



Opotiki District Council

Section 32 Evaluation Report

15. Subdivision

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1. Introduction

Subdivision is a means of creating areas of land or parts of buildings which are separately identifiable and which may then be sold, leased or otherwise passed to a different ownership. Control of subdivision of land is one of the functions of Council, under Section 31 of the Resource Management Act 1991 (RMA).

The focus of the RMA is on sustainable management and the effects of activities on the environment. Subdivision may not have direct effects but often allows a more intensive form of development to take place. It is important to ensure that lots created by subdivision will be sustainable, in terms of the effects on natural and physical resources, the demand for services such as water supply, sewage disposal, traffic generation, effects on the amenity values of the area, effects on the life-supporting capacity of versatile land, and on the quality of the environment.

Subdivision occurs throughout the district, subject to different standards for each zone, such as minimum areas, dimensions and the requirement for services. These standards assist in ensuring that the quality of the zone environment is maintained. It is the intention of this Plan to establish an approach to subdivision that will facilitate sustainable land uses, while retaining flexibility in controls.

There is a general expectation that there is an automatic right to build a house on a parcel of residential or rural land, particularly following subdivision, as the District Plan has generally allowed one house per lot as a permitted activity. However this assumption may not be appropriate in every case, where the environment has specific values or characteristics to be protected. Rules for managing buildings and other activities are contained in the other chapters of the Plan.

Section 11 of the RMA exempts a partition of Maori land held by members of the same hapū from the subdivision requirements of the RMA. The process for allocation of Maori land by hapū partition is administered by the Maori Land Court, and not by Council.

Section 32 of the RMA requires Council to carry out an evaluation before a plan is publicly notified and before making a decision on submissions. The evaluation must examine whether each objective is the most appropriate way to achieve the purpose of the RMA and whether, having regards to their efficiency and effectiveness, the policies and other methods including rules are most appropriate or achieving the objectives. The evaluation must take into account the benefits and costs of policies, rules or other methods, as well as the risk of acting or not acting if there is uncertain or insufficient information about the subject.

This report provides the required evaluation of the objectives, policies and methods including rules relating to subdivision.

2. Legislative Framework

2.1. Resource Management Act 1991 (RMA)

The Council is required to prepare a district plan for its district under section 73 of the RMA. The district plan must be prepared in accordance with the Council's functions under section 31 and the provisions of Part 2 of the RMA. The Council's functions under section 31 are to achieve the integrated management of the effects of the use, development or protection of land and associated natural and physical resources of the District.

Section 5 of the RMA sets out the purpose of the RMA as follows:

- (1) *The purpose of this Act is to promote the sustainable management of natural and physical resources.*
- (2) *In this Act, sustainable management means managing 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, or mitigating any adverse effects of activities on the environment.*

Sustainable management of the land resource is fundamental to being able to meet the needs of future generations and the life-supporting capacity of soil and water and hence managing the effects of subdivision is important to achieve the purpose of the RMA.

Section 6 lists matters of national importance which must be recognised and provided for in achieving the purpose of the RMA. The effects of subdivision are a matter to consider in relation to section 6 matters, in particular subsections (a), (b), (c), (d), (e) and (f):

Section 7 requires that regard is given to a number of matters relevant to activities on the surface of the water, as follows: kaitiakitanga, the ethic of stewardship, the efficient use and development of natural and physical resources, the maintenance and enhancement of amenity values, intrinsic values of ecosystems, maintenance and enhancement of the quality of the environment, and the protection of the habitat of trout and salmon.

Section 31 of the RMA gives Council the responsibility for managing any actual or potential effects of the use, development or protection of land and in particular requires Councils to develop rules to prevent or mitigate any adverse effects of subdivision of contaminated land. Under section 11 of the RMA, subdivision can only be undertaken if there is a rule in the district plan or resource consent has been obtained. Therefore, controlling subdivision is required by the RMA. Section 77 enables the Council to include rules requiring esplanade reserves or strips to be set aside.

2.2. National Policy Statements

The Council must give effect to National Policy Statements in the District Plan under sections 55 and 75(3)(a) of the RMA.

