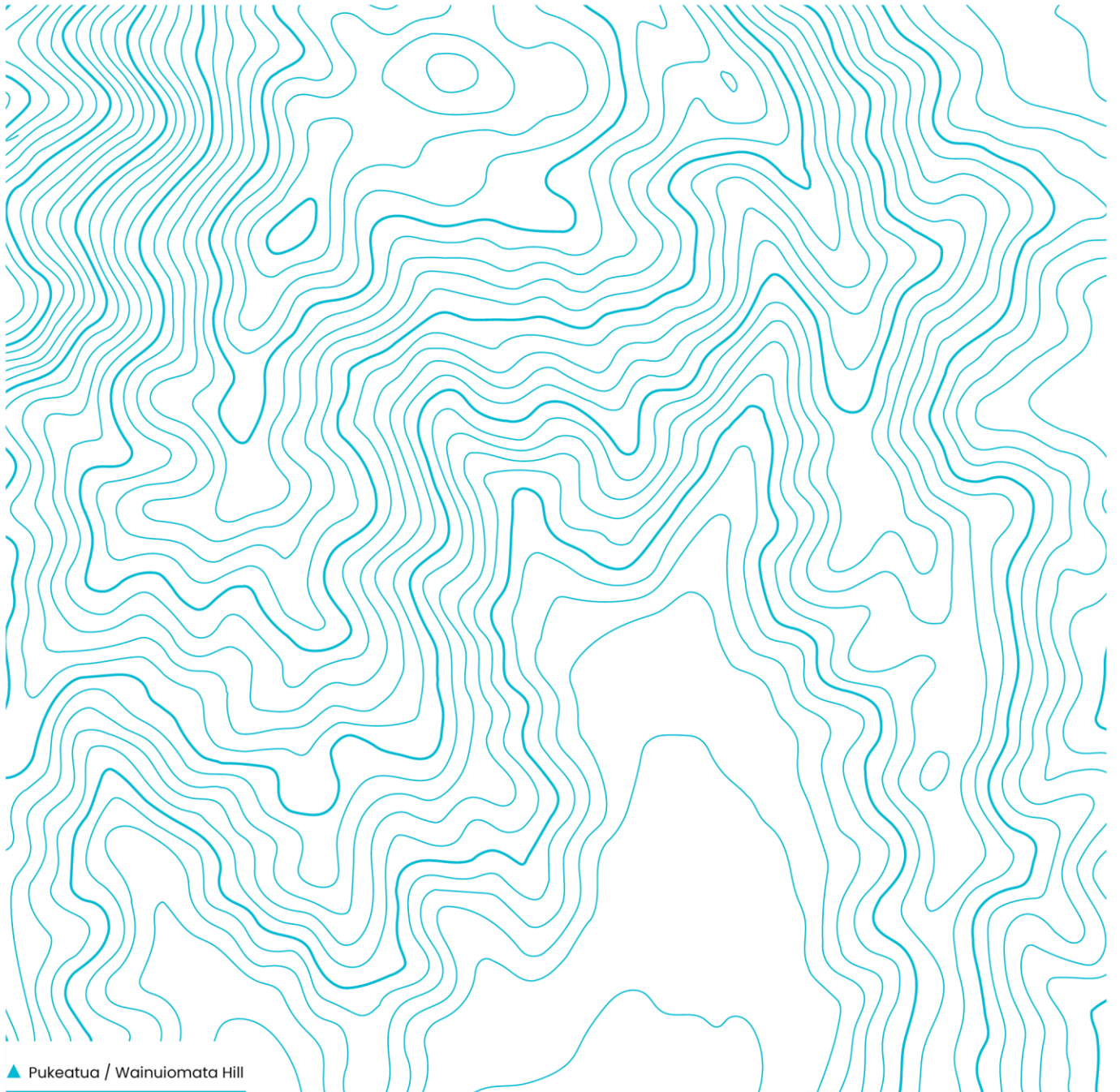


Section 32 Evaluation TEMPORARY ACTIVITIES



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2 Overview and Purpose

- (1) Hutt City Council is reviewing the City of Lower Hutt District Plan. This is a full review of the District Plan, including the approach to temporary activities and filming.
- (2) For both this report and the proposed district plan, filming is considered a type of temporary activity, and will only be mentioned separately when relevant.
- (3) This report is a record of the review with regard to temporary activities, and includes an evaluation of objectives and provisions for a proposed District Plan to address temporary activities, in accordance with the requirements of s32 of the Resource Management Act 1991.
- (4) This report sits as one of a package of reports for the proposed Plan and should be read alongside the Plan-Wide Report, which covers matters common to all Plan topics.

