

T O L L E M A C H E

C O N S U L T A N T S L T D .

Auranga B2 Private Plan Change Request

Planning Assessment: Section 32 Assessment

Application to Auckland Council pursuant to
Schedule 1 of the Resource Management Act 1991



**Proposed Drury 2 Precinct in
the Auckland Unitary Plan**

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1. INTRODUCTION

- 1.0.1. This report documents the section 32 statutory analysis undertaken in support of an application by Karaka and Drury Ltd ("KDL") for a private plan change ("PPC") to rezone an area of land known as Auranga B2 (comprising an area of approximately 33.65ha) from Future Urban ("FUZ") to Town Centre Zone ('TC'), Terraced Housing and Apartment Zone ("THAB"), and Mixed Housing Urban Zone ("MHU").
- 1.0.2. The land falls within the wider Auranga MasterPlan, and the Auckland Council Drury Opaheke Structure Plan ("DOSP").
- 1.0.3. The application has been made to Auckland Council ("Council") under the Resource Management Act 1991 ("RMA") and the Auckland Unitary Plan (Operative in Part) ("AUP: OP").

2. STATUTORY REQUIREMENTS

2.1. Section 32

- 2.1.1. Section 32 of the RMA sets out the requirements for preparing and publishing evaluation reports for proposals for a plan change (amending proposal) to an existing plan (existing proposal). The overall purpose of section 32 in that context is to ensure that any provisions proposed through a plan change are evidence-based, clear and certain, and the best means to achieve the purpose of the RMA. An evaluation of the proposed provisions is required prior to notification of the proposed plan change. The section 32 evaluation report sets out the reasoning and rationale for the proposed provisions and should be read in conjunction with those.

- 2.1.2. In particular, section 32(1) requires that, prior to public notification of a proposed plan change, Council must:

(a) "examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and

(b) 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;"

The evaluation report must also contain a level of detail that,

(c) corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.

2.1.3. When assessing efficiency and effectiveness of the provisions in achieving the objectives of the proposed plan the report must under s32(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

(b) if practicable, quantify the benefits and costs referred to in paragraph (a); and

(c) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions."

2.1.4. Section 32(3) provides that if the proposal is an amending proposal, the examination under section 32(1)(b) is required to relate to:

(a) The provisions and objectives of the amending proposal; and

(b) The objectives of the existing proposal to the extent that those objectives –

i) Are relevant to the objectives of the amending proposal; and

ii) Would remain if the amending proposal were to take effect.

2.1.5. This subsection is relevant to the proposed private plan change as it will amend the existing District Plan, which by this definition is the "existing proposal".

2.1.6. Of particular relevance in the current context is that the proposed plan change provisions rely on existing objectives as well as introducing new objectives.

2.1.7. Against that background, it is necessary to consider the RMA definition of "objectives" for the purpose of evaluating the proposed plan change. The RMA defines the term "objectives" as follows:

Objectives means, -

(a) for a proposal that contains or states objectives, those objectives:

(b) for all other proposals, the purpose of the proposal.

2.1.8. Accordingly, in accordance with the requirement set out in sections 32(1)(b) and 32(3) (above), the relevant existing objectives in the District Plan are examined as well as any new objectives introduced by the PPC.

2.1.9. For completeness, this evaluation also includes an assessment of whether the new (proposed) provisions will assist to achieve the relevant existing objectives of the District Plan and not undermine them.

- 2.1.10. In addition, Section (4A) also required that any proposal which utilises a Schedule 1 process must also in the evaluation report:
- (a) summarise all advice concerning the proposal received from iwi authorities under the relevant provisions of Schedule 1; and
 - (b) summarise the response to the advice, including any provisions of the proposal that are intended to give effect to the advice.

2.2. Statutory Context

- 2.2.1. The purpose of the RMA is to promote the “sustainable management of natural and physical resources”. The term “sustainable management” is defined to mean:

“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 [emphasis added] –

(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.”

- 2.2.2. This evaluation under section 32 must, as directed in section 32(1)(a), “examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve” the purpose of the RMA.

- 2.2.3. Section 31 of the RMA sets out the functions of territorial authorities for the purpose of giving effect to the RMA, which includes:

“(a) The establishment, implementation, and review of objectives, policies, and methods to achieve integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district.”

