



PROPOSED DISTRICT PLAN CHANGE 78:
***GENERAL MINOR AMENDMENTS TO
DISTRICT PLAN TEXT AND MAPS***

**Section 32 Report: Consideration of alternatives,
benefits and costs**

March 2014

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1. Introduction

The Council is required to undertake an evaluation of the proposed Plan Change before the Plan Change can be publicly notified. This duty is conferred by Section 32 of the Resource Management Act 1991 (the Act). Under this section, this evaluation must:

- 1(a) *examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and*
- 1(b) *examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—*
 - (i) *identifying other reasonably practicable options for achieving the objectives; and*
 - (ii) *assessing the efficiency and effectiveness of the provisions in achieving the objectives; and*
 - (iii) *summarising the reasons for deciding on the provisions; and*
- 1(c) *contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.*

An evaluation must also:

- 2(a) *identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—*
 - (i) *economic growth that are anticipated to be provided or reduced; and*
 - (ii) *employment that are anticipated to be provided or reduced; and*
- 2(b) *if practicable, quantify the benefits and costs referred to in paragraph (a); and*
- 2(c) *assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.*

The evaluation report must be available for public inspection at the time the proposed Plan Change is publicly notified. This report is Wellington City Council's response to this statutory requirement.

2. Statutory Context

2.1. Purpose and Principles of the RMA

The purpose of the RMA is to promote the sustainable management of natural and physical resources. Sustainable management means the use, development and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while:

- (a) *sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- (b) *safeguarding the life-supporting capacity of air, water, soil and ecosystems; and*
- (c) *avoiding, remedying and mitigating any adverse effects of activities on the environment.*

Section 6 of the Act includes seven matters of national importance which need to be recognised and provided for. Section 7 of the Act requires particular regard to be given to a range of other matters, including:

- (b) *the efficient use and development of natural and physical resources*
- (c) *the maintenance and enhancement of amenity values,*

(f) maintenance and enhancement of the quality of the environment

Section 8 of the Act requires the principles of the Treaty of Waitangi to be taken into account.

2.2. Consultation

Consultation on the entire proposed Plan Change has been undertaken with parties identified in the First Schedule of the RMA, specifically:

- Ministry for the Environment
- Port Nicholson Block Settlement Trust
- Te Runanga O Toa Rangatira Inc.
- Greater Wellington Regional Council
- Department of Conservation

3. Description of the Plan Change

This Plan Change comprises 33 separate minor changes to the District Plan. The changes include a number of re-zonings and text changes, predominantly involving clarifications and updates.

The Plan Change does not involve any changes to existing objectives and policies; instead it proposes to make general minor amendments to the District Plan in order to ensure its efficient functioning. Due to the nature of the proposed amendments there are only limited options available and this report has been prepared to address the Section 32 requirements.

3.1. Clarifications

3.1.1 Zone Boundaries at Centre of Road – General Provisions

Section 3.7 of the District Plan is concerned with the status of roads, service lanes and motorways. Within this section, the second bullet point currently states:

Where a formed, unformed or stopped road, [service lane or motorway]^{PC34} is bounded by different areas, the demarcation between areas is the centre of the road.

In order to ensure this sentence is explicit and clear, it is proposed to modify it to use the term 'legal road'. This would make certain that readers understood that the 'centre of the road' referred to the centre point of the legal parcel of land that constitutes the road, rather than the physical road itself. The proposed sentence would be:

Where a formed, unformed or stopped road, [service lane or motorway]^{PC34} is bounded by different areas, the demarcation between areas is the centre of the legal road.

3.1.2 Whitmore Street Viewshaft – Central Area

The Whitmore Street viewshaft (VS 4 – Chapter 13 Appendix 11) has a boundary issue relating to the right margin. The margin is stated as 'The Whitmore Street boundary of 93 Featherston Street' but does not state which point on the boundary should be used. In addition, the viewpoint location is stated to be in the wrong place. It currently states that it is the south west corner of the intersection of Bowen Street and Lambton Quay, while it is actually the north west corner (as indicated in the map to the right of the description). Also, the left margin is based on the edge of the parcel boundary, not the building boundary as stated.

The proposed changes to resolve these errors are all minor in terms of the effects on the viewshaft scope, however are necessary to ensure the key elements are correctly understood and represented.

3.1.3 Signs above Parapet Level – Central Area

Standard 13.6.4.1.2 states that '*no sign shall project above the parapet level, or the highest part of that part of the building to which it is attached*'. In cases where a sign is attached to a parapet and also connected to a higher section of the building, the intention of the rule was to use the lower of the two levels, however this is not clear in the wording of the rule. This Plan Change proposes to make this more explicit.

3.1.4 Land above Seatoun Tunnel – Between 9 and 11 Beacon Hill Road

Map 7 shows the Seatoun Tunnel as legal road, however the strata above it (between 9 and 11 Beacon Hill Road) would be more appropriate to be shown as Outer Residential zoning. This land would currently be treated as Outer Residential due to the surrounding zoning, as noted in Section 3.7 of the District Plan. The Plan Change proposes to 'rezone' this land as Outer Residential, a largely cartographic change.

3.1.5 References to New Zealand Standard Updates – Utilities Chapter

Throughout Chapter 23 (Utilities Rules), provisions refer to '*New Zealand Standard NZS 2772 : Part 1 : 1999 Radiofrequency Fields Part 1 – Maximum Exposure Levels – 3 kHz to 300 GHz (or subsequent amendments)*'. However, under Schedule 1, Clause 31 of the Resource Management Act 1991, a Variation or Plan Change is required to incorporate any amendments or replacements of material referenced by a District Plan. This Plan Change consequently proposes the removal of all references to 'subsequent amendments' from Chapter 23.

3.1.6 Use of 'Streams' and 'Rivers' – Earthworks Chapter

The introduction in Section 30.1, as well as Standards 30.1.1.2, 30.1.2.2, 30.2.1.1 (v), 30.2.1.2(v) all refer to 'streams'. There is no definition of 'stream' in the District Plan; instead the definitions section contains a definition of 'River'. The definition of 'river' includes 'stream', however the interchanging use of the different terms may lead to confusion. For consistency between the Earthworks chapter and the Definitions section of the Plan, it is proposed that references to 'streams' in Chapter 30 are amended to 'rivers'. The change will not alter the way the standard is currently used or enforced, but will improve clarity and remove any ambiguity.

3.1.7 Residential Building Conversions in Rural Areas

Rule 15.3.3a currently states that, with some exceptions:

The construction, alteration of, or addition to, residential buildings, accessory buildings (associated with a residential activity) and residential structures... are Discretionary Activities (Restricted)

This allows Council to control certain elements with the potential for adverse effects, such as design and siting. While this rule is intended to capture the conversion of existing buildings to residential use, this is not explicit. The conversion of buildings to residential use can have the same effects as the construction of a new residential building and it is sensible to treat it in a consistent manner.

In order to clarify the rule and ensure its intent is met, it is proposed to explicitly add conversion to Rule 15.3.3a. This will ensure that conversions continue to require resource consent and that the possible adverse effects can be controlled.