New Zealand Coastal Policy Statement (NZCPS)

The NZCPS provides guidance for addressing issues in the coastal environment, part of which is contained in the District. The Council must give effect to the provisions of the NZCPS under section 75(3)(b). The NZCPS contains seven objectives and 29 policies, of which the following objectives and their associated policies are relevant to subdivision:

- Objective 2, which relates to preserving the natural character of the coastal environment and protecting natural features and landscape values, including from the effects of subdivision.
- Objective 3, which relates to the principles of the Treaty of Waitangi, the role of tangata whenua as kaitiaki and tangata whenua involvement in the management of the coastal environment.
- Objective 4, which relates to the maintenance and enhancement of public open space qualities and recreation opportunities, including public access, of the coastal environment.
- Objective 5 – ensuring that coastal hazard risks are managed and responded to.
- Objective 6, which enables people and communities to provide for their social, economic and cultural wellbeing and their health and safety through subdivision, use and development.

The NZCPS acknowledges that the coastal environment will vary from locality to locality. In the Ōpōtiki District, the coastal environment has been mapped in the Operative BOP Regional Policy Statement (RPS) and this has been adopted for this plan.

National Policy Statement on Electricity Transmission 2008 (NPSET)

The NPSET provides objectives and policies to recognise the national importance of the national grid and to guide the effects on and from the national grid in relation to other activities. The NPSET recognises that the National Grid is a physical resource of national significance and that it plays a vital role in the wellbeing of New Zealand, its people and the environment. The NPSET helps to ensure that there is a nationally consistent approach to the National Grid.

2.3. National Environmental Standards

Section 44A of the RMA requires the Council to ensure that a rule in the district plan does not duplicate, or be in conflict with, a national environmental standard. There are five National Environmental Standards (NES).

- National Environmental Standards for Air Quality (NESAQ)
- National Environmental Standards for Sources of Drinking Water (NESWQ)
- National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health (NESCS)
- National Environmental Standards for Electricity Transmission Activities 2009 (NESETA)
- National Environmental Standard for Telecommunications Facilities 2008 (NESTF)

The **NESCS** provides a nationally consistent set of planning controls and soil contaminant values to ensure that land affected by contaminants in soil is appropriately identified and assessed before it is developed. If necessary, the land must be remediated or the contaminants contained to make the land safe for human use. It requires district councils to assess proposals for subdivision for a change from production land in accordance with the level of risk.

2.4. Regional Policy Statement

Section 74 of the RMA requires that the District Plan must give effect to the Operative RPS.

The RPS identifies regionally significant issues as including:

- Inadequate recognition and provision for matters of national importance
- Effects of growth and development pressures on access to the coast, lakes and rivers, ancestral sites and historic heritage
- Inadequate recognition of kaitiakitanga, the Maori environmental resource management system and Te Tiriti o Waitangi principles
- Insufficient protection of tangata whenua environmental values
- Degradation of mauri of land and water
- Uncoordinated growth and development
- Land supply and inefficient patterns of land use
- Reverse sensitivity effects on infrastructure
- Fragmentation of rural land
- Effects of urban and rural subdivision on natural features and landscapes
- Conflict between incompatible or sensitive activities and rural production activities in rural areas
- Integration of land use and infrastructure.
- Significant adverse effects on the natural character and ecological functioning of the coastal environment;
- Effects of land use on Ōhiwa Harbour, including increased sedimentation.

Objective	RPS Objective	Policies	Relevance
6	Provide for the social, economic, cultural and environmental benefits of, and the use and development of nationally and regionally significant infrastructure and renewable energy	EI 3B EI 4B	Protecting nationally and regionally significant infrastructure Recognising the benefits from nationally and regionally significant infrastructure and the use and development of renewable energy
7	Provide for the appropriate management of: (a) any adverse environmental effects (including effects on existing lawfully established land uses) created by the development and use of infrastructure and associated resources; (b) any reverse sensitivity effects on established, consented or designated infrastructure.	EI 7B	Managing the effects of infrastructure development and use