- 2.2.4. The purpose of a district plan is to assist territorial authorities to carry out their functions to achieve the purpose of the RMA (s72).

- 2.2.5. Section 74 sets out the matters to be considered by a territorial authority for the purpose of preparing or changing its district plan. This includes its obligation to prepare an evaluation report prepared in accordance with section 32. As explained above, this report sets out that evaluation.

3. PURPOSE OF THE PLAN CHANGE AND OUTLINE OF THE PROPOSAL

- 3.0.1. The PPC is required because the Auranga B2 land is currently zoned FUZ under the AUP, meaning it cannot be developed for urban activities without a further structure planning and plan change process. The PPC is explained in detail in the AEE.
- 3.0.3. A full list of proposed provisions is contained in the AEE (as well as a description of the reasons for the proposed changes).
- 3.0.4. Full analysis for the PPC is contained in the attached appendices included with the PPC package as listed in the AEE.

4. SECTION 32 ASSESSMENT

- 4.0.1. The PPC proposes a rezoning of the subject land and the application of a new Precinct, which contains new objectives, policies, rules and/or other methods to provide for the development of the land, as well as a reliance on the underlying and operative AUP provisions.
- 4.0.3. The provisions of the AUP relevant to this PPC have undergone a full and thorough section 32 evaluation associated with the notification of the PAUP, and the AUPHP hearings. For that reason, a full assessment of the existing operative objectives, policies and rules of the AUP that are proposed to be applied to the subject land through this PPC request is not necessary. Rather, the assessment focusses on whether the existing operative provisions are appropriate. New objectives and provisions are specifically identified and addressed in the section 32 evaluation.
- 4.0.4. Section 32(2)(a) requires that councils identify and assess the costs and benefits of the environmental, economic, social and cultural effects that are anticipated from implementing the provision, including the opportunities for:
 - (a) Economic growth that are anticipated to be provided or reduced; and
 - (b) Employment that is anticipated to be provided or reduced.
- 4.0.5. The effects of the rezoning of the Auranga B2 area and application of a new Precinct are considered to be limited given that the land has been earmarked for future urban development. These matters are addressed in the section of this report considering effects on the environment.
- 4.0.6. The primary matters considered in this section 32 assessment are:
 - (a) What is the "most appropriate" zoning for the subject land in terms of s32 of the RMA?
 - (b) Should the subject land be included within a precinct?
 - (c) Does the proposed Precinct Plan layout represent the most appropriate use of the subject land?
 - (d) Are the proposed new provisions appropriate?
- 4.0.7. The alternatives and their respective costs and benefits are discussed below.

5. ALTERNATIVES

5.1. Alternative Approaches (zoning and provisions application)

5.1.1. This section addresses the alternatives associated with the rezoning of the PPC area. The alternatives to progressing a PPC are:

- (a) Retain the status quo (i.e. FUZ and wait until planned re-zoning); or
- (b) Rezone for a Business Zone (to accord with the DOSP identified "Centre")):
 - i) Re-zone the land as a Town Centre Zone; or
 - ii) Rezone the land for a low order centre (e.g. Local or Neighbourhood Centre).
- (c) Rezone for a Residential Zone
 - i) Rezone the land for a medium to low residential zone (i.e Single House Zone or Large Lot Zone);
 - ii) Rezone the land for a medium residential zone (i.e. Mixed Housing Suburban Zone);
 - iii) Rezone to a high density zone (Mixed Housing Urban Terrace Housing and Apartment Zone).

5.1.2. These alternatives are considered in Table 1 below.

5.1.3. The alternative to rezone to Countryside Living zone is not considered to be a viable option as it is entirely inconsistent with the FULSS And DOSP expectations and planning for the Drury West area; as such, it has not been considered as an option.

5.1.4. The alternative of applying for resource consent rather than a PPC is not considered to be viable as a result of the inability to achieve consistency with the policies of the RPS and FUZ.

