

# Proposed District Plan Change 24

1-13 LUDLAM CRESCENT, WOBURN  
ZONING AS GENERAL RESIDENTIAL ACTIVITY AREA –  
MEDIUM DENSITY

Publicly Notified:  
Submissions Close:

21 February 2012  
23 March 2012 at 5.00pm

**PLAN CHANGE ANALYSIS  
PURSUANT TO SECTION 32 OF THE  
RESOURCE MANAGEMENT ACT 1991**

Proposal:	To rezone the 1-13 Ludlam Crescent, Woburn from the Suburban Commercial Activity Area to the Medium Density General Residential Activity Area
Address:	1 – 13 Ludlam Crescent, Woburn
Applicant:	Ludlam Developments Ltd
	Ref: 27703/BebanJ

## **PART 1: INTRODUCTION**

### 1.1 What is Proposed Plan Change 24

The purpose of Proposed Plan Change 24 is to rezone 1 – 13 Ludlam Crescent as General Residential Activity Area – Medium Density in the City of Lower Hutt District Plan. The entire site is currently zoned Suburban Commercial Activity Area and until approximately 3 years ago was occupied by a Mobil Petrol Station. The area of the application site is 2158m<sup>2</sup> and the property has frontages onto Ludlam Crescent and Whites Line West as denoted on the Cuttriss Consultants Plan 27703SCH contained in Appendix 1. The proposed residential zoning would be consistent with the zoning of the adjoining properties. No new District Plan provisions e.g. objectives, policies, rules or standards will be introduced as a result of this proposal. The only amendments which will need to be made will be to District Plan Map 'C5' to reflect the zone change.

### 1.2 Reasons for the Proposed Plan Change

The application site has a longstanding history of being used for commercial purposes. Originally this commercial use was limited to a cluster of small shops which serviced the surrounding residential properties. However, in 1995 a Mobil Petrol Station was established on this site. This petrol station operated from the property until 2008. Since the petrol station was decommissioned, the site has remained vacant.

The property has been purchased by Ludlam Developments Limited who has considered a variety of development options for the site. It has been determined that the best use of the site would be to undertake a fee simple residential subdivision. To facilitate this use of the property, the applicant is seeking to rezone the site from its current Suburban Commercial Activity Area zone to the General Residential Activity Area - Medium Density zone. This proposed residential zoning would result in the site having the same zoning as the adjoining properties and will ensure that any development undertaken on the site is in keeping with the established character of the surrounding area.

### 1.3 Structure of this document

This document contains five parts. These are as follows:

- Part 1 Introduction
- Part 2 A copy of the public notice of Proposed Plan Change 24 which was advertised in the Hutt News.
- Part 3 Identifies the amendments proposed to the District Plan Maps (C5)
- Part 4 A copy of the Section 32 Evaluation prepared for Proposed Plan Change 24, as required by Section 74 of the Resource Management Act 1991;
- Part 5 A copy of the submission form (Form 5).

All five parts of this document are publicly available from Hutt City Council as detailed in Part 2 of this document.

#### 1.4 The Process of Proposed Plan Change 24

The process for preparing Proposed Plan Change 24 can be summarised as follows:

May 2011	Cuttriss Consultants Limited is commissioned to prepare a private plan change for Ludlam Developments Limited.
June 2011	An indicative scheme plan is developed for the site on the basis that the site is rezoned to the General Residential Activity Area - Medium Density.
September 2011	Consultation is undertaken with the local residents and representatives from neighboring territorial authorities (including Greater Wellington Regional Council), Ministry for the Environment and local iwi.
October 2011	Plan Change is submitted to Hutt City Council.
21 February 2011	Proposed Plan Change is notified.

Upon notification of the Proposed Plan Change, all interested persons and parties have an opportunity to have further input through the submission process. The process for public participation in the consideration of this proposal under the Resource Management Act 1991 is as follows:

- The period in which submissions may be made is 20 working days from the date of the Public Notice
- After the closing date for submissions, Council must prepare a summary of the submissions and this summary must be publicly notified;
- There is then an opportunity for 10 working days after the notification of the submissions to make a further submission in support of, or in opposition to, the submissions already made;
- If a person making a submission asks to be heard in support of their submission, a hearing must be held;
- Council must give its decision on the proposal in writing (including its reasons for accepting or rejecting submissions) following the hearing; and
- Any person who has made a submission has the right to appeal the Council decision on the proposal to the Environment Court.

**PART 2: PUBLIC NOTICE**



## PUBLIC NOTICE

### Public Notification of Proposed District Plan Change 24 to the City of Lower Hutt District Plan

*Clause 5 of the First Schedule – Part 1 of the Resource Management Act 1991*

#### **Proposed Private District Plan Change 24: 1 – 13 Ludlam Crescent, rezoning to General Residential Activity Area, Medium Density**

Cuttriss Consultants on behalf of Ludlam Developments Limited have made a request to the Hutt City Council for a private plan change to rezone the site at 1 – 13 Ludlam Crescent, Woburn from Suburban Commercial Activity Area to General Residential Activity Area.

#### **Documentation for Proposed Private Plan Change 24 can be inspected at:**

- All Hutt City Council Libraries; and
- Customer Services Counter, Council Administration Building, 30 Laings Road, Lower Hutt.

Alternatively, copies of the documentation are available on the Council website:

- <http://www.huttcity.govt.nz/Your-Council/Plans-and-publications/District-Plan/District-Plan-changes/District-Plan-change-24>

Copies can also be requested by contacting Hutt City Council:

- Phone: (04) 570 6666 or
- Email: [district.plan@huttcity.govt.nz](mailto:district.plan@huttcity.govt.nz)

### **Submissions close on FRIDAY 23 MARCH 2012 at 5.00pm**

Any person may make a submission on Proposed Private Plan Change 24. You may do so by sending a written submission to Council:

- Post: Environmental Policy Division, Hutt City Council, Private Bag 31912, Lower Hutt 5040;
- Deliver: Council Administration Building, 30 Laings Road, Lower Hutt;
- Fax: (04) 570 6799;
- Email: [district.plan@huttcity.govt.nz](mailto:district.plan@huttcity.govt.nz)

The submission must be written in accordance with RMA Form 5 and must state whether or not you wish to be heard in respect of your submission. Copies of Form 5 are available from all of the above locations and the Council website.