2.1 Temporary activities and district plans

- (5) Temporary activities are not a single distinctive type of activity with distinctive effects. Temporary activities can include for example festivals, parades, concerts, fairs, markets, circuses, carnivals, exhibitions, displays, theatrical productions, art installations, filming on location, military training, emergency response training, cultural events, sporting events, ceremonies, public meetings, public gatherings, and other community or special events. Temporary activities can also include temporary buildings and structures.
- (6) What unites temporary activities is their short duration and short-term or intermittent effects.
- (7) However, common effects that can need managing are impacts on the transport network, noise, amenity values, heritage and cultural values, health and safety, public access, and the risks that a temporary activity could nonetheless have permanent effects.

- (8) The Temporary Activities chapter follows the issues set out for this chapter covered in the National Planning Standards, and so covers temporary activities, buildings, and events.
- (9) Not all short-term or intermittent activities are covered through the Temporary Activities chapter. Infrastructure activities are dealt with in the Infrastructure chapter, and construction activities are dealt with in zone chapters. Accordingly, these are not considered in this report but in the Section 32 reports for the relevant chapters.

3 Statutory and Policy Context

- (10) The following sections discuss the national, regional and local policy framework that are particularly relevant to the statutory and policy context for temporary activities for the District Plan Review.
- (11) The relevance of the national, regional and local planning documents for the District Plan is summarised in the Overview and Strategic Directions Report.
- (12) Temporary activities are not often directly addressed in legislation, policies and strategies. While they can have a wide range of environmental effects, these effects are typically addressed in legislation, policies in strategies more generally. The statutory and policy context for those effects are mostly covered in other section 32 reports (for example, effects on the transport network are addressed in the Transport section 32 report).

3.1 Resource Management Act 1991

3.1.1 Part 2 – Purpose and Principles

- (13) The purpose of the RMA is set out in Section 5. The purpose is to promote the sustainable management of natural and physical resources.
- (14) Under s5(2) of the Act, sustainable management means:

managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while—

- (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations;*
- and*

- (b) *safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
 - (c) *avoiding, remedying, or mitigating any adverse effects of activities on the environment.*
- (15) Section 6 of the RMA sets out matters of national importance that all persons exercising functions and powers under the Act shall *recognise and provide for* in achieving the purpose of the RMA.
- (16) Section 7 of the RMA sets out other matters that all persons exercising functions and powers under it shall *have particular regard to* in achieving the purpose of the RMA.
- (17) Section 8 of the RMA requires Council to *take into account* the principles of the Treaty of Waitangi when exercising functions and powers under the Act.
- (18) Given the broad range of temporary activities, but their generally temporary effects, any matter in section 5, 6, 7, or 8 might be relevant to a particular temporary activity. However, the most common matters are likely to be health and safety (s5), avoiding, remedying, or mitigating effects (s5), public access (s6), the efficient use of resources (s7), and amenity values (s7).

3.2 National direction

- (19) No National Policy Statements, National Environmental Standards, or the New Zealand Coastal Policy Statement are particularly relevant to temporary activities.

3.2.1 National Planning Standards

- (20) The only relevant direction in the Standards is that provisions for temporary activities must be included in a Temporary Activities chapter (standard 7.37).

3.3 Regional direction

- (21) The Regional Policy Statement for the Wellington Region ('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.
- (22) There are no particularly relevant objectives or policies in either the operative or proposed RPSs.
- (23) Under Section 75(4)(b) of the RMA, a district plan must not be inconsistent with a regional plan for any matter specific in section 30(1) of the RMA (which relates to functions of regional councils). For the Wellington Region, the Natural Resources Plan ('the NRP') is the only relevant regional plan. There is a currently proposed change to the NRP, Proposed Change 1.
- (24) Neither the operative NRP nor the proposed change have any particularly relevant provisions to temporary activities.

