids natural land features and hazards. No other options are considered to be present, without resulting in increased inefficiencies, costs and risks associated with developing in alternative locations.

Clause 3.6(4)(c)

Clause 3.6(4)(c) requires that the environmental, social, cultural and economic benefits of rezoning outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land. PCA is considered to give rise to several positive benefits, including tangible and intangible economic, social and cultural benefits. This includes benefits of increased housing supply, increased economic activity, the urban design

benefits of a planned greenfield development (including walking and cycling), provisions of housing choice and restoration of natural features.

As outlined above, there is currently no land available for growth. Council is required to provide for growth under the NPS-UD and to meet the needs of the district. Therefore, PCA is a direct response to this matter. Furthermore, the specific locations for rezoning are considered to be the most appropriate for each township for the reasons also outlined above.

On this basis, the benefits of PCA are considered to outweigh the costs of the loss of Highly Productive Land (HPL).

Clause 3.6(5)

In addition to the above, Clause 3.6(5) of the NPS-HPL states: “(5) Territorial authorities must take measures to ensure that the spatial extent of any urban zone covering HPL is the minimum necessary to provide the required development capacity while achieving a well-functioning urban environment.”

When considering this clause, the assessment covering the distribution of growth across the district is particularly relevant. In this case, PCA is considered to promote a sufficient amount of land supply to cater for the growth needs of the district over the next 30 years. The need to zone the full extent of each area, as recommended by the TDUGS, is to ensure that housing supply within each location has sufficient opportunity to be realised and that appropriate efficiencies and economies of scale can be achieved. The provision of housing is heavily reliant on the private sector, as Council itself is not a developer. This is due to land ownership, size of land holdings and infrastructure solutions.

Therefore, the proposed spatial extent of the PCA areas is considered to be the minimum necessary required to maintain the character of each township while also ensuring that expected demand for additional housing can be met. It is also considered that based on the assessments above, PCA will provide for and achieve a well-functioning urban environment.

CONCLUSION

There is an established need to provide for growth within the district and for the reasons outlined in this report, it is important to provide for this growth within all four of the main townships. Currently, no greenfield land exists for neither housing and/or industrial growth. Therefore, PCA directly responds to Council’s obligations to provide for growth in the district. This is further supported by the technical reports appended to this report.

An assessment of the Land Use Capability (LUC) classification of the soils contained within the flat areas adjacent to the existing residential areas is such that all land suitable for development, contains HPL. Thus, it is considered the HPL cannot be completely avoided when providing for growth. The benefits of maintaining a compact urban form and providing the ability for the district to grow, in line with projections, is considered to outweigh the cost of the loss of HPL under PCA.

PCA will deliver on housing development outcomes that are required to meet projected population growth and housing demand across the district. The LUC of the soils has been examined in detail to understand their productive capacity and in relation to other soil types present within the district. Despite being regarded as highly productive under the definition of LUC Class 1 - 3, their use in a productive capacity is considered limited due land fragmentation, soil qualities, and economic viability of the landholdings. The costs associated with their loss are therefore not regarded as significant and it is clear the benefits of rezoning outweigh the costs associated with the loss of productive land.

6.1 National Environmental Standards

The following National Environmental Standards (NES) are currently in force:

- NES for Commercial Forestry 2023
- NES for Storing Tyres Outdoors 2021
- NES for Freshwater 2020
- NES for Marine Aquaculture 2020
- NES for Telecommunication Facilities 2016
- NES for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
- NES for Electricity Transmission Activities 2009
- NES for Sources of Drinking Water 2007
- NES for Air Quality 2004
- NES for Greenhouse Gas Emissions from Industrial Process heat 2023

There are no National Environmental Standards that are considered to be directly relevant to PCA.

6.2 National Planning Standards

The National Planning Standards 2019 (NP-Standards) outline the structure and format of District Plans. TDC is yet to implement the NP-Standards.

PCA proposes to maintain an uncomplicated development framework by not introducing additional zones into the District Plan but rather incorporating specific development area chapters as outlined above in this report. These development area sub-sections have been drafted in accordance with the national planning standards. The existing residential management area is used predominantly for residential activities with a mix of building types, and other compatible activities. A combination of the existing industrial management area and new provisions is proposed to manage industrial subdivision and development. The proposed provisions have been incorporated into this zone and enable subdivision and development within the relative development areas.

7. Regional Direction

7.1 Regional Policy Statement – Horizons Regional Council One Plan

Horizons Regional Council's One Plan combines the Regional Policy Statement and Regional Plan into one document. The Regional Policy Statement (RPS) is contained in Part 1 while the Regional Plan is in Part 2. Chapters RPS-UFD (Urban Form and Development), and RPS-EIT (Energy, Infrastructure and Transport) of the Regional Policy Statement set out the resource management issues, objectives and policies that are relevant for PCA. These chapters provide specific direction that territorial authorities must consider in their District Plans.

The Tararua District Plan is required to give effect to the RPS as required by section 75(3) of the RMA, and must not be inconsistent with a regional plan (section 75(4)(b)).

Key One Plan Objectives & Policies	Response for Proposed PCA
Objective 2-1: Resource Management a. To have regard to the mauri* of natural and physical resources^ to enable hapū* and iwi* to provide for their social, economic, and cultural wellbeing. b. Kaitiakitanga^ must be given particular regard and the relationship of hapū* and iwi* with their ancestral lands^, water^, sites*, wāhi tapu* and other taonga* (including wāhi tūpuna*) must be recognised and provided for through resource management processes.	Consultation with mana whenua has been undertaken throughout the plan preparation process. Interests and values of mana whenua have been incorporated into PCA where appropriate. For the growth areas identified, the main consideration relates to the management of stormwater and water quality. Provisions have been included to ensure this is appropriately managed.
Objective 3-3: The strategic integration of infrastructure with land use Urban development occurs in a strategically planned manner which allows for the adequate and timely supply of land and associated infrastructure.	The development areas proposed under PCA have been identified as future growth area through the Tararua District Urban Growth Strategy.
Objective 3-4: Urban growth and rural residential subdivision on versatile soils To ensure that territorial authorities consider the benefits of retaining Class I and II versatile soils for use as production land^ when providing for urban growth and rural residential subdivision.	The NZ Land Resource Inventory indicates that the PCA areas contain Class I, II and III soils. The matters have been considered earlier in this report. PCA has considered the benefits of retaining versatile soils in the context of providing for growth.
Policy 3-4: The strategic integration of infrastructure with land use Territorial Authorities must proactively develop and implement appropriate land use strategies to manage urban growth, and they should align their infrastructure asset management planning with those strategies, to ensure the efficient and effective provision of associated infrastructure.	The proposed growth areas are all logical extensions of existing urban areas where infrastructure exists. Providing for growth in these locations will require the extension and upgrade of the ese networks to enable development to occur. Infrastructure studies have been undertaken to determine feasibility and once the growth areas are zoned, Council's infrastructure planning will follow to enable the growth. The proposed plan provisions require adequate stormwater to be in place before residential development can proceed.
Policy 3-7: Energy efficiency* a. The Regional Council and Territorial Authorities^ must have particular regard to the efficient end use of energy in	The proposed provisions have been designed to ensure that future subdivision is undertaken consistent with the policy direction. Access to sunlight and the connectivity of development are important

Key One Plan Objectives & Policies	Response for Proposed PCA
consent decision-making processes for large users of energy. b. Territorial Authority^ decisions and controls on subdivision and housing, including layout of the site* and layout of the lots in relation to other houses/subdivisions, must encourage energy-efficient house design and access to solar energy. c. Territorial Authority^ decisions and controls on subdivision and land^ use must ensure that sustainable transport options such as public transport, walking and cycling can be integrated into land^ use development.	considerations that will be included in consent processes.
Objective 5-2: Water Quality: a. Surface Water quality is managed to ensure that: i. Water quality is maintained in those rivers and lakes where the existing water quality is at a level sufficient to support the Values in Schedule B ii. Water quality is enhanced in those rivers and lakes where the existing water quality is not at a level sufficient to support the Values in Schedule B iii. Accelerated eutrophication and sedimentation of lakes in the region is prevented or minimised iv. The special values of rivers protected by water conservation orders are maintained b. Groundwater quality is managed to ensure that existing groundwater quality is maintained or where it is degraded/over allocated as a result of human activity, groundwater quality is enhanced. Policy 5-9: Point source discharges^ to water^ The management of point source discharges^ into surface water^ must have	The proposed growth areas will be required to manage stormwater in accordance with existing Operative District Plan framework, strengthened by objectives, policies, and rules proposed under PCA. These require stormwater discharges to be managed in such a way that promotes hydraulic neutrality. A stormwater management plan will also be required as part of any new application within the development areas.