The process for public participation in the consideration of this proposal under the Act is as follows:

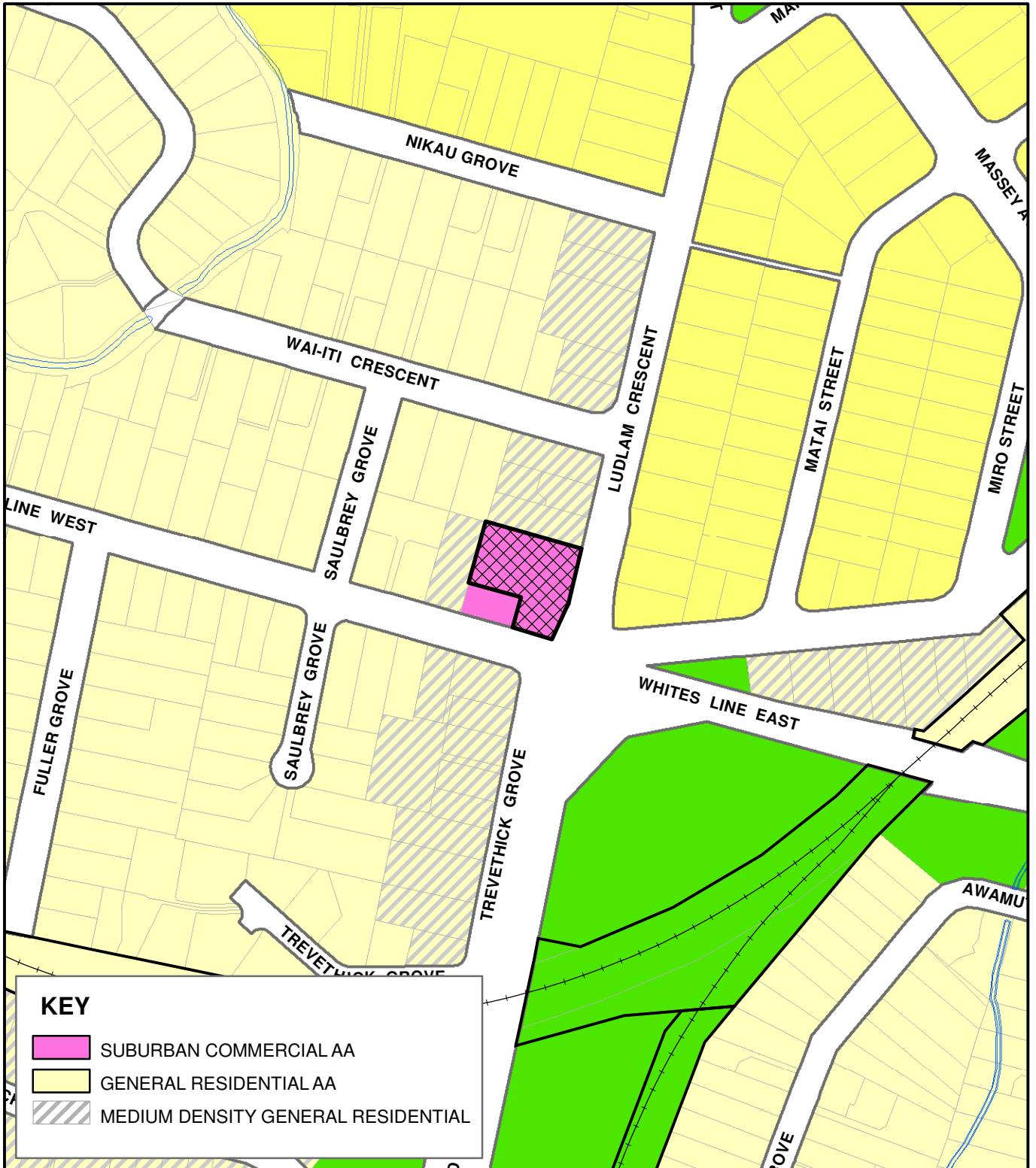
- after the closing date for submissions, Hutt City Council must prepare a summary of the submissions and this summary must be publicly notified; and
- there must be an opportunity to make a further submission in support of, or in opposition to, the submissions already made; and
- if a person making a submission asks to be heard in support of his or her submission, a hearing must be held; and
- Hutt City Council must give its decision on the proposal (including its reasons for accepting or rejecting submissions); and
- any person who has made a submission has the right to appeal the decisions on the proposal to the Environment Court.

Tony Stallinger  
Chief Executive  
21 February 2012



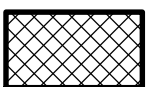
**PART 3: PROPOSED AMENDMENTS TO DISTRICT PLAN MAP C5**





## Proposed Plan Change 24

1-13 Ludlam Crescent, Woburn, Lower Hutt  
 Lot 1 DP 330343



Land to be zoned General Residential Activity Area - Medium Density

Planning Map C5



**District Plan - City of Lower Hutt**



Scale 1:3000



## **PART 4: SECTION 32 EVALUATION**

### **1. Introduction**

Prior to the public notification of a plan change, Section 32 of the Resource Management Act 1991 requires an evaluation of the Proposed Plan Change, and the preparation of a report outlining the basis and outcome of the evaluation. Section 32 of the Resource Management Act 1991 states:

*An evaluation must examine—*

- (a) The extent to which each objective is the most appropriate way to achieve the purpose of this Act; and*
- (b) Whether, having regard to their efficiency and effectiveness, the policies, rules, or other methods are the most appropriate for achieving the objectives.*

*An evaluation must take into account—*

- (a) The benefits and costs of policies, rules, or other methods; and*
- (b) The risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods.*

*Benefits and costs are defined as including the benefits and costs of any kind, whether monetary or non monetary.*

*The person required to carry out an evaluation must prepare a report summarising the evaluation and giving reasons for that evaluation.*

*The report must be available for public inspection at the same time as the document to which the report relates is publicly notified or the regulation is made*

This report, prepared in accordance with section 32, focuses on the appropriateness of the proposal to rezone 1-13 Ludlam Crescent from Suburban Commercial Activity Area to General Residential Activity Area - Medium Density.

#### **Description of the Site**

##### ***Physical Description***

The application site is a flat 2158m<sup>2</sup> property situated at 1 – 13 Ludlam Crescent, Woburn (Appendix 2 identifies the locality of the subject property). The application site has been divided into two, with the southern portion being a 387m<sup>2</sup> grassed area which has its frontage onto Whites Line West and Ludlam Crescent. The remainder of the property is covered by a concrete pad which was the on-site manoeuvring and forecourt area of the petrol station which operated from the site. The buildings which were associated with the petrol station have been recently removed. The boundaries of the property are delineated with a mix of fencing types including, close boarded fencing where the site adjoins the surrounding residential properties and security fencing along the Ludlam Crescent frontage of the property. Access to the site is achieved via the existing vehicle crossings off Ludlam Crescent.

The character of the area immediately surrounding the application site is predominately residential in nature. These residential properties contain dwellings of a mix of architectural

styles, ages and designs, some of which are two storied, although most are single storied. These properties are generally between 250m<sup>2</sup> and 1012m<sup>2</sup> in size. Located to the immediate north of the site is a doctors surgery. This is the only non-residential use within the immediate area. It is however noted that the underlying zone of this property is General Residential Activity Area - Medium Density.

#### Legal Description

The application site is legally described as Lot 1 Deposited Plan 330343 and is approximately 2158m<sup>2</sup> in area and is held in the Computer Freehold Register 124841 (copies of the Computer Freehold Register is contained in Appendix 3). The application site is subject to several encumbrances, including a Section 37 Certification under the Building Act. These interests are listed on the respective Computer Freehold Registers. These encumbrances and the Section 37 Certificate do not affect the Plan Change and would likely be discharged as part of any future subdivision of the site.

