

# Section 32 Evaluation Report – Part 1 – Context to Evaluation and Strategic Objectives – Section 9

## 9.0 Evaluation of Proposed Strategic Objectives

The objectives in the Strategic Directions chapter of the PDP set the direction for managing growth, land use and development in Wellington. They also help to implement relevant Council strategies and policies along with regulatory planning documents that the District Plan needs to give effect to.

The strategic objectives outlined in this chapter are intended to be particularly instrumental in considering future plan changes and complex resource consent applications as follows:

- For the purpose of plan implementation (including the assessment of resource consents and notices of requirement):
  - They provide further direction to reinforce the outcomes sought by the topic specific objectives and policies in other chapters of the Plan
  - Along with topic specific objectives and policies they will need to be included as part of the assessment of any Discretionary or Non-Complying activity
- For the purposes of plan development, including future plan changes and variations:
  - They form the basis for the development of more detailed objectives, policies and rules in Parts 2 and 3 of the District Plan
  - They form an important input to guide future plan change or variation proposals

### 9.1 Strategic Objectives Overview

Thirty-four strategic objectives are included in the PDP. A brief summary of the outcomes sought is included below, noting that the specific provisions should also be referred to in conjunction with this evaluation report.

#### 9.1.1 Anga Whakamua – Moving into the future (AW-O1 to AW-O4)

The strategic objectives within the Anga Whakamua – Moving into the Future chapter demonstrate a commitment to the city goal of ‘Partnership with mana whenua’ and the role of mana whenua in the City’s planning processes.

These objectives also seek to ensure that the values and aspirations of mana whenua that are expressed in the Tangata Whenua chapter are given due consideration in future plan-making and significant consent processes.

The objectives provide recognition of the important role mana whenua have to play in the City’s future development including enabling them to use and develop land in order to realise their own social, economic, commercial and cultural aspirations. This includes the use and

development of Treaty Settlement land and land subject to Deed of Settlement provisions relating to right of first refusal land for commercial redress purposes.

### **9.1.2 Capital City (CC-O1 to CC-O3)**

The Capital City strategic objectives provide an important link between the Council's overarching strategies and policies and the district plan itself. In particular, these objectives provide a statutory link between the Spatial Plan City Goals, and the District Plan. The objectives provide an overarching vision, highlighting not only the important role that Wellington City plays in the region, but also at a national scale as the capital city.

These objectives are complemented by the remaining strategic objectives which are more topic-specific, and further implemented through lower-order chapters across the plan.

### **9.1.3 City Economy, Knowledge and Prosperity (CEKP-O1 to CEKP-O5)**

The City Economy, Knowledge and Prosperity strategic objectives recognise the important role of Wellington's commercial areas in supporting the local and regional economies. The City has traditionally had a strong focus on enabling a wide range of commercial activities across the City to provide diversity. This is reinforced through these objectives (CEKP-O1, CEKP-O2). In addition, CEKP-O1 recognises that technology and ways of working are likely to evolve over the life of the plan, and that this should be provided for.

CEKP-O2 establishes a centres hierarchy, which ensures each centre is developed with activities that are of a scale appropriate to that environment, and complement the City Centre. CEKP-O3 provides for the role of mixed use, industrial and commercial zones to complement the centres hierarchy.

Aside from the centres and wider commercial areas, these objectives also recognise the strategic role of the City's cultural and knowledge institutions (CEKP-O5) in a well-functioning city and ensures these are provided for.

### **9.1.4 Historic Heritage and Sites and Areas of Significance to Māori (HHSASM-O1 to HHSASM-O5)**

The Historic Heritage and Sites and Areas of Significance to Māori section of the Strategic Direction recognises that these are matters of national importance, but also recognises their important role in the City's identity and sense of place.

The objectives provide for the identification and protection of historic heritage (HHSASM-O1), while also recognising that the resilience of heritage buildings in the city is a priority. HHSASM-O2 enables consideration of heritage values within the context of the desire of building owners to adaptively reuse these buildings. The objective supports initiatives that involve the seismic upgrade of buildings to enable that reuse. As such, the objective provides the basis for prioritising building upgrades, over the complete demolition of a listed heritage building.

Objectives HHSASM-O3 to O5 support the identification and protection of sites of significance to mana whenua.

### 9.1.5 Natural Environment (NE-O1 to NE-O4)

The Natural Environment section of the Strategic Direction recognises that the preservation of the natural character of the coastal environment, and the protection of significant indigenous vegetation, significant habitats of indigenous fauna, and outstanding natural landscapes and features from inappropriate subdivision, use, and development are matters of national importance.

NE-O1 provides for the identification, protection, and, where possible, the enhancement of natural character, landscapes and features, and ecosystems. This includes identifying their contribution to the City's identity and significance for mana whenua as kaitiaki. NE-O2 gives effect to the National Policy Statement for Freshwater Management's (NPS-FM) direction relating to Te Mana o Te Wai, through directing subdivision and development to improve water quality as well as recognising mana whenua and their relationship to water.

NE-O3 supports the retention of the city's extensive open space network, with a focus on accessibility, connecting the urban and natural environment, supporting ecological, cultural and landscape values and meeting the needs of a growing population. NE-O4 provides for Mana Whenua's ability to exercise their customary responsibilities as mana whenua and kaitiaki with their own mātauranga Māori in the protection and management of the natural environment.

### 9.1.6 Strategic City Assets and Infrastructure (SCA-O1 to SCA-O5)

The Strategic City Assets and Infrastructure section of the Strategic Direction acknowledges that infrastructure is critical to the ability of Wellington to thrive and grow. The expected population growth over the next 30 years will place pressures on this infrastructure, particularly with regards to three waters and transport networks.

This section also acknowledges Wellington's Regionally Significant Infrastructure in the form of major infrastructure facilities such as the Commercial Port and Wellington International Airport.

The Plan responds to the NPS-UD's requirement of local authorities to enable sufficient development capacity for housing and business needs over the short, medium and long term. Given the significant costs involved with servicing new growth with infrastructure, Wellington City is taking a long-term and pragmatic approach to prioritising growth areas for infrastructure investment through its Spatial Plan, Long Term Plan and Infrastructure Strategy. This includes seeking that future development aligns with this sequencing as much as possible, as well as encouraging the use of green infrastructure.

SCA-O1 seeks that infrastructure is established, operated, maintained and upgraded in a manner that recognises the benefits of the infrastructure, enables the City to function safely, ensures a resilient infrastructure network and enables future growth and development.

SCA-O2 and SCA-O3 supports new urban development that occurs in locations that are supported by sufficient development infrastructure capacity and additional infrastructure which provides significant benefit at a regional or national scale.

SCA-O4 seeks that regionally significant infrastructure is provided for in appropriate locations and the benefits of this infrastructure are recognised and provided for. SCA-O5 ensures that adverse effects of infrastructure are managed whilst providing considering to

the benefits, technical and operational needs of infrastructure. SCA-06 seeks the protection of infrastructure from reverse sensitivity effects.

### **9.1.7 Sustainability, Resilience and Climate Change (SRCC-O1 to SRCC-O3)**

The Sustainability, Resilience and Climate Change section of the Strategic Direction provides direction that is consistent with the City's Te Atakura goal of being a net 'zero emission city' by 2050. The direction acknowledges that how and where the City grows will play a key role in our ability to reach this goal and support future generations to live more sustainably.

This section acknowledges that the City is subject to a range of natural hazards, including earthquakes, liquefaction, and flooding, and that the impacts of climate change and sea level rise are also beginning to be felt in some parts of the City. It is important that new development does not exacerbate these risks.

SRCC-O1 directs the City's built environment to support a net reduction in the City's carbon emissions by 2050, more energy efficient buildings, an increase in the use of renewable energy sources and a healthy functioning of native ecosystems and natural processes.

SRCC-O2 seeks that risks from natural hazards are identified, understood, planned for through adaptation and mitigation measures, and avoided where the risks are intolerable. SRCC-O3 and SRCC-O4 directs subdivision, development and land use to effectively manage the risks associated with climate change and sea level rise, support adaptation over time from potential impacts, and supports natural functioning ecosystems and processes.

### **9.1.8 Urban Form and Development (UFD-O1 to UFD-07)**

The Urban Form and Development section of the Strategic Direction acknowledges that population growth will result in higher demand for housing and employment over the next 30 years. Without significant increases in the amount of urban intensification the City will fall short of meeting this demand and the NPS-UD's directive to provide sufficient development capacity in the short, medium and long-term. The management of where this new development is to occur is an important matter for the District Plan.

The objectives focus on increasing housing choice and affordability by enabling development across the housing spectrum. The objectives also seek to ensure that the City remains liveable and functions in a way that enhances people's wellbeing through quality-built environments.

UFD-O1 supports the maintenance of Wellington's compact urban form through the locating the majority of urban development within the City Centre, in and around Centres, and along major public transport corridors. UFD-O2 provides for urban development in identified greenfield areas that is environmentally and ecologically sensitive, makes efficient use of land, is well-connected to the public transport network and reinforces the city's compact form.

UFD-O3 supports medium to high density and assisted housing developments located in areas that are connected to the transport network, within or near a Centre Zone with employment opportunities and served by open space and social infrastructure. UFD-O4 directs Council to meet or exceed housing bottom lines in the short, medium and long-term.

UFD-O5 and UFD-O6 seeks sufficient land development capacity provision in the City and that a variety of housing types, sizes and tenures are available across the City. UFD-O7 provides for development which supports the creation of a liveable, well-functioning urban environments and sets out measures to achieve this. UFD-O8 ensures that areas of identified special character are recognised and new development is responsive to these.