3.1.8 Cross Reference Error in Rule 23.3.3 – Utilities Chapter

The non-notification clause for Rule 23.3.3 currently states:

The written approval of affected persons will not be necessary in respect of items 23.3.2.1 to 23.3.2.5...

The reference to items 23.3.2.1 to 23.3.2.5 is a mistake. It is proposed that this is amended to refer to 23.3.3.1 to 23.3.3.4.

3.2. Mapping Errors

3.2.1 Heritage Tree #10 – 35 Hobson Crescent

Heritage Tree #10 is listed on the schedule as a single tree on 35 Hobson Crescent, as shown below. However, Map 18 instead shows three symbols on 39 Hobson Street annotated as #10. Research has shown that the schedule is correct and it is consequently proposed that map be amended.

HERITAGE LIST: TREES					
Symbol Reference	Number	Street	Map Reference	Species	Common name
10	35	Hobson Crescent	18	Eucalyptus ficifolia	Red Flowering Gum

3.2.2 Heritage Tree #286 – 108 Abel Smith Street

Heritage Tree #286 is included in the heritage schedule, but the corresponding symbol is missing from Map 16. This tree was included in the schedule and maps of the notified District Plan (1994) as Tree #1. However, Variation 12 to the notified Plan introduced a new Tree #1 on The Terrace and renumbered the Abel Smith Street tree as Tree #286 in the schedule. It appears that the tree symbol was inadvertently removed from Map 16 at this time. It is proposed to recreate the heritage tree symbol on Map 16.

HERITAGE LIST: TREES					
Symbol Reference	Number	Street	Map Reference	Species	Common name
286	108	Abel Smith Street	16	Metrosideros robusta	Northern Rata

3.2.3 Heritage Building #348 – 128 Willis Street

Map 17 currently shows Heritage Building #348 (McDonald Building) as being on an incorrect parcel. The symbol is currently placed on the St George's Hotel site, while it should be located one parcel south. It is proposed that the symbol is consequently relocated to sit over the McDonald Building.

HERITAGE LIST: BUILDINGS				
Street	Number	Building and Date of Construction (if known)	Map Ref	Symbol Ref
Willis Street	128	McDonald Building 1919	17	348

3.2.4 Heritage Building #405 – 26 Stoke Street

Heritage Building #405 is shown on Map 6 as located on 28 Stoke Street, however the heritage schedule states that it is on 26 Stoke Street. Research has shown that 26 Stoke Street is correct and it is proposed to consequently amend Map 6 to reflect this.

HERITAGE LIST: BUILDINGS				
Street	Number	Building and Date of Construction (if known)	Map Ref	Symbol Ref
Stoke Street	26	House and Garage 1905	6	405

3.2.5 Allen Street/Blair Street Heritage Buildings

The former Wellington Produce Market buildings between Blair Street and Allen Street are incorrectly shown on the heritage schedule and planning maps. The addresses in the schedule are incorrect and Map 16 shows incorrect heritage building numbers. It is proposed to amend the addresses and symbol annotations to ensure they are correctly shown.

3.2.6 Character Area Overlays – Central Area

Under Plan Change 48, new heritage areas were established for Courtenay Place, Cuba Street and Civic Centre. There was an intention to remove the respective character areas at the same time, however this instruction was absent from Plan Change 48 documents. These character areas are not linked to any rules and consequently have no regulatory status. This Plan Change proposes to remove the character area boundaries from the Volume 3 maps.

3.2.7 Map 32 – Central Area Height Limits

Map 32 of the District Plan displays maximum building heights for the Central Area. However, there are areas on the map which are zoned Open Space A. Chapter 17, which relates to Open Space rules, does not include any reference to this map and instead sets a 10m height limit to buildings and structures for recreation activities (Rule 17.1.9.5). This conflicts with the height limits of up to 75m that are implied by Map 32. The height limits in Map 32 were never intended to apply to Open Space A zones, which is the reason why no link is made between the map and Open Space chapters.

Having no colouring for Open Space A areas in Map 32 was considered, however this would make these areas identical to roads. This option is not considered appropriate, as it would make it more difficult for Plan users to recognise the road network and block patterns of Wellington city. The Plan Change proposes to show Open Space A areas in Map 32 using separate symbology to avoid confusion for Plan users.

3.2.8 Map 34 – Central Area Road Hierarchy

Plan Change 48 included numerous changes to the Central Area road hierarchy presented in Map 34. During this process, the red 'Principal Road' symbology was removed from the section of Victoria Street between Vivian and Webb streets. The removal of the 'Principal Road' status was an error, as it was not included in the textual description of the proposed changes and no reason has been identified why the amendment would have been made. Consequently, it is proposed to re-apply the 'Principal Road' status to Victoria Street between Vivian and Webb streets on Map 34.

3.2.9 Cross Reference Error on Map 17

Map 17 contains an annotation near the corner of Willis Street and Lambton Quay stating 'Refer Appendix 14, Chapter 13'. This reference is incorrect and is meant to refer to Appendix 15 – Comprehensive Development at 360-366 Lambton Quay (CT WN48D/184) and 8 Willis Street (CT WN27A/486). Appendix 14 is the Port Noise Management Plan, which is not related to the area where the annotation is located.

It is proposed to change the annotation to state 'Refer Appendix 15, Chapter 13'.

3.2.10 Duplication of Heritage Building Appellations

There are currently two Heritage Buildings numbered 407:

- 'Group of houses' - The Esplanade
- 'Taikiwai circa 1870' - Stowe Hill and Frandi Street

Taikiwai was incorporated into the District Plan through Plan Change 3, while the group of houses on The Esplanade have been in the District Plan as #407 since it was notified in 1994. It is proposed that Taikiwai is renumbered as #467 on the heritage schedule and the District Plan maps.

3.3. Rule Changes

3.3.1 Road Utilities in Open Space Areas

The introduction to the Utilities Rules chapter states:

The area based objectives, policies and rules shall not apply to utility network infrastructure dealt with in this chapter except that the conditions that apply to Permitted Activities in respect of noise, dust, lighting, electromagnetic radiation and hazardous substances apply to all activities in this chapter

The application of area-based conditions has been an issue for LED variable message road signs and street lights in Open Space areas. Specifically, Condition 17.1.1.4.3 restricts any lines of sight between light sources and streets or residential areas. This condition sets an unworkable and undesirable constraint on street lights and LED variable message road signs. It was never intended for Condition 17.1.1.4.3 to apply in these circumstances, which is evident by the fact that it is nonsensical to restrict street lights from being seen from streets.

It is proposed to exempt Rule 23.1.7 (a Permitted activity rule for traffic management and control structures, and street lighting) from Condition 17.1.1.4.3. Potential lighting effects on residential areas would continue to be protected under Condition 17.1.1.4.1, which sets an 8 lux limit at the windows of residential buildings within any Residential Area.