The application site is currently zoned Suburban Commercial Activity Area in the City of Lower Hutt District Plan. There are no other special notations or restrictions registered within the District Plan which would affect this proposal.

#### **2. Historical Planning Review of the Site**

A review has been undertaken of the previous Hutt County District Schemes, Transitional District Plan, Proposed District Plan and the Operative District Plan. In the 1964 Hutt County District Scheme the site was zoned as Commercial A, which allowed for small scale commercial and retail use. The site retained this zone until the third review of the Hutt County District Scheme in 1983 where it was zoned Commercial Local. This zone also allowed for the site to be used for small scale retail and commercial activities. Under the Proposed and Operative District Plan, the application site was zoned Suburban Commercial Activity Area.

#### **3. Background**

In June 1989, the Planning Tribunal refused dispensation for a service station to operate from the application site as it was considered to be contrary to the provisions of the then Commercial Local Zone.

Subsequent to the above decision, the site was rezoned to Suburban Commercial Activity Area under the Proposed Hutt City District Plan. Under this new zone, service stations were a permitted activity. Subsequently, Mobil sought a Certificate of Compliance pursuant to Section 139 of the Resource Management Act (1991) to allow for the construction and operation of a service station on the application site. A disagreement between Hutt City Council and Mobil arose regarding the definition of an intersection and a declaration from the Environment Court was sought. In 1993, this declaration was heard and the Environment Court ruled in favour of the applicant thereby permitting the construction of the service station on the property. The service station was established and commenced operations in 1995.

In 2008 the Mobile Service Station was decommissioned and the in-ground fuel storage tanks were removed in 2009. The property has been subsequently sold to Ludlam Properties Limited and the buildings which were on the site have been removed. No commercial or

retail activities have been undertaken on the property since the service station was decommissioned.

Prior to the service station the application site was occupied by five small shops, which included a dairy, a book exchange and a watch repair store. These small shops would have assisted with meeting the servicing needs of the local community.

The site is currently zoned Suburban Commercial Activity Area in the City of Lower Hutt District Plan. Within this zone, a variety of activities are permitted including commercial and retail services, places of assembly and residential activities above the ground floor. This Proposed Plan Change is seeking to rezone the site to General Residential Activity Area - Medium Density to facilitate residential development.

If the application site is rezoned to be General Residential Activity Area - Medium Density, it is anticipated that a 5 lot subdivision could be undertaken on this area (as identified on the indicative plan within Appendix 1). This subdivision would comply with the minimum allotment size and design and standards of the Subdivision Chapter of the City of Lower Hutt District Plan, and would also be consistent with the wider character of the local environment.

Access to the proposed allotments would be primarily achieved via the proposed right of way as denoted on the indicative scheme plan. This right of way would be a sufficient width to allow for two way vehicle movements. A turning head could be provided which would allow for vehicles to enter and exit the site in a forward direction. It should be noted that access to proposed Lot 1 would not be via the right of way, but would be achieved via a vehicle crossing onto Whites Line West.

The scheme plan in Appendix 1 is only an indicative development design of what could be undertaken on the property, the site be rezoned as General Residential Activity Area - Medium Density. This identified development is not being applied for as part of this Proposed Plan Change. Any subdivision proposal would be subject to a more detailed design and would require a separate resource consent application.

#### **4. Environmental Effects**

##### **Amenity and Character Effects**

The Proposed Plan Change is seeking to rezone the site from Suburban Commercial Activity Area to General Residential Activity Area - Medium Density. This zoning would allow for a possible 5 lot residential development on the site. These lots would comply with the net site area and shape factor requirements for the General Residential Activity Area - Medium Density zone and would result in a density of development which is consistent with the established character of Woburn. It is noted that any future subdivision of the site requires a resource consent application (as all subdivisions require resource consent under the District Plan) and would be subject to the conditions and standards which are detailed within the District Plan and any subsequent resource consent decision.

The permitted activity conditions for the General Residential Activity Area - Medium Density zone would ensure that dwellings built on the site would be similar in scale (size and height) to the existing housing in Woburn. The permitted activity conditions for buildings in the General Residential Activity Area - Medium Density zone include a maximum height of 8

metres, minimum yard setbacks and maximum site coverage.

The existing rules in the District Plan for subdivision will contribute to maintaining the character and amenity values of the surrounding area. Any future subdivision of the site would require resource consent and would be subject to the conditions and standards of the District Plan and any conditions imposed on the consent. The adverse effects of subdivision and any measures used to avoid, remedy or mitigate adverse effects are assessed in the resource consent process. A subdivision of the site for residential development is likely to be a controlled activity due to the limited site development works which would be required to implement a subdivision. The matters which Council seeks to control when assessing subdivision proposals include the design and layout of the subdivision, the provision of servicing, management of construction effects, protection of significant sites and the avoidance or mitigation of natural hazards.

The assessment criteria for subdivisions also state that subdivisions should be to give a strong and positive identity by taking into account characteristics of the area (Rule 11.2.2.3 of the District Plan). Given the flat nature of the site, any future subdivision on this property would be able to be designed in a manner which reflects the character of the surrounding environment, being medium density residential development.

The properties located on the opposite side of Ludlam Crescent from the application site are within the Special Residential Activity Area. Within this zone, low density housing is encouraged through large lots sizes and a smaller site coverage limit for structures on the site. Furthermore, there is an emphasis to retain mature vegetation when a site is developed.

The properties opposite the subject site which are within the Special Residential Activity Area have a level of development which is consistent with the density of housing expected within the Medium Density, General Residential Activity Area. Many of these properties contain multiple dwellings on moderate size lots. As such, the level of development which would result from the Proposed Plan Change would be consistent with this existing character of the local environment.

Given the residential nature of the local environment, the existing Suburban Commercial zoning of the site could be considered to be inconsistent with the established character of the surrounding area. While the site has a historical association of being used for retail purposes; this use concluded with the closure and subsequent decommissioning of the petrol station. Under the existing zoning, the site could be developed to include offices, retail stores and residential apartments. Any buildings constructed on the site could be up to 8m in height and constructed up to the front boundary of the property. Providing the gross floor area of the building was less than 500m<sup>2</sup>, no on-site car parking would be required for the retail and commercial activities. This form of development on the site could conflict with the residential development which is located on the surrounding residential properties and detract from the character and amenity values of the surrounding area. In particular, the anticipated development for the site under the current zoning could result in a considerably higher density of development, which would not fit with the existing character of the local environment.