10	Cumulative effects of existing and new activities are appropriately managed	IR3B IR5B	Adopting an integrated approach Assessing cumulative effects
18	The protection of historic heritage and outstanding natural features and landscapes from inappropriate subdivision, use and development	IW 2B MN 1B	Recognising matters of significance to Maori Recognise and provide for matters of national importance in relation to rivers and their margins
19	The preservation of the natural character of the regional coastal environment (including coastal marine areas) wetlands, lakes and rivers and their margins	MN 1B	Recognise and provide for matters of national importance
20	The protection of significant indigenous habitats and ecosystems, having particular regards to their maintenance, restoration and intrinsic values	MN1B MN2B	Recognise and provide for matters of national importance Giving particular consideration to protecting significant indigenous habitats and ecosystems
24	An efficient, sustainable, safe and affordable transport network, integrated with the region's land use patterns	UG 1A UG2A	Protecting the national and regional strategic transport network Identifying a consistent road hierarchy
26	The productive potential of the region's rural land resource is sustained and the growth and efficient operation of rural production activities are provided for	UG 18B UG23B UG 20B UG24B UG 21B B	Managing rural development and protecting versatile land Providing for the operation and growth of rural production activities Managing reverse sensitivity effects on rural production activities and infrastructure in rural areas Managing reverse sensitivity effects on rural production activities in urban areas Provision for utilisation of mineral resources

3. Key Issues

3.1 The key issues to be addressed in relation to activities on the surface of the water are as follows:

#	Issue	Commentary
1	Subdivision may compromise the amenity values and character of the surrounding environment	Increased density through subdivision and resulting changes in land use or building development can change the visual character of an environment and lead to loss of amenity through increased noise, lighting, traffic generation and the like.
2	Demands for services for development may not be financially and environmentally	Sporadic subdivision cannot support communal or Council infrastructure such

	sustainable for the community in the long term.	as water supplies or wastewater treatment systems
3	If the land is subject to natural hazards, subdivision may increase exposure of people and assets to the hazard.	Parts of the District are susceptible to flooding from rivers, inundation or erosion along the coast. Subdivision of land at risk of natural hazard should not increase the risk to people and property.
4	The subdivision of land for lifestyle lots can compromise the surrounding working rural environment and lead to reverse sensitivity effects	New residents of small lot subdivision for lifestyle purposes can have unrealistic expectations about the amenity of rural areas and complain about noise, odour, dust, traffic, etc. This can lead to constraints on rural production activities.
5	Coastal and riparian areas, aquatic ecosystems, indigenous vegetation, and dunelands and wetlands need to be protected where appropriate to maintain landscape values, amenity values, and ecological and biodiversity values including important flora and fauna habitats	Subdivision can lead to vegetation clearance and bring more people into an area, disturbing important habitats and environments.
6	The subdivision of land provides an opportunity to protect sites of cultural, ecological, scientific, or historical value.	Where subdivision affects a site with identified values, there can be an opportunity to secure a formal protection of part of the site and its values.
7	Further subdivision can adversely affect the safe and efficient functioning of regionally significant infrastructure and the National Grid	New subdivision can bring buildings or other activities close to infrastructure, constraining maintenance or future expansion.
8	The versatile land in the District may be degraded and fragmented as a result of inappropriate subdivision	Small lot subdivision of versatile land often changes the use from rural production to residential with a consequential loss of production.
9	Ad hoc provision for public access to the coast, rivers, and streams to provide for a wide range of recreational and leisure opportunities does not benefit the community or environmental values	Public access needs to be provided in an integrated manner to be most effective
10	Public access and increasing demand for public facilities along rivers and the coastline can result in a loss of aquatic and terrestrial habitats and conservation values if not managed effectively	While public access is encouraged, it may need to be controlled to avoid over-use and consequential loss of values and damage to habitats
11	Subdivision of sites identified as HAIL sites can result in unacceptable risks to human health or the environment	information needs to be provided about past use of land to avoid risk to public health if there is a change of land use on subdivision.
12	Subdivision can result in cumulative losses of ecosystem extent and representativeness (including rare and	New subdivision can lead to vegetation clearance and access roads and tracks that damage habitats and vegetation

	threatened habitats) through vegetation clearance for building sites and increased plant and animal pests	over time.
13	Increased stormwater runoff from land developed following subdivision can decrease surface water quality (including wetlands) and habitat quality for aquatic fauna	Development following subdivision can increase hard surfaces, including buildings, and this needs to be addressed in the design of lots and building sites,
14.	Sites created by subdivision need to be the right size for the intended use, have safe access and have connections appropriate services, according to the location and infrastructure available	Sites need to be big enough for the proposed type of buildings and use and have suitable services and access for the intended use. if Council services are available then connections need to be required.