3.3.2 Earthwork Assessment Triggers

Plan Change 70 introduced two new chapters for the management of earthworks and was made operative in 2010. During the process of making this Plan Change operative, it became apparent that Rules 30.2.1.1 and 30.2.1.2 required an amendment for the policy intent to be properly applied. These rules, as originally put forth in the Plan Change, stated:

30.2.1.1 For non compliance with the permitted activity conditions in Rule 30.1.1 the Council has restricted its discretion to:

(iii) visual amenity – where the cut height or fill depth exceeds 2.5m;

30.2.1.2 For non compliance with the permitted activity conditions in Rule 30.1.2 the Council has restricted its discretion to;

(iii) visual amenity – where the cut height or fill depth exceeds 1.5m;

These rules only allowed the Council to consider visual amenity based on the cut height or fill depth. As the area of earthworks can also have a significant effect on visual amenity, Wellington City Council submitted on the Plan Change and requested the inclusion of area as a trigger for allowing the consideration of visual amenity. This submission included the following recommended text:

Amend 30.2.1.1 (iii) to state:

Visual amenity – where the cut height or fill depth exceeds 2.5m or the area to be cut or filled exceeds 250m².

Amend 30.2.2.1 (iii):

Visual amenity – where the cut height or fill depth exceeds 1.5m or the area to be cut or filled exceeds 100m².

This was received favourably by Commissioner Kinnear, who stated in the Decision Report:

WCC request the inclusion of an additional matter over which discretion is retained in regard to visual amenity. Currently the consideration of visual amenity of earthworks is limited to when the cut height exceeds 2.5m (or 1.5m in visually sensitive areas). However, in addition to the height/depth of earthworks, the area over which the earthworks are undertaken can also have an adverse effect on visual amenity. Therefore, the inclusion of the area limits of 250m² and 100m² in the relevant matter over which Council has restricted its discretion is considered appropriate.

However, the annotated provisions provided with the Decision Report amended the two rules to (emphasis added):

30.2.1.1(iii): visual amenity – where the cut height or fill depth exceeds 2.5m **and** the area exceeds 250m²;

30.2.1.2(iii): visual amenity – where the cut height or fill depth exceeds 1.5m **and** the area exceeds 100m²; (emphasis added)

This reflects the addition of area, but requires both area and height/depth to be above a certain size to allow the consideration of visual amenity. There is no evidence to suggest that this is the intention of Commissioner Kinnear and it is considered to be a clerical error. Plan Change 78 proposes to correct this error by substituting the word ‘or’ for the word ‘and’ in each sentence:

30.2.1.1(iii): visual amenity – where the cut height or fill depth exceeds 2.5m ~~and~~ or the area exceeds 250m²;

30.2.1.2(iii): visual amenity – where the cut height or fill depth exceeds 1.5m ~~and~~ or the area exceeds 100m²;

3.3.3 Multiple Household Units within Ridgelines and Hilltops Overlays – Rural Area

There is currently an inconsistency in the District Plan that building a second house in the Rural Area is generally a Non-complying activity, but would only be Discretionary (Unrestricted) if it was within an identified ridgeline or hilltop. As the effects of a second household unit on an individual allotment are potentially higher within an identified ridgeline or hilltop than outside of them, it is illogical that it would have a more tolerant activity status.

Rule 15.3.3a, which deals with residential buildings outside of identified ridgelines and hilltops, contains a standard that ‘*the number of household units per allotment shall not exceed one*’. However, the equivalent rules for residential buildings within identified ridgelines and hilltops (Rules 15.4.2 and 15.4.2a) do not contain the same standard. This is likely an oversight and it is proposed that the same standard is added to Rules 15.4.2 and 15.4.2a. The construction of a second (or subsequent) household unit on a rurally-zoned allotment would then be a Non-complying activity, regardless of whether it is in an identified ridgeline or hilltop.

3.3.4 Open Space B Areas within Ridgelines and Hilltops Overlays

Earthworks on sites within the Ridgelines and Hilltops Overlay and zoned Open Space B that do not meet the Permitted activity standards are currently a Discretionary (Restricted) activity, while earthworks on sites within the Ridgelines and Hilltops Overlay and zoned Rural that do not meet the Permitted activity standards are a Discretionary (Unrestricted) activity.

Plan Change 33 (and the subsequent Environment Court decision) made earthworks within the Ridgelines and Hilltops Overlay (regardless of underlying zone) that do not meet the Permitted activity standards a Discretionary (Unrestricted) activity. However, during the drafting of the new Earthworks chapter (Plan Change 70), earthworks in Open Space B areas within the Ridgelines and Hilltops Overlay were inadvertently made a Discretionary (Restricted) activity.

The proposed change corrects the error made during the Plan Change 70 process and makes the rules for the Ridgelines and Hilltops Overlay consistent across Rural and Open Space B areas. The majority of Open Space B land is owned and managed by the Council.

3.3.5 Smoke Extractor Fans – Central Area

The intent of Rule 13.6.1.1.2 is to exempt emergency plant from the more onerous level of 55 dBA (L₁₀) limit set in 13.6.1.1.1 and replace the limit with the more relaxed limit of 60 dBA (L₁₀). This is based on the fact that emergency plant rarely operates and when it does it is usually for a very short duration. Emergency plant is generally only operated occasionally for maintenance purposes and in emergency situations.

However, 60 dBA is still too restrictive for smoke extract fans, which by their nature are noisy, and there are limited opportunities to reduce that noise. The effect is that the rule potentially prohibits the operation of smoke extract fans.

Smoke extract fans are rarely used for maintenance and are predominantly used in true emergency situations (i.e. to remove smoke from a building after a fire) and therefore should be exempt from the noise limits specified in Rule 13.6.1.1. It is worth noting that Section 16 of the Resource Management Act (*duty to avoid unreasonable noise*) would apply even in an emergency situation – creating an obligation to adopt the Best Practicable Option to reduce noise to a reasonable level. This provides a practical approach and provides adequate protection for adjacent uses, given that emergency smoke fans rarely operate.

The requirement for emergency mechanical plant to comply with standards where the site borders a Residential Area is set out in Appendix 5 to Chapter 13. This in effect requires emergency mechanical plant on sites where the Central Area borders a Residential Area to comply with a limit of 55 dBA during the day (when tested or operated in emergencies) and an onerous limit of 40 dBA at night (when operating during emergencies). This means emergency plant in Central Areas bordering Inner Residentially zoned land must be designed to meet the onerous limit of 40 dBA, as during an emergency they would operate day and night.

The noise limit of 40 dBA for emergency plant in Central Areas bordering Inner Residentially zoned land, when operating in an emergency, is too onerous. Therefore it is proposed to change the limit to only apply the more onerous limit (in Appendix 5) when operating for maintenance.

3.3.6 Permitted Activity Status of Small Aerials – Utilities Chapter

Plan Change 74 (Telecommunication Structures) made a number of changes to the Utility Chapter provisions. During the submission and decision-making process, the Commissioners learned that the terms 'aerial' and 'antenna' were often used interchangeably. It was agreed that the two separate definitions for aerial and antenna would be combined into one definition under the name 'antenna'. The aerial definition was removed, and consequently the Permitted activity rule for aerials was also removed.

In the same decision, the Commissioners agreed with submitters that antennas below a certain size do not cause environmental effects and therefore should not be regulated by the District Plan. The definition for antenna was amended to exclude antennas less than a certain size (i.e. less than 70mm diameter and no greater than 150cm²) so that the Plan would not regulate these devices.