Table 1: Assessment of Alternatives			
Options:	Benefits	Costs /Risks	Accept/Reject
Option 1: Retain the status quo (i.e. FUZ and await a Council rezoning).	<ul style="list-style-type: none">Consistent with the existing AUP.Comparatively low visual impacts as no change would be facilitated from the existing environment.Vegetation removal would be limited to normal farming and	<ul style="list-style-type: none">There is no guarantee on timing of any Council planned rezoning. Accounting for time for preparation, hearings and resolution of any appeals, this would be likely to take a further 24-30 months with the result that it would be unlikely that land would be "development ready by	Reject

Table 1: Assessment of Alternatives

Options:	Benefits	Costs /Risks	Accept/ Reject
	<p>countryside living activities.</p> <ul style="list-style-type: none"> • Earthworks would be generally limited to rural activities and small scale built form developments associated with countryside living activities and rural activities. • No changes for existing landowners in the regulatory framework. • KDL (or other landowners) would be spared the substantial costs of a PPC as the Council would meet the costs of a future public plan change. 	<p>2022" as required by the FULSS.</p> <ul style="list-style-type: none"> • Although the option to retain status quo is consistent with the current provisions, these same provisions envisage that a plan change will occur to rezone in the land (alongside appropriate infrastructure provision). Therefore, doing nothing is also inconsistent with what is envisaged by the AUP and the FULSS. • No contribution to housing supply to accommodate Auckland's growth. Almost no additional houses would result from FUZ as all or most of the sites currently have dwellings. Furthermore, without a Centre as a focal point and "heart" the emerging Auranga community is at risk of being perceived as no more than 'just another subdivision'. • Underutilisation of bulk infrastructure already in place or being currently developed by Auranga A and B1 and infrastructure providers. • Proportion of infrastructure costs associated with bulk infrastructure shared between a small number of contributing lots/units rather than spread on a lower cost per lot/unit basis over a wider number of contributing lots. 	

Table 1: Assessment of Alternatives

Options:	Benefits	Costs /Risks	Accept/ Reject
		<ul style="list-style-type: none"> No enhancement of riparian margins (unless undertaken voluntarily). Uncertainty for landowners in terms of what final urban zoning may be. Landowners continue to be restricted by restrictive planning provisions for effectively a 'holding zone'. 	
Business Rezoning Options			
Option 2: Rezone as a Town Centre Zone	<ul style="list-style-type: none"> Rezoning is the most efficient way of ensuring District Plan integrity and giving the community surety over intended environmental outcomes. A Town Centre is needed to serve the dwellings envisaged for Drury West, to become the community focal point and hub for the residents. A Town Centre zoning can provide for retail goods and services (as well as large scale convenience i.e. supermarket or department store) but local employment opportunities (retail, services and "white collar" opportunities). A Town Centre zone and scale of activity is much more likely to attract civic facilities, public squares and plazas, and services needed by the local community. Zoned land at Drury West (Auranga A and B1) 	<ul style="list-style-type: none"> Loss of remaining semi-rural character. Development will initially generate landscape and visual effects as the land transitions from rural to urban uses. Potential for oversupply if too much land is zoned-needs to be managed carefully. 	Accept in part.

Table 1: Assessment of Alternatives

Options:	Benefits	Costs /Risks	Accept/ Reject
	<p>expects a total of 2,650 dwellings; development of this community is already underway. Zoning for a town centre brings surety to that community of planned services and on the location of those services to existing homes.</p> <ul style="list-style-type: none"> • A town centre is also expected to contribute towards the accommodation of residential growth. • A town centre enables the density benefits of being near a (future) rail station to be maximised. • Growth and services in this location has the potential to reduce traffic and transport movements from the Drury West catchment (and wider western catchment of Karaka) before State Highway 1, thereby freeing up the main highway and its associated major thoroughfare intersections for other traffic and travel demands. • Growth projections in this region can support a town centre facility (of an appropriate scale) without competing with or detracting from other major centres such as the existing Metropolitan Centre of Papakura and/or another future Town Centre (or similar) in 		

