Appendix 12: Evaluation of alternative options to achieve plan change objectives and efficiency and effectiveness of the provisions

In determining the most appropriate method for achieving the objectives of the Plan Change, consideration has been given to the following other reasonably practicable options:

Option 1: Status quo (Rural Zone)

This option involves retaining the operative Rural Zone, zoning and provisions.

Option 2: Rezone Plan Change area ODP Residential Zone

This option involves rezoning the plan change area Residential Zone. The rezoning will apply standard ODP residential zone, relying upon the zone and district wide provisions to control development and does not introduce bespoke provisions.

Option 3: Rezone a new proposed zone Low Density Residential Zone

This option involves rezoning the plan change area a new proposed Low Density Residential Zone with new provisions to allow for living opportunities.

Option 4: Seek for Residential Zone change via Structure Plan or Urban Development Area.

This option involves rezoning the plan change area Residential Zone by way of inserting a Structure Plan into the ODP following the directions of the ODP chapter 3.

Option 5: Rezone the plan change area with a Development Area that sits within the ODP with stand along bespoke provisions as detailed in Appendix 3.

This option introduces a Development Area to the ODP that includes bespoke controls for subdivision, urban design, protection and enhancement of ecological features, provision of open space and reverse sensitivity.

Table 1 below provides the section 32 evaluation of alternative options

Table 1: Evaluation of Alternative Options

Option One: Status Quo (Rural Zone)	Option Two: Rezone plan change area KDP Residential Zone	Option Three: Rezone a new proposed zone Low Density Residential Zone	Option Four: Seek for Residential Zone change via Structure Plan or Development Area.	Option Five: Rezone the plan change area with a Development Area that sits within the ODP with stand along bespoke provisions as detailed in Appendix 3.
 Benefits: No changes to the KDP necessary. Existing productive potential of the plan change area can continue to be realised. Removes the cost of initiating a plan change for the applicant. Costs: Does not address NPS-FM and NES-FM. KDP format does not align or give effect to Planning Standards. Does not address the NPS-UD. Residential living capacity and housing choice is not provided, cost of living and housing affordability increased within Mangawhai. Ecological features will not benefit from enhancement and increased protection (afforded by the proposed precinct provisions). 	 Benefits: Only requires minor changes to KDP policies and rules. Plan-users are familiar with approach. Cost of implementation for Council will be similar to that of existing provisions. Development contributions for wastewater upgrades or on-site wastewater solution needed to support desired density. Includes policy framework that puts onus on developer to provide wastewater/infrastructure servicing solution. The density provisions provide for residential living and development via an integrated residential development. Ensures consistency of amenity and character of residential zone. 	 Benefits: Certainty of outcomes for Council and applicant. Certainty of infrastructure provision Cost of implementation for Council will be similar to that of existing provisions. Development contributions for wastewater upgrades or on-site wastewater solution needed to support desired density. Includes policy framework for that puts onus on developer to provide wastewater/infrastructure servicing solution. The density provisions provide for low density residential living and development. Ensures consistency of amenity and character of surrounding residential zone. 	 Benefits: Certainty of outcomes for Council and applicant. Certainty of infrastructure provision. Consistent with Chapter 3 of the KDP. Positive environmental benefit, open space and public access connections are secured. This approach can be designed to address higher order policy direction. Can include provisions to provide for high level of urban design and protection and enhancement of ecological features. Establishes constraints and opportunities of the plan change area. Aligns with higher order policy direction. Takes into account the KDP provisions, but introduces targeted provisions that 	 Benefits: Align with higher order policy direction. Takes into account the KDP provisions, but introduces targeted provisions that will apply to this particular site to manage effects. Provides certainty of outcomes for the Council and future development. Will ensure character and amenity of the zone is maintained, whilst enabling a range of densities and living opportunities. Positive environmental benefit, open space and public access connections are secured. Addresses NPS-FM and NES-FM. Strong urban design outcomes which address NPS-UD. Ecological features will benefit from enhancement and increased protection