4. Summary of Plan Provisions

The issues, objectives, policies, rules and other provisions and their relationship in the PDP are set out in the following table.

Issue	Objective	Policies	Rules	Other Methods
15.1.1	15.2.1	15.2.1.1, 15.2.1.2, 15.2.1.6	15.3.4, 15.4.1, 15.4.2 15.6 15.8	
15.1.2	15.2.2	15.2.1.1, 15.2.2.1, 15.2.2.3	15.4.1.2, 15.4.4, 15.5.4, 15.5.5, 15.5.6, 15.5.7, 15.5.8 15.6 15.8	
15.1.3	15.2.1	15.2.1.1	15.3.3, 15.5.3 15.6 15.8	
15.1.4	15.2.1	15.2.1.1, 15.2.1.4, 15.2.1.5	15.4.1 15.8	
15.1.5	15.2.1, 15.2.3	15.2.1.2, 15.2.1.6, 15.2.3.1, 15.2.3.3	15.4.2, 15.4.3, 15.5.9, 15.4.2.4, 15.6 15.8 15.10	15.11.1
15.1.6	15.2.1, 15.2.3	15.2.1.6, 15.2.3.3	15.4.3, 15.5.12 15.8 15.01	15.11.1
15.1.7	15.2.2	15.2.2.1, 15.2.2.2, 15.2.2.4	15.5.4, 15.5.10, 15.5.11 15.6 15.7 15.8	
15.1.8	15.2.1	15.2.1.3	15.4.22, 15.4.2.3 15.6	

Issue	Objective	Policies	Rules	Other Methods
			15.8	
15.1.9	15.2.3	15.2.3.2	15.6 15.8 15.10	15.11.1
15.1.10	15.2.3	15.2.3.1, 15.2.3.2, 15.2.3.3, 15.2.3.4	15.6 15.8 15.10	15.11.1
15.1.11	15.2.1	15.2.1.1	15.6 15.8	
15.1.12	15.2.1, 15.2.3	15.2.1.2, 15.2.1.6, 15.2.3.1, 15.2.3.3	15.4.3, 15.5.12, 15.5.13 15.8 15.10	15.11.1
15.1.13	15.2.1, 15.2.2, 15.2.3	15.2.1.2, 15.2.1.6, 15.2.2.3	15.5.7 15.6 15.8 15.10	15.11.1
15.1.14	15.2.1	15.2.1.1, 15.2.2.1, 15.2.2.2, 15.2.2.3	15.3.4, 15.4.4, 15.5.4, 15.5.5, 15.5.6, 15.5.7, 15.5.8, 15.5.9, 15.5.10 15.8	

5. Changes Made to ODP Approach

- 5.1 The ODP has a dedicated chapter for Subdivision in section 10 and the different zone requirements for size, frontage and access are contained in the zone sections. While few material changes have been made, chapter 15 now contains all subdivision rules.
- 5.2 A number of minor amendments have been made to the objectives, policies, rules and other methods to clarify provisions where unclear, delete unnecessary text and update references.
- 5.3 New rules have been included to address subdivision in the new zones, marine Services and Harbour Industrial, but otherwise the controls on subdivision remain similar to the ODP. New rules require specific provision for water, waste water and stormwater management, including connections where Council infrastructure is available.
- 5.4 New rules have also been included where subdivision affects land that may be near or within the National Grid Yard. This includes introducing restricted discretionary activity status for such subdivision.

6. Evaluation – Appropriateness of Objectives

- 6.1 Objectives are to be assessed as to whether they are the most appropriate to achieve the purpose of the RMA. ‘Most appropriate’ has been interpreted to mean ‘suitable’.

	ODP Objectives	Appropriateness
15.2.1	Subdivision within the district maintains the quality of the environment, and	Addresses Issues 15.1.1, 2, 4, 5, 6, 8, 10, 12, and 13.