The site is unique in the context of the other areas within the Hutt Valley which are within the



Suburban Commercial Activity Area. This is highlighted within the District Plan where it recognises the Suburban Commercial Activity Area as being compromised of the following:

*“The character and amenity values of this activity area do vary with the specific locations. The factors influencing this generally include small allotment sizes, small scale buildings with residential development at second storey level, close proximity to residential activity areas which are usually abutting, busy short term parking areas, and a mix of retail and service areas.”*

The above description contrasts with the site which is large, vacant and has recently been used by a service station. Furthermore, given the proximity of the property to the intersection to the south, there is little on-street car parking available within the immediate area. While the property does abut residential activities, the only other commercial service which is undertaken within the immediate area is the doctor's surgery located to the immediate north. On this basis, it could be considered that the site is inappropriately zoned and does not meet the general description of a Suburban Commercial Activity Area.

It is also recognised that the existing zoning of the property allows for the site to be used for residential purposes. It is however likely that this residential use would be in the form of apartments as that is the design which is encouraged under the current zoning of the site. As such, the proposed General Residential Activity Area - Medium Density zone will not introduce a new use onto the property. Rather, the form and appearance of the residential use will be different, with the proposed General Residential Activity Area - Medium Density zone encouraging fee simple subdivisions, which is consistent with the surrounding residential properties.

In conclusion, it is considered that given the factors described above, any potential visual amenity or character effects arising from rezoning of the property to the General Residential Activity Area – Medium Density will be minor and any adverse effects resulting from the future subdivision of the site can be appropriately addressed by the existing rules of the District Plan and at the time subdivision consent is sought.

#### Traffic Effects

The potential traffic related effects of the Plan Change to rezone the site to General Residential Activity Area - Medium Density and resulting residential development have been assessed. An assessment of the traffic effects associated with the Plan Change has been undertaken by Traffic Design Group Ltd (see Appendix 4). This assessment focused on the traffic effects which could result from activities provided for as permitted activities within the General Residential Activity Area - Medium Density zone being undertaken on the site, and whether any traffic safety or efficiency effects would arise within the existing traffic environment as a result of the potential change in zoning and therefore change in use.

The traffic assessment was prepared on the premise of the indicative 5 lot subdivision of the site (identified in Appendix 1) proceeding, subject to the approval of the Plan Change. The traffic report has compared the potential effects which could result from the undertaking of a permitted activity on the site (being a 500m<sup>2</sup> retail and commercial development) with the potential traffic effects resulting from residential use of the site. The traffic report concluded that the traffic volumes associated with residential development would be approximately 50 to 60 vehicles per day and that the majority of the car parking demand would be met on site.

This contrasts to the traffic volumes which could arise from the undertaking of a permitted activity on the application site under the current Suburban Commercials zoning where 13 – 15 off site car parking spaces would be required to accommodate the traffic demand and traffic volumes of between 10 – 120 vehicles per hour (depending on the type and combination of activities) could be expected.

The traffic report recognises that at the resource consent stage, consideration will need to be given to how to safely accommodate the right turn out of the site onto Ludlam Crescent. It is anticipated that this matter can be addressed as part of the detailed design work associated with any resource consent application.

The traffic report concludes that the transportation related effects of the anticipated level of residential development arising from the General Residential Activity Area - Medium Density zone will likely be less than those associated with a permitted mixed use development under the current zoning of the site.

Overall, it is considered that from a transportation perspective the effects of rezoning the site will be less than the current zoning and it is appropriate for the site to be rezoned.

#### Contamination Effects

When the service station on the application site was decommissioned, Mobil Oil New Zealand Limited commissioned a report which investigated the levels of contamination on the property (Appendix 5 contains a copy of this report). This contamination report involved a series of boreholes being drilled around the site, with the levels of contaminants within the soil being tested. The areas tested included the area where the in-ground storage tanks were located on the site. This testing occurred after the tanks and 14m<sup>3</sup> of contaminated material had been removed from the site. The testing was undertaken on the basis that the site may be used for residential development in the future. The contamination thresholds of Tier 1 of the Ministry for the Environment Guidelines for Assessing and Managing Petroleum Hydrocarbon Contaminated Sites in New Zealand were used for comparison against the levels of contaminants found on the property.

In total 50 soil tests from 23 boreholes were undertaken. None of the samples contained petroleum hydrocarbon concentrations above the Ministry for the Environment Tier 1 soil acceptance criteria in the context of residential or commercial/industrial land use. The groundwater tests also had no recorded petroleum hydrocarbons concentrations above the indoor/outdoor air inhalation criteria for residential/agricultural land use.

It should be noted that while no borehole tests were undertaken on the southern portion of the site (the area identified as Lot 1 on the indicative scheme plan), the phase 1 study concluded that it would be highly unlikely that this portion of the site would be contaminated as it was not used in conjunction with the service station and has a historical association with residential and retail activities.

As of 1 January 2012 the National Environmental Standard (NES) for Assessing and Managing Contaminants in Soil to Protect Human Health came into effect. Under this NES, sites which contain or formally contained an activity which is identified within the Ministry for the Environment HAIL list is considered to be contaminated. Service stations are identified on this list and therefore the site is considered to be contaminated under the NES. Upon

reviewing the NES it appears that given the very low levels of contamination on the site, the proposed subdivision will be permitted. However, it is possible that resource consent will be required for the installation of servicing and the creation of the right of way as the soil disturbance levels are likely to exceed the thresholds identified within the NES. A potential effects associated with the earthworks associated with the subdivision can be considered at the resource consent stage and appropriate mitigation measures can be incorporated to reduce the effects associated with the earthworks which have required to implement the subdivision.

Given the above factors, it is considered that the proposed General Residential Activity Area - Medium Density zoning is appropriate for the site and that the levels of contaminants within the soil and groundwater are appropriate for this use.

#### Infrastructure Effects

The proposed General Residential Activity Area – Medium Density zone would allow for up to five residential properties to be created. A review has been undertaken by Cuttriss Consultants Limited of the services available to the site within the local environment (see Appendix 6).

The report investigates wastewater, stormwater, water, power and telephone services within the local area surrounding the site and their capacity to support the residential development that would be enabled by the Plan Change. The report concludes that future residential development of the site could be appropriately serviced, subject to final design.

Overall, no issues were identified with the availability and capacity of services to the site and therefore the proposed General Residential Activity Area - Medium Density zone is considered to be an appropriate zoning for the site.

#### Economic Effects

As the proposal would involve the rezoning of a property which currently has a commercial activity area zoning, the potential economic implications from the loss of commercial space need to be considered.

Located within close proximity to the site are two clusters of shops. The first cluster is located approximately 300m to the east on Whites Line East (locally known as the Waiwhetu Shops) (Appendix 7 shows the location of these commercial centres). The Waiwhetu Shops are within the Suburban Commercial and General Business Activity Areas of the District Plan and include a hair salon, dairy, take-away outlet, a service station, a pharmacy and a vacuum repair store. At the time of preparation of this Plan Change, the store located on the corner of Whites line East and Waiwhetu Road was vacant. It is also noted that a resource consent has been approved for the construction of a retail and office complex on 1 Cambridge Terrace. The construction of this building has not yet commenced.