## **9.2 Evaluation of Proposed Strategic Objectives**

### **9.2.1 Introduction**

Section 32(1)(a) of the RMA requires that the evaluation report examine the extent to which the objectives of the proposal are the most appropriate way to promote the sustainable management of natural and physical resources.

An examination of the proposed strategic objectives along with reasonable alternatives is included below, with the relative extent of their appropriateness based on an assessment against the following criteria:

1. Relevance (i.e. Is the objective related to addressing resource management issues and will it achieve one or more aspects of the purpose and principles of the RMA?)
2. Usefulness (i.e. Will the objective guide decision-making? Does it meet sound principles for writing objectives (i.e. Does it clearly state the anticipated outcome?)
3. Reasonableness (i.e. What is the extent of the regulatory impact imposed on individuals, businesses or the wider community? Is it consistent with identified tangata whenua and community outcomes?)
4. Achievability (i.e. Can the objective be achieved with tools and resources available, or likely to be available, to the Council?)

### **9.2.2 Evaluation of Strategic Objectives AW-O1-AW-O4**

For the purposes of this evaluation, the Council has considered the following:

1. The proposed objectives
2. No objectives

Proposed objectives:

**AW-O1** Resource management processes include mana whenua as active participants in a way that recognises Te Tiriti o Waitangi and its principles.

**AW-O2** The relationship of Tangata Whenua with their Lands and Traditions is recognised and provided for, including:

1. The use, development and expansion of Treaty Settlement land and any land that is subject to Deed of Settlement provisions relating to right of first refusal land, in a manner that recognises its commercial redress purposes; and
2. The use and development of all other land to provide for the social, economic, commercial, and cultural aspirations of Tangata Whenua.

**AW-O3** Mana whenua can exercise their customary responsibilities as mana whenua and kaitiaki with their own mātauranga Māori.

**AW-O4** The development and design of the City reflects mana whenua and the contribution of their culture, traditions, ancestral lands, waterbodies, sites, areas and landscapes, and other taonga of significance to the district's identity and sense of belonging.

General intent:

Strategic Objectives AW-O1 to AW-O4 are intended to provide strategic status in the PDP to the role of mana whenua in resource management processes and reaffirm their right to exercise their customary rights and responsibilities according to their own knowledge and traditions (mātauranga Māori). The objectives recognise the role of mana whenua as kaitiaki.

The objectives reinforce the commitment of the Council to a partnership approach with mana whenua at a resource management planning level. This is stated within AW-O1 which is directive to decision-makers that mana whenua must be given the opportunity to actively participate in such processes. Furthermore, AW-O4 seeks to ensure that mana whenua values have a greater presence in the City's environment – both in the built and natural environments.

It is expected that these objectives are applied through the resource consent and plan change process where these proposals have the potential to impact the environmental outcomes sought by mana whenua (as outlined in the Tangata Whenua chapter). They should also be applied where mana whenua themselves are undertaking land use, development and subdivision activity so that appropriate consideration is given to the right of mana whenua to exercise their customary rights and responsibilities, whether on their own land or on Treaty Settlement land, and to apply their own knowledge and traditions in exercising these rights and responsibilities.

Overall, these objectives recognise the importance of the District Plan in providing for the social, cultural, environmental and economic wellbeing of mana whenua.

Other potential objectives

Alternative: No other objectives were considered as part of this assessment.

Criteria	Preferred objective	No objectives
<i>Relevance:</i>		
Addresses a relevant resource management issue	These objectives enable appropriate consideration of mana whenua values, knowledge and traditions in the management of the use and development of land in Wellington City.	The absence of these objectives would not preclude consideration of mana whenua values in the implementation of the District Plan. However, the absence of these objectives would mean that insufficient consideration of the role of mana whenua and their values in managing land use and development would not be provided for at a strategic level in the PDP.
Assists the Council to undertake its functions under s31 RMA	These objectives assist the Council in achieving s31(1)(a) of the Act in terms of the integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district. The objectives ensure that the effects of use and development of land and associated natural and physical resources on mana whenua values and the ability to provide for their social, cultural, environmental and economic wellbeing is considered in resource management processes.	The absence of these objectives may hinder the ability for Council to take an integrated approach in considering mana whenua values in the implementation of the plan. This is because the inclusion of strategic objectives provides overarching guidance on the outcomes that are sought by mana whenua. The absence of strategic objectives would mean a reliance on topic-based provisions in the lower order chapters which by their nature are specific to that topic, rather than taking a strategic view.
Gives effect to higher level documents	The objectives assist in giving effect to national direction, in particular: <ul style="list-style-type: none"> <li>• NPS-UD 2020: Objective 5 and Policy 1(a)(ii)</li> <li>• NPS-FM 2020: Objective 1, Policy 1, and Policy 2.</li> </ul> The objectives also assist in giving effect to the RPS, in particular Objectives 23 to 28.	The absence of strategic objectives in relation to mana whenua values would not hinder the ability of the PDP to give effect to higher order documents. However, once again, there would be a reliance on lower-order chapters to provide sufficient guidance and these would be topic-specific. This prevents the ability of the Council to take a 'strategic view' in implementing the PDP, and provide a clear line of sight from higher order documents through to the topic-specific objectives, policies and rules.
<i>Usefulness:</i>		
Guides decision-making	The objectives provide a guide for decision-makers in terms of mana whenua expectations of their involvement in the decision-making process, the outcomes that	The absence of these strategic objectives would prevent a clear line of sight from the overarching City goals (from the Spatial Plan) through to the District Plan. This strategic view is important for decision-makers to

	are sought by mana whenua in terms of how land is used, and how mana whenua values can be recognised and provided for in development.	understand the strategic priorities for the City and may not always be apparent in the topic-specific objectives, policies and rules.
Meets best practice for objectives	Yes, the objectives are outcome-focused.	N/A
<b>Reasonableness:</b>		
Will not impose unjustifiably high costs on the community/parts of the community	These objectives do not impose unjustifiably high costs on the community or parts of the community. The objectives are strategic and inform the implementation of lower-order chapter provisions.	N/A
Acceptable level of uncertainty and risk	There is sufficient certainty in these provisions and the risks are low. These objectives have been tested through the Draft District Plan process and there is general support for the approach. The objectives address a significant gap in the Operative District Plan and align with statutory requirements as noted above.	A lack of strategic objectives on this topic could provide a level of uncertainty for decision-makers and plan users in determining how mana whenua values should be considered through resource management processes.
<b>Achievability:</b>		
Consistent with identified tangata whenua and community outcomes	The objectives have been drafted following significant engagement with mana whenua during the plan development process and reflect the outcome of that engagement. These objectives have also been tested with the wider community through the Draft District Plan process and there was general support for the approach.	The absence of these strategic objectives would be inconsistent with the outcomes sought by mana whenua and the wider community. Aside from legal obligations, there is an expectation that the District Plan include appropriate provisions that raise the profile of mana whenua values and aspirations, and that support a partnership approach with mana whenua in resource management processes.
Realistically able to be achieved within the Council's powers, skills and resources	These objectives are strategic in nature and will be achieved through the implementation of lower-order chapters and through future plan change processes.	N/A
<b>Summary</b>		
Objectives AW-O1-O4 are considered to be the most appropriate way of achieving section 5 of the RMA as they enable the appropriate consideration of mana whenua values in the sustainable management of the use, development and protection of natural and physical resources.		



### 9.2.3 Evaluation of Strategic Objectives CC-O1 to CC-O3

For the purposes of this evaluation, the Council has considered the following:

1. The proposed objectives
2. No objectives

Proposed objectives:

**CC-O1** Wellington City continues to be the primary economic and employment hub for the region.

**CC-O2** Wellington City is a well-functioning Capital City where:

1. A wide range of activities that have local, regional and national significance are able to establish and thrive;
2. The social, cultural, economic and environmental wellbeing of current and future residents is supported;
3. Mana whenua values and aspirations become an integral part of the City's identity;
4. Urban intensification is delivered in appropriate locations and in a manner that meets the needs of current and future generations;
5. Innovation and technology advances that support the social, cultural, economic and environmental wellbeing of existing and future residents are promoted; and
6. Values and characteristics that are an important part of the City's identity and sense of place are identified and protected.

**CC-O3** Development is consistent with and supports the achievement of the following strategic City objectives:

1. Compact: Wellington builds on its existing urban form with quality development in the right locations;
2. Resilient: Wellington's natural and built environments are healthy and robust, and we build physical and social resilience through good design;
3. Vibrant and Prosperous: Wellington builds on its reputation as an economic hub and creative centre of excellence by welcoming and supporting innovation and investing strategically to maintain a thriving economy;
4. Inclusive and Connected: Wellington recognises and fosters its identity by supporting social cohesion and cultural diversity, has world-class movement systems and attractive and accessible public spaces and streets;