3.4 Iwi management plans

- (25) Section 74(2A) requires territorial authorities, when preparing or changing a district plan, to take into account any relevant planning document recognised by an iwi authority and lodged with the territorial authority, to the extent that its content has a bearing on the resource management issues of the district.
- (26) In addition, iwi authorities may have other planning documents that, while not mandatory considerations for the District Plan Review, should still be taken into account for the Review as they are a source of information on the intentions of an iwi authority. Considering these documents can aid integrated management.
- (27) There are no relevant iwi management plans for this topic.

3.5 Hutt City Council plans, policies, and strategies

- (28) Council has no plans, policies, or strategies directly relevant to managing the effects of temporary activities. However, as a major driving force and funder of large-scale temporary activities, Council's plans and strategies do affect the type and number of temporary activities we can expect in Lower Hutt.
- (29) At the time of writing the following Council plans, policies and strategies were relevant for Council's participation in temporary activities:
- Arts and Culture Policy 2016
 - Events Strategy 2013
 - Events Plan Approach 2020 (an operational plan from the Chief Executive, not adopted by Council).
 - Parking Policy 2017 (a replacement is currently undergoing public engagement)
 - Reserve Management Plans for individual parks and reserves
 - Smokefree Outdoor Public Places Policy 2019
- (30) There are also various Council bylaws that would be relevant to temporary activities involving alcohol, or held in public reserves or the road corridor, such as:
- Control of Alcohol in Public Places Bylaw 2016
 - Parks and Reserves Bylaw 2017
 - Public Places Bylaw 2016
 - Solid Waste Management and Minimisation Bylaw 2021
 - Trading in Public Places Bylaw 2018
 - Traffic Bylaw 2017
- (31) In addition, the Local Alcohol Policy, while not a bylaw, governs the policy for the issue of special liquor licences and has provisions for managing some adverse effects such as noise.

3.6 District plans of adjacent territorial authorities

- (32) Many temporary activities are conducted by people who conduct these activities across the region, country, or internationally. Location filming is often a very short term activity in any one location but may be conducted by the same operator in numerous places around the country for any one production. The New Zealand Defence Force, concert promoters, and travelling circuses are other historic examples of relevance to Lower Hutt.
- (33) Council delegates much of its regulatory responsibilities for managing location filming to Screen Wellington, a regional body who issue permits for several territorial authorities.
- (34) This warrants careful consideration of the consistency with other councils in preparing the proposed chapter, although not at the exclusion of achieving other objectives, particularly regulatory simplicity and avoiding unnecessary resource consents.

3.7 Other statutory and non-statutory plan, policies, and strategies

- (35) The following other non-statutory document is relevant for temporary activities:
- New Zealand Local Government Filming Protocol 2002
- (36) This protocol is discussed below:

Plan, Policy, or Strategy	Comments
New Zealand Local Government Filming Protocol 2002	While dated, this is the most relevant guidance on the needs of the screen industry, such as the typical tight timeframes of the industry and other common regulatory approvals needed for filming.

4 Resource management issues

4.1 Introduction to resource management issues

- (37) Temporary activities include public events like fairs, concerts, and markets, and private events such as can bring a wide range of economic, social, and cultural benefits to the city. Due to their nature they can be set up at short notice and it is often impractical to hold them to the same standards for managing their effects as permanent activities. The community is also generally more accepting of short-term effects.
- (38) However, there are still issues to be managed with temporary activities, particularly larger events or those that run more frequently or for a longer span of time.

4.2 Evidence base

- (39) Council has reviewed the operative District Plan, reviewed a sample of resource consents, compared the approaches in other recent district plans in the region, and sought and considered community feedback.