Key One Plan Objectives & Policies	Response for Proposed PCA
regard to the strategies for surface water[^] quality management set out in Policies 5-3, 5-4 and 5-5, while having regard to: - the degree to which the activity will adversely affect the Schedule B Values for the relevant Water Management Sub-zone* - whether the discharge[^], in combination with other discharges[^], including non-point source discharges[^] will cause the Schedule E water quality targets* to be breached - the extent to which the activity is consistent with contaminant[^] treatment and discharge[^] best management practices - the need to allow reasonable time to achieve any required improvements to the quality of the discharge[^] - whether the discharge[^] is of a temporary nature or is associated with necessary maintenance[^] or upgrade* work and the discharge[^] cannot practicably be avoided - whether adverse effects[^] resulting from the discharge[^] can be offset by way of a financial contribution set in accordance with Chapter 19 - whether it is appropriate to adopt the best practicable option.	
Policy 5-10: Point source discharges[^] to land[^] Discharges[^] of contaminants[^] onto or into land[^] must be managed in a manner which: - does not result in pathogens or other toxic substances accumulating in soil or pasture to levels that would render the soil unsafe for agricultural, domestic, or recreational use - has regard to the strategies for surface water[^] quality management set out in Policies 5-3, 5-4 and 5-5, and the	

Key One Plan Objectives & Policies	Response for Proposed PCA
strategy for groundwater management set out in Policy 5-6 c. maximises the reuse of nutrients and water[^] contained in the discharge[^] to the extent reasonably practicable d. results in any discharge[^] of liquid to land[^] generally not exceeding the available water[^] storage capacity of the soil (deferred irrigation) e. ensures that adverse effects[^] on rare habitats*, threatened habitats* and at-risk habitats* are avoided, remedied, or mitigated.	
Objective 6-1: Indigenous biological diversity Protect areas of significant indigenous vegetation and significant habitats of indigenous fauna and maintain indigenous biological adversity[^], including enhancement where appropriate.	There are no known biodiversity sites or locations within the PCA growth areas.
Policy 6-2: Regulation of activities affecting indigenous biological diversity For the purpose of managing indigenous biological diversity[^] in the Region: a. Habitats determined to be rare habitats* and threatened habitats* under Schedule F must be recognised as areas of significant indigenous vegetation or significant habitats of indigenous fauna b. At-risk habitats* that re assessed to be significant under Policy 13-5 must be recognised as significant indigenous vegetation or significant habitats of indigenous fauna. c. The Regional Council must protect rare habitats*, threatened habitats* and at-risk habitats* identified in (a) ad (b), and maintain and enhance other at-risk habitats* by regulating activities through its regional plan and through decisions on resource consents[^]. d. Potential adverse effects[^] on any rare habitat*, threatened habitat* or at-risk	

Key One Plan Objectives & Policies	Response for Proposed PCA
habitat* located within or adjacent to an area of forestry* must be minimised. e. When regulating the activities described in (c) and (d), the Regional Council must, and when exercising functions and powers described in Policy 6-1. Territorial Authorities^ must: i. Allow activities undertaken for the purpose of pest plan and pest animal control or habitat maintenance or enhancement. ii. Consider indigenous biological diversity^ offsets in appropriate circumstances as defined in Policy 13-4 iii. Allow the maintenance*, operation* and upgrade* of existing structures^, including infrastructure^ and other physical resources or regional or national importance as identified in Policy 3-1, and iv. Not unreasonably restrict the existing use of production land^ where the effects of such land^ use the rare habitat*, threatened habitat* or at-risk habitat* remain the same or similar in character, intensity, and scale.	
Policy 6-8: Natural Character a. The natural character of the coastal environment, wetlands^, rivers^ and lakes^ and their margins must be preserved, and these areas must be protected from inappropriate subdivision, use and development. b. The natural character of these areas must be restored and rehabilitated where this is appropriate and practicable. c. Natural character of these areas may include such attributes and characteristics as:	

Key One Plan Objectives & Policies	Response for Proposed PCA
i. Natural elements, processes, and patterns, ii. Biophysical, ecological, geological, geomorphological, and morphological aspects, iii. Natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs, and surf breaks, iv. The natural movement of water and sediment including hydrological and fluvial processes, v. The natural darkness of the night sky, vi. Places or areas that are wild and scenic, vii. A range of natural character from pristine to modified, and viii. Experiential attributes including the sounds and smell of the sea; and their content or setting	
Policy 6-9: Managing natural character In relation to the natural character of: a. The component of the coastal environment which is not coastal marine area^ (CMA), and b. Wetlands^, rivers^ and lakes^ and their margins subdivision, use or development must generally (but without limitation) be considered appropriate if it: c. is compatible with the existing level of modification to the environment, d. has a functional necessity to be located in or near the component of the coastal environment which is not coastal marine area (CMA), wetland^, river^ or lake^ and no reasonably practicable alternative locations exist, e. It is an appropriate form, scale, and design to be compatible with the	

Key One Plan Objectives & Policies	Response for Proposed PCA
existing landforms, geological features, and vegetation f. Will not, by itself or in combination with effects^ of other activities, significantly disrupt natural processes or existing ecosystems, and g. Will provide for the restoration and rehabilitation of natural character where that is appropriate and practicable.	
Policy 6-10: Public access to and along rivers^ and lakes^ and their margins a. Activities within or near rivers^ and lakes^ must be established and operated in a manner which readily provides for public access. Public access may be restricted only where necessary for safety, cultural or conservation purposes, or to ensure a level of security appropriate for activities authorised by a resource consent^. b. Public access for recreational purposes must recognise the need to protect rare habitats*, threatened habitats* and at-risk habitats*. c. Public access must recognise existing provide property* rights.	
Objective 9-1: Effects^ of natural hazard^ events The adverse effects^ of natural hazard^ events on people, property, infrastructure^ and the wellbeing of communities are avoided or mitigated.	Management of hazards is achieved through the existing ODP and the PCA policy and rule framework, including requiring a geotechnical assessment of land stability and/or liquefaction risk at the consenting stage. Additionally, the PCA policy framework mandates the avoidance of activities that exacerbate or create natural hazards.
Policy 9-4: Other types of natural hazards^ The Regional Council and Territorial Authorities^ must manage future development and activities in areas susceptible to natural hazard^ events (excluding flooding) in a manner which: a. ensures that any increase in risk to human life, property, or infrastructure^ from natural hazard^ events is avoided	

Key One Plan Objectives & Policies	Response for Proposed PCA
where practicable, or mitigated where the risk cannot be practicably avoided, b. is unlikely to reduce the effectiveness of existing works, structures^, natural landforms or other measures which serve to mitigate the effects^ of natural hazard^ events, and c. is unlikely to cause a significant increase in the scale or intensity of natural hazard^ events.	

Overall PCA is considered to be consistent with the relevant objectives and policies of the One Plan.

7.2 Horizons Regional Land Transport Plan

RMA s74(2)(b) requires territorial authorities to have regard to management plans and strategies prepared under other acts to that extent they have a bearing on the resource management issues of the district.

The Horizons Regional Land Transport Plan sets five objectives with those most relevant objectives to PCA being:

- **Objective 1:** Transport users in the region have access to affordable transport choices that are attractive, viable and encourage multi-modal travel.
- **Objective 3:** The transport network is safe for all users.
- **Objective 4:** The transport system is resilient, minimises climate change through reduction in emissions, and reduces adverse effects from transport on the environment.
- **Objective 5:** The transport network is well maintained and integrates with current and planned land use to a level which supports a well-functioning and fit for purpose system.

PCA is consistent with these objectives by enabling a greater housing choice, including provision for redevelopment of existing residential sites for the purpose of intensification. The provisions include specific reference to ensuring development considers transport modes where possible. It is acknowledged that the district is not connected to a current public transport network. This does not preclude additional residential development, and emphasis is proposed to be placed on reducing the adverse effects on the transportation network and the environment while promoting alternative transport modes where possible.

8. Iwi Management Plans

Under section 74(2A) of the RMA, when changing a district plan TDC must take into account any relevant planning document recognised by an iwi authority and lodged with the territorial authority. A number of Iwi have Management Plans and Statutory Acknowledgments in place, noting that some Iwi are still progressing through Waitangi Tribunal process. A copy of draft plan change areas was sent to mana whenua contacts as part of the proposed plan preparation. No opposition was raised to the proposed areas for rezoning, with feedback

received relating to ensuring the consenting process continues to enable Iwi input where cultural values are an important consideration.

9. Local Policies, Plans and Strategies

9.1 Long-Term Plan

The Long-Term Plan (LTP) is the Council's big picture plan, setting out the projects and services that the Council will provide for the district for a ten-year period. The LTP is reviewed and adopted on a three-yearly basis and sets and delivers on the strategic directions and outcomes that are discussed above.

These outcomes drive the decision making for projects and services to be prioritised for the next ten years. It is important that the LTP is aligned with the District Plan and that any budget implications can be coordinated. The District Plan provides the regulatory framework but cannot fully meet its objectives without alignment with the LTP and Infrastructure Strategy.

It is important to align growth demands and zoning requirements with the delivery of infrastructure to enable well planned and timely urban environments. An integrated approach to growth planning is required to meet with objectives of the NPS-UD.

The LTP also enables the delivery of many of the District Plans 'other methods'. Consideration to the budgeting and financial implications of objectives and policies is considered where relevant to ensure on-going alignment with the LTP.

PCA is intended to complement the LTP priorities by:

- Allowing for a wider range of housing choice to enable the community to provide for their current and future needs.
- Minimising the impact of new development on Council's infrastructure, including specific provisions relating to managing stormwater disposal, early in the process, where the network is both available and not available for connection.
- Supporting and enable better use and reuse of land and buildings in order to make more efficient of use of land.
- Placing emphasis on good design principles at the forefront of the development process, to ensure that the District Plan supports the creation of enduring, functional and quality places for people.