Table 1: Assessment of Alternatives

Options:	Benefits	Costs /Risks	Accept/ Reject
	<p>the Opaheke-Drury East area.</p> <ul style="list-style-type: none"> The existing Lake feature can provide for recreational and amenity associated with the town centre. 		
<p>Option 3:</p> <p>Rezone for another lower centre zoning</p>	<ul style="list-style-type: none"> Rezoning is the most efficient way of ensuring district plan integrity and giving the community surety over intended environmental outcomes. Will provide some limited retail, services and small-scale employment to the surrounds. 	<ul style="list-style-type: none"> Loss of remaining semi-rural character. Development will initially generate landscape and visual effects as the land transitions from rural to urban uses. A lower centre zoning has the potential to fail in being able to provide for the ultimate development of Drury West, which will force residents to travel to other centre for retail, services and employment. This is not consistent with a principle of creating a sustainable community. Due to the range of activities limited to a Local Centre and its role and function it is less likely to be able to maximise economic development and the creation of employment when compared to a Town Centre. 	Reject
Residential Re-Zoning Options:			
<p>Option 4:</p> <p>Re-zone the land for a low density residential zone</p>	<ul style="list-style-type: none"> Rezoning is the most efficient way of ensuring district plan integrity and giving the community surety over intended environmental outcomes. 	<ul style="list-style-type: none"> Potential to undermine Council's ability to meet land supply/new dwelling targets which will continue to create adverse social and economic effects as house prices increase due to high demand which 	Reject

Table 1: Assessment of Alternatives

Options:	Benefits	Costs /Risks	Accept/ Reject
	<ul style="list-style-type: none"> Contributes some housing supply to assist with accommodating the city's growth pressures. 	<ul style="list-style-type: none"> cannot be met by adequate supply. Loss of remaining semi-rural character. Development will initially generate landscape and visual effects as the land transitions from rural to urban uses. Significant infrastructure costs (lack of density may not cover costs of works required to service the development). Loss of opportunity for higher density three storey housing, utilising land efficiently. Loss of opportunity for the efficient use of land resources. Potential to undermine viability of a Town Centre in Drury West due to a lack of population density. 	
<p>Option 5:</p> <p>Re-zone the land for medium density residential zone</p>	<ul style="list-style-type: none"> Rezoning is the most efficient way of ensuring district plan integrity and giving the community surety over intended environmental outcomes. Will accommodate a range of detached and attached units (in terms of townhouses, duplex developments, terraced houses, and low rise apartments). 	<ul style="list-style-type: none"> Loss of remaining rural character. Development will initially generate landscape and visual effects as the land transitions from rural to urban uses. If paired with a Centre zone, the Mixed Suburban Housing zone will not enable the intensification and/or population densities afforded by the MHU and/or THAB zone, which may affect the ability to support transport and other public infrastructure. Potential to undermine viability of a Town Centre in 	Reject

Table 1: Assessment of Alternatives			
Options:	Benefits	Costs /Risks	Accept/Reject
		Drury West due to a lack of population density.	
Option 6: Rezone for high density – Mixed Housing Urban and Terraced Housing and Apartments	<ul style="list-style-type: none"> Rezoning is the most efficient way of ensuring district plan integrity and giving the community securing over intended environmental outcomes. Will accommodate a range of attached units (in terms of townhouses, duplex developments, terraced houses, and apartments (low and high rise). The zoning pattern would be consistent with the zoning principles developed by the Council, as the THAB zone is envisaged in proximity to town centres and the public transport network, and is envisaged to make the most efficient use of land and infrastructure in areas where residents have convenient access to services and employment etc to promote walkable neighbourhoods. 	<ul style="list-style-type: none"> Loss of remaining rural character. Development will initially generate landscape and visual effects as the land transitions from rural to urban uses. Potential for effects character when view from surrounding areas. The THAB zone needs to be supported by a Centre zone and/or public transport infrastructure. On its own and without these services, THAB zoned land may become underutilised. 	Accept in part.

Analysis:

- 5.1.5. Having regard to the assessment in Table 1, the status quo is the least appropriate option. It is inefficient to delay the land's zoning when there is a clear housing need and willing developer able to delivery residential lots and housing and its associated town centre and infrastructure to accord with the FULSS delivery of 2022.
- 5.1.6. Therefore, this option was rejected as being an efficient or effective means to meet demand, and the analysis moved into the application of an appropriate zone.