4.2.1 Existing approach of City of Lower Hutt District Plan

- (40) The operative plan handles temporary activities in two chapters, largely in the Temporary Activities chapter (14J) but with location filming broken out into a separate Filming chapter (14K). Both were introduced by Plan Change 13, which became operative in 2010.
- (41) The objectives are generic, and seek:

- To provide for a wide range of temporary activities,
- To avoid, remedy, and mitigate effects on the environment both in general, and specifically on amenity values, and
- The appropriate management of filming and associated activities

(42) To these ends, policies and rules set out:

- Permitted types and scales of temporary activities, based on the duration, hours and location
- Standards for the effects of temporary activities
- That other district-wide standards still apply
- A restricted discretionary resource consent pathway for other temporary activities, covering amenity values, the natural environment, cultural values, reverse sensitivity, waste, health and safety.

(43) Through a review of consenting and compliance issues for temporary activities, the operative plan has been found to be reasonably effective. Feedback is that consenting is not a major barrier to conducting events and there are also relatively few complaints about the effects of events.

(44) However, a lack of clarity over limits on event recurrence has led to some frequently recurring activities that are not really “temporary” have been treated as permitted by the chapter despite not being within the intent of the chapter.

(45) The plan’s efficiency could be improved, as many consents in the sample analysed were granted on the basis of less than minor effects, and it was generally unnecessary for them to have gone through the consenting process. This is particularly the case for breaches of high trip generator thresholds in the Transport chapter (introduced to the operative District Plan in 2018).

(46) The temporary activities chapter does not have significant usability or legibility issues, although there is a lack of clarity over the definition of “temporary activity”.

4.2.2 Analysis of other District Plans

- (47) Council considered the approach of the Wellington City proposed district plan, the Porirua City proposed district plan, and the operative Upper Hutt City district plan, as these are relatively recent plans from nearby in the region.
- (48) These plans commonly contain objectives recognising the benefits of temporary activities and the promoting the management of effects. There is little consistency over the details of related standards such as hours, light, noise, or how the chapter integrates with other district-wide matters.
- (49) No other chapter breaks out location filming as a separate activity.

4.2.3 Advice from mana whenua

- (50) Council has engaged with mana whenua on the district plan review through the Kāhui Mana Whenua engagement group. No specific issues have been raised with regard to the topic of temporary activities.

4.2.4 Stakeholder and community engagement

- (51) Council engaged with the community and stakeholders in several rounds:

Date	Invitees	Summary
2020	Stakeholder groups	General comment was sought and received from Screen Wellington, and some events promoters
2020	General public	General comment was received from several members of the community
2023	Stakeholders and general public	Specific comment was sought on the draft chapter from the public and stakeholders – general comments were received as well as users filling out the online survey tool.

- (52) Main themes of this feedback were:
- Support for providing for events,
 - Concerns around the duration of temporary events,
 - Concerns around the provision of public transport for large events,

- Concerns around parking for large events,
- Concerns about the interaction with Heritage and Sites and Areas of Significance to Māori provisions,
- Feedback from filming operators about the different characteristics and needs of location filming activities, and
- Requests for additional sites for the Major Events Overlay (this overlay was first introduced through the draft District Plan).

4.3 Summary of issues analysis

(53) Based on the above sources of information, the key resource management issues are as follows:

4.3.1 Providing for temporary activities

(54) The District Plan should continue to enable temporary activities and avoid unnecessary resource consent burdens for temporary activities with only minor or short-term effects.

4.3.2 Amenity values

(55) Temporary activities can impact on amenity values, particularly through noise, light, traffic, and general disruption. These effects can be managed or reduced through appropriate management.

4.3.3 Transport network

(56) Larger scale temporary activities can have impacts on transport network capacity and safety. These impacts, as well as the benefits of temporary activities can also be affected by location, with locations closer to major centres and the public transport network generally having greater benefits and lower impacts.

4.3.4 Needs of specific temporary activities

(57) Some specific temporary activities have different characteristics and needs, such as hours of operation or duration, but due to their unusual nature or specific characteristics these needs can be accommodated through exceptions to general standards.

4.3.5 Other adverse effects

- (58) Temporary activities less commonly can have impacts on matters of particular importance such as the natural environment, cultural values, or public access. Given the high impacts of these effects, temporary activities need to be managed to ensure these effects are short-term and minimised.

5 Scale and significance assessment

(59) In writing this evaluation report we must provide a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects anticipated from the implementation of the proposal.