	<p>enables the sustainable management of the natural and physical resources of the district</p>	<p>Section 5: The objective promotes the purpose of the RMA by seeking outcomes that provide for the sustainable management of natural and physical resources of the District.</p> <p>Section 6: The objective seeks to maintain the quality of the environment, which includes matters of national importance</p> <p>Section 7: The objective provides for the efficient use and development of natural and physical resources, the maintenance and enhancement of amenity values and the maintenance and enhancement of the quality of the environment in accordance with section 7(b), (c), and (f).</p> <p>Section 8: The objective is consistent with the principles of the Treaty.</p> <p>RPS: It gives effect to Objectives 2, 10, 18, 19, 20, 21 and 26 of the RPS and associated policies</p>
<p>15.2.2</p>	<p>Subdivision of land does not adversely affect the safe and efficient functioning of regionally significant infrastructure and the National Grid and the capacity of roads and infrastructure to service new development</p>	<p>Addresses Issues 15.1.2, 7, 13, and 14.</p> <p>Section 5: The objective will achieve the purpose of the RMA by seeking the sustainable management of physical resources of the district and the wellbeing of the community.</p> <p>Section 6: There are no matters of national importance addressed through this objective. The electricity transmission network is a matter of national significance under the NPSET.</p> <p>Section 7: The objective provides for the efficient use and development of physical resources in accordance with section 7(b).</p> <p>Section 8: The objective is consistent with the principles of the Treaty.</p> <p>RPS: It gives effect to Objectives 6 and 7 of the RPS and associated policies</p>
<p>15.2.3</p>	<p>An integrated network of esplanade reserves or strips is provided for public access to rivers, streams and the coast, where this is consistent with conservation values</p>	<p>Addresses Issues 15.1.1, 5, 6, 9, 10, and 12</p> <p>Section 5: The objective will achieve the purpose of the RMA by seeking outcomes that provide for the sustainable management of natural and physical resources of the District.</p> <p>Section 6: The objective relates to outcomes which support the achievement of several matters of national importance – 6(a), (b), (c), and (d).</p> <p>Section 7: The objective provides for a number of matters in accordance with section 7(b), (c), (d), (f), (g) and (h).</p>

		<p>Section 8: The objective is consistent with the principles of the Treaty.</p> <p>RPS: It gives effect to Objectives 2, 18, 19, and 20 and associated policies</p>
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6.2 These objectives are considered to be the most appropriate methods of achieving the purpose of the RMA as they recognise the matters set out in Part 2, they give effect to the relevant objectives and policies in the RPS, and they will guide the appropriate management of subdivision.

7. Evaluation – Achieving the Objectives

7.1 Section 32(1)(b) Requirements

Section 32(1)(b) of the RMA requires examination of whether the provisions (being policies, rules and other methods) in the Proposed Plan are the most appropriate way to achieve the objectives. The appropriateness must be considered in relation to:

- “(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”.*

These are set out below.

The assessment must be at a level of detail that corresponds to the scale and significance of the environmental, economic, social and cultural effects of the Proposed Plan. The Operative District Plan contains an existing section, Section 10, to manage subdivision, as well as subdivision rules in each zone. As set out in section 5 above, the approach taken in the Proposed District Plan is to amend the provisions only where necessary to:

- Clarify the provisions;
- Improve consistency across the Plan;
- Respond to new statutory requirements, such as through a national or regional policy statement;
- Delete unnecessary text;
- Update references.

Only where there are new statutory requirements through a national policy statement or regional policy statement have new provisions been introduced. A change in activities or the way they are managed requires examination of the provisions in more detail.

Therefore, as the plan provisions, being policies and rules, have not materially changed and are generally well understood and accepted as appropriate mechanisms to achieve environmental outcomes sought through the district plan, a detailed re-examination of the plan provisions is not considered to be necessary.

7.2 Reasonably Practicable Options

In terms of reasonably practicable options, as discussed above, the plan provisions have been generally carried forward. The reasonably practicable options are therefore considered to be:

Options	Response
Do nothing	<ul style="list-style-type: none"> ▪ No policy or rule in the plan. ▪ Rely on other non-statutory methods as set out in the chapter ▪ BOPRC plan provisions address the issue and duplication is unnecessary
Status Quo	<ul style="list-style-type: none"> ▪ Carry forward the policy or rule without change or with only minor amendment
New policy or provision	<ul style="list-style-type: none"> ▪ Address an issue that is not addressed or is ineffective in the operative plan ▪ Give effect to a new requirement in a NPS or RPS ▪ Align with plans or other statutory documents

7.1.5 The plan provisions have been generally carried forward with amendments to clarify and improve consistency across the plan and with other documents. the status of activities and standards to be applied are well known to the community and well understood.