<p>5. Greener: Wellington is environmentally sustainable and its natural environment is protected, enhanced and integrated into the urban environment; and</p> <p>6. Partnership with mana whenua: Wellington recognises the unique role of mana whenua within the city and advances a relationship based on active partnership.</p>		
<b>General intent:</b>		
Strategic Objectives CC-O1 to CC-O3 provide a regulatory link to the Spatial Plan, which is a non-statutory document. These objectives set out the overarching vision for the District Plan and the outcomes sought through its implementation.		
<b>Other potential objectives</b>		
Alternative: No other objectives were considered as part of this assessment.		
<b>Criteria</b>	<b>Preferred objective</b>	<b>No objectives</b>
<b>Relevance:</b>		
Addresses a relevant resource management issue	The objectives address a number of resource management issues, including the role of Wellington City as the nation's capital and its role at a regional and national scale. This requires an appropriate planning response in providing for the right mix of land use activities and development to support this important role and managing the effects of these activities on the wider environment.	The absence of these strategic objectives would not hinder the ability to address the resource management issues as these objectives are strategic.
Assists the Council to undertake its functions under s31 RMA	The objectives assist the Council in undertaking its functions under s31 of the RMA by enabling the consideration of a range of City outcomes in the decision-making process.	The absence of these strategic objectives would not be detrimental to the Council's ability to fulfil its functions under s31. However, the inclusion of this direction does enhance fulfilment of this function of integrated management.
Gives effect to higher level documents	The objectives assist in giving effect to the RPS, in particular Objective 22.	The absence of these strategic objective would not be detrimental to the Council's ability to give effect to higher level documents. Rather, their inclusion enhances the ability to give effect to these documents.
<b>Usefulness:</b>		
Guides decision-making	The objectives provide guidance to decision-makers about the vision and outcomes sought from the plan overall.	The absence of strategic objectives on this topic would mean there is insufficient guidance for decision-makers about the overarching outcomes sought by non-

		statutory/non-RMA strategies and policies, such as the Spatial Plan.
Meets best practice for objectives	Yes, the objectives are outcome-focussed.	N/A
<i>Reasonableness:</i>		
Will not impose unjustifiably high costs on the community/parts of the community	The objectives are strategic in nature and will not impose unjustifiably high costs on the community or parts of the community.	The absence of these objectives will not impose unjustifiably high costs on the community/parts of the community.
Acceptable level of uncertainty and risk	The objectives provide clarity about the outcomes that are sought from the implementation of the plan overall. They also provide a level of certainty that the goals sought by the Spatial Plan will be implemented through the District Plan. The risks associated with these objectives are low.	The absence of these objectives would create a level of uncertainty as to how non-statutory strategic level documents, such as the Spatial Plan should be considered in implementing the District Plan.
<i>Achievability:</i>		
Consistent with identified tangata whenua and community outcomes	<p>These objectives have been developed in line with the values and aspirations expressed by mana whenua through the plan development phase and are consistent with the 'Anga Whakamua' objectives outlined above.</p> <p>The objectives are also based on the vision, goals and directions of the Spatial Plan which has been subject to City-wide consultation. As such, the objectives are consistent with the outcomes sought by the community.</p>	The absence of strategic objectives on this topic would be inconsistent with mana whenua and community outcomes.
Realistically able to be achieved within the Council's powers, skills and resources	These objectives are strategic in nature and will be achieved through the implementation of lower-order chapters and through future plan change processes.	N/A
<b>Summary</b>		

The proposed objectives support the achievement of the sustainable management purpose of the RMA as they provide clear guidance for decision-makers about the outcomes that are sought for the City overall through implementation of the Proposed District Plan. In doing so, the objectives provide direction about the priorities for the City in order to provide for the community's wellbeing.

#### 9.2.4 Evaluation of Strategic Objectives CEKP-O1 to CEKP-O5

For the purposes of this evaluation, the Council has considered the following:

1. The proposed objectives
2. No objectives

Proposed objectives:

**CEKP-O1** A range of commercial and mixed-use environments are provided for in appropriate locations across the City to:

1. Promote a diverse economy;
2. Support innovation and changes in technology; and
3. Facilitate alternative ways of working.

**CEKP-O2** The City maintains a hierarchy of centres based on their role and function, as follows:

1. City Centre – the primary centre serving the City and the wider region for shopping, employment, city-living, government services, arts and entertainment, tourism and major events. The City Centre is easily accessible and easy to navigate for all and serves as a major transport hub for the City and wider region. The City Centre is the primary location for future intensification for both housing and business needs;
2. Metropolitan Centres – these centres provide significant support to the City Centre Zone at a sub-regional level by offering key services to the outer suburbs of Wellington City and the wider Wellington region. They contain a wide range of commercial, civic and government services, employment, office, community, recreational, entertainment and residential activities. Metropolitan Centres are major transport hubs for the City and are easily accessible by a range of transport modes, including rapid transit. As a result, these centres are will be major live-work hubs for the City over the next 30 years. Intensification for housing and business needs will be enabled in these locations, to complement the City Centre;

3. Local Centres – these centres service the surrounding residential catchment and neighbouring suburbs. Local Centres contain a range of commercial, community, recreational and entertainment activities. Local Centres are well-connected to the City’s public transport network and active transport modes are also provided for. Local Centres will play a role in accommodating and servicing the needs of the existing and forecast population growth that is complementary to the City Centre and Metropolitan Centre Zones. This intensification is due to the capacity of the area to absorb more housing with enablers of growth such as walkable access to public transport, and community facilities and services; and
4. Neighbourhood Centres - these centres service the immediate residential neighbourhood and offer small-scale convenience-based retail for day-to-day needs. These centres are generally for small commercial clusters and community services. Neighbourhood Centres are accessible by public transport and active transport modes.

**CEKP-O3** Mixed use and industrial areas outside of Centres:

1. Complement the hierarchy of Centres;
2. Provide for activities that are incompatible with other Centres-based activities; and
3. Support large scale industrial and service-based activities that serve the needs of the City and wider region.

**CEKP-O4** Land within the City Centre, Centres, Mixed Use, and General Industrial Zones is protected from activities that are incompatible with the purpose of the zone or have the potential to undermine the City’s hierarchy of centres.

**CEKP-O5** Strategically important assets including those that support Māori culture, tourism, trade, education, research, and health and cultural wellbeing are provided for in appropriate locations.

<b>General intent:</b>		
Strategic Objectives CEKP-O1 to CEKP-O5 provide direction on how the PDP will provide for commercial, industrial and mixed-use activity across the city, as well as key services that contribute to the economy and education. The objectives establish the relationship between the City’s City Centre zone and the centres zones through the hierarchy of centres (CEKP-O2), the role of additional business employment and industrial areas in supporting that hierarchy (CEKP-O3), and provide direction to manage incompatible activities within these different areas (CEKP-O4). Finally, CEKP-O5 recognises the strategic importance of key city assets that contribute to the economy more broadly and may establish outside of areas zone for commercial activity, but serve an important role in the City in terms of cultural, educational and health services. This includes the City’s tertiary education institutions, museums, and hospitals.		
<b>Other potential objectives</b>		
Alternative: No alternative objectives were considered for this topic.		
<b>Criteria</b>	<b>Preferred objective</b>	<b>No objectives</b>
<i>Relevance:</i>		

Addresses a relevant resource management issue	<p>These objectives address the following key issues:</p> <ul style="list-style-type: none"> <li>• Where and how activities that provide for the City's economic and social wellbeing are provided for in the PDP;</li> <li>• How these areas are to be retained as commercial and business areas into the future;</li> <li>• Providing for viable commercial areas to support urban intensification in and around suburban centres;</li> <li>• Ensuring these commercial and business areas are retained for their intended purpose, rather than being undermined by non-commercial/business activities; and</li> <li>• Ensuring the City continues to provide for important educational, cultural and healthcare activities across the City.</li> </ul>	The absence of strategic objectives relating to this topic would result in insufficient acknowledgement at a strategic level of these resource management issues.
Assists the Council to undertake its functions under s31 RMA	<p>These objectives assist the Council in undertaking its functions under s31 of the RMA, specifically:</p> <ul style="list-style-type: none"> <li>• s31(a) – in recognising the need to provide for the use of land for economic, employment, and social needs at a range of scales appropriate to the locality</li> <li>• s31(aa) – in providing a framework within which sufficient development capacity for business land can be provided across the City. (Note that specific direction on this matter is provided under the Urban Form and Development chapter).</li> </ul>	<p>The absence of these objectives would make it more challenging for Council to take an integrated approach to providing for commercial and business activities across the City as there would be no overarching direction on the centres hierarchy, and how other commercial areas support these centres.</p> <p>The absence of these objectives would not hinder the Council's ability to carry out its requirements under s31(aa).</p>
Gives effect to higher level documents	<p>These strategic objectives assist in giving effect to the following higher-level documents, including:</p> <ul style="list-style-type: none"> <li>• NPS-UD Objective 1 – these objectives contribute to creating a well-functioning urban environment in providing for the City's economic, social and cultural wellbeing.</li> <li>• NPS-UD – Policy 1(b) – these objectives provide a framework that ensures a range of</li> </ul>	An absence of strategic objectives on this topic would not prevent the ability of the District Plan to give effect to these higher order documents. However, there would be a reliance on the zone-based chapters to provide sufficient guidance.