	 Costs: Lack of policy direction for residential development, protection of ecological features and urban design outcomes. Activity status Discretionary may trigger notification. Does not address NPS-FM and NES-FM. KDP format does not align or give effect to Planning Standards. Urban design outcomes are limited and does not address NPS-UD. Ecological features will not benefit from enhancement and increased protection (afforded by the proposed precinct provisions). 	 Aligns with the Planning Standards. Costs: Costly for applicant and requires detailed investigations to support it. Additional costs for Council to administer. Plan-users are unfamiliar with approach. Lack of policy direction for residential development, protection of ecological features and urban design outcomes. Activity status Discretionary may trigger notification. Does not address NPS-FM and NES-FM. Creates a zone that would apply district wide, pre-empting the future Proposed District Plan. 	will apply to this particular site to manage effects. - Addresses NPS-FM and NES-FM. - Strong urban design outcomes which address NPS-UD. Costs: - Costly for applicant and requires detailed investigations to support it. - Can result in inflexible development provisions. - Additional costs for Council to administer. - Inconsistent with the Planning Standards.	 (afforded by the proposed precinct provisions). Standalone chapter that can be accommodated into the ODP and future Proposed District Plan. Establishes constraints and opportunities of the plan change area. Costs: KDP format does not align or give effect to Planning Standards. Cost of initiating a plan change for the applicant and cost to Council to process
Efficiency and Effectiveness				
Whilst this option is an effective and efficient method with respect to the KDP generally. It will not give effect to the objectives of the plan change. This option is ineffective and inefficient and will not achieve the plan change objectives as it will not provide residential living opportunities.	Option 2 is inefficient as it does actively manage potential effects on ecology, character and amenity required in the plan change objectives. Option 2 does not actively manage potential effects on ecology, character and amenity and is inconsistent with the NPS-FW with respect to management of stormwater.	Option 3 will provide an effective method in achieving the plan change objectives, however it is not considered to be the most effective and efficient method. In the absence of mapping to identify particular features and design outcomes of the plan change area, Option 3 will cumbersome and difficult to interpret. As such there is a risk that Option 3 will not effectively achieve the plan change objectives.	Option 4 will provide an effective method in achieving the plan change objectives, however it is not considered to be the most effective and efficient method. Integrating a precinct to achieve the plan change objectives will be complicated and inefficient.	Option 5 will provide the most effective and effective method in achieving the plan change objectives, because it provides for a Development Area/Structure Plan Map to identify, constraints and opportunities, particular features and design outcomes of the plan change. The Development Area objectives and policies provide clear and directive outcomes which clearly link to the proposed methods. The Development Area can efficiently and effectively be accommodated within both the ODP and any future Proposed District Plan.
Opportunities for Economic Growth and Em	nployment			
Option 1, the Rural Zone enables the establishment and operation of commercial and industrial activities on a case-by-case	Option 2 will create economic growth and employment, from the construction and development enabled by the Development	Option 3 will create economic growth and employment, from the construction and development enabled by the Development	Option 4 enables the establishment and operation of commercial activities in a limited manner, contributing positively to	Option 5 enables the establishment and operation of commercial activities in a limited manner, contributing positively to

and industrial activities on a case-by-case basis as a restricted discretionary activity. Which in-turn maintains the ability to contribute to the local economy.

The status quo will not result in a change to opportunities for employment.

development enabled by the Development

Increased residents will contribute to the local economy gaining goods and services from Mangawhai.

development enabled by the Development Area.

Increased residents will contribute to the local economy gaining goods and services from Mangawhai.

limited manner, contributing positively to the economy whilst protecting the viability and vibrancy of Mangawhai business areas.

Option 4 will create economic growth and employment, from the construction and development enabled by the Development Area.

Increased residents will contribute to the local economy gaining goods and services from Mangawhai.

- oes not align or give effect tandards.
- ing a plan change for the cost to Council to process.

the economy whilst protecting the viability and vibrancy of Mangawhai business areas.

Option 5 will create economic growth and employment, from the construction and development enabled by the Development Area.

Increased residents will contribute to the local economy gaining goods and services from Mangawhai.

Certainty and Sufficiency of Information/Risk of Acting or not Acting if there is Uncertainty

Provisions are within the operative WDP, therefore there is sufficient information and certainty as to how the rules are implemented, therefore there is no risk of acting or not acting.