- 5.1.7. Given the projected growth for the Drury West catchment, the options discounted small centre zonings as these would not appropriately serve the catchment and would require reliance on another larger centre to establish.
- 5.1.8. A town centre was identified as the most appropriate to serve the community focal point and hub, and could reasonably be supported by the Drury West population without causing negative effects on other existing and planned major Centres. However, the risk that too much land could have negative impacts required the pairing with other zonings. Within the UDA in **Attachment 8**, Mr Munro identifies that a Town Centre is more effective and efficient in meeting the needs of the local community than a Local Centre zone (or no centre zone at all), for the following reasons:
- i. *A Town Centre zone lends itself to more efficient building heights and a higher-density population able to walk to the future train station, but in a way that does not consume ground-level space best put to commercial use (a problem in Mixed Use zones in particular). The additional height overlay of 27m is particularly relevant.*
 - ii. *A Town Centre zone lends itself to offices, a supermarket and department store, likely to anchor a retail main street but also to meet the needs of an 18,00 – 25,000 person local population in Drury West. A Local Centre zone would be inferior in that respect, and would likely require people to cross SH1 to Drury East or travel to Pukekohe, a very inefficient and unnecessary outcome for the meeting of basic daily needs.*
 - iii. *A Town Centre zone and scale of activity is much more likely to attract civic facilities, public squares and plazas, and services needed by the local community such as Browns Bay, Glen Innes, or Onehunga, whereas Local centres tend to be more basic retail-based 'villages' such as St. Helliers, Mairangi Bay or Kingsland.*
 - iv. *A Town Centre zone provides much greater potential for non-retail employment and commercial activity including offices and professional services than a Local Centre zone.*
- 5.1.9. A MHU/THAB re-zoning of land between the Town Centre and the adjoining Drury 1 Precinct is considered efficient from the point of view of using the land in a way that will leverage infrastructure benefits based on the critical mass of development occurring, and will appropriately buffer the lower residential zones (MHU and MHS). It would be effective from the point of view of achieving the AUP goals of well sequenced, justified and spatially well-coordinated (through the structure plan and master plan process) development.
- 5.1.10. However, the application of MHU/THAB zones without a corresponding town centre in this location would have the potential to be underutilised and, on their own, may not support the provision of significant investment in public transport infrastructure.
- 5.1.11. Lower densities in close proximity to the Town Centre were considered to be inefficient and would have the potential not to achieve the critical mass required to support the vitality of the town centre.

Alternatives for provisions/methods to implement the zonings

5.1.12. The alternatives also identify the preferred options for zoning and explore high for whether provisions/methods are needed. These options are:

- (a) Retain existing provisions, methods etc
- (b) New suite of provisions specific only to Precinct
- (c) Modify/provide bespoke provisions, methods etc and retain existing provisions where these can achieve the objectives.

5.1.13. An assessment of the options and alternatives has been undertaken, including the costs and benefits of each, in Table 2 Below.

Table 2: Assessment of Alternatives			
Options:	Benefits	Costs /Risks	Accept/Reject
Option A: No precinct - Retain existing provisions, methods etc	<ul style="list-style-type: none"> Would provide consistency with other locations in Auckland not subject to a structure plan or character overlay. 	<ul style="list-style-type: none"> Risk of design and overall layout outcome not meeting high quality and integrated development proposed by the objectives. Would be unlikely to achieve a desirable level of consistency in urban form of the PPC area or an approach which recognises greenfield subdivision. 	Reject
Option B: Creation of a new precinct	<ul style="list-style-type: none"> Tailored provisions provides the community and Council surety over intended environmental outcomes. The Precinct Plan layout has been derived from a concept master plan, and carefully designed to 'stand on its own feet' whilst ensuring connections to the existing Operative Drury 1 Precinct, and making connections to future development areas (i.e. south of SH22). It remains sufficiently flexible to integrate with more detailed design at 	<ul style="list-style-type: none"> Few disadvantages or costs are considered to result. The biggest risk is administrative - by not having all provisions in the same location (i.e. a AUP chapter) other developers/areas in the City may not appreciate the full suite of provisions which work together in combination to produce the outcome (and may seek to utilise / pick and choose rules that suit them as a "precedent"). This risk can be internally managed within Council, and the section 32 and AEE provides the record to 	Accept

Table 2: Assessment of Alternatives			
Options:	Benefits	Costs /Risks	Accept/Reject
	resource consent stage because it identifies key roading to ensure an overall interconnected pattern. This has the benefit of creating a variety of routes through the PPC, establishing connections with the Drury 1 Precinct and providing for pedestrian, cycle and vehicle movements.	capture the statutory assessment.	
Option C: Extend the Drury 1 Precinct	<ul style="list-style-type: none"> The Drury 1 Precinct provisions have been tested through the section 32 associated with PV15 and PC6 and through the lodgement of resource consent applications within the Precinct. 	<ul style="list-style-type: none"> The existing Drury 1 Precinct is intended to provide primarily for residential development and housing densities consistent with low rise apartments, terrace houses, town houses and duplexes. This is inconsistent with the high densities, and town centre outcomes sought. 	Reject