	<p>commercial, business and other key services are provided for across the City at a range of scales.</p> <ul style="list-style-type: none"> <li>• RPS – Objective 22(a)-(c) – the proposed strategic objectives support the viability and vibrancy of the City Centre and suburban centres by enabling a range of activities appropriate to the centre (RPS Objective 22 (a) and (b)), while also providing for additional areas that complement these centres providing industrial-based employment opportunities (RPS Objective 22(c)).</li> <li>• RPS – Policies 30-32 – the proposed objectives provide the framework for the maintenance and enhancement of the viability and vibrancy of regionally significant centres through the inclusion of ‘Metropolitan Centres’ of Johnsonville and Kilbirnie (Policy 30), establishing a zoning approach that provides for a wide mix of activities appropriate to each zone (Policy 31), and inclusion of a General Industrial zone that supports industrial-based activities in key areas of the City (Policy 32).</li> </ul>	
<i>Usefulness:</i>		
Guides decision-making	The proposed objectives provide guidance to decision-makers about how to consider appropriate zoning for commercial and business. It also assists in making decisions about the appropriateness of seemingly incompatible activities, such as large-scale retail activities outside of the City Centre Zone.	Without these objectives, there would be insufficient guidance in the PDP about the hierarchy of centres and the appropriateness of proposed activities in particular locations.
Meets best practice for objectives	Yes, the objectives are outcome-focussed.	N/A
<i>Reasonableness:</i>		
Will not impose unjustifiably high costs on the	The objectives will not impose unjustifiably high costs on the community or parts of the community. The objectives are strategic in nature and are intended to	The absence of these objectives will not impose unjustifiably high costs on the community or parts of the community.

community/parts of the community	guide the implementation of lower-order objectives, policies, and rules in complex resource consents, and in future plan-change processes.	
Acceptable level of uncertainty and risk	The proposed objectives provide clear direction about the outcomes that are sought and there is sufficient certainty in these provisions. As such, the risks associated with the proposed objectives are low.	The absence of these objectives would increase the level of uncertainty in the implementation of the Plan, particularly with regard to the hierarchy of centres. Without clear direction on the hierarchy, there is increased risk of activities in centres that are lower in the hierarchy undermining those that are higher in the hierarchy. A further risk is that as a result of a lack of clear guidance about the role of the mixed-use, commercial and general industrial zones relative to centres, activities that are more appropriately located in centres locate in these complementary zones thus undermining the role of these centres in serving their catchment.
<i>Achievability:</i>		
Consistent with identified tangata whenua and community outcomes	The proposed objectives are consistent with the outcomes sought by mana whenua and the community. The Centres hierarchy is a well-established mechanism in the Operative District Plan. The proposed objectives reflect the approach outlined in the Spatial Plan to maintain the centres hierarchy which focuses on meeting the demand for commercial and business land in the right locations. The Spatial Plan notes that this is facilitated by the continued prominence of the City Centre as Wellington's primary employment, entertainment, and cultural location, supported by a network of suburban centres such as Johnsonville and Kilbirnie as well as the identified mixed use and industrial areas. The objectives ensure the City attracts and retains business to support the City's economy.	An absence of strategic objectives relating to this topic would not meet community expectations that the District Plan provide for the establishment of activities that support the City's economy and employment needs.
Realistically able to be achieved within the Council's powers, skills and resources	The proposed objectives are realistic and achievable as they are largely consistent with the Operative District Plan approach to providing for business and	N/A



	commercial needs which to date has operated effectively.	
<b>Summary</b>		
<p>Proposed Objectives CEKP-O1 to CEKP-O5 are the most appropriate means of achieving the purpose of the RMA as they provide a clear framework for the lower-order chapters to manage land use and development in the City's commercial and business areas. The proposed objectives provide certainty to the community and business sector about how these areas are managed, including activities that are compatible and incompatible with the purpose of the zone, and the level of intensification anticipated for both housing and business needs. In doing so these objectives support the City's economy by providing for a range of activities in appropriate locations across the City thus supporting a diverse range of employment opportunities.</p>		

### 9.2.5 Evaluation of Strategic Objectives HHSASMO1 to HHSASM-05

For the purposes of this evaluation, the Council has considered the following:

1. The proposed objectives
2. Alternative objectives
3. No objectives

<p>Proposed objectives:</p> <p><b>HHSASM-01</b> Significant buildings, structures, areas, and sites that exemplify Wellington's historical and cultural values are identified, recognised and protected.</p> <p><b>HHSASM-02</b> Built heritage is resilient and has a sustainable long term use while ensuring heritage and cultural values are recognised and maintained.</p> <p><b>HHSASM-03</b> The cultural, spiritual and/or historical values associated with sites and areas of significance to Māori are protected.</p> <p><b>HHSASM-04</b> Sites of significance to Māori are identified and mana whenua's relationships, interests and associations with their culture, traditions, ancestral lands, waterbodies, sites, areas and landscapes, and other taonga of significance are recognised and provided for.</p> <p><b>HHSASM-05</b> Recognise that only mana whenua can identify impacts on their relationship with their culture, traditions, ancestral lands, waterbodies, sites, areas and landscapes and other taonga/sites of significance to Māori.</p>
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<b>General intent:</b>			
Strategic Objectives HHSASM-O1 to HHSASM-O5 recognise the importance of the City's historic heritage and sites and areas of significance to Māori and provide guidance about how these values are to be recognised and protected in the District Plan.			
<b>Other potential objectives</b>			
Alternative: The following alternative objectives were considered:			
<ol style="list-style-type: none"> <li>Wellington's historical and cultural values are exemplified through the identification, recognition and protection of important Māori and non- Māori buildings, sites, areas, places and objects.</li> <li>Heritage buildings and objects are resilient and have a sustainable long term use while ensuring their heritage and cultural values are recognised and maintained.</li> </ol>			
<b>Criteria</b>	<b>Preferred objective</b>	<b>Alternative objectives</b>	<b>No objectives</b>
<i>Relevance:</i>			
Addresses a relevant resource management issue	The objectives address the issue of managing and protecting historic heritage <sup>1</sup> and the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga.	The objectives address the issue of managing and protecting historic heritage.	The absence of strategic objectives relating to this topic would result in insufficient acknowledgement at a strategic level of these resource management issues.
Assists the Council to undertake its functions under s31 RMA	These objectives assist the Council in undertaking its functions under s31(a) of the RMA insofar as they support the integrated management effects of land use and development on historic heritage values, including Māori cultural heritage values.	These objectives assist the Council in undertaking its functions under s31(a) of the RMA to a certain extent insofar as they provide some support for the integrated management effects of land use and development on historic heritage values, including Māori heritage values. However, these objectives are general and do not provide clear guidance for how the Council is to enact this function. <del>could be made more specific to provide more guidance to Council to undertake its</del>	The absence of these objectives would hinder the Council's ability to carry out its functions under s31(a) of the RMA in that there would be insufficient support for the integrated management of effects of land use and development on historic heritage values, including Māori heritage values, as there would be no overarching direction on the management of protection and management of these values.

<sup>1</sup> 'Historic heritage' in this report has the same meaning as in the RMA. As such, it is intended in this report to also refer to Sites and Areas of Significance to Māori.

		function, as they are somewhat generalised.	
Gives effect to higher level documents	<p>These objectives assist in giving effect to the RPS, specifically:</p> <ul style="list-style-type: none"> <li>• Objective 15 – Historic Heritage is identified and protected from inappropriate modification, use and development <ul style="list-style-type: none"> <li>○ Policy 21 – identifying places, sites and areas with significant historic heritage values</li> <li>○ Policy 22 – Protecting historic heritage values</li> <li>○ Policy 46 – managing effects on historic heritage values</li> </ul> </li> <li>• Objective 25 – The concept of kaitiakitanga is integrated into the sustainable management of the Wellington region’s natural and physical resources <ul style="list-style-type: none"> <li>○ Policy 49 – recognising and providing for matters of significance to tangata whenua</li> </ul> </li> <li>• Objective 28 – The cultural relationship of Māori with their ancestral lands, water, sites, wāhi tapu and other taonga is maintained. <ul style="list-style-type: none"> <li>○ Policy 49 – recognising and providing for matters of significance to tangata whenua.</li> </ul> </li> </ul>	<p>The alternative objectives would assist in giving effect to the RPS in part, as noted for the proposed objectives. However, the alternative objectives would provide inadequate guidance for giving effect to Objectives 25 and 28 and associated Policy 49 of the RPS. This is because the alternative objectives provide insufficient recognition of Māori cultural heritage values.</p>	<p>The absence of strategic objectives for this topic would provide insufficient guidance on how the PDP should give effect to the RPS and other higher level documents.</p>
<i>Usefulness:</i>			

Guides decision-making	The objectives provide guidance to decision-makers about the role of historic heritage in the City and what factors should be considered in assessing the effects of use and development on historic heritage values. It also makes it clear that these decisions must involve mana whenua in order to determine whether use and development will impact their relationship their culture, traditions, ancestral lands, waterbodies, sites, areas and landscapes and other taonga/sites of significance to Māori.	The alternative objectives provide sufficient guidance for decision-makers about the strategic importance of historic heritage in the City. However, they do not provide clear guidance about the role of mana whenua in the decision-making process.	An absence of strategic objectives on this topic would not provide sufficient guidance to decision-makers about the role of historic heritage in the City and how this should be considered alongside a range of other strategic matters. Decision-makers would have to rely on lower-order objectives to make these decisions, which may not provide sufficient guidance in a complex resource consent or plan change process where there are competing values.
Meets best practice for objectives	Yes, the objectives are outcome-focussed.	The objectives are outcome-focussed, but also stray into policy by directing how the objective should be achieved.	N/A
<i>Reasonableness:</i>			
Will not impose unjustifiably high costs on the community/parts of the community	There will be a cost to landowners who have historic heritage or sites or areas of significance on their property. This cost is associated with resource consent requirements where use or development of the site where the listed building, structure, site, or area is affected. These costs are justified as they are necessary to protect the historic heritage values of the City. These costs will still be incurred even without these strategic objectives, as a result of lower order objectives in the Historic Heritage and Sites and Areas of Significance to Māori chapters.	There will be a cost to landowners who have historic heritage or sites or areas of significance on their property. This cost is associated with resource consent requirements where use or development of the site where the listed building, structure, site, or area is affected. These costs are justified as they are necessary to protect the historic heritage values of the City. These costs will still be incurred even without these strategic objectives, as a result of lower order objectives in the Historic Heritage and Sites and Areas of Significance to Māori chapters.	The absence of objectives on this topic would not impose unjustifiably high costs on the community or parts of the community. However, costs will still be incurred even as a result of lower order objectives in the Historic Heritage and Sites and Areas of Significance to Māori chapters. These costs are justified as they are necessary to protect the historic heritage values of the City.
Acceptable level of uncertainty and risk	There is sufficient certainty about these objectives, and clear direction about the outcomes to be achieved, such that	There is sufficient certainty about these objectives, and clear direction about the outcomes to be achieved, such that	A lack of strategic objectives in relation to Historic Heritage and Sites and Areas of Significance to Māori does not provide sufficient