Provisions are within the operative WDP, therefore there is sufficient information and certainty as to how the rules are implemented, therefore there is no risk of acting or not acting.

High level of uncertainty creating a district wide zone, which is required to achieve the site specific and technical requirements of the plan change area.

High risk of acting.

Limited uncertainty if the rules are not comprehensive and do not appropriately manage potential adverse effects.

Low risk of acting.

Limited uncertainty if the rules are not comprehensive and do not appropriately manage potential adverse effects.

Low risk of acting.

Option 5 is the preferred option. Rezoning the plan change area to the Mangawhai Hills Development Area, is the most appropriate mechanism for achieving the objectives of the plan change. This option enables residential development and the use of land more efficiently. The Development Area will ensure that urban growth is integrated with the protection and enhancement of ecological features, management of provision of infrastructure and mitigation of landscape effects.

Table 2 below provides evaluation of Option 5 methods.

Table 2: Evaluation of Methods

Proposed Plan Change Rule	Reason Discussion
DEV1-R1 Buildings, accessory buildings and structures	 Buildings, accessory buildings and structures are enabled as a permitted activity subject to compliance with standards. Separate building rule is consistent with Eplan formatting and the National Planning Standards. Defaulting to a restricted discretionary activity provides sufficient ability to assess potential effects via consent. Permitted activity standards require compliance with bulk and location, amenity standards to ensure that built development will not result in adverse effects.
DEV1-R2 Residential unit	 Residential units enabled as a permitted activity subject to compliance with standards. Minimum net site area of 1,000m2 provides for a low level of residential density that responds to the constraints and opportunities of the plan change area and establishes a high level of residential amenity, consistent with the ODP Residential Zone. Limiting the number of residential units onsite maintains the low-level residential density, requires any intensification to be appropriately assessed via a consent. Permitted activity standards require compliance with infrastructure standards ensuring that residential units are appropriately serviced. Defaulting to a restricted discretionary activity provides sufficient ability to assess potential effects via consent. Increasing the density is not considered appropriate as it could create adverse environmental and social effects associated with on-site services. Decreasing the density is not considered appropriate as the density maintains consistency for residents and developers, provides additional economic benefits and plan-enabled capacity, and is more consistent with the existing environment when compared to a decreased density. It is considered appropriate to provide for up to two residential units within a site provide additional opportunities and flexibility for residential development and to provide more variety and affordability in housing options. Sites within the RES are considered to be a sufficient size to accommodate up to two residential units and the proposed bulk and location standards will manage the scale of built form within sites.
DEV1-R3 Home business	 Home business is enabled as a permitted activity subject to compliance with standards. Permitted activity rule standards minimum floor area, numbers of employees, hours of operation etc. keep the activity to a scale that is consistent with a residential environment. Limiting the number of residential units onsite maintains the low-level residential density, requires any intensification to be appropriately assessed via a consent. Permitted activity standards require compliance with infrastructure standards ensuring that residential units are appropriately serviced. Defaulting to a restricted discretionary activity provides sufficient ability to assess potential effects via consent. Maintaining status quo and a discretionary activity status where considered.
DEV1-R4 Visitor accommodation	 Visitor accommodation is enabled as a permitted activity subject to compliance with standards. Permitted activity rule standards keep the activity to a scale that is consistent with a residential environment and adequately serviced. Defaulting to a discretionary activity is proposed to enable the full gambit of effects to be assessed at time of consent. Maintaining status quo and a discretionary activity status where considered.
DEV1-R5 Commercial Activities, Educational Facilities and Community Facilities	 These activities are enabled as a permitted activity subject to compliance with standards. Permitted activity rule standards keep the activities to a scale that is consistent with a residential environment and adequately serviced. Strict GFA limits are proposed to manage potential economic effect to the Mangawhai Business Area whilst ensuing local neighbourhood services can be available. Limited spatial locations are proposed to:

	 avoid sensitive locations within the Development Area; conform with the Mangawhai Hills Development Area Conceptual Structure Plan; manage reverse sensitivity effects; and ensure connection and legibility with transport network. Defaulting to a discretionary activity is proposed to enable the full gambit of effects to be assessed at time of consent. Maintaining status quo and a discretionary activity status where considered.
DEV1-R6 Any activity not otherwise provided for	Defaulting to a discretionary activity is proposed to enable the full gambit of effects to be assessed at time of consent.
DEV1-R7 Excavation and Fill	 Earthworks and fill are enabled as a permitted activity subject to compliance with standards. Defaulting to a restricted discretionary activity provides sufficient ability to assess potential effects via consent. Permitted activity rule standard provides for the ability to undertake earthworks. Maintaining status quo or no earthworks rules have been considered. Status quo will not afford the level of protection necessary to manage potential effects to ecology and landscape values. No earthworks rules, would result in reliance of the Northland Regional Plan provisions to manage potential effects, this option would not effectively manage the potential effect to amenity and character within the Development Area.
DEV1-R8 Indigenous Vegetation Clearance	 Ecological impact assessment (Appendix 11) confirms that there is a mix of native vegetation, native-exotic bush areas, pasture and exotic shelterbelts within the Development Area. A large native bush remanent within the northern portion of the site, with a total area of approximately 14.7ha is identified to have high ecological value. This area has been mapped within the Structure Plan; the provisions ensure protection of this feature. Indigenous vegetation clearance is only enabled as a permitted activity subject to compliance with standards. Defaulting to a restricted discretionary activity provides sufficient ability to assess potential effects via consent. Permitted activity rule standard provides for the ability to undertake earthworks. Maintaining status quo or no vegetation clearance rules have been considered. Status quo will not afford the level of protection necessary to manage potential effects to ecology and landscape values. No vegetation clearance rules, would result in loss of areas of vegetation identified as high value, this option would not effectively manage the potential effect to amenity and character within the Development Area, fail to meeting the RPS and the NPS-FW.
DEV1-R9 Noise	 These provisions reflect the ODP Residential Zone rules to maintain consistency. Alternatives considered are status quo (ODP Rural Zone Rules), no rules or bespoke development area standards. It is considered that the status quo rural rules and no
DEV1-R10 Vibration	rules would not effectively and efficiently manage effects associated with large lot residential development. Introduction of bespoke development area standards would be inconsistent with the National Planning Standards which require these matters to be addressed in District Wide chapters.
DEV1-R11 Hazardous Substances	
DEV1-R12 Radioactive Materials	
DEV1-R13 Lighting	
DEV1-R14 Signs	
DEV1-R15 Vehicle Crossing	
DEV1-S13 Vehicle Crossings	 Vehicle access, public roads, pedestrian walkways and cycle trails are a permitted activity subject to compliance with standard to ensure that the access to ensure adverse effects and health and safety risk do not occur.
DEV1-R16 Public Roads, Pedestrian Walkways and Cycleways	 Defaulting to a restricted discretionary activity provides sufficient ability to assess potential effects via consent. Alternatives considered are status quo (ODP Rural Zone Rules) or no rules. It is considered that the status quo rural rules and no rules would not effectively and efficiently manage effects associated with large lot residential development.
DEV1-S14 Public Roads, Pedestrian Walkways and Cycleways	• Standard requirements to ensure that crossings are established in accordance with the recommendations of Traffic Assessment (Appendix 6).
DEV1-R17 Network Utilities	 These provisions reflect the ODP Residential Zone rules to maintain consistency. Alternatives considered are status quo (ODP Rural Zone Rules) or no rules. It is considered that the status quo rural rules and no rules would not effectively and efficiently manage effects associated with large lot residential development.
DEV1-R18 Outdoor Recreational Activities	 These activities are enabled as a permitted activity subject to compliance with standards. Permitted activity rule standards keep the activities to a scale that is consistent with a residential environment and adequately serviced. Strict GFA limits are proposed to manage potential economic effect to the Mangawhai Business Area whilst ensuing local neighbourhood services can be available. Limited spatial locations are proposed to:

	 avoid sensitive locations within the Development Area; conform with the Mangawhai Hills Development Area Conceptual Structure Plan; manage reverse sensitivity effects; and ensure connection and legibility with transport network. Defaulting to a discretionary activity is proposed to enable the full gambit of effects to be assessed at time of consent.
DEV1-R19 Subdivision	• Subdivision is only provided for as a restricted discretionary activity, this ensures that subdivision is comprehensively designed and will implement the Mangawhai Hills Structure Plan. Defaulting to a discretionary activity is proposed to enable the full gambit of effects to be assessed at time of consent.
DEV1-REQ2 Subdivision	 Subdivision rule standards seek to achieve the following: Minimum net site area of 1,000m2 provides for a low level of residential density that responds to the constraints and opportunities of the plan change area and establishes a high level of residential amenity. Important outcome of the plan change is the establishment of transport network connections (Appendix 6). Provision to primary and secondary roads in accordance with the Mangawhai Hills Structure Plan, ensures this outcome is achieved. Creation of neighbourhood open space for the use and enjoyment of future residents is provided for in accordance with high quality urban design outcomes (urban design statement Appendix 4). Ecological impact assessment (Appendix 11) confirms that there are a number of natural wetland features, intermittent and permanent streams within the Development Area. Protection and enhancement of these ensure that the proposed rezoning will not result in adverse ecological effects. Protection and enhancement of these are required at the time of subdivision.
DEV1-S1 Site coverage	 The site coverage standard aims to ensure sufficient land is retained for landscaping to improve amenity and to mitigate the potential effects of stormwater runoff. The importance of managing stormwater is identified in the Land Development Report (Appendix 7) and the proposed standard is more restrictive than the status quo or the ODP Residential Zone. The alternative considered was the ODP Residential Zone Permeable Surfaces and Building Coverage rules are not considered appropriate to give effect to the NPS-FW or the plan change objectives. The proposed reduction of impervious area limits takes into account the large allotment size
DEV2-S2 Height	 The proposed 8m building height allows for 2 storey buildings and is consistent with the status quo of the ODP Residential Zone. The Landscape Report (Appendix 5) has identified a sensitive ridgeline within the Development Area, and recommends that development is designed to protect the values of this ridgeline. The proposed 5m building height within the Landscape Protection Area is proposed to ensure that buildings do not extend beyond the nearest ridgeline and reflect the recommendations of the landscape assessment. Alternatives include increasing or decreasing the height limits. Decreased height limits from status quo are not considered other than the Landscape Protection Area appropriate as they would increase economic costs and reduce the plan-enabled capacity. Increased height limits are not considered appropriate as they may have adverse effects on amenity and character. Taller buildings may require further assessment as to their suitability, and it is considered that they should be assessed through the resource consent process.
DEV1-S3 Height in relation to boundary	 In conjunction with the building height and setback provision, it is proposed to impose height in relation to boundary (HIRB) standards to further protect amenity values. High buildings close to common boundaries can have significant adverse effects on neighbouring sites, including being overbearing and restricting the admission of daylight. The proposed provisions require higher buildings to be located further from the site boundaries. Alternatives considered were the ODP Residential Zone status quo, or having no height/bulk in relation to boundary rules and instead relying on building height and setbacks. With regard to the status quo, the 3m height limit was considered to be restrictive give the large lot size, height and setback standards. The option of removing all height/bulk in relation to boundary rules was considered ineffective in managing adverse effects as a building that is built to the maximum height and minimum setback could have significant adverse effects on neighbours.
DEV1-S4 Setbacks from internal boundaries	 Building setbacks allow for open space between buildings and site boundary for site access, building maintenance, privacy, noise reduction and the like. It is considered that on sites with a net site area of 1000m2 provide sufficient site area to establish buildings without the need to require an increased setback from
DEV1-S5 Setback from road boundaries	 internal boundaries. The proposed 5m setback from roads is consistent with the status quo of the ODP Residential Zone and allow for road maintenance, boundary landscaping, site access, privacy, noise reduction and the like. More restrictive and less restrictive setback provisions were evaluated. In general, the operative provisions have operated efficiently and effectively and wholesale changes to the ODP setback provisions were not considered necessary. Rather, minor amendments were considered more appropriate to provide more clarity and flexibility giving effect to the plan change objectives.