Analysis:

- 5.1.14. Having regard to the benefits over costs associated with option assessed above, it is proposed to develop a new precinct, the majority of which would be subject to the existing AUP objectives and methods, with a few tailored objectives and methods to achieve a quality outcome. Reliance solely on the AUP may not achieve a cohesive and integrated outcome for development of the precinct.
- 5.1.15. Although the site has linkages to the Drury 1 Precinct, those existing provisions cannot be effectively "rolled over" for the PPC as they were tailored for a specific medium to high residential outcome, compared to the PPC which is predominately Town Centre (and associated with high density residential).

5.2. Objectives Evaluation

- 5.2.1. Section 32(1)(a) requires that an evaluation under that provision assesses the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA.
- 5.2.2. In accordance with section 5, the purpose of the RMA is to promote the sustainable management of natural and physical resources. "The term "sustainable management" is defined in section 5 to mean:

“...managing the use, development and protection of natural and physical resources in a way and at a rate, which enables people and communities to provide for their social, economic and cultural wellbeing 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.”*

5.2.3. As a PPC, KDL has a duty under section 32 of the RMA to examine whether the objectives of the proposal and its provisions are the most appropriate way for achieving the purpose of the RMA.

5.2.4. The objectives of the PPC are listed in Table 3 below. They have been evaluated in terms of the extent that they represent the most appropriate means to achieve the purpose of the RMA and also in relation to the objectives of the Regional Policy Statement Section of the AUP.

Table 3: Assessment of Proposed Objectives		
Objective	Resource Management Act	AUP – Regional Policy Statement
<p>(1) Provide a Town Centre within the Precinct, which services</p> <p>a. Achieves high-quality urban design outcomes;</p> <p>b. Services the needs of the existing and planned Drury West area; and</p> <p>c. Is supported by high-density residential</p>	<p>This objective achieves the purpose of the RMA by:</p> <ul style="list-style-type: none"> Ensures that the land resource is developed in a manner that achieves, and does not undermine, its potential to accommodate its share of projected growth and in particular contributes to the anticipated population growth for Auckland and Drury West. Growth in this location relieves pressure for growth in other less appropriate parts of the Auckland Region (such as productive land), thereby safeguarding the needs of future generations. The objective promotes and enables an efficient use of natural and physical resources as it will utilise land already earmarked for urban development under the AUP and FULSS and enables a 	<p>This objective gives effect to the RPS sections and particularly those listed in B2 by:</p> <ul style="list-style-type: none"> Enabling a compact urban form by releasing land already identified for urban growth (as evident by its existing zoning as FUZ) for a range of urban activities/zones Releasing land within the FUZ to support existing zoned and planned future growth in the Drury West area. The Town Centre zone and associated zonings are required to support the estimated population growth of up to 13,000 dwellings in Drury West. Enabling urbanisation of land contained within the Rural-Urban boundary. Promoting a quality built form and design of development to achieve an attractive, healthy

Table 3: Assessment of Proposed Objectives

Objective	Resource Management Act	AUP – Regional Policy Statement
developme nt.	<p>range of housing/lifestyle options to meet the shortfall in housing supply within the Auckland Region, as well as promoting a town centre and associated employment opportunities to support the community.</p> <ul style="list-style-type: none"> • Employment opportunities and public amenities provided by the Town Centre zonings will enable the social and economic wellbeing of people and the developing community. • The relationship of Maori with their waahi tapu (and any customary activities) has been recognised (and obligations under the Treaty of Waitangi) and provided for through consultation. Implementation of this objective does not undermine this. 	<p>and safe environment.</p> <ul style="list-style-type: none"> • Promotes high residential intensification around the planned Town Centre and its associated future public transport routes, which in combination with residential activities in the Centre itself will support the function, and role of the Centre. • Encouraging diversity of buildings and a high amenity in the Town Centre (to lead to an attractive and efficient urban environment which has a distinct sense of place). • Quality design will assist in establishing a character to the new centre that supports its role as a focal point for the community. • Provides a range of housing types and opportunities as well as the ability for employment choices in the Drury West area (via the Town Centre zoning). • Enables an increase in housing capacity. • Areas identified for intensification do not contain any identified schedule feature for protection, and any risk of hazards can be appropriately addressed at resource consent stage.
(2) Develop the Precinct for urban activities in a comprehensive and integrated way, which recognises the importance of the Town Centre	<p>This objective achieves the purpose of the RMA by:</p> <ul style="list-style-type: none"> • Ensures that the land resource is developed in a manner that achieves, and does not undermine, its potential to accommodate its share of projected growth and in particular contributes to the anticipated population growth 	<p>This objective gives effect to the RPS sections and particularly those listed in B2) by:</p> <ul style="list-style-type: none"> • Enabling a compact urban form by releasing land already identified for urban growth (as evident by its existing zoning as FUZ) and within the Rural Urban Boundary;