9.2 District Strategy 2050

The Council adopted its first District Strategy in 2023. This provides the direction to progress the District forward, adapting to environmental and social changes over the next 30 years. Through all these changes, we want our infrastructure, our whenua (land) and our people of Tararua to thrive together.

This District Strategy sets the long-term vision and at the same time can adapt to swift and constant change driven by central government, political, economic, social, technological, legal, environmental and other changes. The District Strategy is dynamic and agile enough to change whilst holding on to its integrity for Tararua.

It provides strategic context and the foundational principles which set Council's direction and how TDC works with communities. These are supported by "*our strategic enablers, our vision and our outcomes*" for a successful and thriving Tararua. These are brought to life and measured across the key focus areas:

- A Thriving District
- Improving our Environment
- Connected Communities
- Interactive Council

The Strategy will ensure that Council keeps and maintain focus on the areas that have been identified by the community as important to them. To ensure TDC captures the dynamic environment, the District Strategy will be regularly reviewed to highlight current priorities, changing needs, and the role of Council in each focus area.

PCA contributes to the delivery of this strategy by providing additional land for the growth of the district that will enhance the ability to address the four focus areas listed above.

9.3 Tararua District Urban Growth Strategy

The purpose of the TDUGS is to begin the process of understanding growth requirements, outline the challenges faced with increased housing demand, and provide recommendations for how Council can meet these demands efficiently and effectively. The Urban Growth Strategy sets out the policy considerations, explores the aspirations for growth, and provides a summary overview of the key development constraints (such as flood management and infrastructure).

A key part of the TDUGS is providing rezoning recommendations. These are provided through a series of maps included in the document. These maps form the basis of PCA, so it's important that these are well considered and meet our community's requirements.

The focus of the TDUGS is on spatial growth within the four town centres - Dannevirke, Woodville, Pahiatua and Eketāhuna. However, there is also a small consideration of the existing zoning within Norsewood to assist with some known commercial growth constraints that currently exist in this Rural Village.

The TDUGS identifies that the next phase of work includes the development of policy recommendations for inclusion within future planning processes. These are to ensure that any new growth areas are well connected and provide great places for communities to live and work.

This Strategy also aligns with the partnership agreements between Rangitāne-o-Tamaki-nui-a-Rua, Ngāti Kahungunu Tāmaki-nui-a-Rua and Council and has been developed in consultation with both iwi.

As outlined above, PCA has also been heavily informed by the TDUGS, which was prepared and adopted in 2024 as a direct input to future planning processes. This strategy was deliberate in its assessment and level of detail to provide a basis for the wider district plan review, and now PCA. Each of the townships was robustly assessed with the growth recommendations informed by technical information on natural hazards, population and growth projections, natural features, connectivity, infrastructure provision, roading, soils and maintaining a compact urban form. Therefore, the outcomes and assessment undertaken as part of the TDUGS process has been heavily relied upon for the purposes of PCA. Due to the recency of the information, for efficiency and cost purposes, additional technical reporting is not considered necessary. The outcomes sought by PCA are a direct representation of the outcomes presented in the TDUGS and are directly informed by the technical information that supported the TDUGS document and process.

9.4 Operative District Plan

The overarching resource management issues and objectives for the district are outlined under section 2 of the District Plan. These Issues and Objectives establish the intent of the Plan at the strategic level. The strategic approach set out by this section provides a basis and direction for the identification of lower level and more specific resource management issues, objectives, policies and methods for the specific zones in the District Plan.

The Objectives that are directly applicable to PCA highlight:

- To encourage the District's urban areas to develop to meet communities' needs in a sustainable manner.
- To ensure efficient and sustainable urban areas.
- To ensure a high level of environmental quality and amenity in the urban areas of the district.
- To maintain the vitality and character of the district's rural areas.
- To provide a flexible and reliable subdivision process which ensures the maintenance and enhancement of environmental quality in the district.
- To promote a pattern of subdivision and land use in the district which results in the efficient use and development of natural and physical resources.
- To ensure that all lots created are suitable for the intended development or use.
- To reduce the risks imposed by, and the effects of, natural hazards on the people, property and infrastructure of the Tararua District
- To maintain and/or enhance amenity values and environmental quality in the district, for present and future generations.
- To protect the natural, scenic, ecological, cultural and amenity values of the district's lakes, rivers, and wetlands and maintain and/or enhance public access to and along their margins.
- To maintain and develop the district's infrastructure to meet the community's needs in a safe, effective and efficient manner while avoiding, remedying or mitigating adverse environmental effects.
- To ensure the safe, efficient and effective operation of the district's transportation networks while avoiding, remedying or mitigating adverse environmental effects.
- To take into account the principles of the Treaty of Waitangi (Te Tiriti O Waitangi) in the management of the district's natural and physical resources.
- To recognise and provide for Maori values in the management of the district's natural and physical resources.

The objectives above, and the associated policy direction within the operative plan, provide the basis for use and development of land across the district. They are considered to remain relevant to the future development context as they are the engrained strategic direction in the operative plan. PCA has been developed in accordance with this policy direction and is considered to be consistent with the outcomes sought here. The provisions of PCA are considered to align with this direction and promote the outcomes sought by the operative plan. Any future development and consenting within the development areas will be considered under this foundation and strategic direction set by the plan.

10. Consultation

10.1 RMA

Clause 3 of the First Schedule of the RMA specifies those who must be consulted in the preparation or changing of a plan as follows:

Extensive consultation has been undertaken as part of this District Plan Review process with key stakeholders and the local community. This report gives a general overview of this process.

10.2 Consultation Approach

TDC undertook extensive consultation as part of the wider district plan review process and the preparation of the draft district plan and final district plan for consultation. The matters discussed and the feedback received is considered to be relevant and appropriate in the context of PCA in regard to consultation on the key themes in providing for growth within the district.

The Council's approach to the District Plan Review centred on early and ongoing engagement in an iterative plan development process. The approach has encouraged engagement with the community throughout the review process, allowing the public to have input on the shape and direction of the Proposed District Plan, before the formal public notification of the Proposed District Plan.

The consultation process has followed the following stages:

Process/Stage	Summary	Consultation
Urban Growth Strategy	A high level growth direction for the District that will help create a vision and guide decision making. This helped guide the District Plan Review.	Consultation for the strategy included targeted workshops and hui with business and community stakeholders and tangata whenua. The Strategy was adopted in 2024.
Draft District Plan (paper based) – November 2024	This informal draft included the Draft District Plan's new framework with proposed objectives, policies and zones. A summary document was released to explain the changes.	This process was made available to the public for comment and submissions. Public meetings were advertised and held. Over 50 written comments were received, on a range of issues. Using social media the draft plan reached a wide range of people. Targeted engagement with key stakeholders and landowners who were directly affected by a change from the operative plan.

Process/Stage	Summary	Consultation
Proposed District Plan – September 2025	The Proposed District Plan complies with the National Planning Standards and includes a full set of Plan provisions	The Proposed District Plan will be public notified in accordance with the first schedule requirements of the RMA.

Engagement and consultation techniques have included:

- Holding workshops and meetings with Councillors and Community Boards to utilise their knowledge and connections with their communities in understanding issues and strategic requirements.
- Engaging in early discussions and workshops with stakeholders and the wider community to refine or resolve issues.
- Targeted consultation with community and business stakeholders to develop a new framework and positioning of the key issues requiring response.
- Working with key agencies to develop the plan in a wider legislative/policy context to ensure it is robust and relevant long term.
- Wide consultation with the general community on the key Top 4 issues to gather community perspectives and views.
- Targeted engagement with impacted landowners through various reviews and areas of change.
- Conducting a range online and social media campaigns and open days to engage the public and indicate changes.
- Ongoing targeted engagement and response to feedback to refine policy direction throughout plan development.
- Ongoing work with key Ministries, agencies and other territorial authorities to ensure alignment with wider policy and planning frameworks, including the new National Planning Standards.
- Targeted engagement with key stakeholders in refining and finalising the provisions of the Proposed District Plan.

These approaches have provided for the different parts of the community to be genuinely involved in shaping the Proposed Plan.

10.3 Consultation Themes

Overall, consultation engagement levels were low and feedback was limited. The themes from the small amount of feedback, relevant to PCA, were as follows:

Local Centres:

There was general support for a new framework of zones and policy direction, especially reinforcing the importance of the Town Centres and encouraging new business and residential living. There were many suggestions on how to create vibrancy and vitality in centres.

Residential Growth:

There was general support for ensuring growth is well planned, in the right places and able to be serviced. There was positive support for more intensive living through medium density residential provisions. There was also support for a new rural lifestyle zone with feedback advocating for inclusions of lifestyle areas.

Managing Industry:

There was general support for the policy direction in the Industrial and Rural Zones. General comments related to ensuring adequate future industrial land supply, protecting versatile soils and primary production activities. Avoiding conflict between different industry/rural land use and residential properties was also a common theme.

10.4 Consultation with Iwi Authorities

Clause 4A of Schedule 1 of the RMA sets out the requirements for local authorities to consult with iwi authorities before notifying a proposed plan and to have particular regard to any advice received from those iwi authorities.

Draft plan change documentation was sent to all iwi authorities throughout the district.