The second cluster of shops is located approximately 400m to the south on Randwick Road, Moera. This cluster of shops is within the Suburban Commercial Activity Area and includes dairies, takeaway stores, cafes, a pharmacy and a hairdresser. At the time of preparation of this plan change, there were seven vacant stores within the Moera suburban centre.

As previously identified, retail use of the application site ceased in 2008 and since then the

property has remained unused. During this time, shops within both the Waiwhetu and Moera suburban centres have remained vacant. This demonstrates that there is not a high demand for retail or commercial stores within the local environment. It also demonstrates that if there is an increase in demand for these shops, then there is capacity within the immediate area which would be able to accommodate this demand. Given these factors, it is considered that the Plan Change will not result in an undersupply of commercial space within the local environment.

Given the close proximity of the site to two established commercial centres, it is considered that rezoning of the site will not adversely affect the ability for local residents to meet their small scale servicing needs. The two existing suburban centres are both within walking distance to the residential properties which surround the application site and contain a wide variety of shops which will largely meet their needs.

Given the above factors, it is considered that by rezoning the site to the General Residential Activity Area - Medium Density it will not result in an undersupply of commercial land in the local area and will not significantly affect the ability for local residents to meet their small scale servicing needs.

## **5. Policy Analysis**

### **5.1 – Resource Management Act 1991**

Part II of the Resource Management Act (1991) outlines the purposes and principles of the Act. An assessment of the Proposed Plan Change against Part II is as follows:

#### **Section 5**

Section 5 seeks to promote the sustainable management of natural and physical resources. Section 5 states:

*“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 wellbeing and for their health and safety while –*

- a) *Sustaining the potential of natural and physical resources to meet the reasonably foreseeable needs of future generations*
- 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.”*

The proposal is considered to be consistent with Section 5 of the Resource Management Act 1991. The proposed General Residential Activity Area – Medium Density zone would be consistent with the zoning of the immediately adjoining residential properties and would allow for a density of housing which is in keeping with the immediate and wider environments. It is therefore considered that the proposed General Residential Activity Area - Medium Density zone will maintain the amenity values and character of the local environment.

The site is located in close proximity to two suburban shopping centres as well as a bus stop and the Woburn Railway Station. As such, the development of residential activities is an appropriate use for this property as it is located close to amenities which would allow for future

owners to meet their social, economic and cultural wellbeing needs.

The proposal would result in the loss of an area of land which is currently zoned for commercial purposes. Located in close proximity to the application site are two suburban shopping centres, both of which have vacant stores. These stores have been vacant for sometime and are an indication that there is sufficient commercial space (if not an over supply of space) within the immediate environment. Furthermore, given the isolated nature of the site from other properties of a similar zone, it is unlikely that the site could be developed in a manner which would result in a sustainable and integrated commercial development. Given these factors, the loss of this potential commercial space is not considered to have a detrimental economical impact on the surrounding environment.

It is considered that the potential traffic generation which would arise from a maximum credible permitted or controlled development resulting from this Proposed Plan Change would be able to be accommodated on the local roading network without compromising the traffic safety or efficiency of the existing roading network.

Given the above factors, the proposal is considered to be consistent with Section 5 of the Resource Management Act 1991.

#### Section 6 – Matters of National Importance

Section 6 of the Resource Management Act sets out the matters of national importance which are required to be taken into account. The proposal is considered to be consistent with Section 6 of the Resource Management Act 1991 for the following reasons:

- The site which is the subject of the Plan Change is not situated within a Significant Natural Resource as identified within the City of Lower Hutt District Plan. Furthermore there is no significant vegetation located on the site which could be considered to be ecologically significant.
- The site does not contain a wetland, lake or river, and it is not on the margin of any of these.
- The site is not situated within the coastal environment.

#### Section 7 – Other Matters

Section 7 of the Resource Management Act sets out the other matters which are required to be taken into account. The proposal is considered to be consistent with Section 7 of the Resource Management Act 1991 for the following reasons:

- The proposed General Residential Activity Area - Medium Density zone is consistent with the zoning of the adjoining residential properties. As such, the density of development which could result from rezoning the site would be in keeping with the character and visual amenity values of the wider environment.
- The levels of contaminants within the soil are within the Tier 1 criteria for residential development as defined within the Ministry for the Environment Guidelines.
- The site is highly modified and any site development works required to allow for the property to be used for residential purposes will be minimal.
- The potential traffic effects associated with rezoning the site would be less than if the site was developed in accordance with its current zoning.
- Existing services within the local environment have sufficient capacity to service future residential development on the site.

### Section 8 - Treaty of Waitangi

Section 8 of the Resource Management Act requires that applications take into account the principles of the Treaty of Waitangi.

The principles of the Treaty of Waitangi have been taken into account in the analysis of this Plan Change. The site does not contain any Significant Cultural Resources which are identified in the District Plan. Consultation has been carried out with the local iwi authorities as part of the statutory consultation during the formation of the Plan Change and they raised no concerns regarding this proposal.

### 5.2 – Regional Policy Statement

The Regional Policy Statement (RPS) for the Wellington Region sets out the regional perspective for managing the environment and providing for growth and its effects.

The RPS identifies the significant resource management issues for the region and outlines the policies and methods required to achieve the integrated sustainable management of the region's natural and physical resources.

The Soils and Minerals and the Built Environment and Transportation chapters of the RPS are considered to be most relevant to the Proposed Plan Change. In particular, the most relevant objectives and policies of the RPS are considered to be as follows:

#### **Chapter 6 - Soils and Minerals - Contaminated Sites**

*Policy 3 - To ensure that, where feasible, sites are rehabilitated in circumstances where, as a result of either natural processes or human activities, or some combination of both, soils are, or are likely to be, eroded, removed, disturbed or otherwise rendered unable to sustain their life supporting capacity or to meet the needs of the local or regional community.*

*Policy 6 - To avoid, remedy or mitigate the adverse effects of harmful waste and contaminants on soil, and to dispose of these in ways which respect the assimilative capacity of the soil and which comply with relevant standards set for water quality and air quality.*

#### **Chapter 14 - Built Environment and Transportation**

*Objective 1 - Urban areas, the built environment and transportation systems are developed so that they, and their associated activities, use resources efficiently and demand for the use of finite resources is moderated.*

*Objective 2 -The adverse environmental effects that result from the use of urban areas, transportation systems and infrastructure are avoided, remedied or mitigated and, in particular, any effects that result from the concentration and scale of activities in urban areas are recognised and provided for.*

*Objective 3 - The environmental quality of urban areas is maintained and enhanced.*

*Policy 2 - To use natural and physical resources efficiently in the development of urban areas and in use of the built environment by:*

*(1) Encouraging forms of urban development that reflect efficient use of resources; and*

- (2) *Avoiding, where practicable, the use of new resources, particularly non-renewable resources.*

*Policy 6 - To promote the provision and efficient use of infrastructure in the Region, and the reduction of adverse environmental effects from its use.*

*Policy 8 - To promote a high level of environmental quality in urban areas by:*

- (1) *Encouraging good urban design;*
- (2) *Enhancing and protecting amenity values; and*

It is considered that the Plan Change is consistent with the objectives and policies of the Regional Policy Statement.