	the risks associated with these objectives is low.	the risks associated with these objectives is low.	certainty about the strategic importance of identifying and protecting these values for the City.
<b>Achievability:</b>			
Consistent with identified tangata whenua and community outcomes	Yes, these objectives are consistent with the outcomes that are sought by both mana whenua and the wider community.	These objectives are broadly consistent with the outcomes that are sought by both mana whenua and the wider community. However, they do not provide sufficient recognition of the importance of sites and areas of significance to Māori for the City. Mana whenua have sought separate objectives for this as reflected in the proposed suite of objectives.	The absence of strategic objectives relating to this topic is inconsistent with the outcomes sought by mana whenua and the wider community.
Realistically able to be achieved within the Council's powers, skills and resources	These strategic objectives are able to be achieved within the council's powers, skills and resources. The objectives would be considered at the resource consent stage, along with other lower order objectives.	These strategic objectives are able to be achieved within the council's powers, skills and resources. The objectives would be considered at the resource consent stage, along with other lower order objectives.	N/A
<b>Summary</b>			
The proposed objectives are the most appropriate means of achieving the purpose of the RMA as they recognise at a strategic level the need to protect historic heritage values, including Māori heritage values. The objectives recognise the role of historic heritage in providing for the community's environmental, social, economic and cultural wellbeing, and the need to protect this while also allowing for change. This ensures historic heritage values are retained for future generations to enjoy and provides scope for reasonable use and development of these sites, areas, and structures.			

### 9.2.6 Evaluation of Strategic Objectives NE-O1 to NE-O4

For the purposes of this evaluation, the Council has considered the following:

1. The proposed objectives
2. Alternative objectives
3. No objectives

Proposed objectives:

**NE-O1** The natural character, landscapes and features, and ecosystems that contribute to the City's identity and have significance for mana whenua as kaitiaki are identified, recognised, protected, and, where possible, enhanced.

**NE-O2** Future subdivision and development contributes to an improvement in the quality of the City's water bodies, and recognises mana whenua and their relationship to water (Te Mana o Te Wai).

**NE-O3** The City retains an extensive open space network that:

1. Is easily accessible;
2. Connects the urban and natural environment;
3. Supports ecological, cultural, and landscape values; and
4. Meets the needs of anticipated future growth.

**NE-O4** Mana whenua are able to exercise their customary responsibilities as mana whenua and kaitiaki with their own mātauranga Māori in the protection and management of the natural environment.

General intent:

Strategic Objectives NE-O1 to NE-O4 recognise the importance of the City's natural environment in providing for the community's wellbeing, and the particular importance of the natural environment for mana whenua and their role in its management and protection. The objectives provide the direction for the identification and protection of specific natural environment values across the City in the lower order chapters of the plan.

Other potential objectives

Alternative: The following alternative strategic objectives were considered:

**NE-O1** Natural and coastal environment values that are part of the City's identity and exemplify ecological, landscape, or cultural significance to Māori and non-Māori and that contribute to the City's identity are recognised and protected.

**NE-O2** Future subdivision and development are designed to prevent further degradation of the City's water bodies.

**NE-O3** The City retains an extensive open space network that:

1. Is easily accessible;
2. Connects the urban and natural environment;
3. Supports ecological, cultural, and landscape values; and
4. Meets the needs of anticipated future growth.

Criteria	Preferred objective	Alternative objectives	No objectives
<i>Relevance:</i>			
Addresses a relevant resource management issue	Yes, these objectives address the issue of the protection of natural environment values from the effects of land use, subdivision and development. They also provide for the ability of mana whenua to exercise their customary rights and responsibilities in the protection of the natural environment.	Yes, these objectives address the issue of the protection of natural environment values from the effects of land use, subdivision and development.	A lack of objectives on this topic would result in lack of acknowledgement at a strategic level of this resource management issue.
Assists the Council to undertake its functions under s31 RMA	These objectives assist the Council in undertaking its functions under s31 of the Act as they support and guide the integrated management of the effects of land use and development on natural environment values.	These objectives assist the Council in undertaking its functions under s31 of the Act as they support the integrated management of the effects of land use and development on natural environment values.	The absence of strategic objectives on this topic would make it more challenging for the council to undertake its functions under s31 of the RMA. Decision-makers would be reliant on lower-order chapters which may not provide sufficient guidance about the strategic priorities of the PDP.
Gives effect to higher level documents	These objectives assist in giving effect to the National Policy Statement on Freshwater Management (NPS-FM) by providing strategic direction about the need to ensure future development does not exacerbate water quality issues in the City. The objectives also specifically recognise the importance of water to mana whenua, and their relationship with water (Te Mana o Te Wai). These are fundamental aspects of the NPS-FM. The Council is required to include objectives, policies and methods in the district plan to promote positive effects, and avoid, remedy or mitigate adverse effects (including cumulative effects), of urban development on the health and well-	The alternative objectives assist in giving effect to higher order documents in the same way as the proposed objectives. However, the alternative objectives do not sufficiently recognise the concept of 'Te Mana o te Wai' which is a core part of the NPS-FM.	A lack of objectives on this topic would not provide sufficient assistance in giving effect to the higher order documents. Decision-makers would be reliant on the provisions of the lower-order chapters, and this may not provide sufficient guidance on the strategic priorities for the City in terms of the natural environment.

	<p>being of water bodies, freshwater ecosystems and receiving environments.</p> <p>These objectives also give effect to the RPS, in relation to natural character, landscapes and biodiversity protection as follows:</p> <ul style="list-style-type: none"> <li>• Objective 3 – Habitats and features in the coastal environment that have significant indigenous biodiversity values are protected; and Habitats and features in the coastal environment that have recreational, cultural, historical or landscape values that are significant are protected from inappropriate subdivision, use and development.</li> <li>• Objective 4 – The natural character of the coastal environment is protected from the adverse effects of inappropriate subdivision, use and development.</li> <li>• Policy 3 – Protecting high natural character in the coastal environment</li> <li>• Policy 4 – identifying the landward extent of the coastal environment.</li> <li>• Policy 24 – Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values</li> <li>• Policy 26 – Protecting outstanding natural features and landscape values</li> <li>• Policy 28 – managing special amenity landscape values</li> </ul>		
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	<ul style="list-style-type: none"> <li>• Policy 35 – preserving the natural character of the coastal environment</li> <li>• Policy 36 – managing effects on natural character in the coastal environment</li> </ul>		
<i>Usefulness:</i>			
Guides decision-making	The proposed objectives provide guidance for decision-makers about the natural environment values that are of strategic importance for the City and the outcomes that are to be achieved in resource management processes. Not only do these objectives set out priorities, but they also outline the role of mana whenua in managing and protecting the natural environment through these processes.	The proposed objectives provide guidance for decision-makers about the natural environment values that are of strategic importance for the City and the outcomes that are to be achieved in resource management processes.	The absence of strategic objectives on this topic provides insufficient guidance as to the importance of the natural environment for the City as whole, and the key priorities.
Meets best practice for objectives	Yes, the objectives are outcome-focussed.	Yes, the objectives are outcome-focussed.	N/A
<i>Reasonableness:</i>			
Will not impose unjustifiably high costs on the community/parts of the community	<p>There will be a cost to landowners where their land is subject to protection via landscape or significant natural area overlay protection. This cost is associated with resource consent costs, and loss of land development potential in some cases.</p> <p>There may also be additional development costs where mitigations are required to manage stormwater runoff and prevent contaminants entering the City's waterways.</p> <p>In all cases these costs are borne by the landowner/developer rather than</p>	<p>There will be a cost to landowners where their land is subject to protection via landscape or significant natural area overlay protection. This cost is associated with resource consent costs, and loss of land development potential in some cases.</p> <p>There may also be additional development costs where mitigations are required to manage stormwater runoff and prevent contaminants entering the City's waterways.</p> <p>In all cases these costs are borne by the landowner/developer rather than</p>	A lack of strategic objectives on this topic would not impose additional costs on landowners/developers that are unjustifiably high. The provisions of the lower-order chapters would remain, however, and include more specific provisions that may still impose costs in order to protect natural environment values.

	the community. The costs are justified in order to ensure the City's natural environment values are protected and are not considered unjustifiably high.	the community. The costs are justified in order to ensure the City's natural environment values are protected and are not considered unjustifiably high.	
Acceptable level of uncertainty and risk	The proposed objectives provide clear direction about the outcomes that are sought for the natural environment through the PDP implementation. This includes the role of mana whenua in achieving these outcomes. The level of risk associated with these provisions is considered to be low.	The proposed objectives provide clear direction about the outcomes that are sought for the natural environment through the PDP implementation. The level of risk associated with these provisions is considered to be low.	A lack of strategic objectives on this topic would provide insufficient certainty to decision-makers and plan-users about the strategic importance of natural environment values in the District Plan.
<b>Achievability:</b>			
Consistent with identified tangata whenua and community outcomes	The proposed objectives are consistent with the outcomes sought by mana whenua and the community.	The alternative objectives are consistent with the outcomes sought by the community but are unlikely to meet expectations of mana whenua as there is insufficient acknowledgement of their values and their role in the protection of these values.	A lack of strategic objectives on this topic would be inconsistent with identified mana whenua and community outcomes.
Realistically able to be achieved within the Council's powers, skills and resources	The proposed objectives are able to be achieved within the Council's powers under the RMA. The Council may need to rely on technical experts through the resource consent decision-making process but this is achievable within the Council's resources.	The proposed objectives are able to be achieved within the Council's powers under the RMA. The Council may need to rely on technical experts through the resource consent decision-making process but this is achievable within the Council's resources.	N/A
<b>Summary</b>			
The proposed objectives are the most appropriate way to achieve the purpose of the Act. They provide direction for the lower-order chapters about the outcomes that are being sought more broadly for the City in protecting the natural environment. The proposed objectives also highlight the importance of the natural environment for mana whenua and their role in managing and protecting it.			