Ongoing consultation has been undertaken with local iwi throughout the wider District Plan review process. Local iwi have indicated a strong preference to have their values embedded within the District Plan as opposed to isolated in one section.

The key priority areas identified by Ngā Kaitiaki include:

- The inclusion of directive strategic objectives to facilitate active tangata whenua engagement in resource management decision making.
- The impact of development and land-uses on the natural environment and in particular the coastal area, water bodies and indigenous biodiversity.
- Involvement in the early stages of growth and planning the urban form of the district to ensure cultural issues are addressed upfront.
- Opportunities for development on Māori land and protection of sites of significance to Māori.

The discussion and collaboration between iwi and hapū, continues to be ongoing and will continue through the formal submission stage of PCA. The continued formal phase of the plan change process will enable additional consultation as and where required

Part 3: Statutory Evaluation

11. Evaluation of Alternatives and the Preferred Option

11.1 Introduction

Section 32 of the RMA sets out the requirements for preparing and publishing plan change evaluation reports. A proposed plan change needs to be evaluated in terms of:

- a. Whether its stated objectives are the most appropriate way to achieve the purpose of the RMA.
- b. Whether the proposed provisions are the most appropriate way to achieve this objective/s by:
 - Identifying other reasonably practicable options for achieving the objectives.
 - Assessing the efficiency of the provisions in achieving the objectives.
 - Summarising the reasons for deciding on the provisions.

Section 32(2) requires the benefits and costs of implementing provisions to be assessed in terms of the environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions, including opportunities for economic growth and employment. If practical, these benefits and costs should be quantified.

11.2 Scale and Significance

Under Section 32(1)(c) of the Act, this Evaluation Report needs to *contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.*

The level of detail undertaken for the evaluation of the new chapters and provisions proposed in PCA has been determined by an assessment of the scale and significance of the implementation of these provisions. The scale and significance assessment considers the environmental, economic, social and cultural effects of the provisions. In making this assessment regard has been had to whether the provisions meet the criteria in the table below.

Key considerations that informed this assessment included:

- a. The reasons for the change;
- b. The resource management issues being addressed by Proposed PCA;
- c. The degree of change from the Status Quo;
- d. Who and how will be affected, and when.
- e. Degree of impact on, or interest from iwi/Māori;
- f. The geographical scale of impacts;
- g. The types of effects; and
- h. The degree of policy and implementation risk, or uncertainty.

Based on this, scale and significance of the proposed provisions are considered to be low to moderate for the following reasons:

The scale of effects associated with PCA are mostly expected to be low-moderate and localised to the specific rezoning areas and do not apply district wide. Those people most affected by PCA are the landowners and residents who would be subject to the newly proposed growth areas and associated provisions as the changes relate to how this land is to be managed moving forward.

PCA is a response to higher order documents and national direction (the NPS-UD) and local resource management issues (refer Part II, section 2 of this Report) that seek to provide additional housing capacity to meet growing demand in the district. This will go some way to resolving the resource management issue around housing and industrial land supply, by providing for greater capacity and housing choice and to provide for growth in a comprehensively planned manner. In this regard, it also implements non-statutory planning initiatives including the TDUGS.

PCA involves additions to the existing Operative District Plan, which are specific to managing subdivision and development within the identified areas only.

The effects of PCA will be ongoing from the date the Schedule 1, RMA process commences through notification of the plan change.

When considering effects, there will be positive impact on the social and economic wellbeing of the community, particularly in relation to housing supply and housing choice. There will be a range of permanent effects on the character and amenity of the area, which will be managed through the proposed provisions within PCA. There will be a range of permanent effects on infrastructure and services and community centres and open space. Overall, there will be a positive impact on Part 2 matters, with Proposed Plan Change A assisting the Council in achieving its obligations under ss 7(b) and 7(f).

The proposed provisions provide clearer direction on the outcomes sought for greenfield development and therefore greater certainty for landowners / businesses and plan users. There remains an element of risk around landowner reaction to the rezoning, as well as timing of upgrade works to support the anticipated growth that needs to be addressed through the Long Term Plan and planning for staged growth through the proposed provisions.

The overall scale and significance of this proposal have therefore been assessed as being low-moderate, recognising the degree of change from the operative District Plan, direction provided by national direction and the scale of effects (which will be felt locally). This means that this evaluation report needs to contain a low to moderate level of detail and analysis including:

- A planning analysis of the effectiveness and efficiency of current plan provisions as part of determining their on-going appropriateness.
- Preparation of, and reference to, technical assessments (such as in respect to urban stormwater risk management).
- Engagement with landowners and other key stakeholders, and consideration of their feedback.

Section 32(2)(b) requires that, where practicable, the benefits and costs of a proposal are to be quantified. In this case, specific detailed quantification of the benefits and costs in this report is considered neither necessary, beneficial nor practical. Instead, this report identifies more generally where any additional costs may lie.

Overall, a high-level evaluation of these provisions has been identified as appropriate.

11.3 Quantification of Benefits and Costs

Section 32(2)(b) of the RMA requires that if practicable, the benefits and costs of a proposal are quantified. Significant work has been undertaken to understand the impacts of the proposed rezoning areas and the associated provisions. These include population demographic studies, soil and agro-economic assessments, natural hazard studies and general growth provision work. However, it would be costly and time consuming to quantify all benefits and costs of the proposal. There are also many social benefits to PCA that are difficult to monetise or quantify. Therefore, specific quantification of the benefits and costs in this report is considered neither necessary, beneficial nor practicable. Instead, this Report records an appropriate and fulsome evaluation of PCA on a qualitative basis and identifies more generally where any additional costs or cost may arise as a consequence of PCA.

11.4 Evaluation Approach

The sections below assess the appropriateness of objectives, analyses options for achieving the objectives, and evaluates the proposed provisions for the preferred approach A tiered approach has been undertaken because PCA seeks to add objectives and policies to the Operative District Plan.

This section evaluates the associated policies and methods, as they relate to the Proposed District Plan Residential objectives. Along with the proposed provisions, the Council has also identified through the research, consultation, information gathering and analysis undertaken in relation to this topic one reasonably practicable alternative option to achieve the objectives.

For each potential approach an evaluation has been undertaken relating to the costs, benefits and the certainty and sufficiency of information in order to determine the effectiveness and efficiency of the approach, and whether it is the most appropriate way to achieve the relevant objective(s). For the purpose of this evaluation, the Council has considered the following potential options:

- PCA as proposed.
- The status quo.
- Rezoning the growth areas with no associated plan provisions.

Options	Costs	Benefits	Efficiency & Effectiveness
Option 1 – Maintain the status quo	• There continues to be no land currently zoned for greenfield purposes within the district. • Would not provide the housing capacity required to address housing demand and meet population growth. There would be limited ability, if any, to address housing choice, density, affordability. • Existing areas would continue to be developed in an ad hoc manner through individual consent applications, with inconsistent urban design and environmental outcomes for the area.	• No further plan change costs for Council. • No additional infrastructure costs to service the area. • Retention of primary production focus in use of land.	• This would not be effective on delivering on Council's strategies and the RPS. It also does not satisfy the requirements of the NPS-UD in that it would not enable a land supply or additional housing capacity nor provide for a variety of housing types to be provided or contribute to a well-functioning urban environment. • It would result in a lower yield of houses and an inefficient use of land. It would not be effective in realising the full development potential of the land. • This option would not enhance a compact urban form.
Option 2 – Rezone the growth areas and rely on existing provisions	• No coordinated approach to greenfield subdivision and development. • Will not provide for a variety of housing outcomes which will limit housing typology, choice and affordability. • Uncoordinated, ad hoc development would continue through unrelated consent applications, likely resulting in greater adverse effects on the environment, including the absence	• Additional land supply is provided for future growth. • Supports the intent of the NPS-UD, although not with regard to well-functioning urban environments. • Will respond to demand for residential housing. • Generally, provides a continuation of the District Plan approach which offers some certainty to plan users.	• Efficiency in that it would be simple plan change with rezoning only. • Without the specific provisions the residential zone does not provide sufficient guidance with regards to specific characteristics of the areas, the outcomes sought and the identified resource management issues. Including in this case, development occurring in a comprehensive and coordinated manner. • Some efficiencies in consenting processes, although the existing provisions are not going to be effective in

Options	Costs	Benefits	Efficiency & Effectiveness
	of, or limited connectivity, to other areas. - Provisions will not specifically account for greenfield development. - Is unlikely to be infrastructure ready and the provisions will not enable the Council to manage this going forward. - Requires a plan change process to re-zone the land; with associated costs.	Better consenting certainty for developers, with cost advantages.	dealing with specific issues as they are too general in nature and do not inform the outcome for the particular area. No specific provision for the management of stormwater and other key infrastructure.
Option 3 – PCA as proposed	- Requires a plan change process to re-zone the land and introduce the associated provisions; with associated costs for Council, landowners, and third parties. - Enabling greater housing density and variety and variety will change the rural environment over time. - Require additional investment into existing infrastructure networks.	- Creates land supply that does not currently exist with a clear framework to provide direction on how growth is to occur and the outcomes sought. - Provides for housing choice and development in comprehensively planned locations with provisions that are tailored to the area thereby ensuring that density and use is appropriate to the local context and identified constraints. - Provisions would be able to address desired amenity values and specific urban design principles for the areas. - The design and density of urban residential development	- Will deliver on the requirement to provide for the continued growth of the district. - Will provide more certainty to the community about how the area will develop. - This option supports positive urban design outcomes and includes provisions to protect residential amenity. It also allows people to choose to live in a range of housing types depending on their lifestyle. - Greater effectiveness in meeting national, regional and district policy direction. - Is the most efficient and effective way to ensure the growth demand for the district is provided for in a planned and coordinated manner.