7.1.6 The “Do Nothing” option has not been selected as it is not acceptable where a policy or rule is required to achieve the purpose of the RMA and the objectives set out above. Either the status quo (with or without minor amendments for clarification) or a new provision have been assessed as reasonably practicable options. The proposals are concluded to be the only reasonably practicable options to evaluate.

7.3 Policies and methods

7.3.1 Efficiency and Effectiveness

In assessing the efficiency and effectiveness of the proposed provisions, the RMA requires the Council to “*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”.*

If practicable, the benefits and costs referred should be quantified.

7.3.2 Efficiency

The proposed policies will be efficient in achieving the objectives as they give clear direction for potential activities on the surface of the water and guidance for decision makers.

7.3.3 Effectiveness

Objective 15.2.1

Issue relationship	
Objective 15.2.1	Subdivision within the district maintains the quality of the environment, and enables the sustainable management of the natural and physical resources of the district
Policies 15.2.1.1 15.2.1.2 15.2.1.3 15.2.1.4 15.2.1.5 15.2.1.6	<p>To ensure that lots are of a size, design and density that is consistent with the characteristics and purpose of the zone and suitable for the intended use.</p> <p>To avoid, remedy, or mitigate the adverse effects of subdivision and other land uses on ecological, landscape, heritage and cultural values.</p> <p>To avoid the fragmentation and loss of the productive rural land, and in particular versatile land.</p> <p>To ensure that subdivision does not compromise rural production activities.</p> <p>To manage the effects of new small lot subdivision for rural residential purposes in sensitive rural and coastal environments.</p> <p>To avoid subdivision of land that would result in the modification, degradation or destruction of significant natural and cultural heritage features, or reduction of threatened, under-represented and originally rare ecosystem or vegetation types, and to encourage legal protection where practicable.</p>
Methods	<p>Methods to give effect to the policies relate to:</p> <ul style="list-style-type: none"> ▪ Establishing minimum lot sizes and dimensions appropriate to the intended use anticipated within each zone. ▪ The status of subdivision, being less restrictive for subdivision consistent with the outcome for each zone and where the environment is less sensitive to adverse effects from change ▪ Enabling controls to be imposed through the consent process for subdivision that could otherwise result in reverse sensitivity effects or adversely affect the character and amenity of the zone environment ▪ Requiring consideration of the scale and effects of new subdivision in rural and coastal environments. ▪ Controlling subdivision of versatile land where further subdivision could remove land from use for rural production activities. ▪ Using legal protection mechanisms where possible to protect sites of identified value and the margins of the coast and riparian areas. ▪ The use of the different status classes to respond to subdivision in different zones and environments
Benefits	
Environmental benefits	<ul style="list-style-type: none"> ▪ Provides clear guidance through the objective, policies, and rules for