In late 2013, the Council was approached by a utility provider seeking clarity over how a proposed upgrade of electricity meters in residential homes to 'smart meters' would be treated under the District Plan. The smart meters are well within the dimensions identified in the antenna definition, but there was considerable confusion over how the plan's provisions actually work. Legal advice was subsequently sought.

This legal advice concluded that while these devices aren't captured by the antenna definition, they could be captured by the utility structure definition. The implication of this for the utility provider was that while the upgrade would be a Permitted Activity for most zones in the plan, there were a number of exceptions for various reasons, meaning that resource consents would be required for many individual sites.

This plan interpretation, while legally correct, does not fit the very clear intention of the Hearings Committee, as shown in an extract from their decision below:

In considering the best way to accept the relief sought by Capacity, the Committee has, given other submissions to reconsider the definitions of aerial and antenna, decided that redrafting the definitions is the best approach. The Committee has combined the two definitions into one, (noting the many other district plans do not define either term or perhaps only define antenna). Further, the Committee has excluded certain sized aerials/antennas from the definition, ie. those aerials/antennas deemed to have no environmental effects. The effect of this is that any antennas/aerial not meeting the definition is not covered by the District Plan, and therefore permitted under the Resource Management Act.

To make the policy intent clear in the Plan, it is proposed that a new Permitted Activity rule is introduced that expressly permits antennas below a certain size. It is noted that the National

Environmental Standards (NES) for Telecommunication Structures ensures that the radiofrequency issues associated with antennas will be addressed without the need for a specific radiofrequency condition on the proposed new rule.

In summary, a new rule is required to give effect to the policy intent established by the Plan Change 74 decision that very small antennas have no environmental effects and should not be regulated under the District Plan.

The proposed new rule is:

23.1.16 Any antenna where no part of the antenna is greater than 70mm in diameter (not including any mountings) or where its total area is less than 150cm² is a Permitted Activity.

This rule would be accompanied by a margin note that says:

NB: The radiofrequency emission provisions of the NES for Telecommunication Facilities still apply in respect of antennas permitted under this Plan.

No change is proposed to the current 'antenna' definition; providing for a 'belts and braces' approach. Some minor consequential changes are required to Rules 23.1.13, 23.1.14 and 23.1.15 to provide a cross reference to new rule 23.1.16.

3.3.7 Updated Methodology for Measuring Wind Effects – Central Area

Plan Change 48 (Central Area Review) introduced a revised policy and rule framework for assessing the pedestrian wind environment in the Central Area. The wind tunnel testing methodology was also revised. The revised wind provisions were formulated after more than a year's collaboration of the Council's Wind Expert (Mike Donn), Opus (who conduct wind tests for applicants in the Opus wind tunnel) and Council officers.

After the provisions were notified as part of Plan Change 48, some concerns were raised (outside of the submission process) that the revised provisions may make it harder to achieve the Permitted activity thresholds, which was never the intent of the work in revising the methodology. Accordingly, we asked Opus and Council's wind advisor to work together to do further testing of the Plan Change 48 testing methodology compared with the operative provisions at the time. This testing was completed in 2008 and revealed that one of the criteria in the wind rules could be amended to better account for the margin of error in the scientific wind tunnel testing procedure. The methodology to be followed in conducting wind tests also needed further clarification (i.e. Appendix 8 of Chapter 13).

The findings from that further testing also revealed a need to ensure that the methodology provisions were robust enough so that any wind tunnel laboratory could implement them and generate results that the council could rely on. Traditionally, Opus have conducted all wind tunnel tests in Wellington, however Auckland University has been contracted to conduct some studies in the past and officers are aware that Australian companies may be interested in doing this work too. This issue has taken on even more relevance this year as the Opus wind tunnel was decommissioned in February 2014 while Opus moved office locations.

The changes identified may appear to be of a minor, technical nature, but they are required to ensure the wind provisions are 'fit for purpose'. Plan Change 48 has recently been made fully operative, making this current Plan Change the first opportunity available to make these changes.

It is now approximately eight years since the Plan Change 48 provisions were first introduced. In 2006 when those provisions were first considered, officers discussed whether the wind rules should explicitly provide for wind tunnel tests to be prepared using computer technology. It was considered that the technology was still at an early stage and there was little real world application of it in modelling pedestrian wind environments. However, Computational Fluid Dynamics (CFD) is advancing at a fast rate and Council's wind advisor now holds the view that applying this technology to wind tunnel testing is possible within the next ten years of the Plan. One amendment is consequently proposed to clarify that wind tunnel testing can be carried out using electronic tools, provided the testing process demonstrates that the model is properly calibrated. This change is proposed purely as a means of future-proofing the Plan.

Officers note that Plan Change 73 (Suburban Centres Review) also introduced the need for some buildings to be tunnel tested. However, no variation is required to that Plan Change, as the specific text refers back to the Central Area provisions. Accordingly, the proposed changes to Chapter 13 and Appendix 8 will have the beneficial effect of addressing tunnel tests under the other chapters without having to undertake a variation.

3.4. Updates

3.4.1 Stout Street Non-Heritage Items

As the new Supreme Court building was constructed in 2009 over the top of Justice Park, some features identified as ‘non-heritage’ have been removed. These consist of *Justice Park (incl. remnants of demolished buildings and Oscar Wilde plaque)* and *Supreme Court annexe, Whitmore Street*. It is proposed that the table and map entries for these features in Chapter 21, Appendix 16 are removed.

3.4.2 New Formed Legal Roads

Various new formed legal roads have recently been developed, predominantly in the northern suburbs. These are still shown on the Volume 3 planning maps as being zoned rather than legal road. It is proposed to remove the zoning from these roads in order to make the road network clear on the Volume 3 maps and ensure they are controlled in a manner appropriate for legal roads. As stated in Section 3.7 of the District Plan, legal roads generally adopt the provisions of the underlying zone:

With regard to the application of District Plan objectives, policies and rules, the Plan provisions of the area in which any formed or unformed legal road, [service lane or motorway]^{PC34} is located shall apply.

However, the District Plan contains certain rules for specific activities on legal road, which contributes to the importance of ensuring the new formed legal roads are correctly shown.

3.4.3 Heritage Tree #198 – 144b Abel Smith Street

Heritage Tree #198 at 144b Abel Smith Street (English Elm) has been physically removed for safety reasons. The tree was considered unsafe due to one of the main stems failing and coming to rest on a neighbouring property. The remaining stem had significant amounts of deadwood and a crack running from the base to the main crown break.

As the tree has been physically removed, it is proposed to remove it from the heritage schedule and Map 16.

HERITAGE LIST: TREES					
Symbol Reference	Number	Street	Map Reference	Species	Common name
198	144b	Abel Smith Street	16	Ulmus procera	English Elm

3.4.4 Incorporation of Updated New Zealand Noise Standards

New Zealand Standards NZS 6801:1991 “Measurement of Sound” and NZS 6802:1991 “Assessment of Environmental Sound” are referenced throughout the District Plan. These were updated in 2008, including some changes in best practice guidance and notation styles. As a result, the District Plan currently uses outdated sound measurement and assessment methods. It is proposed to update the noise provisions by amending references to the standards to the 2008 versions and changing measurements in L₁, L₁₀ and L_{max} formats to L_{Aeq(1 min)}, L_{Aeq(15min)} and L_{AFmax} respectively.