DEV1-S6 Fencing and Landscaping	 The ODP Residential Zone does not have standards or rules for fencing and landscaping. Fences can detract from amenity and reduce the feeling of open space. It is considered appropriate to maintain a standard of 1.2m and require permeability to ensure passive surveillance of public spaces. The standards achieve high quality urban design consistent with the Urban Design Statement (Appendix 4). Landscaping of private property is considered to contribute to the amenity of the Development Area, creating connections and links to established and protected natural areas, as recommended in the Landscape and Ecological Assessments.
DEV-S7 Setbacks from natural features	• Ecological Impact Assessment (Appendix 11) confirms that there are a number of natural wetland features, intermittent and permanent streams within the Development Area. Protection and enhancement of these ensure that the proposed rezoning will not result in adverse ecological effects.
DEV1-S8 Residential Unit Separation Distance	 The proposed residential unit separation allows for open space between buildings for outdoor living areas, privacy, noise reduction and the like. The proposed standard is consistent with the ODP Residential Zone rule. More restrictive and less restrictive separation provisions were evaluated. In general, the operative provisions have operated efficiently and effectively.
DEV1-S9 Exterior Finish	• The plan change seeks to enable large lot residential development, that responds positively to the local context. Exterior finish of buildings, particularly within the more sensitive Landscape Protection Area is considered to effectively achieve this outcome. Consistent with the Landscape assessment, giving effect to the plan change objectives.
DEV1-S10 Earthworks	The Development Area is subject to a varied contour, with sensitive ridgelines. Management of the potential effect of earthworks on the amenity and character of the Development Area is considered to be necessary.
DEV1-S11 Traffic Intensity	 The proposed traffic intensity standard ensures that activities which generate effects on the transport network are activity managed. The proposed standard is consistent with the ODP Residential Zone rule. More restrictive and less restrictive standards were evaluated. In general, the operative provisions have operated efficiently and effectively.
DEV1-S12 Building platform(s) DEV1-S18 Minimum Floor Level	 Creation of residential allotments that are of a size, dimension and physically developable ensure that subdivision is viable and cost effective. Lot dimensions contribute to the amenity and character the Development Area. The proposed standard gives effect to the recommendations of the Land Development Report.
DEV1-S15 Water Supply	
DEV1-S16 Stormwater Disposal	• Three waters standards ensure there is adequate capacity in the existing or proposed stormwater and public reticulated wastewater network to service development.
DEV1-S17 Wastewater Disposal	 Provision for private and communal onsite wastewater, water and stormwater services ensures that reduced demand on the existing council reticulation and the CWWTP is provided, and that sustainable, environmentally conscious and innovative design objectives of the plan change are given effect to. The proposed standards give effect to the recommendations of the Land Development Report and ensure that the proposed rezoning will not result in adverse water
DEV1-REQ1 Stormwater Management	quality and quantity effects.

Efficiency and Effectiveness

It is considered that the proposed suite of methods is efficient and effective for the following reasons:

- The proposed rules and standards provide a clearer expectation for the community and developers as to what types of activities are anticipated within the Development Area.
- The proposed rules and standards are considered more effective than the status quo in managing adverse effects and protecting residential character and amenity, whilst protecting the natural environment.
- The proposed rules are considered more effective than the status quo at managing commercial sprawl and its associated adverse effects.
- The proposed rules provide for a permitted threshold of activities, in line with the plan change objectives, so that opportunities for appropriate non-residential activities are provided.

Opportunities for Economic Growth and Employment

Rules and standards managing the activities can have significant effects on economic growth and employment opportunities as they can dictate where certain businesses can and cannot operate without consent. The proposed Commercial activity rules seek to provide for local neighbourhood scale employment opportunities whilst protecting land within the existing commercial zones within Mangawhai, and subdivision and land use rules relating to residential activities within the site seek to ensure that sufficient residential capacity is enabled through the District Plan.

Certainty and Sufficiency of Information/Risk of Acting or not Acting if there is Uncertainty

Limited uncertainty if the rules are not comprehensive and do not appropriately manage potential adverse effects.

Low risk of acting.