### 9.2.7 Evaluation of Strategic Objectives SCA-O1 to SCA-O6

For the purposes of this evaluation, the Council has considered the following:

1. The proposed objectives
2. No objectives

Proposed objectives:

**SCA-O1** Infrastructure is established, operated, maintained, and upgraded in Wellington City so that:

1. The social, economic, cultural, and environmental benefits of this infrastructure are recognised;
2. The City is able to function safely, efficiently and effectively;
3. The infrastructure network is resilient in the long term; and
4. Future growth and development is enabled and can be sufficiently serviced.

**SCA-O2** New urban development occurs in locations that are supported by sufficient development infrastructure capacity, or where this is not the case the development:

1. Can meet the development infrastructure costs associated with the development, and
2. Supports a significant increase in development capacity for the City.

**SCA-O3** Additional infrastructure is incorporated into new urban developments of a nature and scale that supports Strategic Objective UFD-O6 or provides significant benefits at a regional or national scale.

**SCA-O4** Regionally significant infrastructure is provided for in appropriate locations and the social, cultural economic, and environmental benefits of this infrastructure are recognised and provided for.

**SCA-O5** The adverse effects of infrastructure are managed having regard to the economic, social, environmental and cultural benefits, and the technical and operational needs of infrastructure.

**SCA-O6** Infrastructure operates efficiently and safely and is protected from incompatible development and activities that may create reverse sensitivity effects.

General intent:

<p>Strategic Objectives SCA-O1 to SCA-O6 seek to recognise the importance of providing for the necessary infrastructure in order for the City to function and for future growth and development to be serviced. These objectives recognise the need not only for key network infrastructure (e.g. stormwater, wastewater, water supply) but also key assets that are regionally significant and connect the wider region. These assets include Wellington International Airport and the Port.</p>		
<p><b>Other potential objectives</b></p>		
<p>Alternative: No other objectives were considered for this topic.</p>		
<b>Criteria</b>	<b>Preferred objective</b>	<b>No objectives</b>
<p><i>Relevance:</i></p>		
Addresses a relevant resource management issue	Yes, these objectives address the issue of the provision of infrastructure that enables development and supports the environmental, social, cultural and economic wellbeing of the community.	A lack of objectives on this topic would result in lack of acknowledgement at a strategic level of this resource management issue.
Assists the Council to undertake its functions under s31 RMA	These objectives assist the Council in undertaking its functions under s31 of the Act as they support and guide the integrated management of the provision of infrastructure and its effects on the environment.	The absence of strategic objectives on this topic would make it more challenging for the council to undertake its functions under s31 of the RMA. Decision-makers would be reliant on lower-order chapters which may not provide sufficient guidance about the strategic priorities of the PDP.
Gives effect to higher level documents	These objectives assist in giving effect to the NPS-UD, by providing strategic direction about the need to provide sufficient infrastructure to support development. The objectives require the provision of 'development' infrastructure (i.e. core infrastructure to service the development) as well as additional infrastructure that supports broader community wellbeing (e.g. parks, schools etc). The NPS-UD requires that the District Plan provide sufficient development capacity to meet expected demand for housing which is 'infrastructure ready'. As such these objectives provide direction on how this should be achieved in future development, and what the priorities are.	A lack of objectives on this topic would not provide sufficient assistance in giving effect to the higher order documents. Decision-makers would be reliant on the provisions of the lower-order chapters, and this may not provide sufficient guidance on the strategic priorities for the City in terms of infrastructure provision.

	<p>These objectives also provide guidance at a high level to give effect to other national direction including:</p> <ul style="list-style-type: none"> <li>• National Policy Statement on Electricity Transmission (NPS-ET)</li> <li>• National Policy Statement for Renewable Energy (NPS-REG).</li> </ul> <p>The proposed objectives recognise the strategic importance of national scale infrastructure and the need to provide for it and protect it from incompatible uses.</p> <p>These objectives also give effect to the RPS, as follows:</p> <ul style="list-style-type: none"> <li>• Objective 10 – the social, economic, cultural, and environmental benefits of regionally significant infrastructure are recognised and protected.</li> <li>• Policy 7 – recognising the benefits from renewable energy and regionally significant infrastructure.</li> <li>• Policy 8 – protecting regionally significant infrastructure</li> <li>• Policy 39 – recognising the benefits from renewable energy and significant infrastructure.</li> </ul>	
<i>Usefulness:</i>		
Guides decision-making	The proposed objectives provide guidance for decision-makers about the strategic importance of infrastructure for the efficient functioning of the City and its role in supporting community wellbeing. At the same time the objective directs the management of the effects generated by infrastructure activities alongside consideration of the benefits of this infrastructure.	The absence of strategic objectives on this topic provides insufficient guidance as to the importance of the provision of infrastructure for the efficient functioning of the City.
Meets best practice for objectives	Yes, the objectives are outcome-focussed.	N/A
<i>Reasonableness:</i>		

<p>Will not impose unjustifiably high costs on the community/parts of the community</p>	<p>There will be costs to infrastructure providers to ensure that the effects of the infrastructure network are managed appropriately, however these are not considered to be unjustifiably high costs. These costs should be anticipated by the infrastructure provider.</p> <p>There may also be a cost to developers if insufficient development capacity is available to service a proposal. In these cases, either the developer would need to provide the infrastructure themselves, or partner with Council to fund the necessary infrastructure that is required.</p>	<p>A lack of strategic objectives on this topic could create unforeseen costs for the community or for developers/landowners if large scale development occurs out of sequence with the Council's infrastructure investment plans.</p>
<p>Acceptable level of uncertainty and risk</p>	<p>The proposed objectives provide clear direction about where and how infrastructure is to be provided and under what circumstances development in areas with insufficient infrastructure capacity will be considered. In addition, the proposed objectives provide certainty to the community, developers and infrastructure providers about how infrastructure provision will be considered alongside other factors such as the benefits created by the infrastructure and how well the effects are managed.</p>	<p>A lack of strategic objectives on this topic would provide insufficient certainty to decision-makers and plan-users about the strategic importance of infrastructure for the efficient functioning of the City in the District Plan.</p>
<p><i>Achievability:</i></p>		
<p>Consistent with identified tangata whenua and community outcomes</p>	<p>The proposed objectives are consistent with the outcomes sought by mana whenua and the community to provide for infrastructure and manage it effectively.</p>	<p>A lack of strategic objectives on this topic would be inconsistent with identified mana whenua and community outcomes.</p>

Realistically able to be achieved within the Council's powers, skills and resources	The proposed objectives are able to be achieved within the Council's powers under the RMA.	N/A
<b>Summary</b>		
<p>The proposed objectives are the most appropriate way to achieve the purpose of the Act. They provide clear direction about the strategic importance of infrastructure provision for the future functioning of the City. The objectives will ensure that the necessary infrastructure is provided for at a city-scale as well as within individual developments that supports the social, environmental, cultural and economic wellbeing of the community. The objectives recognise that not all effects of infrastructure can be avoided, but the overall benefits of that infrastructure for the City mean that some effects may be tolerated. The objectives are high level, but provide sufficient direction for each case to be considered on its merits through the lower-order chapters and in considering these strategic objectives alongside those in other chapters.</p>		

### 9.2.8 Evaluation of Strategic Objectives SRCC-01 to SRCC-04

For the purposes of this evaluation, the Council has considered the following:

1. The proposed objectives
2. No objectives

Proposed objectives:

**SRCC-01** The City's built environment supports:

1. A net reduction in the City's carbon emissions by 2050;
2. More energy efficient buildings;
3. An increase in the use of renewable energy sources; and
4. Healthy functioning of native ecosystems and natural processes.

**SRCC-02** Risks from natural hazards are:

1. Identified and understood;
2. Planned for through adaptation and mitigation measures to ensure the risks are low; and
3. Avoided where the risks are intolerable.

<b>SRCC-O3</b> Subdivision, development and use:			
<ol style="list-style-type: none"> <li>1. Effectively manage the risks associated with climate change and sea level rise;</li> <li>2. Support the City's ability to adapt over time to the impacts of climate change and sea level rise; and</li> <li>3. Support natural functioning ecosystems and processes to help build resilience into the natural and built environments.</li> </ol>			
<b>SRCC-O4</b> Land use, subdivision and development design integrates natural processes that provide opportunities for carbon storage, natural hazard risk reduction and support climate change adaptation.			
<b>General intent:</b>			
Strategic Objectives SRCC-O1 to SRCC-O4 provide direction on how the issues of climate change, sea level rise and resilience to natural hazards are to be considered across the PDP. These objectives align with the City's goals of being 'greener' and 'resilient' and provide a key link to broader Council strategies, such as Te Atakura First to Zero and the Resilience Strategy. SRCC-O2 recognises the strategic importance of managing the risks associated with natural hazards, and provides direction for the lower-order chapters, in particular the provisions within the Natural Hazards and Coastal Environment chapters.			
<b>Other potential objectives</b>			
Alternative:			
The following alternative objectives were considered for this topic:			
<b>SRCC-O1</b> New development supports:			
<ol style="list-style-type: none"> <li>1. A reduction in the City's carbon emissions.</li> <li>2. A reduction in the use of non-renewable energy sources</li> <li>3. An increase in the social and physical resilience of the City.</li> </ol>			
<b>SRCC-O2</b> The risks associated with natural hazards are identified, planned for, mitigated, and where necessary avoided.			
<b>SRCC-O3</b> Development and land use activities:			
<ol style="list-style-type: none"> <li>1. Account for, accept, and mitigate the risks associated with climate change and sea level rise; and</li> <li>2. Support the City's ability to adapt over time to the impacts of climate change and sea level rise.</li> </ol>			
<b>Criteria</b>	<b>Preferred objective</b>	<b>Alternative objectives</b>	<b>No objectives</b>
<i>Relevance:</i>			