Changes are not required to Residential, Business Area, or Centres chapters, as they have recently been reviewed and updated to reflect the new standards. References in the

appendices to the Designations chapter cannot be updated through a Plan Change and would instead require Notices of Requirement by the relevant Requiring Authorities.

The changes to noise standards are not considered to be significant in terms of noise levels, only reflecting current industrial best practice methods for measuring and assessing sound.

3.5. Zoning Changes

3.5.1 79 Dixon Street

A carpark at the corner of Dixon and Victoria Street (Lot 1 DP 82741 – 79 Dixon Street) is currently shown in the District Plan as legal road. However, the land is privately owned and has not been vested as legal road. It should therefore be zoned as Central Area, which would match the adjacent land. For all intents and purposes, this zoning already applies to the property under section 3.7 of the District Plan. However, it is proposed to amend Map 16 in order to ensure the zoning is shown correctly and clearly.

3.5.2 Lot 441 DP352897 – Open Space Area in Woodridge

An area of open space in Woodridge between Kentwood Drive, Cedarwood Street and Woodridge Drive (Lot 441 DP 352897) was classified as reserve under the Reserves Act in June 2009, but is still zoned Outer Residential in the District Plan. It is proposed that the land is rezoned from Outer Residential to Open Space B to reflect its nature as a reserve. The land suits this proposed zoning, as it is an informal expanse of open space without buildings or structures.

3.5.3 Gibraltar Rock Rezoning – Breaker Bay Road

An area of land at Gibraltar Rock is currently zoned Open Space A on Map 5. This land would be more appropriate being zoned Conservation Site 2D, which would match adjacent land. Comments were sought from Council's Urban Ecology Manager, who stated that the main habitat types were:

- Cliff faces dominated by taupata and coastal flax
- Taupata dominated low coastal forest
- Rock, gravels, shingle, scree and sand
- Taupata shrubland with coastal flax
- Harakeke flaxland with taupata

The assessment also stated that the area has significance as a Conservation Site for a range of reasons. The site is part of an important stretch of the coastal environment. The immediate coastal fringe and low-lying coastal sections of the site on the seaward side of the road provide habitat for coastal species dominated by glasswort (*Sarcocornia quinqueflora*), *Samolus repens var. repens* and *Sellaria repens* with other turf-field species.

The rock stacks within the coastal fringe are dominated by coastal flax, native ice plant and taupata. Given their relative protection from many invasive pests (environmental weeds and animal grazing species), these rock stacks have retained relatively natural vegetation.

Moving inland and on the inland side of the coastal road, the lower faces and coastal cliffs of the site are typically dominated by low-lying taupata (*Coprosma repens*) shrubland and coastal flaxland (*Phormium cookianum*) with other low-lying shrubland species such as *Meliclytus crassifolius*, *Coprosma propinqua* and *Muehlenbeckia complexa*.

The sheltered gully on this site is dominated by a low canopy of predominantly taupata with mahoe. Outside of this lower gully, the majority of the dry faces and hillslopes are dominated by grasses with club sedge (*Ficinia nodosa*) and scattered taupata.

The low coastal flax and shrub communities of the area provides important habitat for blue penguin (*Eudyptula minor*) and they are known to nest in the area. The coastal margins on the seaward side of the road are likely to provide seasonal habitat to other bird species including variable oystercatcher (*Haematopus unicolour*), black backed gull (*Larus dominicanus*), black shag (*Phalacrocorax carbo*) and pied shag (*Phalacrocorax varius*).

This site has high habitat values for lizard species. The wider stretch of coastline has some of the highest known densities of lizards in Wellington, including common geckos and common skinks. The cushion-field and shrubland vegetation communities of the site are also likely to support a range of indigenous moth species.

This site also contains part of a site of archaeological significance.

It is proposed to rezone this land from Open Space A to Conservation Site 2D.

3.5.4 68A Victory Avenue

An area of land at 68A Victory Avenue, Karori, was previously used as a playground. However, the playground equipment was decommissioned in 2008 in line with the Council's Playgrounds Policy 2002 and the land has since remained vacant. The site was declared surplus and approved for sale by Council on 24 November 2011. This Council approval was conditional upon the reserve revocation being successful and the land being rezoned from Open Space A to Outer Residential Area.

As part of the disposal process, consultation was undertaken with Council departments, councillors, public (via a public notice and letters to adjoining owners), iwi, and Department of Conservation. This consultation was undertaken April-June 2012 and focused on the revocation of the reserve status, as well as the proposed disposal of the land. No objections were raised. Department of Conservation approved the revocation of the reserve status on 13 September 2012.

The land is level with the road on the western boundary, but rises steeply at the eastern boundary. The flat land is grassed, and trees and shrubs cover the eastern boundary. There are no built improvements on site, with the exception of fencing on some boundaries. The parcel proposed to be rezoned is approximately 300m², however it would likely be sold along with the adjoining 42m² parcel, which is already zoned Outer Residential.

The proposed rezoning would reflect that the site is no longer used for recreational activities, which is the anticipated focus of Open Space A areas. There would be minimal benefit from rezoning it as Open Space B (which provides for passive recreational activities in areas with natural character), as there is already sufficient Open Space B land in the vicinity of the site. Outer Residential Area is the most appropriate zoning, as it is consistent with the surrounding land and is likely to be the most desirable use of the site.

It is considered that the potential for adverse effects on the surrounding environment would be sufficiently controlled by the Outer Residential provisions.

4. Section 32 Considerations

The tables below provide an analysis of the costs and benefits of the proposed amendments.

This analysis enables an assessment of the efficiency, effectiveness and appropriateness of the proposed Plan Change. Instead of assessing all cases individually, a cost/benefit and appropriateness assessment has generally been undertaken for each subject group.

Only two options have been considered for these assessments due to the minor nature of the proposed amendments; do nothing or to amend the District Plan as proposed.