Extensive testing has been undertaken on the site to investigate the level of contaminants within the soil. In total 50 soil samples from 23 boreholes were tested for contaminants. The levels of contaminants within the soil were compared against the thresholds identified within Tier 1 of the Ministry for the Environment Guidelines for Assessing and Managing Petroleum Hydrocarbon Contaminated Sites in New Zealand. All of the samples complied with the Tier 1 soil acceptance criteria for residential or commercial/industrial land use. The groundwater tests also had no recorded petroleum hydrocarbon concentrations above the indoor/outdoor air inhalation criteria for residential/agricultural land use. On this basis no remedial works would be required to be undertaken on the site to ensure that the property is suitable for residential development. On this basis the proposal is considered to be consistent with the objectives and policies of the Regional Policy Statement pertaining to Soils and Minerals.

In relation to the Built Environment and Transportation chapter, the RPS promotes development which uses resources efficiently, maintains and enhances urban areas and avoids, remedies or mitigates adverse environmental effects. The site is located within a predominately residential area and can be serviced using the existing infrastructure. The site is located within walking distance to the public transport network and two suburban commercial centres and therefore is an appropriate location for a residential development.

The potential traffic generation associated with developing the site in accordance with the proposed General Residential Activity Area - Medium Density zone would be less than if the site was developed under its current commercial zoning. As such the transportation related effects of the anticipated level of residential development will likely be less than those associated with a mixed use development that could reasonably be established in accordance with the existing zoning.

Overall, it is considered that the Plan Change is consistent with the objectives and policies relating to the Built Environment and Transportation.

### 5.3 – Proposed Wellington Regional Policy Statement

Greater Wellington Regional Council has undertaken a review of the Regional Policy Statement. The Proposed Regional Policy Statement was notified in early 2009 with a decision on submissions being made in May 2010. The Proposed Wellington Regional Policy Statement is currently subject to several appeals at the Environment Court. The objectives and policies of the Proposed Regional Policy Statement which are considered to be relevant to this proposal are detailed below:

### **Soils and Minerals**

*Objective 29 – Soils maintain those desirable physical, chemical and biological characteristics that enable them to retain their ecosystem function and range of uses.*

*Policy 33 – Avoiding activities on contaminated land.*

### **Regional Form Design and Function**

*Objective 21 - A compact, well designed and sustainable regional form that has an integrated, safe and responsive transport network and:*

- (e) urban development in existing urban areas, or when beyond urban areas, development that reinforces the region's existing urban form;*
- (k) efficiently use existing infrastructure (including transport network infrastructure);*

*Policy 30 – Identifying and promoting higher density and mixed use development.*

*Policy 32 – Supporting a compact, well designed and sustainable regional form.*

*Policy 54 – Maintaining a compact, well designed and sustainable regional form.*

*Policy 57 - Co-ordinating land use with development and operation of infrastructure.*

Objective 29 and Policy 33 pertain to undertaking development on contaminated sites. The testing undertaken on the site has identified that the level of contaminants measured are below the Ministry for the Environment Tier 1 criteria for residential development. Given these factors, the Plan Change is considered to be consistent with Objective 29 and Policy 33 of the Proposed Regional Policy Statement as the residential use of the property would not be an inappropriate use of the site, given the very low levels of contaminants present.

Objective 21 and the associated policies seek to ensure that urban development is undertaken within existing urban centres in a manner which is an efficient use of the existing infrastructure. The proposal site is located within an urban environment and is well serviced by existing infrastructure. The rezoning of the site would promote residential development within an area which is well serviced by two existing suburban commercial centres and public transport. Given these factors, the Plan Change is considered to be consistent with Objective 21 and the supporting policies of the Proposed Regional Policy Statement as the development of the site for residential purposes would be an efficient use of the land resource.

#### **5.4 The Wellington Regional Strategy**

The Wellington Regional Strategy (WRS) is a sustainable growth strategy that has been developed by the nine local authorities within the Greater Wellington Area, in conjunction with central government, and the region's business, education, research and voluntary sector interests.

The WRS does not address the residential zoning in general which is sought within this Proposed Plan Change. It is however considered that the Proposed Plan Change is not inconsistent with the outcomes sought within the WRS.



### 5.5 Other Strategies and Plans

The Hutt City Council has a number of strategies and plans that detail the priorities for the City, namely:

- Economic Development Strategy 2009
- Environmental Sustainability Strategy 2009
- Long Term Council Community Plan (LTCCP) 2009

The Proposed Plan Change is considered to be consistent with the outcomes sought under the above strategies and plans.

### 5.6 Consistency with Surrounding District Plans

Section 74(2) (c) of the Act requires Council to consider the extent to which this Proposed Plan Change needs to be consistent with the plans or proposed plans of adjacent territorial authorities.

The Proposed Plan Change involves a small area of land which is located well within the boundaries of the City of Lower Hutt. It will have no affect on the plans or proposed plans of adjacent territorial authorities and will not be inconsistent with them.

### 5.7 Area Wide Objectives of the District Plan

Chapter 1 of the City of Lower Hutt District Plan identifies the area wide objectives which the District Plan seeks to achieve. The area wide objectives which are considered to be relevant to the proposal are as follows:

#### *1.10.1 Resource Management and the Tangata Whenua of Lower Hutt*

##### *Objective*

*To respond to the principles of the Treaty of Waitangi and other matters of significance to the tangata whenua as specified in the Act.*

##### *Policies*

- (a) To have particular regard to tangata whenua's desire to carry out kaitiakitanga.*
- (b) To protect waahi tapu and sites of cultural or historical significance to tangata whenua from desecration or disturbance.*
- (c) To recognise and protect the tangata whenua desire to maintain and enhance their traditional relationship with the environment.*
- (d) To consult with the tangata whenua when discharging functions and duties under the Act.*

#### *1.10.2 Amenity Value*

##### *Objective*

*To identify, maintain and enhance the character and amenity values of the different activity areas.*

##### *Policy*

*To identify within all activity areas the general character and amenity values of that activity area.*

### 1.10.3 – Residential Activity

#### Objective

*To accommodate residential growth and development through consolidation of the existing urban area but to allow some peripheral development.*

#### Policy

- (a) *To provide opportunities for gradual intensification of residential densities by:*
- (i) *Enabling higher densities along major transport routes and near suburban focal points,*
  - (ii) *Providing for infill development throughout the established residential areas to appropriate minimum standards, and*
  - (iii) *Managing the rate at which land at the periphery of the urban area is developed for residential purposes.*

### 1.10.4 – Commercial Activity

#### Objective

*To promote an integrated and hierarchical approach to commercial centres as communal focal points.*

#### Policies

- (c) *Recognise the Suburban and Special commercial centres as the secondary areas in the hierarchy, being small scale with a limited number of activities servicing local area needs.*
- (d) *Manage the nature and scale of activities in the commercial centres based on the integrated and hierarchical approach.*
- (e) *Manage and restrict commercial and other activities located outside the identified commercial centres that have the potential to undermine or detract from the vitality and vibrancy of the commercial centres.*

The Proposed Plan Change is considered to be consistent with the above Area Wide Objectives and Policies of the District Plan. The Area Wide Objectives and Policies of the District Plan have an emphasis on higher density developments being located on main transport links that are near suburban focal points. As previously identified, there are two suburban shopping centres located less than 500m from the site. Furthermore, Ludlam Crescent is a main transport link and there is an established public transport network within walking distance of the site. Given these factors, it is considered that the proposed rezoning is consistent with the relevant objectives and policies pertaining to medium density residential development within the Hutt Valley.