Options	Costs	Benefits	Efficiency & Effectiveness
		anticipated by Council's strategies, and higher order documents (including the NPS-UD) will be more directly provided for. • Greater consenting certainty for developers, which creates efficiencies in consenting and related costs. Also, greater direction for Council officers in dealing with proposals for development of the growth area. • Promotes integrated, connected development that delivers the high quality environmental and design outcomes. • Provides clear direction on the management of stormwater for any new subdivision or development.	

12. Evaluation of Objectives

This section of the report evaluates the proposed objectives as to whether they are the most appropriate to achieve the purpose of the RMA. The valuation has had regard to factors such as relevance, usefulness, reasonableness and achievability, in assessing the objective against higher order documents and the purpose of the RMA, being sustainable management.

Relevance:	Achieves purpose and principles of RMA Addresses a resource management issue Assists Council to carry out its statutory function Within the scope of higher level documents
Feasibility:	Acceptable level of uncertainty and risk Realistically able to be achieved
Acceptability:	Consistent with identified Iwi and community outcomes Will not result in unjustifiably high costs on the community or parts of the community.

Collectively, the objectives will ensure integrated development in accordance with the RPS, while protecting and maintaining the natural landscape features of the area that the community value. The objectives seek to provide a sustainable supply of land for current and future housing needs in a manner that protects and enhances amenity values, incorporates walkable neighbourhoods protecting access to local services/facilities, requires water sensitive urban design.

In combination with the existing District Plan framework, the proposed objectives provide a robust and sustainable direction for the growth areas that is based on the framework of the RMA, along with the RPS and the NPS-UD. The below evaluation confirms that the proposed objectives are the most appropriate to achieve the purpose of the Act.

The focus of PCA is to enable housing supply and choice, industrial growth capacity, and provide for intensification of development across the area as a whole.

Based on observations of the existing environment, expected residential growth and housing demand projections, and priorities expressed through national direction, PCA proposes to rezone land and revise the planning framework managing residential development to explicitly provide a pathway for development within the new growth areas.

The proposed objectives seek to align with the objectives and policies of the NPS-UD around achieving well-functioning residential environments that cater for a range of household types and sizes and are supported by sufficient infrastructure. They also seek to align with the district wide objectives included in the operative district plan as outlined earlier in this report.

Proposed Objective	Consistency with Higher Order Direction	Appropriateness to Achieve the Purpose of the Act
DEV01-O1 DEV01-O2 DEV01-O3 DEV01-O4 DEV01-O5 DEV02-O1 DEV02-O2 DEV02-O3 DEV02-O4 DEV02-O5 DEV02-O6	- The objectives are consistent with the sustainable management purpose of the RMA, particularly enabling people to provide for the social, economic and cultural well-being. - The objectives are consistent with Council's strategies to implement national direction and higher order documents, including the NPS-UD, through making additional land available for residential purposes within an area identified as a greenfield growth area for development. The area has already been signalled for rezoning through the Tararua District Urban Growth Strategy. - The objectives give effect to higher order planning documents, including the NPS-UD in that it is focused on achieving a well-functioning urban environment. This is because it directs a range of housing choices, supported by a local centre, open space, and transport infrastructure. - The objectives give effect to the RPS requirements around integration of land use and the provision of infrastructure. - The objectives assist the Council with giving effect to the NPS-UD, as they provide opportunities for land to be developed in a way that enables and encourages a range of housing types, while protecting the natural	- The objectives are consistent with the sustainable management purpose of the RMA, particularly enabling people to provide for the social, economic and cultural well-being. - The objectives support meeting the needs and demand for housing of current and future generations by providing for increased housing choice and density of development to occur in parts of the district that have good access to commercial activities and community services in the district's four main townships. - Through focussing growth land that has good accessibility and seeking the efficient use of this land for continued urban living, these objectives will increase housing supply and choice, enabling people, communities, and future generations to provide for their social, economic and cultural wellbeing in accordance with s5(2). - The objectives support meeting the needs and demand for industrial growth of current and future generations by providing for increased opportunity for industrial development to occur in parts of the district that have good access to existing townships and the wider district and region. - The objectives will also contribute to mitigating effects on the environment from climate change through reducing carbon emission in accordance with s5(2). - Enabling and encouraging comprehensive residential development in suitable locations where there is demand enables people and communities to provide for their social, cultural and economic wellbeing.

Proposed Objective	Consistency with Higher Order Direction	Appropriateness to Achieve the Purpose of the Act
	environment that the development occurs within. • The objectives contribute to providing a balanced supply of residential housing and locational and density choice. • PCA is focused on utilising the land in the most efficient manner taking into account the special features and values of the areas. This is achieved by directing development to occur at an appropriate intensity and scale, and in appropriate locations and ensuring that any adverse effects on the environment are avoided, remedied or mitigated through the specific development control provisions. • Infrastructure is available within the identified growth area and is able to be extended to provide for sufficient capacity or will be accounted for in future Long Term Plans and associated work programmes.	• Allowing greenfield development across the district provides greater choice to the community and means that different housing types can be developed to cater for the reasonably foreseeable needs of future generations. • Providing a range of housing options in all urban locations means that all members of the community have access to these options and therefore can provide for their social, cultural and economic wellbeing. This objective is considered consistent with the purpose of the Act s5(2). • The objectives give effect to the NPS-UD, which seek to ensure that more people live in areas which are accessible to centres, existing or planned transport nodes, or where there is high demand for housing. • Through seeking the supply and diversity of housing meets the needs of communities, the objectives ensure that that the residential environment enables people, communities, and future generations to provide for their social, economic and cultural wellbeing in accordance with s5(2). • They give effect to objective 1 and policy 1 of the NPS-UD, which seek well-functioning urban environments that have or enable a variety of homes. • Through seeking to ensure that development and activities provide high amenity living environments, these objectives will ensure that design outcomes within the urban environment enable people and communities to provide for their social well-being and health and safety in accordance with s5(2). • Through seeking high amenity living environments, these objectives have regard to the maintenance and enhancement of

Proposed Objective	Consistency with Higher Order Direction	Appropriateness to Achieve the Purpose of the Act
		amenity values and the quality of the environment in accordance with s7(c). • Through seeking development that is consistent with the planned suburban built character, these objectives contribute to providing housing choice, enabling people, communities, and future generations to provide for their social, economic and cultural wellbeing in accordance with s5(2). • Through recognising any identified characteristics of the neighbourhood, these objectives have regard to the quality of the environment in accordance with s7(f). • The objectives will guide decision making by clearly directing compatible and incompatible activities within the growth areas. • The objectives are clear in the outcomes sought, which are given effect to through supporting policies, rules, and standards. • Through seeking to sustainable design and the appropriate provision of infrastructure, these objectives have regard to the quality of the environment in accordance with s7(f). • Uncertainty of outcomes is reduced by providing for clarity within the objectives as to the anticipated built form outcomes to be enabled within the areas. • The objectives provide for a level of development that reduces the risk that the district will not achieve a sufficient supply and variety of housing over the long-term. • Changes to provide for greater housing choice and intensification have been supported in community engagement and reflected in iwi aspirations.

Proposed Objective	Consistency with Higher Order Direction	Appropriateness to Achieve the Purpose of the Act
		• The objectives will not place unjustifiable costs on the community but rather will assist decision makers in providing for appropriate activities within the range of residential environments. • The activities that are enabled and the requirement to manage outcomes aligns with the overall intent and purpose of the zone. • The general direction of the objectives has been consulted on, including through the draft plan consultation and feedback has largely been supportive. • It is noted that the costs of planning and developing infrastructure associated with the proposed objectives may require additional resources provided for through development. • Sufficiency of long-term infrastructure capacity, and resourcing to plan/fund additional long-term development may need to be reviewed in future as part of the LTP process. • The purpose of the RMA (sustainable management) includes the management of physical resources and enabling people to provide for their social, economic and cultural wellbeing. • Under the RMA, the maintenance and enhancement of amenity values (e.g. visual appearance and character) and the quality of the environment are other matters which councils are required to have particular regard to. • The National Planning Standards (2019) and the National Policy Statement on Urban Development anticipate a wide range of housing choice and intensified development. • The objectives address the relevant resource management issues for the residential area as outlined above in this report. • The objectives give effect to the National Planning Framework and to the direction of the National Policy Statement for Urban

Proposed Objective	Consistency with Higher Order Direction	Appropriateness to Achieve the Purpose of the Act
		Development and the supporting provision for residential growth to the level commensurate with the level of demand expected in the district while respecting the unique values that contribute to the quality and liveability of the existing residential areas. • The objectives support meeting the needs and demand for housing of current and future generations by providing increased density of development to occur in parts of the district that have good access to commercial activities and community services in the district's centre. • Through seeking to maintain public health and environmental wellbeing, these objectives ensure that the built environment enables people, communities, and future generations to provide for their social, economic and cultural wellbeing and health and safety in accordance with s5(2). • Through seeking to sustainable design and the appropriate provision of infrastructure, these objectives have regard to the quality of the environment in accordance with s7(f). • The protection of rivers and their margins from inappropriate use and development, relationship of Māori with ancestral lands and water, and management of significant risks from natural hazards are all matters of importance under RMA s6. • The National Policy Statement on Freshwater Management requires every territorial authority to objectives to promote positive effects, and avoid, remedy, or mitigate adverse effects of urban development on the health and well-being of water bodies.