Addresses a relevant resource management issue	Yes, these objectives address the issue of managing the risks associated with natural hazards, climate change and sea level rise. They also address the issue of climate change adaptation in land use and development.	Yes, these objectives address the issue of managing the risks associated with natural hazards, climate change and sea level rise. They also address the issue of climate change adaptation in land use and development.	A lack of objectives on this topic would result in lack of acknowledgement and direction at a strategic level of these resource management issues.
Assists the Council to undertake its functions under s31 RMA	These objectives assist the Council in undertaking its functions under s31 of the Act as they support and guide the integrated management of the effects of land use and development on natural hazard risks, and how future use and development can contribute to climate change adaptation.	These objectives assist the Council in undertaking its functions under s31 of the Act as they support and guide the integrated management of the effects of land use and development on natural hazard risks, and how future use and development can contribute to climate change adaptation.	The absence of strategic objectives on this topic would mean a lack of direction on the role of the District Plan in dealing with natural hazard risks and climate change. This could make it challenging for the Council to fully undertake its functions under s31 of the Act, as decision-makers would be reliant on the provisions in topic-based chapters which may not provide sufficient direction on an integrated approach to these issues.
Gives effect to higher level documents	<p>These strategic objectives assist in giving effect to the following RPS Objectives and Policies:</p> <ul style="list-style-type: none"> <li>• Objective 19 – The risks and consequences to people, communities, their businesses, property and infrastructure from natural hazards and climate change effects are reduced.</li> <li>• Objective 21 – Communities are more resilient to natural hazards, including the impacts of climate change, and people are better prepared for the consequences of natural hazard events.</li> </ul>	<p>These strategic objectives assist in giving effect to the following RPS Objectives and Policies:</p> <ul style="list-style-type: none"> <li>• Objective 19 – The risks and consequences to people, communities, their businesses, property and infrastructure from natural hazards and climate change effects are reduced.</li> <li>• Objective 21 – Communities are more resilient to natural hazards, including the impacts of climate change, and people are better prepared for the consequences of natural hazard events.</li> </ul>	Decision-makers would be reliant on the provisions of lower-order chapters to give effect to the RPS.

	<ul style="list-style-type: none"> <li>• Policy 29 – Avoiding inappropriate subdivision and development in areas at high risk from natural hazards</li> <li>• Policy 51 – Minimising the risks and consequences of natural hazards</li> </ul>	<ul style="list-style-type: none"> <li>• Policy 29 – Avoiding inappropriate subdivision and development in areas at high risk from natural hazards</li> <li>• Policy 51 – Minimising the risks and consequences of natural hazards</li> </ul>	
<i>Usefulness:</i>			
Guides decision-making	The proposed objectives provide guidance for decision-makers about the strategic importance of managing hazard risks, climate change adaptation and sustainability and the role of the District Plan in these matters. The objectives are high level and support the more specific, topic-based provisions of the lower-order chapters.	The proposed objectives generally provide guidance for decision-makers about the strategic importance of managing hazard risks, climate change adaptation and sustainability and the role of the District Plan in these matters. The objectives are high level and support the more specific, topic-based provisions of the lower-order chapters. SRCC-O1 may not provide sufficient guidance for decision-makers due to a lack of measurable outcomes. Reference to 'new development' also suggests that all development, at any scale, needs to achieve the matters listed, when in fact it is a consideration of the contribution of that development to the city-wide goals that is to be assessed.	The absence of strategic objectives on this topic would provide insufficient guidance to decision-makers about the strategic importance of climate change and resilience considerations at a City scale.
Meets best practice for objectives	Yes, the objectives are outcome-focussed.	Yes, the objectives are outcome-focussed.	N/A
<i>Reasonableness:</i>			

<p>Will not impose unjustifiably high costs on the community/parts of the community</p>	<p>There will be costs associated with these objectives alongside the provisions of the lower-order chapters. These costs will largely fall to landowners and developers where activity is planned in areas of hazard risk, or where the design of the activity or development needs to address issues such as energy efficiency or provision of alternative transport modes. These costs are not considered to be unjustifiably high.</p>	<p>There will be costs associated with these objectives alongside the provisions of the lower-order chapters. These costs will largely fall to landowners and developers where activity is planned in areas of hazard risk, or where the design of the activity or development needs to address issues such as energy efficiency or provision of alternative transport modes. SRCC-O1 could be interpreted that every development must achieve a reduction in carbon emissions, non-renewable energy resources, and increase the City's social and physical resilience on an individual basis. This could place unnecessary additional costs on developers/landowners for minor gain where applied to small-scale development.</p>	<p>A lack of strategic objectives on this topic could create high costs for the community, developers/landowners, and individuals in terms of inadequate planning for natural hazard risks, climate change and sea level rise. These costs could include costs to people's safety as well as the costs associated with property and infrastructure damage.</p>
<p>Acceptable level of uncertainty and risk</p>	<p>The proposed objectives provide high-level direction about the outcomes that are sought at a city-wide level in terms of managing natural hazard risks, adapting to climate change, building the City's resilience to these events and reducing carbon emissions. They support the implementation of lower-order chapter provisions which provide more detail about how these outcomes should be achieved.</p>	<p>The alternative objectives provide guidance on the outcomes that are sought, however SRCC-O1 may not be certain enough in terms of what an individual development must provide, given the objective is focussed on new development and there are no metrics provided. This could create a level of uncertainty for plan users and decision-makers as to what is required. SRCC-O2, clause 1, may also create uncertainty through the use of several similar concepts such as 'accept' and 'account for'. It is not clear what is actually required of new development and land use activities.</p>	<p>A lack of strategic objectives on this topic would provide insufficient certainty to decision-makers and plan-users about the strategic importance of natural hazard risk management, climate change adaptation and carbon reduction.</p>

<b>Achievability:</b>			
Consistent with identified tangata whenua and community outcomes	The proposed objectives are consistent with the outcomes sought by mana whenua and the community to provide greater direction in the District Plan about how natural hazard risks will be managed, and how climate change and sea level rise will be considered in future decision-making.	The proposed objectives are consistent with the outcomes sought by mana whenua and the community to provide greater direction in the District Plan about how natural hazard risks will be managed, and how climate change and sea level rise will be considered in future decision-making.	A lack of strategic objectives on this topic would be inconsistent with identified mana whenua and community outcomes.
Realistically able to be achieved within the Council's powers, skills and resources	The proposed objectives are able to be achieved within the Council's powers under the RMA.	The proposed objectives are able to be achieved within the Council's powers under the RMA.	N/A
<b>Summary</b>			
The proposed objectives are the most appropriate way to achieve the purpose of the Act. They provide strategic acknowledgement in the Proposed District Plan of the importance of climate change, sea level rise and natural hazard risks and the need to manage these matters in future land use and development decision-making processes. These objectives provide direction to decision-makers on the factors to be considered when assessing proposals including the community's health, safety and wellbeing.			

### 9.2.9 Evaluation of Strategic Objectives UFD-O1 to UFD-O7

For the purposes of this evaluation, the Council has considered the following:

1. The proposed objectives
2. Alternative objectives
3. No objectives

<p>Proposed objectives:</p> <p><b>UFD-O1</b> Wellington's compact urban form is maintained with the majority of urban development located within the City Centre, in and around Centres, and along major public transport corridors.</p> <p><b>UFD-O2</b> Urban development in identified greenfield areas:</p>
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1. Is environmentally and ecologically sensitive
2. Makes efficient use of land
3. Is well-connected to the public transport network, and
4. Reinforces the City's compact urban form.

**UFD-O3** Medium to high density and assisted housing developments are located in areas that are:

1. Connected to the transport network and served by multi-modal transport options; or
2. Within or near a Centre Zone or other area with many employment opportunities; and
3. Served by public open space and other social infrastructure.

**UFD-O4** In order to achieve sufficient, feasible land development capacity to meet expected housing demand, the following housing bottom lines below are to be met or exceeded in the short-medium and long term in Wellington City as contained in the Wellington Regional Housing and Business Capacity Assessment (Housing Update 2022).

	2021-2024 Short	2024-2031 Medium	2031-2051 Long
Demand figures	4, 148	8, 426	18, 724
Competitiveness margin	20%		15%
<b>Housing bottom line</b>	<b>15, 089</b>		<b>21, 532</b>

**UFD-O5** Sufficient land development capacity is available to meet the short-, medium- and long-term business land needs of the City, as identified in the Wellington Regional Housing and Business Capacity Assessment.

**UFD-O6** A variety of housing types, sizes and tenures, including assisted housing, supported residential care, and papakainga options, are available across the City to meet the community's diverse social, cultural, and economic housing needs.

**UFD-O7** Development supports the creation of a liveable, well-functioning urban environments that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety now and into the future.

Development will achieve this by:

1. Being accessible and well-designed;
2. Supporting sustainable travel choices, including active and micromobility modes;
3. Being serviced by the necessary infrastructure appropriate to the intensity, scale and function of the development and urban environment;
4. Being socially inclusive;
5. Being ecologically sensitive;
6. Respecting of the City's historic heritage;
7. Providing for community well-being; and
8. Adapting over time and being responsive to an evolving, more intensive surrounding context.