Table 3: Assessment of Proposed Objectives

Objective	Resource Management Act	AUP – Regional Policy Statement
<p>as a focal point for Drury West.</p>	<p>for Auckland and Drury West. Growth in this location relieves pressure for growth in other less appropriate parts of the Auckland Region (such as productive land) thereby safeguarding the needs of future generations.</p> <ul style="list-style-type: none"> • Adverse effects of urban activities on the environment will be avoided, remedied or mitigated through the proposed provisions for land within the PPC Precinct and the existing AUP rules. • The site does not contain any “outstanding landscape” or features. • The objective promotes and enables an efficient use of natural and physical resources as it will utilise land already earmarked for urban development under the AUP and FULSS and enables a range of housing/lifestyle options to meet the shortfall in housing supply within the Auckland Region, as well as promoting a town centre and associated employment opportunities to support the community. • Employment opportunities and public amenities provided by both the Town Centre zoning will enable the social and economic wellbeing of people and the developing community. • The objective supports the provision of the high density zonings (THAB and MHU) as a means of providing opportunities for intensification in proximity to the town centre. 	<ul style="list-style-type: none"> • Releasing land within the FUZ to support existing zoned and planned future growth in the Drury West area. The Town Centre and associated zonings are required to support the estimated population growth in Drury West, and will serve as the focal point for community, civic and retail activities. • Ensuring that the town centre is the focal point of for the Drury West community so as to appropriately manage the overall distribution of centres in the Southern Growth areas (given that a town centre in this location can co-exist without detracting from existing centres at Papakura and Pukekohe or a future centre to service the Opaheke-Drury East area).

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Objective	Resource Management Act	AUP – Regional Policy Statement
	<ul style="list-style-type: none"> • While the land will no longer be retained for its rural amenity, the amenity values and quality of the area have been recognised and will be enhanced through the implementation of Precinct Plan and proposed provisions, in conjunction with the existing provisions of the AUP; • Stream and coastal margin enhancement and protection will be provided for in conjunction with land uses and development of the precinct. • The relationship of Maori with their waahi tapu (and any customary activities) has been recognised (and obligations under the Treaty of Waitangi) and provided for through consultation. Implementation of this objective does not undermine this. • Natural hazard risk at land development and subdivision stage is already provided for in the existing AUP provisions. 	
(3) Integrate transport and land use patterns to achieve a sustainable, liveable community, which provides pedestrian linkages through and between the Precinct, adjoining Precincts and to future planned public transport facilities.	<p>This objective achieves the purpose of the RMA by:</p> <ul style="list-style-type: none"> • The objective promotes the safety and wellbeing of people by ensuring that adequate infrastructure to service development is provided. • The objective also promoted the wellbeing of people and the wider community by promoting interconnections and linkages to for access between Precincts and safeguards for future generations by promoting linkages to future planned infrastructure (such as the future train station). 	<p>This objective gives effect to the RPS sections by:</p> <ul style="list-style-type: none"> • Encourages a high level of amenity and safety for pedestrians, as well as encouraging a balance of the street network to provide for amenity, vehicle movements, pedestrians and other functions (such as cyclists etc). • Ensuring that the movement of people/goods via streets does not undermine the key the functions in the Town Centre to provide for retail, commercial and civic activities. • Integrating transport considerations with the centre