Table 1: Clarifications		
	OPTION 1: Do Nothing – Retain Existing Provisions	OPTION 2: Amend Wording and Maps This is the RECOMMENDED option.
Description	This relates to the following sections. See relevant aspects of Section 3 for more details.	
	3.1.1 Zone Boundaries at Centre of Road 3.1.2 Whitmore Street Viewshaft 3.1.3 Signs above Parapet Level 3.1.4 Land above Seatoun Tunnel	3.1.5 References to New Zealand Standard Updates 3.1.6 Use of 'Streams' and 'Rivers' 3.1.7 Residential Building Conversions in Rural Areas 3.1.8 Cross Reference Error in Rule 23.3.3
Costs	<ul style="list-style-type: none"> Environmental costs – Low. Suboptimal environmental outcomes may arise if the Plan is not interpreted correctly. Economic costs – Medium. The processing of resource consents may take additional time if the Plan is not easily interpreted. Costs would be borne by developers through consent processing charges. Social costs – Low. Suboptimal social outcomes may arise if the Plan is not interpreted correctly. 	<ul style="list-style-type: none"> Environmental costs – None identified. Economic costs – Low. Costs of processing the Plan Change. Social costs – None identified.
Benefits	<ul style="list-style-type: none"> Environmental benefits – None identified. Economic benefits – None identified. Social benefits – None identified. 	<ul style="list-style-type: none"> Environmental benefits – Medium. Ensures the environmental objectives of the Plan are correctly interpreted. Economic benefits – Medium. Processing of resource consents may be streamlined due to the Plan being easier to interpret. Social benefits – Medium. Ensures good planning outcomes for communities.
Efficiency & Effectiveness of achieving Objectives	<ul style="list-style-type: none"> The Plan's objectives would be less efficiently and effectively achieved, as the provisions have been identified as being ambiguous and requiring alterations to ensure the overriding objectives can be given effect to. 	<ul style="list-style-type: none"> Most efficient and effective in achieving Plan objectives, as the changes would clarify how they are meant to be given effect to. Improves the efficient functioning of the District Plan.
Most appropriate for achieving Objectives	<ul style="list-style-type: none"> Not considered appropriate, as the provisions are unclear. 	<ul style="list-style-type: none"> Appropriate, because the changes allow better and easier decision-making processes that meet Plan objectives.

Table 2: Mapping and Reference Errors		
	OPTION 1: Do Nothing – Retain Existing Provisions	OPTION 2: Amend Wording and Maps This is the RECOMMENDED option.
Description	This relates to the following sections. See relevant aspects of Section 3 for more details.	
	3.2.1 Heritage Tree #10 3.2.2 Heritage Tree #286 3.2.3 Heritage Building #348 3.2.4 Heritage Building #405 3.2.5 Allen Street/Blair Street Heritage Buildings	3.2.6 Character Area Overlays 3.2.7 Map 32 Height Limits 3.2.8 Map 34 Road Hierarchy 3.2.9 Cross Reference Error on Map 17 3.2.10 Duplication of Heritage Building Appellations
Costs	<ul style="list-style-type: none"> Environmental costs – Medium. Suboptimal environmental outcomes may arise if the Plan is not applied correctly. Economic costs – Medium. The processing of resource consents may take additional time if the Plan is not easily interpreted. Costs would be borne by developers through consent processing charges. Social costs – Low. Suboptimal social outcomes may arise if the Plan is not applied correctly. 	<ul style="list-style-type: none"> Environmental costs – None identified. Economic costs – Low. Costs of processing the Plan Change. Social costs – None identified.
Benefits	<ul style="list-style-type: none"> Environmental benefits – None identified. Economic benefits – None identified. Social benefits – None identified. 	<ul style="list-style-type: none"> Environmental benefits – Medium. Ensures the environmental objectives of the Plan are correctly applied. Economic benefits – Medium. Processing of resource consents may be streamlined due to the Plan being easier to interpret. Social benefits – Medium. Ensures good planning outcomes for communities.
Efficiency & Effectiveness of achieving Objectives	<ul style="list-style-type: none"> The Plan’s objectives would be less efficiently and effectively achieved, as the provisions have been identified as being unclear and incorrect. 	<ul style="list-style-type: none"> Most efficient and effective in achieving Plan objectives, as the changes would clarify how they are meant to be given effect to. Improves the efficient functioning of the District Plan.
Most appropriate for achieving Objectives	<ul style="list-style-type: none"> Not considered appropriate, as the provisions are unclear and incorrect. 	<ul style="list-style-type: none"> Appropriate, as the changes allow more informed decision-making processes that meet Plan objectives.

Table 3: Updates		
	OPTION 1: Do Nothing – Retain Existing Provisions	OPTION 2: Amend Wording and Maps This is the RECOMMENDED option.
Description	This relates to the following sections. See relevant aspects of Section 3 for more details.	
	3.4.1 Stout Street Non-Heritage Items 3.4.2 New Formed Legal Roads	3.4.3 Heritage Tree #198 3.4.4 Incorporation of Updated New Zealand Noise Standards
Costs	<ul style="list-style-type: none"> Environmental costs – Low. Suboptimal environmental outcomes may arise if Plan information is outdated. Economic costs – Low. If some Plan information is outdated, Plan users may question whether other information is outdated also. This could increase general time taken when using the Plan, due to the perceived and/or real need to validate information. Social costs – Low. Suboptimal social outcomes may arise if the Plan information is outdated. 	<ul style="list-style-type: none"> Environmental costs – None identified. Economic costs – Low. Costs of processing the Plan Change. Social costs – None identified.
Benefits	<ul style="list-style-type: none"> Environmental benefits – None identified. Economic benefits – None identified. Social benefits – None identified. 	<ul style="list-style-type: none"> Environmental benefits – Low. Ensures best practice is employed for measuring and assessing noise. Economic benefits – None identified. Social benefits – Medium. Keeping the Plan up to date makes it easier for the public to understand and use the Plan.
Efficiency & Effectiveness of achieving Objectives	<ul style="list-style-type: none"> The Plan's objectives would be less efficiently and effectively achieved, as outdated information and processes would distract from Plan objectives. 	<ul style="list-style-type: none"> Most efficient and effective in achieving the Plan's objectives and policies, as the proposed changes would ensure the objectives are kept in focus. Improves the efficient functioning of the District Plan.
Most appropriate for achieving Objectives	<ul style="list-style-type: none"> Not considered appropriate, as the provisions are out of date and do not reflect current circumstances and best practice. 	<ul style="list-style-type: none"> Appropriate, because the changes ensure the Plan is up to date and best practice is used.

Table 4: Changes/Clarifications towards Permitted Activity Status		
	OPTION 1: Do Nothing – Retain Existing Provisions	OPTION 2: Amend Wording This is the RECOMMENDED option.
Description	This relates to the following sections. See relevant aspects of Section 3 for more details. 3.3.1 Road Utilities in Open Space Areas 3.3.5 Smoke Extractor Fans 3.3.6 Permitted Activity Status of Small Aerials	
Costs	<ul style="list-style-type: none"> Environmental costs – None identified. Economic costs – High. The relevant activities all require resource consent on technicalities, causing additional expense to applicants and Council. Social costs – None identified. 	<ul style="list-style-type: none"> Environmental costs – Low. The relevant activities would generally gain resource consent in most realistic situations under existing rules. Creating Permitted activity rules would allow these activities as of right, however the potential environmental effects are considered to be less than minor. Economic costs – Low. Costs of processing the Plan Change. Social costs – None identified.
Benefits	<ul style="list-style-type: none"> Environmental benefits – Low. Extra protection would exist around these activities, however this protection is not necessary and is not considered to be useful for improving environmental outcomes. Economic benefits – None identified. Social benefits – None identified. 	<ul style="list-style-type: none"> Environmental benefits – None identified. Economic benefits – High. Costs associated with the resource consent process would be avoided. Social benefits – Medium.
Efficiency & Effectiveness of achieving Objectives	<ul style="list-style-type: none"> The Plan's objectives would be less efficiently and effectively achieved, as it was never intended to require consent for the relevant activities. 	<ul style="list-style-type: none"> Most efficient and effective in achieving the Plan's objectives and policies, as the proposed changes would ensure the objectives are kept in focus. Improves the efficient functioning of the District Plan.
Most appropriate for achieving Objectives	<ul style="list-style-type: none"> Not considered appropriate, as the Plan acts as an impediment to developments that are not considered to have potential for significant adverse effects. 	<ul style="list-style-type: none"> Appropriate, because the changes ensure that focus is kept on the Plan's objectives.