The site is located in an established medium density residential area which is serviced by existing infrastructure. The location of the site on a main transport link, and the capacity within the local roading network means that the local environment will be able to accommodate the likely traffic generation which could result from future development of the site for residential purposes. Given these factors, it is considered that the proposed General Residential Activity Area - Medium Density zoning is appropriate for the site and would allow for the maximum development potential to be realised while allowing for further consolidation of an existing established residential area.

The proposal would result in the loss of an area of land which is zoned for commercial purposes. Located in close proximity are two suburban commercial centre, both of which contain vacant stores. These stores have been vacant for sometime and are an indication that there is sufficient commercial space (if not an over supply of space) within the immediate environment. Furthermore, the proximity of these existing commercial centres to the application site ensure that the local servicing needs of the local community would still be able to be met when the subject property is rezoned to the General Residential Activity Area - Medium Density.

It is considered that given the above factors, the existing Area Wide Objectives and Policies are appropriate for the subject site and no site specific changes are proposed to these as part of this application. It is considered that the proposed General Residential Activity Area - Medium Density zone will maintain the amenity values and character of the local environment while allowing for the development potential of the site to be met. It is considered that maintaining the status quo will not be as effective or efficient in achieving these Area Wide Objectives and Policies.

#### 5.8 General Residential Activity Area Objectives

The Proposal Plan Change is considered to be consistent with the relevant objectives and policies pertaining to the General Residential Activity Area (which also covers General Residential Activity Area – Medium Density) of the City of Lower Hutt District Plan. The objectives and policies of the General Residential Activity Area which are considered to be relevant to this proposal are as follows:

##### *4A 1.1.1 – Residential Character and Amenity Value*

###### *Objective*

*To maintain and enhance the amenity values and residential character of the General Residential Activity Area of the City.*

###### *Policies*

- (a) That opportunity be provided for a diversity of residential activities.*
- (c) To ensure residential amenity values are retained, protected and enhanced through the establishment of a net site area per dwelling house.*
- (d) That adverse effects arising from noise, dust, glare, light spill and odour be managed.*
- (e) That vegetation and trees which add to the particular amenity values of the area be retained where practicable.*

##### *4A 1.1.2 Medium Density Residential Development*

###### *Objective*

*To ensure opportunity is made for higher density residential development around some commercial centres, along major transport routes, and where amenity values will not be affected adversely and where there is appropriate servicing of development.*

###### *Policies*

- (a) That opportunity for higher dwelling densities be made along major transport routes, around some commercial centres, in the residential area between Jackson Street and*

*The Esplanade, Petone, where existing dwelling densities are higher, and where amenity values will not be affected adversely.*

- (b) *To avoid, remedy or mitigate the adverse effects of higher dwelling densities on the surrounding area, caused by height of buildings, intensity, scale and location.*

#### 4A 1.2.1 *Building Height, Scale, Intensity and Location*

##### *Objective*

*To avoid, remedy or mitigate adverse effects caused by building height, intensity and location on the amenity values of adjacent residential sites and the residential character of the surrounding residential area.*

##### *Policies*

- (b) *To establish a minimum net site area and maximum site coverage to ensure opportunity is provided for higher density residential development where appropriate, without affecting adversely the amenity values.*
- (c) *To ensure all new development is of a height and scale, which is compatible with surrounding residential development.*
- (d) *To ensure a progressive reduction in height of buildings the closer they are located to a site boundary, to maintain adequate daylight and sunlight to adjoining properties.*
- (e) *To manage the siting of all buildings so as to minimise detracting from the character and visual attractiveness of the surrounding residential activity area.*
- (f) *To manage the siting of all buildings so as to minimise detracting from the amenities of adjoining properties.*
- (g) *That where practicable, the siting of accessory buildings be managed to maintain safety and visibility during manoeuvres.*

The Proposed Plan Change is considered to be an effective and efficient means of achieving the above objectives and policies for the application site. It is considered that the rules within the General Residential Activity Area are sufficient to ensure that the amenity values and character of the application site, neighboring properties and wider environment are maintained and no deviation from these existing objectives, policies and rules is sought as part of this application.

#### 5.9 Consultation

Between September and October 2011, consultation was undertaken with the surrounding residential properties (Appendix 8 identifies the properties who were contacted as part of the consultation process). The actions which were undertaken during the consultation period included:

- Writing to the owners and occupiers of the neighbouring properties informing them of our intention to rezone the site. Within this letter we invited interested parties to contact us either by phone, email or in writing if they would like to discuss the development further;
- Talking with several parties over the phone regarding our proposal and receiving verbal feedback.
- Meeting with interested parties on the application site or at their house to discuss the proposal.

All of the feedback received regarding the Proposed Plan Change was positive. The parties which contacted us thought that residential development on the site was appropriate and would maintain the character of the local area. While questions were asked around traffic safety, contamination and stormwater control, when we explained the implications of the proposal in terms of these matters to the relevant parties, they were supportive that these matters were being considered as part of the Proposed Plan Change.

Consultation has also been undertaken with the following parties:

- Greater Wellington Regional Council
- Ministry for the Environment
- Upper Hutt City Council
- Porirua City Council
- Wellington City Council
- Tenths Trust
- Te Runanganui o Taranaki Whanui ki te Upoko o te Ika a Maui

We received feedback from the following parties:

- Upper Hutt City Council
- Porirua City Council
- Wellington City Council
- Te Runanganui o Taranaki Whanui ki te Upoko o te Ika a Maui

None of these parties had any comments to make on the Proposed Plan Change. While we did not hear from several parties during the consultation phase of this project, we note that when the plan change is notified these parties will be contacted directly and would have the opportunity to lodge a submission.

### **6.0 Evaluation of Options**

The Proposed Plan Change is seeking to rezone the site to General Residential Activity Area - Medium Density. The General Residential Activity Area - Medium Density zone is one of the most common zones within the Hutt Valley and covers large areas of the valley floor. The properties within the General Residential Activity Area - Medium Density zone contain a wide variety of residential development and include single residential dwellings through to higher density multi-storied residential apartments. The defining feature for all properties which are within the General Residential Activity Area - Medium Density zone is that they are within 500m of either a main or suburban shopping centre. In the case of this site, there are two suburban centres which are located within 500m. Furthermore, the site is located in close proximity to both a bus stop and a train station and therefore meets the other requirement of the District Plan which encourages medium density development in close proximity to main transport links.