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		<p>to ensure a safe and efficient transport system can be achieved.</p> <ul style="list-style-type: none"> • Promoting land use patterns (such as key retail frontages etc) along key streets to reinforce an attractive and walkable environment for a neighbourhood and street orientated town centre. • Encouraging connections to planned public transport thereby maximising the planned investment on the infrastructure, and supporting a range of travel choices for the PPC area.
<p>(4) Establish the infrastructure necessary to service development within the Precinct in a coordinated and timely way.</p>	<p>This objective achieves the purpose of the RMA by:</p> <ul style="list-style-type: none"> • Promoting the safety and wellbeing of people by ensuring that adequate infrastructure to service development is provided. • Effects of hazards and climate change will be taken into account in the design of infrastructure devices. • The relationship of Maori with their waahi tapu (and any customary activities) has been recognised (and obligations under the Treaty of Waitangi) and provided for through consultation. Implementation of this objective does not undermine this. 	<p>This objective gives effect to the RPS sections by:</p> <ul style="list-style-type: none"> • Co-ordinating activities with infrastructure provision to service growth efficiently • Ensuring development is adequately serviced by existing infrastructure or is provided with infrastructure prior to or at the same time as development. • Encourages a high level of amenity and safety for pedestrians, as well as encouraging a balance of the street network to provide for amenity, vehicle movements, pedestrians and other functions (such as cyclists, etc.). • Encouraging connections to planned public transport thereby maximising the planned investment on the infrastructure, and supporting a range of travel choices for the PPC area. • Effects of hazards and climate

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Objective	Resource Management Act	AUP – Regional Policy Statement
		change will be taken into account in the design of infrastructure devices.
(5) Include appropriate stormwater management and ecological enhancement measures when developing within the Precinct, to mitigate adverse effects of development on the receiving environments and enhance the existing stream network and lake feature.	<p>This objective achieves the purpose of the RMA by:</p> <ul style="list-style-type: none"> • Promoting the safety and wellbeing of people by ensuring that adequate infrastructure to service development is provided. • The AUP and PPC Precinct provisions anticipates the retention of and enhancement of the natural character of streams (and public access to them) for ecological enhancement and as part of the stormwater management/conveyance network. • Any protection of heritage or other features are already managed via the existing AUP provisions. • Effects of hazards and climate change will be taken into account in the design of infrastructure devices. 	<p>This objective gives effect to the RPS sections by:</p> <ul style="list-style-type: none"> • Ensuring integration of land use and water planning. • Ensuring appropriate stormwater infrastructure to service the development can be provided. • Ecosystems within stream margins (including degraded freshwater systems) can be enhanced through riparian vegetation. • Water quality and improving stream health will be implemented through the designing of the stormwater infrastructure (which will adhere to the SMP). • Effects of hazards and climate change will be taken into account in the design of infrastructure devices.

5.3. Evaluation of Provisions/Methods

- 5.3.1. Section 32(1)(b)(ii) of the RMA requires that councils assess the efficiency and effectiveness of the policies and methods as the most appropriate way to achieve the objectives of the relevant plan. The Ministry for the Environment's guidance explains that "efficiency" is achieved where a policy or method will achieve the objective (the benefit) at the least cost. Least cost can be difficult to quantify, especially in monetary terms, and we have not identified the costs of alternative policies and methods to indicate the least cost option for this section 32 evaluation.
- 5.3.2. A full assessment of provisions/methods to be inserted by this PPC and their associated costs and benefits to assess the efficiency and effectiveness of achieving the proposed objectives (and where relevant existing objectives) has been provided in Appendix 1.

- 5.3.3. As previously outlined (and based on the outcomes of the options assessments), development in the PPC area is not contained to only those objectives and methods proposed by this PPC request. It is expected that the provision work in tandem with existing AUP provisions in other chapters,
- 5.3.4. As acknowledged in the AEE component of this PPC Request, the AUP provision of other chapters, will also ensure that any other potential effects can be adequately dealt with and responded to development and subdivision stage. It is not unusual or ineffective to rely on existing provisions in any way, and does not undermine the viability of the re-zoning. Therefore, the reliance of this PPC on existing provisions is considered to be both efficient and effective.

6. CONCLUSION

- 6.0.1 This report has undertaken an analysis of the PPC request in terms of section 32 of the RMA. This analysis concludes that the objectives of the PPC are consistent with the purpose of the RMA as they:
- provide for growth in an identified growth area in Drury whilst maintaining and enhancing the core environmental values; and
 - propose provisions that are the most appropriate means of achieving the objectives as they provide a framework which will ensure that the development of the PPC area is comprehensive, integrated and efficient in its layout and form.