12.1 Conclusions

The above analysis indicates that the proposed objectives for the new development/growth areas are the most appropriate way to achieve the purpose of the Act. The objectives provide an effective and efficient approach to balancing:

- a. Enabling new land supply to provide for development to meet the growth needs of the district over the next 30 years,
- b. Enabling current and future generations to undertake a wide range of residential uses within the areas which are consistent with the role of the associated townships as a rural commercial centre,
- c. Ensuring diverse land uses are compatible with each other, and
- d. Reducing hazard risks and improving outcomes for the natural environment where possible.

The suite of objectives contribute to achieving the overall purpose of the Resource Management Act including the sustainable management of natural and physical resources within the Tararua District. The new objectives seek to enable residential development in accordance with the relevant higher level documents, while ensuring a quality residential living environment is achieved for residents and neighbours. The new objectives for industrial development, seek to enable growth in a well-planned manner that results in a well-functioning urban environment in accordance with higher level documents.

The objectives seek to provide a sustainable supply of land for current and future housing needs in a manner that sees change to the urban environment as an opportunity to create a new urban character. The new residential environments allow greater housing choice and options for living arrangements that will meet the demands of current and future generations of the community. The objectives also seek to provide a sustainable supply of land for current and future industrial needs.

Overall, the suite of objectives identified within PCA, are considered to be the most appropriate way to achieve the purpose of the Act. All of the objectives proposed align with one or more of the key provisions of the Act including:

- The RMA's purpose of sustainable management of natural and physical resources (s5).
- Matters of National Importance (s6).
- Other matters (s7).
- The general duties to avoid remedy or mitigate adverse effects and avoid unreasonable noise (s16 and s17).

The objectives also align national direction including the National Policy Statement on Urban Development and Natural Hazards, National Planning Standards and National Policy Statement on Freshwater Management.

13. Section 32(1)(b) Evaluation of Provisions (Policies, Rules and other methods)

This section of the Report evaluates the whether the PCA provisions are the most appropriate way to achieve the objectives by identifying other reasonably practicable

options, assessing the efficiency and effectiveness of the provisions in achieving the objectives, and summarising the reasons for deciding on the provisions. The assessment must identify and assess the benefits and costs of environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions, including opportunities for economic growth and employment. The assessment must if practicable quantify the benefits and costs and assess the risk of acting or not acting if there is uncertain or insufficient information available about the subject matter.

RMA s32(1)(b) requires an evaluation as to whether the provisions of PCA are the most appropriate way to achieve objectives by:

- Identifying other reasonably practicable options for achieving the objectives (s32(1)(b)(i))
- Assessing the efficiency and effectiveness of the provisions in achieving the objectives (s32(1)(b)(ii))
- Summarising the reasons for deciding on the provisions (s32(1)(b)(iii))

The assessment carried out under s32(1)(b)(ii) must identify and assess:

- The benefits and costs of environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions, including opportunities for economic growth and employment.
- The assessment must (if practicable) quantify the benefits and costs and assess the risk of acting or not acting if there is uncertain or insufficient information available about the subject matter.

Given the assessment earlier in this report of the scale and significance of the proposed provisions, specific quantification of the benefits and costs in this report is not considered necessary and instead, the assessment below identifies generally where any additional cost(s) may lie and, where possible, the approximate scale.

The alternatives to PCA is no plan change, i.e. the status quo, or rezoning land with the existing Operative District Plan provisions applied, already addressed earlier in this report.

13.1 Policies, Rules and Standards to Implement Objectives

The following sections summarise the benefits and costs of environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions including opportunities for economic growth and employment.

Provisions have been bundled into one 'package' as they are expected to work together to achieve the objectives such that there is not a detailed analysis of every provision. This is to avoid unnecessary repetition and is considered to be more efficient in understanding the package of provisions to achieve the proposed objectives of PCA and ultimately the purpose of the Act.

It is noted that the existing provisions of the District Plan will continue to apply to the proposed development areas, except where explicitly provided for in the PCA provisions. The proposed provisions are intended to take precedence for managing subdivision within both the residential and industrial areas. For the proposed industrial areas, additional activity-based provisions are proposed. Where a development is not managed by the proposed provisions, the operative provisions of the Plan are to apply.

As the operative provisions are in force, it is not considered necessary or appropriate to reevaluate these further under this report. Therefore, the assessments below focus on the proposed provisions only.

The following relates to the proposed Policies in DEV01 and DEV02

(Note: these have been grouped together to avoid unnecessary repetition and is considered to be more efficient in understanding the package of provisions to achieve the proposed objectives of PCA and ultimately the purpose of the Act.

Proposed Provisions	Costs	Benefits
DEV01-P1 DEV01-P2 DEV01-P3 DEV01-P4 DEV01-P5 DEV01-P6 DEV01-P1 DEV01-P2 DEV01-P3 DEV01-P4 DEV01-P5 DEV01-P6	Environmental The introduction of the new development areas will result in a gradual change in the density, character, and amenity of the existing environment. New development (particularly new development enabled at an increased density) will result in increased pressure on infrastructure and servicing. There will also be costs in the reporting that may be required with regard to natural hazards and earthworks. Assessment of natural hazards may reduce yield and require a specific design response within the development and on adjacent areas. Economic There will be increased short term costs to plan users and Council consenting teams as they build familiarity with the new provisions. Increased costs involved with applying for resource consent for the development of the new growth areas. There will be economic costs with the design and construction of a connected transport network. There will also be costs associated with the construction of the works required to support development; although these costs exist	Environmental There is a strong emphasis on providing and creating quality environments for their intended purpose, whether it be for residential or industrial. The policies seek good design outcomes through all development and place emphasis on connectivity, stormwater and infrastructure while taking into account physical site characteristics. Requiring connection of subdivision to existing and future development will provide the benefit of a well-connected residential area. Ensuring connectivity between developments will also provide for legible, permeable wayfinding throughout the site in a manner which facilitates walking and cycling. The policies generally maintain the core characteristics and amenity values of existing residential areas, with residential activity remaining the predominant land use. The proposed policies require a variety of allotment types and sizes that achieve the planned built character within the residential area. The proposed policies are clear and provide certainty to the community as to the future level of change or type of subdivision development it can expect.

Proposed Provisions	Costs	Benefits
	with any development to varying degrees. TDC has recognised the need to fund and provide adequate infrastructure to support development of land in the four townships with steps to be taken following rezoning to prepare an infrastructure work programme to enable growth. The growth-related costs will lie with the developer. There will be consenting costs associated with preparation of the comprehensive development plan and stormwater management plans. The information requirements now extend to land use consents, connectivity, timing of transport infrastructure, and stormwater management. Any additional costs may be offset by the improved efficiencies to the consenting process. Social Some people may be affected or concerned about change in character or amenity value from new development patterns and development in new areas. Some non-residential activities are restricted and require resource consent. This may present a barrier to some community or other non-residential activities that support residential areas. Cultural No direct or indirect costs have been identified.	Requiring comprehensive development, stormwater management, and suitable building platforms to be demonstrated early in the process will ensure appropriate consideration of natural hazards and any potential effects avoided or mitigated. The policies for the residential areas do not significantly depart from the approach of the Operative District Plan, and therefore generally maintain the core characteristics and amenity values of existing residential environment, with residential activity remaining the predominant land use for the RGDA. The policies for the industrial areas do not significantly depart from the approach of the Operative District Plan, and therefore generally maintain the core characteristics and provision for the industrial environment, with industrial activities emphasised as the predominant land use for the IGDA. Requiring additional stormwater information early in the development process will result in better stormwater resilience by reducing impact on reticulated supply and providing some stormwater resilience. The policies also ensures that stormwater rates are controlled and therefore reduces/avoids scour, erosion and flushing of streams and waterways. There is a clear avoidance requirement of direct discharge into the gullies. There would also be a reduction in contaminants contained within the stormwater. The existing built environment contains predominantly detached residential units within individual sites and is

Proposed Provisions	Costs	Benefits
		anticipated to develop and change over time. Resource consent requirements will ensure that residential developments contribute positively to the creation of neighbourhoods in keeping with the planned built character. The proposed policy packages ensure that development is to occur in a coordinated manner over time with consideration had within each development for the adjoining land and its development potential so that growth can occur in a cohesive manner. Economic The provisions are generally more specific and provide more certainty over the subdivision process and what outcomes need to be managed, resulting in less cost and uncertainty for landowners. In particular, minimum lot sizes have been introduced to provide more clarity on the outcome sought. Increased opportunities for subdivision that provide for a range of housing choices across the RGDA. Increased opportunities for industrial development that provides for greenfield opportunities that are protected for a predominant industrial use. Will simplify the expectations and consenting processes for those looking to develop within the growth areas. Clear policy direction to ensure essential services are provided in advance of, or at the time of, development. The

Proposed Provisions	Costs	Benefits
		need to consider the adequacy and timing of infrastructure delivery is consistent with national direction, and the RPS. Residential development opportunities are enabled and encouraged in locations supported by existing or planned infrastructure and community facilities. Meets the short, medium and long-term land capacity and supply for housing. Meets the land capacity and supply for industrial growth. Ensures appropriate assessment of any natural hazard risks. Social The provisions provide for a variety of residential activities and ancillary activities, or activities that support the overall functioning of the zones and the needs of its current and future residents. Specific policies requiring development to be well designed with a high amenity environment will create an area that is attractive and desirable for residents and the community, with related social and economic benefits. This should result in subsequent social benefits and provide for thriving residential communities while maintaining the attributes that communities value about their residential environments. There will also be social benefits through providing a green network for community use for informal recreation.