(60) In assessing that scale and significance we have had regard to:

Matters of national importance	Given the broad range of temporary activities, any matter of national importance might be relevant to a particular temporary activity.
Other matters	This topic touches on the s7 matter of amenity values and has a minor contribution to that matter.
Degree of change from the operative plan	The proposed approach has a minor degree of change from the operative plan.
Geographic scale of effects	This issue affects the entire district although most effects from any one event (except from major events) are likely to only be relevant at the scale of a neighbourhood.
Number of people affected	Any one event might affect a neighbourhood or suburb.
Duration of effects	Under the definition of “temporary activities” proposed, the effects of temporary activities are necessarily short-lived.

Economic impacts	Low impacts. Temporary activities can have positive economic impacts but events of a scale to have significant economic benefits are currently infrequent in Lower Hutt.
Social and cultural impacts	Moderate. Events and celebrations can be important components of cultural life.
Environmental impacts	Low.
Health and safety impacts	Potentially moderate impacts on transport network safety, although this is largely managed outside the District Plan.
Degree of interest from mana whenua	Low.
Degree of interest from the public	Low.
Degree of risk or uncertainty	Moderate, given the fairly generic nature of the chapter and the wide range of types of activities covered.

(61) Accordingly, the overall scale and significance of the effects of temporary activities are **low**.

6 Proposed District Plan objectives and provisions

(62) The following table gives the objectives of the proposed Temporary Activities chapter, with a summary of the policies and rules that implement each objective:

Objective	Text and associated provisions
TEMP-O1	<p>“A broad range of temporary activities contribute to making Lower Hutt a vibrant, diverse, and prosperous city.”</p> <p>Implemented through:</p> <ul style="list-style-type: none"> • TEMP-P1 (Recognise benefits of temporary activities), • TEMP-P3 (Provide for temporary activities), • TEMP-P8 (Encourage events to be conveniently accessible), • TEMP-R1 (Temporary activities), • TEMP-R2 (Temporary buildings and structures), and • Standards on Duration, Recurrence, Hours of operation, Transport, Restoration of site, and Buildings, structures and features.
TEMP-O2	<p>“Temporary activities occur in ways that:</p> <ol style="list-style-type: none"> 1. Protect cultural and heritage values, people's health and safety, and the natural environment; and 2. Protect public access to lakes, rivers, and the coast; and

	<p>3. Do not detract from public access to public spaces (other than any public space in which the temporary activity occurs) and the capacity of the transport network more than is reasonable considering the benefits of the activity; and</p> <p>4. Do not detract from amenity values more than is reasonable considering the benefits of the activity; and</p> <p>5. Have only temporary adverse effects.”</p> <p>Implemented through:</p> <ul style="list-style-type: none"> • TEMP-P2 (Recognise limited duration of effects), • TEMP-P4 (Manage temporary activities to minimise adverse effects on public access, health and safety, and the natural environment), • TEMP-P5 (When effects of temporary activities on public access to public spaces must be mitigated), • TEMP-P6 (When effects of temporary activities on amenity values must be mitigated), • TEMP-P7 (When effects of temporary activities on transport capacity must be mitigated), • TEMP-R1 (Temporary activities), • TEMP-R2 (Temporary buildings and structures), and • Standards on Duration, Recurrence, Hours of operation, Transport, Restoration of site, and Buildings, structures and features.
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7 Evaluation of objectives

- (63) This section is the evaluation of objectives, as required through s32(1)(a) of the RMA.
- (64) An objective is a statement of what is to be achieved through the resolution of a particular resource management issue. A district plan objective should set out a desired end state to be achieved through the implementation of policies and rules.
- (65) Under s75(1)(a) of the Resource Management Act, a district plan must state the objectives for the district.
- (66) Under s32(1)(a) of the Resource Management Act, an evaluation report required under the Act must examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of the RMA. The purpose of the RMA, as stated in s5(1) of the Act, is to promote the sustainable management of natural and physical resources.
- (67) The objectives in this chapter are intended to be considered together as the two objectives express the two halves of the trade-off to be considered when managing the positive and negative effects of temporary activities. Accordingly, the objectives are evaluated together.