	<p>subdivision in accordance with each zone.</p> <ul style="list-style-type: none"> ▪ Sets expectations for size and appropriateness of lots to achieve the outcomes sought for each zone ▪ Requires that lots are suited to their intended use. ▪ Requires maintenance of lots in the Rural Zone suitable for rural production activities. ▪ Well understood approach which achieves the purpose of managing subdivision in a way that is consistent with the objectives
Economic Benefits	<ul style="list-style-type: none"> ▪ Gives certainty that about the expected area and dimensions of lots in each zone. ▪ Enables subdivision and development consistent with the outcomes sought for each zone. ▪ Greater certainty about the types of effects that will be controlled ▪ Gives controlled activity status to subdivision in urban zones where the outcomes are easier to manage. ▪ Uses the hierarchy of other activity status to manage subdivision according to their potential consequential effects to reduce costs.
Social Benefits	<ul style="list-style-type: none"> ▪ Supports a range of lot sizes suitable for their intended uses ▪ Enables subdivision and consequential development of land in accordance with lot size, to support the zone outcomes.
Cultural Benefits	<ul style="list-style-type: none"> ▪ No specific cultural benefits identified
Costs	
Environmental Costs	<ul style="list-style-type: none"> ▪ Risk of environmental effects is addressed through the objective, policies and rules ▪ Some opportunity remains for subdivision to adversely affect the environment, especially through cumulative change in density
Economic Costs	<ul style="list-style-type: none"> ▪ May be increased application costs associated with management of subdivision in some zones
Social Costs	<ul style="list-style-type: none"> ▪ Subdivision may be limited where it would compromise the values of the rural environment in particular, and hence the opportunity for settlement
Cultural Costs	<ul style="list-style-type: none"> ▪ No specific cultural costs identified
Risk of Acting or Not Acting	<p>Risk is a factor of potential consequences and the likelihood of a consequence occurring.</p>
	<p>The risk of not acting may lead to ad hoc subdivision, including fragmentation of versatile land, for activities that do not rely on the rural land resource, resulting in loss of potential productivity and its values to the community. There may be consequentially loss of social and economic opportunities.</p> <p>The risk of not acting is not consistent with achieving the purpose of the RMA, and especially section 6 and 7.</p> <p>There is sufficient information known about the consequences</p>
Overall Assessment	<p>The inclusion of the provisions above is supported as enabling the purpose of the RMA to be achieved including sections 6 and 7 matters.</p>

Objective 15.2.2

Issue relationship	15.1.2, 7, 13
Objective 15.2.2	Subdivision of land does not adversely affect the safe and efficient functioning of regionally significant infrastructure and the National Grid

	and the capacity of roads and infrastructure to service new development
Policies	
15.2.2.1	To manage the effects of development so that services and roads associated with the subdivision are provided or upgraded to an appropriate standard.
15.2.2.2	To ensure safe access to and from the transport network by requiring accesses to be constructed to a design standard that is appropriate for their intended use.
15.2.2.3	To ensure new sites have services appropriate to their intended use.
15.2.2.4	To manage subdivision within the National Grid Corridor and within 20m of the boundary of a designated National Grid substation to avoid sensitive land use or inappropriate activities from compromising the operation, maintenance, upgrading and development (including access) of the National Grid.
Methods	<p>Methods to give effect to the policies relate to:</p> <ul style="list-style-type: none"> ▪ Status of subdivision within or near the National Grid Corridor to enable effects to be managed and Transpower to be consulted. ▪ Access standards in accordance with road hierarchy and local conditions ▪ Standards requiring water, stormwater and wastewater connections where reticulated services are available ▪ Standards requiring appropriate services to be provided where reticulated services are not available ▪ Enabling controls to be imposed through the consent process for activities that could result in constraints on the maintenance and upgrade of network utilities and regionally significant infrastructure.
Benefits	
Environmental benefits	<ul style="list-style-type: none"> ▪ Provides clear guidance through objectives, policies, status and standards to provide appropriate services. ▪ Will require safe access to new sites. ▪ Provides a process to manage subdivision near the National Grid Corridor. ▪ Well understood approach which achieves the purpose of the objective
Economic Benefits	<ul style="list-style-type: none"> ▪ Gives certainty about the requirements on subdivision for services and access ▪ All new lots have appropriate services and access ▪ Protects the National Grid Corridor from compromise ▪ Uses the hierarchy of other activity status to manage activities according to their effects to reduce costs of establishment.
Social Benefits	<ul style="list-style-type: none"> ▪ Provides lots that are suitable for their intended use ▪ Subdivision will have services appropriate to maintaining a healthy environment to live and work in
Cultural Benefits	<ul style="list-style-type: none"> ▪ No specific cultural benefits identified
Costs	
Environmental Costs	<ul style="list-style-type: none"> ▪ Some risk remains that lots may not be appropriate to their intended

	use as the demands for different activities change over time.
Economic Costs	<ul style="list-style-type: none"> ▪ May be increased application costs associated with subdivision, in relation to investigations and design ▪ Increased costs of providing services and access to the required standard.
Social Costs	<ul style="list-style-type: none"> ▪ Some subdivision may be unaffordable in locations where the cost of servicing or access is higher ▪ Not all expectations for subdivision may be compatible with the expectations for servicing or due to proximity to the National Grid Corridor.
Cultural Costs	<ul style="list-style-type: none"> ▪ No specific cultural costs identified
Risk of Acting or Not Acting	Risk is a factor of potential consequences and the likelihood of a consequence occurring.
	<p>The risk of not acting may lead to development of land without appropriate services and safe access. There may be consequentially loss of social and economic opportunities.</p> <p>The risk of not acting is not consistent with achieving the purpose of the RMA, and especially section 6 and 7.</p> <p>There is sufficient information known about the consequences</p>
Overall Assessment	The inclusion of the provisions above is supported as enabling the purpose of the RMA to be achieved including sections 6 and 7 matters.