Proposed Provisions	Costs	Benefits
		The proposed provisions are clear and provide certainty to the community as to the future level of change or development it can expect. Cultural The provisions ensure that future development considers the values of mana whenua, in particular when it comes to the management of stormwater and development in close proximity to waterways. Where necessary, mana whenua is to be included in the development process to ensure their values are appropriately considered.

Efficiency & Effectiveness

Effectiveness: The proposed provisions are the most effective method of meeting the objectives given they will provide increased environment, economic and social benefits as outlined above while maintaining the existing values and providing for the evolving needs of communities and the district.

The proposed provisions are assessed as being highly effective. They determine areas for residential and industrial development based on a body of evidence; clearly set out the process for subdivision; discourage inappropriate subdivision and use, enables a range of housing types, density and affordability thresholds, and ensures development occurs in line with the delivery of infrastructure. They also ensure a consistent approach across greenfield development in the district. The provisions direct subdivision to be designed and developed in a manner which provides opportunity for this enhancement to occur over time.

The proposed policies provide flexibility for the market to provide for housing choice and industrial growth as required, while managing adverse effects. The proposed provisions are considered to be the most effective means of achieving the objectives as together they will:

- Through policies that have been targeted to the local context, ensure that development contributes to safety, security, and social wellbeing in communities.

- Through policies that require development to occur in a comprehensive and well-planned manner in accordance with objectives and requires subdivision design and layout to respond positively to and be integrated with the surrounding context.
- Ensure that housing supply and choice can be increased to meet the needs of the District's communities in accordance with the objectives.
- Ensure that development is supported by well-planned infrastructure and transportation networks.
- Requires specific attention to be given to stormwater management within new growth areas to ensure the appropriate management of overflows and new discharges as a result of development. Emphasis is placed on hydraulic neutrality.
- Ensure that appropriate considerations regarding site characteristics and natural hazards are appropriately considered in accordance with the objectives.
- Ensure new industrial areas are protected for industrial purposes and non-industrial activities are appropriately managed.

Efficiency: The proposed package to achieve the objectives is efficient in that it maximises the range of development opportunity within each of the growth areas to provide for housing supply and industrial development supply respectively. It is considered that there is certain and sufficient information on which to base the proposed policies and methods as these objectives have been extensively canvassed through community engagement, and there is a high degree of confidence that they reflect desired community outcomes. Limitations are only placed on activities which have a higher risk of being incompatible with the anticipated outcomes for the zone.

Risk of acting/not acting if there is uncertainty or insufficient information about the subject matter of the provisions

There is sufficient certainty and information to act, such that risks are low.

It is considered that there is certain and sufficient information on which to base the proposed policies and methods as these objectives have been extensively canvassed through community engagement, and there is a high degree of confidence that they reflect desired community outcomes.

Appropriateness in relation to relevant existing objectives

The proposed provisions are appropriate when considering relevant existing district wide objectives in the operative plan that relate to urban environments and residential and industrial development. These relate to (among other things) integrated management of development and effects, planned infrastructure, recognising the natural environment the development occurs in, and locating growth in planned growth areas.

Alternatives

Status Quo – there are currently no growth areas or greenfield land available for development across the district. Therefore, this option does not enable the Council to meet its obligations for providing for growth in the district.

Zoning only – the existing plan provisions do not provide specific direction for the development of greenfield land. There is no direction for coordinated and comprehensively planned development over a wider area. Further, the existing provisions do not provide specific direction for stormwater management and the need for planned infrastructure extensions to enable growth.

Overall Evaluation

This package is the most appropriate way to achieve the preferred objectives, mostly because they are efficient in terms of reducing ambiguity in consenting and reducing barriers to entry, and effective in terms of sustainably managing resources.

It is considered that this option will achieve the objectives in the Plan because:

- It enables subdivision and development to be effectively managed, recognising its distinctive amenity and character.
- The policies emphasise the need for planned and coordinated development.
- It enables housing supply and choice to meet the needs of the community.
- It enables industrial development to meet the needs of the business community.
- The policies provide clear direction as to the intent, purpose, and outcomes for the development areas.
- The policies provide clear direction on the core considerations for any development including stormwater, infrastructure, site conditions and natural hazards.

The proposed provisions are necessary to achieve the purpose of the RMA (including the avoidance, remedying or mitigation of adverse effects). They are an effective means of achieving the objectives and efficient in that benefits are expected to outweigh costs.

The following relates to the proposed Rules and Standards in DEV01 and DEV02

(Note: these have been grouped together to avoid unnecessary repetition and is considered to be more efficient in understanding the package of provisions to achieve the proposed objectives of PCA and ultimately the purpose of the Act).

Proposed Provisions	Costs	Benefits
DEV01-SUB-R1	Environmental	Environmental
DEV01-S1	There will be increased costs to developments as a result of the need to incorporate mitigation measures into proposed development.	The proposed provisions provide clear direction for the outcomes sought and the important considerations for any subdivision within a residential or industrial development area.
DEV01-S2		
DEV01-S3		
DEV01-S4		
DEV01-S5		
DEV01-S6		
DEV02-SUB-R1	New development (particularly new development enabled at an increased density) will result in increased pressure on infrastructure and servicing. Permitted activities have the potential to generate adverse effects on the character and amenity values where consent is not required from Council.	The subdivision provisions generally maintain the core characteristics and amenity values of existing residential areas, with residential activity remaining the predominant land use. The proposed provisions will enable a variety of allotment types and sizes that achieve the planned built character within the residential and industrial areas.
DEV02-S1		
DEV02-S2		
DEV02-S3		
DEV02-S4		
DEV02-S5		
DEV02-S6	Economic	The provisions enable development in locations where environmental values will be enhanced and development makes a positive contribution to the change in character and amenity over time.
	There will be increased short term costs to plan users and Council consenting teams as they build familiarity with the new provisions.	
	Increased costs involved with applying for resource consent for the development of the areas.	The provisions efficiently ensure that all subdivision layout creates legible and permeable urban blocks to support conventional development as outlined, which in turn creates positive social and environmental effects.
	There may be economic costs associated with the requirement to connect to adjacent development.	
DEV02-GIZ-R1	Loss of current permitted rights in a few locations, such as where the proposed provisions are applied.	

Proposed Provisions	Costs	Benefits
DEV02-GIZ-R2 DEV02-GIZ-R3 DEV02-GIZ-S1 DEV02-GIZ-S2 DEV02-GIZ-S3	Economic and social costs if there is delay of housing being available due to the need for infrastructure upgrades. There will also be costs associated with the construction of the works required to support development; although these costs exist with any development to varying degrees. There will be consenting costs associated with preparation of the comprehensive development plan. While the information requirements now extend to land use consents, connectivity, timing of transport infrastructure, stormwater management, these would need to be addressed under the proposed policies anyway. Any additional costs may be offset by the improved efficiencies to the consenting process. Social Some people may be affected or concerned about change in character or amenity value from more intensive development and non-residential activities. Some non-residential activities are restricted and require resource consent. This may present a barrier to some community or other non-residential activities that support residential areas. Cultural No direct or indirect costs have been identified.	The proposed provisions are clear and provide certainty to the community as to the future level of change or type of subdivision development it can expect. The proposed standards and matters of discretion will result in better quality allotment layout and design. Requiring suitable building platforms to be provided early in the process will ensure appropriate consideration of natural hazards and any potential effects avoided or mitigated. The provisions do not significantly depart from the approach of the Operative District Plan, and therefore generally maintain the core characteristics and amenity values of existing residential environment, with residential activity remaining the predominant land use. Providing a minimum lot size will ensure specific outcomes in delivery of dwelling sizes and typographies. Meeting density thresholds at subdivision stage will also ensure compliance with the subsequent land use controls in the operative plan. There will economic and social benefits from ensuring delivery of the housing yield projected by development in accordance with the stipulated lot size and density, which will assist in addressing housing supply in the district. The existing character and amenity values are recognised as being open to positive change, or at the least, be maintained. This enables intensification

Proposed Provisions	Costs	Benefits
		across the growth locations and ensures environmental values are being maintained and enhanced. The proposed standards and matters of discretion will provide more design flexibility and result in better quality development layout and design. Requiring additional stormwater information early in the development process will result in better stormwater resilience by reducing impact on reticulated supply and providing some stormwater resilience. A comprehensive development plan will provide clarity for consent applicants about the nature and extent of information required for subdivision applications. This will enable greater efficiency in the consenting process. Resource consent requirements will ensure that residential developments contribute positively to the creation of neighbourhoods in keeping with the planned built character. The proposed package of standards will ensure development achieves a number of amenity benefits, including: - Development will contribute to healthy, safe, high amenity and comfortable residential living environments. - Potentially encourages a greater proportion of dwellings to maximise their outlook over the street

Proposed Provisions	Costs	Benefits
		and internally towards the rear, rather than over neighbouring properties to the side. Allows for daylight and/ or sunlight penetration into new buildings at each end enhancing internal amenity for future residents. Allows for improved daylight and/ or sunlight penetration through to adjoining sites. The control and management of hazards, stormwater, earthworks will have social, environmental and cultural benefits. Management of earthworks will ensure a well-designed environment. Identification and avoidance and/or mitigation of natural hazards with controls over implementation will ensure natural hazards are managed in accordance with Part 2. Ensures a greater level of scrutiny with a full effects assessment to be completed where there is non-compliance with standards relating to specific outcomes sought. The activity status seeks to reflect the importance of the effects including outcomes and natural hazards being managed by the proposed provisions. Economic The proposed provisions allow for private properties to be subdivided more readily than under the current zoning and for applicants to realise the financial benefits from undertaking this process.