Four principal options have been explored as part of the preparation of the Proposed Plan Change. These options include

- Status Quo (do nothing);
- Rezone the application site to the General Residential Activity Area;
- Rezone the application site to the General Residential Activity Area - Medium Density.
- Rezone the application site to the Special Residential Activity Area.

The cost and benefits of these options are discussed below.

Option	Evaluation
<p>Option 1: Status Quo –</p> <p>NOT RECOMMENDED</p>	<p>Benefits</p> <ul style="list-style-type: none"> <li>- Avoids the costs associated with the plan change process</li> <li>- The site is able to be developed to support a variety of mixed uses.</li> </ul> <p>Costs</p> <ul style="list-style-type: none"> <li>- There is a risk that the site would remain under utilised, given the large amount of available commercial and retail space situated within close proximity to the application site.</li> <li>- The development of the property for commercial or retail purposes could result in the undermining of the existing established commercial centres within the local area.</li> <li>- If the application site is developed in accordance with the requirements for the Suburban Commercial Activity Area, the final development form and use could result in a greater detracting from the amenity values and character of the local environment; compared to if the site was used for residential purposes.</li> <li>- The traffic generation and resulting traffic effects arising from the development of the site in accordance with its current commercial zoning would be greater than those which would result from a residential zoning of the site.</li> </ul>
<p>Option 2: Zone the site to the General Residential Activity Area.</p> <p>NOT RECOMMENDED</p>	<p>Benefits:</p> <ul style="list-style-type: none"> <li>- Allows for residential development to be undertaken on the application site.</li> <li>- Results in a low density development which would place less pressure on the local infrastructure and roading network.</li> </ul> <p>Costs</p> <ul style="list-style-type: none"> <li>- The proposal would result in the loss of an area of commercially zoned land within the Hutt Valley.</li> <li>- Results in a level of development which does not utilise the full development potential of the application site.</li> <li>- Results in a level of development arising from the proposal that would be less than what could be established on the surrounding residential sites.</li> <li>- Reduced rates revenue due to the lower number of properties which would be able to be created.</li> <li>- The density of development resulting from this zoning would not recognise the close location of the application site to suburban shopping centres and the public transport network.</li> </ul>
<p>Option 3 Zone the site to the General Residential Activity Area - Medium Density.</p>	<p>Benefits:</p> <ul style="list-style-type: none"> <li>- Allows for the maximum development potential of the application site to be realised.</li> <li>- Allows for higher density development to occur within an area which is located close to two suburban shopping</li> </ul>

Option	Evaluation
RECOMMENDED	<p>centres and main transport links.</p> <ul style="list-style-type: none"> <li>- Results in a density of development which is consistent with the surrounding environment.</li> <li>- Increased rates collection for the Council due the higher density of development which could result.</li> <li>- The neighbouring residential properties gain certainty about the form of development which could occur on the application site. Generally the level of development which could occur would have fewer effects on the amenity values of these neighbouring residential properties than what could occur under the current zoning of the site.</li> <li>- The transportation related effects from a potential residential development would be less than those associated with a permitted development under the existing Suburban Commercial Zone.</li> </ul> <p>Costs:</p> <ul style="list-style-type: none"> <li>- The monetary costs associated with the Plan Change process.</li> <li>- Increased demand on Council infrastructure.</li> <li>- Loss of the site for commercial/retail use.</li> </ul>
<p>Option 4 Zone the site to the Special Residential Activity Area.</p> <p>NOT RECOMMENDED</p>	<p>Benefits:</p> <ul style="list-style-type: none"> <li>- Allows for residential development to be undertaken on the application site.</li> <li>- Results in a low density development which would place less pressure on the local infrastructure and roading network.</li> </ul> <p>Costs</p> <ul style="list-style-type: none"> <li>- The proposal would result in the loss of an area of commercially zoned land within the Hutt Valley.</li> <li>- Results in a level of development which does not utilise the full development potential of the application site.</li> <li>- Results in a level of development arising from the proposal that would be less than what could be established on the adjoining residential sites.</li> <li>- Reduced rates revenue due to the lower number of properties which would be able to be created.</li> <li>- The density of development resulting from this zoning would not recognise the close location of the application site to suburban shopping centres and the public transport network.</li> </ul>

6.4 The Risk of Acting or Not Acting

Section 32 (4) (b) of the Resource Management Act 1991 states:

(4) For the purposes of *[[the examinations referred to in subsections (3) and (3A)]], an evaluation must take into account—*

- (b) *the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods.*

In considering the proposal against Section 32 (4) of the Resource Management Act 1991, it is considered that Council has sufficient information to consider this Proposed Plan Change.

#### **7.0 - SUMMARY:**

The Proposed Plan Change is seeking to rezone 1 – 13 Ludlam Crescent from Suburban Commercial Activity Area zoning to General Residential Activity Area - Medium Density zoning.

The evaluation of the Plan Change has included an assessment of effects on the environment from rezoning the site to General Residential Activity Area - Medium Density and the subsequent residential development. The proposed General Residential Activity Area – Medium Density zoning is considered to be consistent with the character of the local environment and would allow for future development of the site in a manner which is in keeping with the amenity values of the local environment.

An analysis of the relevant national, regional and local policies and plans has been undertaken. It is considered that the Plan Change is consistent with the national, regional and local policies and plans. The rules, objectives and policies for the General Residential Activity Area - Medium Density zone are considered to adequately control any potential adverse effects resulting from the rezoning of the application site and any subsequent residential development. As such, no changes to the existing rules, objectives and policies for the General Residential Activity Area - Medium Density zone have been sought as part of this Plan Change.

The costs and benefits of the Plan Change have been assessed against the purpose of the Resource Management Act 1991. The costs and benefits of the options for the site have been evaluated and the recommended option (option 3, rezone the site to General Residential Activity Area - Medium Density) is considered to be the most appropriate in terms of achieving the purpose of the Act. Overall, the proposed Plan Change is considered to be consistent with the purpose and principles of the Act.

The Section 32 analysis demonstrates the benefits of the Proposed Plan Change outweigh the potential costs and that the other potential methods would not be as beneficial as the proposed General Residential Activity Area - Medium Density zone which has been recommended.

Prepared By

James Beban  
Senior Resource Management Planner  
Cuttriss Consultants Limited



**INDEX TO APPENDICES**

1. An indicative 5 lot subdivision plan for the site.
2. Locality plan.
3. Computer Freehold Registers
4. Assessment of the traffic effects associated with the Proposed Plan Change
5. PDP report investigating the contamination levels on the site
6. Assessment of the infrastructure effects associated with the Proposed Plan Change.
7. Location of the Suburban Commercial Centres in close proximity to the site.
8. Aerial Photograph showing the residential properties consultation was undertaken with.