**UFD-O8** Areas of identified special character are recognised and new development within those areas is responsive to the context and, where possible, enhances that character.

**General intent:**

Strategic Objectives UFD-O1 to UFD-O8 set the direction for where and how future urban development will occur in Wellington City. The objectives direct a compact urban form in line with the growth pattern set out in the Spatial Plan. These objectives are particularly important for providing the direction required to give effect to the National Policy Statement on Urban Development. Enabling housing supply and choice and a well-functioning urban environment are key issues that are addressed by these objectives.

**Other potential objectives**

Alternative: The following alternative objectives were considered:

1. Wellington's compact urban form is retained with the majority of urban development located within the existing urban area.
2. New urban development in identified Greenfield areas is ecologically sensitive, makes efficient use of land, and reinforces the City's compact urban form.
3. Higher density housing is located in areas that are:
  - connected to the transport network and served by multi-modal transport options
  - within or near a commercial centre
  - served by public open space and other social infrastructure.
4. There is sufficient land and capacity to meet the short, medium, and long term housing and commercial needs of the City.

5. New urban development that increases the supply of housing for the City is encouraged.
6. A variety of housing types, sizes and tenures are available across the City to meet the community's diverse social and economic housing needs.
7. New development supports the creation of liveable urban environments that are:
  - safe and well-designed
  - walkable and connected by public transport and sustainable travel choices
  - serviced by the necessary infrastructure appropriate to the intensity, scale and function of the development
  - connected to open space and the natural environment
  - ecologically sensitive
  - close to employment opportunities
  - resilient to the impacts of natural hazards
  - adaptable over time.
8. Areas of identified special character are recognised and new development within those areas is responsive to the context and enhances that character.
9. Development that supports a reduction in the City's carbon emissions is enabled.

Criteria	Preferred objectives	Alternative objectives	No objectives
<i>Relevance:</i>			
Addresses a relevant resource management issue	<p>Yes these objectives address the issue of how land is used for urban development, specifically:</p> <ul style="list-style-type: none"> <li>• The location of urban development</li> <li>• The scale of urban development in different locations</li> <li>• The type and form of urban development that is required</li> </ul>	<p>Yes these objectives address the issue of how land is used for urban development, specifically:</p> <ul style="list-style-type: none"> <li>• The location of urban development</li> <li>• The scale of urban development in different locations</li> <li>• The type and form of urban development that is required</li> </ul>	<p>A lack of objectives on this topic would mean there is no clear direction in the District Plan about the outcomes sought for the City's urban form overall.</p>

	<ul style="list-style-type: none"> <li>• What services and amenities are required to support that urban development</li> <li>• What values (e.g. ecological, special character) should be considered in providing for urban development.</li> </ul>	<ul style="list-style-type: none"> <li>• What services and amenities are required to support that urban development</li> <li>• What values (e.g. ecological, special character) should be considered in providing for urban development.</li> </ul>	
Assists the Council to undertake its functions under s31 RMA	<p>These objectives assist the Council in undertaking its functions under s31(a) of the Act as they support and guide the integrated management of the effects of land use and development on the City's overall form and function.</p> <p>Proposed Objectives UFD-O4 and UFD-O5 are also important for fulfilling the Council's functions under s31(1)(aa) as they provide direction about how much development capacity is required to be enabled to provide sufficient development capacity in respect of housing and business land to meet the expected demands of the district.</p>	<p>These objectives assist the Council in undertaking its functions under s31 of the Act as they support and guide the integrated management of the effects of land use and development on the City's overall form and function.</p> <p>Alternative Objective 4 also assists in meeting s31(1)(aa) by directing that sufficient development capacity to meet the demand for housing and business land over the short, medium and long term. This objective does not, however, detail how much capacity is required.</p>	<p>The absence of strategic objectives on this topic would make it more challenging for the Council in undertaking its functions under s31. In particular, there would be no clear direction around how the Council intends to manage the overall urban form of the City or any guidance about the outcomes to be achieved from urban development in order to create a well-functioning urban environment.</p>
Gives effect to higher level documents	<p>These strategic objectives assist in giving effect to the NPS-UD, in particular:</p> <ul style="list-style-type: none"> <li>• Objectives 1 to 4, and Objective 8</li> <li>• Policies 1 to 3, and Policy 7.</li> </ul> <p>The PDP proposed objectives assist in giving effect to these NPS-UD provisions as they set out clear direction about what a 'well-functioning</p>	<p>The alternative objectives would assist the Council in giving effect to the NPS-UD, however housing bottom lines are not included and therefore would not fully give effect to this requirement of the NPS-UD (Policy 7).</p> <p>The alternative objectives would assist in giving effect to the relevant RPS provisions in the same manner as the Proposed objectives.</p>	<p>The absence of objectives on this topic would mean the PDP would not give effect to the NPS-UD or RPS requirements.</p>



	<p>urban environment' means in Wellington City (UFD-O7) and that a range of housing types are to be provided for a diverse range of needs across the City (UFD-O6), close to centres, public transport and employment opportunities (UFD-O1, UFD-O3).</p> <p>Objective UFD-O4 sets out the Housing Bottom Lines for the City, as directed by Policy 7 of the NPS-UD.</p> <p>Proposed UFD-O1 directs a compact urban form for Wellington which is a key step for the City to reduce carbon emissions and adapt to climate change, as sought by Objective 8 and further directed by Policy 1 of the NPS-UD.</p> <p>The objectives also assist in giving effect to the following RPS provisions:</p> <ul style="list-style-type: none"> <li>• Objective 22 – which directs a compact and well-designed and sustainable regional form that has an integrated, safe and responsive transport network. It also provides direction about the location and type of future urban development activity, including: <ul style="list-style-type: none"> <li>○ A viable and vibrant regional central business district (clause (a))</li> <li>○ An increased range and diversity of activities in and around the regionally significant</li> </ul> </li> </ul>		
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	<p>centres (i.e. Johnsonville and Kilbirnie) (clause (b))</p> <ul style="list-style-type: none"> <li>○ Regional Focus Areas (clause (d))</li> <li>○ Urban development in existing urban areas, or when beyond urban areas, development that reinforces the region's existing urban form (clause (e))</li> <li>○ A range of housing (including affordable housing) (clause (g))</li> <li>○ Integrated land use and transportation (clause (i))</li> <li>○ Efficiently using existing infrastructure (including transport network infrastructure) (clause (k))</li> </ul> <ul style="list-style-type: none"> <li>● Policy 30 – Maintaining and enhancing the viability and vibrancy of regionally significant centres</li> <li>● Policy 31 – identifying and promoting higher density and mixed use development</li> <li>● Policy 54 – achieving the region's urban design principles</li> <li>● Policy 55 – Maintaining a compact, well designed and sustainable regional form</li> <li>● Policy 56 – managing development in rural areas</li> <li>● Policy 57 – integrating land use and transportation</li> </ul>		
<i>Usefulness:</i>			
Guides decision-making	The proposed objectives provide significant clarity and guidance for	The proposed objectives provide guidance to decision-makers about the	The absence of strategic objectives on the City's urban form and

	decision-makers about the outcomes sought for the City's urban form and development.	outcomes sought for the City's urban form and development. However, they do not provide sufficient guidance in relation to the amount of development capacity that must be enabled for housing, nor do they provide sufficient guidance about what a 'well-functioning urban environment' means at a local level.	development would not provide sufficient guidance for decision-making.
Meets best practice for objectives	Yes, the objectives are outcomes-focussed.	Yes, the objectives are outcomes-focussed.	N/A
<i>Reasonableness:</i>			
Will not impose unjustifiably high costs on the community/parts of the community	The proposed objectives are of a strategic nature and serve to direct the City's urban form and development. As such, they do not impose unjustifiably high costs on the community or parts of the community.	The alternative objectives are of a strategic nature and serve to direct the City's urban form and development. As such, they do not impose unjustifiably high costs on the community or parts of the community.	The absence of direction on the City's urban form and development may create costs for the community or parts of the community. In particular, the lack of objectives that serve to give effect to the NPS-UD may create costs in terms of legal challenge. Without a strong overarching directive in relation to providing the required development capacity for housing and business needs, there could also be costs to the community in relation to even higher housing costs and insufficient employment opportunities.
Acceptable level of uncertainty and risk	There is sufficient certainty about these objectives and the outcomes sought such that the exposure to unintended risks is low.	There is a level of certainty provided by the alternative objectives about the outcomes sought. However, there is insufficient certainty provided on key matters such as how much development capacity for housing is required.	A lack of strategic objectives on this topic provides an unacceptable level of uncertainty and would increase the level of risk for both the Council and the community.

<b>Achievability:</b>			
Consistent with identified tangata whenua and community outcomes	The proposed objectives are consistent with identified outcomes sought by mana whenua and the community. These are set out in the Spatial Plan	The alternative objectives are in part consistent with the outcomes sought by mana whenua and the community. However, they do not specifically identify the need to provide for papakainga housing and assisted housing alongside other forms of housing across the City.	A lack of strategic objectives on this topic would be inconsistent with the outcomes sought by mana whenua and the community. There is an expectation that there is a clear directive provided in the District Plan about the City's future urban form and development, that has regulatory weight.
Realistically able to be achieved within the Council's powers, skills and resources	The proposed objectives are able to be achieved within the Council's powers, skills and resources.	The alternative objectives are able to be achieved within the Council's powers, skills and resources.	N/A
<b>Summary</b>			
The proposed objectives are the most appropriate for achieving the purpose of the Act. The objectives provide strategic direction about the use of land to provide for urban development in a way that is efficient and provides for the social, environmental, economic and cultural wellbeing. The objectives are particularly important for ensuring that the City remains compact and that urban intensification is delivered in a way that ensures a well-functioning urban environment.			