Objective 15.2.3

Issue relationship	15.1.5, 6, 9, 10,12, and 13
Objective 15.2.3	An integrated network of esplanade reserves or strips is provided for public access to rivers, streams and the coast, where this is consistent with conservation values
Policies	
15.2.3.1	Esplanade reserves or esplanade strips will be required to maintain or enhance public access to the coast and the main rivers, and for conservation purposes, public recreational use, and enhancement of water quality and riparian habitats .
15.2.3.2	Esplanade reserves or esplanade strips will be required for subdivision of land resulting in lots four hectares or greater only where the coast or river is of high value to achieve an integrated network for public access or for public recreation and this is compatible with conservation values.
15.2.3.3	To give priority to acquiring esplanade reserves or strips which protect sites or features of cultural, botanical, ecological, historical, or scenic significance, consulting with Iwi and Hapū where appropriate.
15.2.3.4	Public access to and along esplanade reserves/strips will be restricted where necessary to protect important conservation values and to protect the management of stock on adjoining properties.
Methods	<p>Methods to give effect to the policies relate to:</p> <ul style="list-style-type: none"> ▪ Requiring 20m wide esplanade reserves on subdivision in accordance with the rules in the Plan.

	<ul style="list-style-type: none"> ▪ Enabling provision of a 20m wide esplanade strip where this would be more appropriate to the specific environment and continuity of access ▪ Identifying areas where public access will be promoted or restricted, depending on the values of the riparian area. ▪ Allowing a waiver only where there would be no current or foreseeable benefits to be obtained.
Benefits	
Environmental benefits	<ul style="list-style-type: none"> ▪ Provides clear guidance through the objective, policies, and rules for securing esplanade reserves. ▪ Sets the expectation that an esplanade reserve will be required on subdivision ▪ Uses the subdivision process to consider the values of riparian margins and their protection ▪ Well understood approach which achieves the intent of the objective
Economic Benefits	<ul style="list-style-type: none"> ▪ Gives certainty that the esplanade reserves will be required on subdivision. ▪ Provision of public access supports the attractiveness of the district to live in or visit.
Social Benefits	<ul style="list-style-type: none"> ▪ Supports public access where appropriate to the values of the waterbody or coast. ▪ Protects places of special value to the community.
Cultural Benefits	<ul style="list-style-type: none"> ▪ Provides for protection of places of cultural value in riparian areas.
Costs	
Environmental Costs	<ul style="list-style-type: none"> ▪ There is a need to identify values of esplanade reserves and manage public access appropriate to the values which can be difficult to achieve. ▪ Where subdivision does not involve small lots securing esplanade reserves cannot be required, leading to loss of continuity of access or of protection.
Economic Costs	<ul style="list-style-type: none"> ▪ May be increased application costs associated with subdivision through assessment of riparian and coastal values. ▪ Loss of land area from lots created
Social Costs	<ul style="list-style-type: none"> ▪ Esplanade reserves or strips can lead to public intrusion into private land where people do not respect the limited access available.
Cultural Costs	<ul style="list-style-type: none"> ▪ No specific cultural costs identified
Risk of Acting or Not Acting	<p>Risk is a factor of potential consequences and the likelihood of a consequence occurring.</p> <p>The risk of not acting may lead to loss of opportunities to secure esplanade reserves or strips and the provision of public access or protection of special values. There may be consequentially loss of social and economic opportunities.</p> <p>The risk of not acting is not consistent with achieving the purpose of the RMA, and especially section 6 and 7.</p> <p>There is sufficient information known about the consequences</p>
Overall Assessment	<p>The inclusion of the provisions above is supported as enabling the purpose of the RMA to be achieved including sections 6 and 7 matters.</p>