Table 5: Ridgelines and Hilltops Overlay Provisions		
	OPTION 1: Do Nothing – Retain Existing Provisions	OPTION 2: Amend Wording This is the RECOMMENDED option.
Description	This relates to the following sections. See relevant aspects of Section 3 for more details. 3.3.3 Multiple Household Units within Ridgelines and Hilltops Overlays 3.3.4 Open Space B Areas within Ridgelines and Hilltops Overlays	
Costs	<ul style="list-style-type: none"> Environmental costs – High. The existing provisions are unrestrictive compared to activities in the Plan with analogous levels of environmental effects. These make environmental protection difficult and increase the possibility that consent will be granted to activities that degrade visual amenity. Economic costs – None identified. Social costs – None identified. 	<ul style="list-style-type: none"> Environmental costs – None identified. Economic costs – Medium. As the proposed changes would elevate the consent activity statuses for some activities, there would likely be additional costs in some consenting processes. Social costs – None identified.
Benefits	<ul style="list-style-type: none"> Environmental benefits – None identified. Economic benefits – None identified. Social benefits – None identified. 	<ul style="list-style-type: none"> Environmental benefits – The proposed changes would elevate the consent activity statuses of certain activities, increasing the ability of Council to consider and control environmental effects of proposed activities. Economic benefits – None identified. Social benefits – None identified.
Efficiency & Effectiveness of achieving Objectives	<ul style="list-style-type: none"> The Plan’s objectives would be less efficiently and effectively achieved, as the Plan does not provide adequate protection from adverse effects on visual amenity and rural character. 	<ul style="list-style-type: none"> Most efficient and effective in achieving the Plan’s objectives and policies, as objectives relating to visual amenity and rural character would be better protected. Improves the efficient functioning of the District Plan.
Most appropriate for achieving Objectives	<ul style="list-style-type: none"> Not considered appropriate, as the provisions are inconsistent with those relating to activities with similar levels and types of potential adverse effects. 	<ul style="list-style-type: none"> Appropriate, because the changes would ensure the rules are sufficient for implementing Plan objectives and allowing environmental protection.

Table 6: Wind Assessment Methodology		
	OPTION 1: Do Nothing – Retain Existing Provisions	OPTION 2: Amend Wording This is the RECOMMENDED option.
Description	Amend Chapter 13 to update the methodology for measuring wind effects and provide for electronic wind tunnel testing.	
Costs	<ul style="list-style-type: none"> • Environmental costs – None identified. • Economic costs – Low. The prescriptive nature of the existing methodology may lead to additional unnecessary costs to developers contracting wind experts to undertake assessments. • Social costs – None identified. 	<ul style="list-style-type: none"> • Environmental costs – None identified. • Economic costs – Low. Costs of processing the Plan Change. • Social costs – None identified.
Benefits	<ul style="list-style-type: none"> • Environmental benefits – None identified. • Economic benefits – None identified. • Social benefits – None identified. 	<ul style="list-style-type: none"> • Environmental benefits – None identified. • Economic benefits – Provision for electronic tunnel testing in future may help to reduce cost of testing procedure. • Social benefits – None identified.
Efficiency & Effectiveness of achieving Objectives	<ul style="list-style-type: none"> • The Plan's objectives would be less efficiently and effectively achieved, as the existing methodology contains unnecessary difficulties for measuring wind effects. 	<ul style="list-style-type: none"> • Most efficient and effective in achieving the Plan's objectives and policies, as the proposed methodology is more efficient at measuring wind effects. • Improves the efficient functioning of the District Plan.
Most appropriate for achieving Objectives	<ul style="list-style-type: none"> • Not considered appropriate, as unnecessary difficulties are added to the assessment process. 	<ul style="list-style-type: none"> • Appropriate, as the proposed changes would make it easier for assessments to be undertaken by a range of experts.

Table 7: Changes to Rules 30.2.1.1 and 30.2.1.2		
	OPTION 1: Do Nothing – Retain Existing Provisions	OPTION 2: Amend Wording This is the RECOMMENDED option.
Description	Amend Rules 30.2.1.1 and 30.2.1.2 to ensure the Council can consider effects on visual amenity if either the height/depth or area of earthworks exceeds the stated size.	
Costs	<ul style="list-style-type: none"> • Environmental costs – High. Inappropriate earthworks may take place and significantly reduce the visual amenity of an area without the ability for control. • Economic costs – None identified. • Social costs – None identified. 	<ul style="list-style-type: none"> • Environmental costs – None identified. • Economic costs – Medium. Costs of processing the Plan Change. Extra potential development costs from the additional consents generated from more stringent rules. • Social costs – None identified.
Benefits	<ul style="list-style-type: none"> • Environmental benefits – None identified. • Economic benefits – Medium. Fewer consents are required, reducing costs for developers. • Social benefits – None identified. 	<ul style="list-style-type: none"> • Environmental benefits – High. Ensures the Council can control inappropriate earthworks and maintain the visual amenity of environments. • Economic benefits – None identified. • Social benefits – Medium. Ensures good planning outcomes for communities.
Efficiency & Effectiveness of achieving Objectives	<ul style="list-style-type: none"> • The Plan's objectives cannot be efficiently or effectively achieved in terms of land use planning and environmental protection, as it restricts Council from fully evaluating developments that may be contrary to Plan Objectives. 	<ul style="list-style-type: none"> • Most efficient and effective in achieving the Plan's objectives and policies in terms of land use planning and environmental protection. • Improves the efficient functioning of the District Plan.
Most appropriate for achieving Objectives	<ul style="list-style-type: none"> • Not considered appropriate, as it is an error and the current wording does not correspond to Plan objectives. Existing wording also allows the possibility of significant earthworks taking place without adequate environmental protection. 	<ul style="list-style-type: none"> • Appropriate, because it ensures the Plan can be implemented to allow better decision-making processes that meet Plan objectives regarding visual amenity.