Proposed Provisions	Costs	Benefits
		The provisions are generally more enabling and provide more certainty over the subdivision process and what outcomes need to be managed, resulting in less cost and uncertainty for landowners. In particular, minimum lot sizes have been introduced for residential subdivision and no minimum lot size exists for industrial development. Increased opportunities for subdivision that provide for a range of housing choices across the areas. Will simplify the expectations and consenting processes for those looking to develop medium density housing. Residential development opportunities are enabled and encouraged in locations supported by existing or planned infrastructure and community facilities. Meets the short-, medium- and long-term land capacity and supply for housing. The provisions maintain an enabling approach and provide more certainty over what activities can occur and what outcomes need to be managed, resulting in less cost and uncertainty for landowners. New industrial activities as a Permitted activity reduces consent costs for this type of activity. Social The provisions provide for a variety of residential activities, industrial activities and ancillary activities, or activities that support the overall functioning of the

Proposed Provisions	Costs	Benefits
		underlying zones and the needs of its current and future residents. This should result in subsequent social benefits and provide for thriving residential communities while maintaining the attributes that communities value about their residential environments. The proposed provisions are clear and provide certainty to the community as to the future level of change or development it can expect. Cultural The provisions ensure that future development considers the values of mana whenua, in particular when it comes to the management of stormwater and development in close proximity to waterways. Where necessary, mana whenua are to be included in the development process to ensure their values are appropriately considered.

Efficiency & Effectiveness

Effectiveness: The proposed provisions are the most effective method of meeting the objectives given they will provide increased economic and social benefits as outlined above while maintaining the values of residential areas and providing for the evolving needs of communities.

The proposed provisions are assessed as being highly effective. They determine areas for residential and industrial development based on a body of evidence; clearly set out the process for subdivision; discourage inappropriate subdivision and use, enables a range of housing types, density and affordability thresholds, and ensures development occurs in line with the delivery of infrastructure. They also ensure a consistent approach across greenfield development in the district. The provisions direct subdivision to be designed and developed in a manner which provides opportunity for this enhancement to occur over time.

It is noted that the existing residential management areas are well established and will provide the land use framework for the new residential development areas.

The proposed rules and standards provide a balance of clear direction and flexibility for the market to provide for housing choice and diversity and industrial development as required, while managing adverse effects. The proposed provisions are considered the most effective means of achieving the objectives as together they will:

- Through standards that have been targeted to the local context, ensure that development contributes to safety, security, and social wellbeing in communities.
- Through additional standards including for outdoor living space and density requirements, ensure residential developments provide healthy, safe, high amenity and comfortable living environments in accordance with objectives.
- Ensure that housing supply and choice can be increased to meet the needs of the district's communities in accordance with the objectives.
- Ensure that development occurs in a planned and coordinated manner that considers the surrounding land areas, the provision of infrastructure and connectivity back into existing urban areas.
- Maintain a suburban built character.

Efficiency: The proposed package to achieve the objectives is efficient in that it maximises the range of residential activities which can be undertaken. It is considered that there is certain and sufficient information on which to base the proposed policies and methods as these objectives have been extensively canvassed through community engagement, and there is a high degree of confidence that they reflect desired community outcomes. The proposed rule structure is an efficient approach without the need for time, money and other resources to be spent on unnecessary resource consent considerations. Limitations are only placed on activities which have a higher risk of being incompatible with the mix of developments which are, and are expected to be, in the zone.

Risk of acting/not acting if there is uncertainty or insufficient information about the subject matter of the provisions

There is sufficient certainty and information to act, such that risks are low.

It is considered that there is certain and sufficient information on which to base the proposed policies and methods as these objectives have been extensively canvassed through community engagement, and there is a high degree of confidence that they reflect desired community outcomes.

Appropriateness in relation to relevant existing objectives

The proposed provisions are appropriate when considering relevant existing district wide objectives in the operative plan that relate to urban environments and residential and industrial development. These relate to (among other things) integrated management of development and effects, planned infrastructure, recognising the natural environment the development occurs in, and locating growth in planned growth areas.

Alternatives

Status Quo – there are currently no growth areas or greenfield land available for development across the district. Therefore, this option does not enable the Council to meet its obligations for providing for growth in the district.

Zoning only – the existing plan provisions do not provide specific direction for the development of greenfield land. There is no direction for coordinated and comprehensively planned development over a wider area. Further, the existing provisions do not provide specific direction for stormwater management and the need for planned infrastructure extensions to enable growth.

Overall Evaluation

This package is the most appropriate way to achieve the preferred objectives, mostly because they are efficient in terms of providing a clear consenting pathway for development in the new areas and reducing barriers to entry, and effective in terms of sustainably managing resources.

It is considered that this option will achieve the objectives in the Plan because:

- It enables development and land use to be effectively managed, recognising its distinctive amenity and character.
- It enables housing supply and choice to meet the needs of the community.
- It enables industrial development in line with projected demand for the district.
- It enables coordinated development that promotes good design outcomes and ensures the areas develop cohesively over time.
- The rules and methods provide clear direction as to the intent, purpose, and character and the matters to be considered through new development.
- The rules and methods provide clear direction on the information requirements for any development occurring.
- The rule framework reflects the amenity anticipated in the areas by managing development through rule requirements and appropriately complements the subdivision provisions.

- It ensures infrastructure provision occurs alongside development.
- The standards are aligned with the anticipated nature and scale of built development in the areas.
- It ensures that the appropriate considerations are undertaken as part of the consent process, in particular with regard to natural hazard risk.

The proposed subdivision provisions are necessary to achieve the purpose of the RMA (including the avoidance, remedying or mitigation of adverse effects). They are an effective means of achieving the objectives and efficient in that benefits are expected to outweigh costs.

14. Risk of Not Acting

Section 32(2)(c) of the Act requires, in the evaluation of the proposed policies and methods, the consideration of 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.

It is considered that there is certain and sufficient information on which to base the proposed provisions as all the issues discussed above are well understood, affect a well-defined area, and have been considered extensively through technical assessment. Therefore, the degree of uncertainty and risk of acting is considered unlikely to outweigh the risk of not acting.

Conversely, there are significant risks around not acting, by retaining or largely retaining the current District Plan approach, including:

- a. The ability to meet projected demand for housing and to provide a range of housing choice in the district will not be met, with recognised issues of housing affordability likely to be further exacerbated. In turn, economic potential is likely to be under-realised, with flow on social and economic effects.
- b. Potential environmental effects as development pressure moves to the urban margins with the continuation of poor urban planning outcomes through ad hoc, uncoordinated development of the land currently available for development.
- c. The potential for development to occur in advance of the necessary infrastructure to manage effects in an appropriate manner.
- d. The absence of steps to protect, restore and enhance the gully network.
- e. The need to give effect to higher order documents, particularly the NPS-UD.

Overall, based on the analysis undertaken throughout this report, the risk of not acting is considered significantly higher than the risk of acting in the manner proposed by PCA.

15. Conclusion

This evaluation under RMA s32 was undertaken to:

- Check compliance and alignment with legislative requirements, national direction and the regional policy statement (as part of examining the extent to which the proposals of PCA meet the requirements of RMA s74 and the purpose of the RMA).
- Assess the appropriateness of objectives in achieving the purpose of the RMA.
- Examine the high-level, reasonably practicable, options for approaches to achieve the objectives.
- Assess the benefits, costs, effectiveness and efficiency, and risk of not acting in respect of policies, rules and standards to achieve the objectives.

The evaluation demonstrates PCA:

- Is necessary to achieve the purpose of the RMA.
- Has been prepared in accordance with the Tararua District Council's functions under RMA s31 and national direction.

- Has had regard to higher order documents including the Horizons One Plan, and management plans prepared under other Acts.
- Includes objectives which are appropriate, effective and efficient as means of achieving the purpose of the RMA.
- Includes policies and methods that will be effective, efficient and appropriately anticipate costs and benefits when achieving the proposed objectives.

Appendices

Appendix 1: Proposed Provisions

Appendix 2: Proposed Maps

Appendix 3: Supporting Technical Reports