Table 8: Rezoning of 79 Dixon Street		
	OPTION 1: Do Nothing – Retain Existing Provisions	OPTION 2: Amend Wording This is the RECOMMENDED option.
Description	Rezoning of 79 Dixon Street (Lot 1 DP 82741) from Legal Road to Central Area.	
Costs	<ul style="list-style-type: none"> • Environmental costs – None identified. • Economic costs – Low. The processing of resource consents may take additional time if the Plan is not easily interpreted. • Social costs – None identified. 	<ul style="list-style-type: none"> • Environmental costs – None identified. The relevant site would already generally be considered under Central Area provisions (and has been in the past). • Economic costs – Low. Costs of processing the Plan Change. • Social costs – None identified.
Benefits	<ul style="list-style-type: none"> • Environmental benefits – None identified. • Economic benefits – None identified. • Social benefits – None identified. 	<ul style="list-style-type: none"> • Environmental benefits – None identified. • Economic benefits – None identified. • Social benefits – Medium. Showing the site as correctly zoned would increase certainty for Plan users.
Efficiency & Effectiveness of achieving Objectives	<ul style="list-style-type: none"> • The Plan's objectives would be less efficiently and effectively achieved, due to the lack of clarity. 	<ul style="list-style-type: none"> • Most efficient and effective in achieving the Plan's objectives and policies, due to the increased clarity. • Improves the efficient functioning of the District Plan.
Most appropriate for achieving Objectives	<ul style="list-style-type: none"> • Not considered appropriate, as the previous zoning decisions in that area are less clear due to the site not being shown as part of the Central Area. 	<ul style="list-style-type: none"> • Appropriate, as the zoning maps would be more clear and accurate.

Table 9: Rezoning of Lot 441 DP352897		
	OPTION 1: Do Nothing – Retain Existing Provisions	OPTION 2: Amend Wording This is the RECOMMENDED option.
Description	Rezoning of Lot 441 DP352897 from Outer Residential to Open Space B.	
Costs	<ul style="list-style-type: none"> • Environmental costs – Low. The reserve classification on the site already restricts the range of permissible activities and protects the natural values. • Economic costs – Low. Possibility of zoning having to be changed at a later stage if not done currently. • Social costs – None identified. 	<ul style="list-style-type: none"> • Environmental costs – None identified. • Economic costs – Low. Costs of processing the Plan Change. • Social costs – None identified.
Benefits	<ul style="list-style-type: none"> • Environmental benefits – None identified. • Economic benefits – None identified. • Social benefits – None identified. 	<ul style="list-style-type: none"> • Environmental benefits – Medium. Open Space land can be maintained and enhanced (with landscaping, plantings, paths etc) which will enable the ecological and landscape values of the land to be protected and enhanced. • Economic benefits – Medium. Recognition and improvements in Open Space areas can help improve property values. • Social benefits – High. Recognition of Open Space allows for increased certainty for the public that the land will continue to be used in an appropriate manner.
Efficiency & Effectiveness of achieving Objectives	<ul style="list-style-type: none"> • The Plan’s objectives would be less efficiently and effectively achieved, as Outer Residential zoning is inappropriate for the site. 	<ul style="list-style-type: none"> • Most efficient and effective in achieving the Plan’s objectives and policies, as the proposed zoning is most appropriate and contributes to values within Plan objectives. • Improves the efficient functioning of the District Plan.
Most appropriate for achieving Objectives	<ul style="list-style-type: none"> • Not considered appropriate, as the zoning does not reflect the current land use and may create uncertainty. 	<ul style="list-style-type: none"> • Appropriate, because proposed zoning reflects current land use and reserves classifications under the Reserves Act.

Table 10: Rezoning of Gibraltar Rock		
	OPTION 1: Do Nothing – Retain Existing Provisions	OPTION 2: Amend Wording This is the RECOMMENDED option.
Description	Rezoning of land at Gibraltar Rock from Open Space A to Conservation Site 2D.	
Costs	<ul style="list-style-type: none"> • Environmental costs – Medium. The current zoning would allow for activities that are inappropriate to the site and which would adversely affect the environment values. • Economic costs – None identified. • Social costs – The inappropriate current zoning of the site has the potential to cause confusion and uncertainty around the future of the land. 	<ul style="list-style-type: none"> • Environmental costs – None identified. • Economic costs – Medium. Costs of processing the Plan Change. The proposed zoning is more restrictive around possible land uses, potentially impacting the land value. • Social costs – None identified.
Benefits	<ul style="list-style-type: none"> • Environmental benefits – None identified. • Economic benefits – None identified. • Social benefits – None identified. 	<ul style="list-style-type: none"> • Environmental benefits – High. The proposed zoning would enable the ecological and landscape values of the land to be protected and enhanced. • Economic benefits – None identified. • Social benefits – Proposed zoning would increase certainty for the public that the land will continue to be used in an appropriate manner.
Efficiency & Effectiveness of achieving Objectives	<ul style="list-style-type: none"> • The Plan's objectives would be less efficiently and effectively achieved, as Open Space A zoning is inappropriate for the site. 	<ul style="list-style-type: none"> • Most efficient and effective in achieving the Plan's objectives and policies, as the proposed zoning is most appropriate and contributes to values within Plan objectives. • Improves the efficient functioning of the District Plan.
Most appropriate for achieving Objectives	<ul style="list-style-type: none"> • Not considered appropriate, as the zoning does not reflect the current land use, may create uncertainty, and would allow for inappropriate activities. 	<ul style="list-style-type: none"> • Appropriate, as the proposed zoning would reflect and protect the existing ecological and landscape values.

Table 11: Rezoning of 68A Victory Avenue		
	OPTION 1: Do Nothing – Retain Existing Provisions	OPTION 2: Amend Wording This is the RECOMMENDED option.
Description	Rezoning of 68A Victory Avenue from Open Space A to Outer Residential.	
Costs	<ul style="list-style-type: none"> • Environmental costs – Medium. Land is currently in an unkempt condition. • Economic costs – High. Economic potential of the land can not be presently realised. Land cannot be used for residential development except by applying for a resource consent. • Social costs – Medium. Land remains under utilised and does not contribute to the community in a positive way. 	<ul style="list-style-type: none"> • Environmental costs – Low. Due to the existing constraints on the site (i.e. topography, shape), future residential development has the potential to adversely impact on the local environment. • Economic costs – Low. Costs of processing the Plan Change. • Social costs – None identified.
Benefits	<ul style="list-style-type: none"> • Environmental benefits – Low. Existing environmental state does not contribute positively to the surrounding area. • Economic benefits – None identified. • Social benefits – None identified. 	<ul style="list-style-type: none"> • Environmental benefits – Medium. If appropriately managed by Plan rules and any future resource consent process, residential development could enhance the local environment. • Economic benefits – High. Land value would be maximised and land would have the ability to be utilised for development. • Social benefits – Medium. Residential development has the potential to contribute to the vibrancy and vitality of the local community.
Efficiency & Effectiveness of achieving Objectives	<ul style="list-style-type: none"> • The Plan’s objectives would be less efficiently and effectively achieved, as the land is not currently being effectively used and the site has no relevant values protected by District Plan objectives. 	<ul style="list-style-type: none"> • Most efficient and effective in achieving the Plan’s objectives and policies, as the proposed zoning is most appropriate to the site. • Improves the efficient functioning of the District Plan.
Most appropriate for achieving Objectives	<ul style="list-style-type: none"> • Not considered appropriate, as the site is under utilised and unkempt. Desirable development cannot reasonably take place under existing zoning. 	<ul style="list-style-type: none"> • Appropriate, as the proposed zoning would allow for a reasonable use of the site. Outer Residential provisions would be able to protect the amenity of neighbours and minimise adverse environmental effects.