TEMP-O1 – Benefits of temporary activities
TEMP-O2 – Adverse effects of temporary activities
Relevance <ul style="list-style-type: none">All objectives directly respond to a resource management issue identified in section 4.3 of this report.
Usefulness <ul style="list-style-type: none">Each objective sets out relevant effects on the environment.Supports Council’s role in advancing economic, social, and cultural wellbeing, and health and safety.Supports the Council function of controlling the actual and potential effects of temporary activities.
Reasonableness

- Council has not opted to set an objective for every identified resource management issue, but rather, only those that are likely to be affected by temporary activities.
- Provides an optional framework for activities unlikely to have major or long-term effects, while managing longer duration and larger events.
- Recognising the benefits as well as adverse impacts of temporary activities means that Council must balance these two factors. Objectives provide a test for this balance where relevant.

Achievability

- Relatively low degree of change from operative plan, so experience shows provisions are achievable.
- Can be achieved without imposing a significant regulatory burden on promoters of temporary activities or excessive enforcement costs on the Council (although the policies and rules that implement the objective would have a greater influence on this).

Alternatives considered

Council did not consider any significant alternatives.

8 Evaluation of Policies and Rules

8.1 Background

- (68) Policies and rules implement, or give effect to, the objectives of a plan.
- (69) Policies of a district plan are the course of action to achieve or implement the plan's objective (i.e. the path to be followed to achieve a certain, specified, environmental outcome). Rules of a district plan implement the plan's policies, and have the force and effect of a regulation.
- (70) Under s32(1)(b) of the Resource Management Act, an evaluation report required under the Act must examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—
- (i) *identifying other reasonably practicable options for achieving the objectives; and*
 - (ii) *assessing the efficiency and effectiveness of the provisions in achieving the objectives; and*
 - (iii) *summarising the reasons for deciding on the provisions.*
- (71) Under s32(2) of the Resource Management Act, the assessment of the efficiency and effectiveness of the provisions must:
- (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.*

8.2 Notes

(72) Specific quantification of the benefits and costs associated with the proposed Temporary Activities chapter is not considered practical, given the relatively low scale and significance of the issue, and the characteristics of temporary activities as a resource management issue that:

- The scale and nature of temporary activities varies unpredictably over time in response to economic and social changes, and changes in non-regulatory council policy,
- The negative effects are expected to be temporary, and
- Many of the positive and negative effects are in areas such as social, cultural, or environmental which are more difficult or impossible to objectively quantify.

(73) The evidence base which has informed the preparation of the proposed Temporary Activities chapter is identified in section 4.2 of this report. With consideration to this evidence base, the issues concerning temporary activities are generally well understood through experience. As such, there is sufficient information on which to base these provisions. To the extent that any information is uncertain or insufficient, the risk of not acting may be that the benefits of temporary activities are not fully realised, or adverse effects of temporary activities are not appropriately managed.

8.3 Evaluation of provisions

(74) The proposed provisions are eight policies and two rules. The rules have six associated standards covering duration, recurrence, hours of

operation, transport, site restoration, and temporary buildings and structures.

- (75) The policies, TEMP-P1 to TEMP-P8, set out the different relevant effects of temporary activities and – primarily – how they are to be weighted in resource consent applications.
- (76) Rule TEMP-R1, covers all temporary activities and provides for them as permitted activities subject to standards or in most cases restricted discretionary otherwise.
- (77) Rule TEMP-R2 covers temporary buildings and structures. The major effect of this rule is to set out in which zones those temporary structures are exempt from some bulk and location controls.

<p>TEMP-P1 to TEMP-P8 TEMP-R1 to TEMP-R2</p>
<p>Why these provisions are included in the proposed District Plan</p>
<p>These provisions implement the objectives TEMP-O1 and TEMP-O2.</p> <p>The policies outlines the purpose of the standards and provides guidance for matters to consider when assessing applications under the rules. The policies are not referred to in the assessment matters for restricted discretionary activities but should be considered in any application. The rules set out permitted temporary activities, and temporary buildings and structures, and a restricted discretionary resource consent pathway when the standards are exceeded.</p>
<p>Efficiency and effectiveness</p>
<p>Benefits</p> <ul style="list-style-type: none"> • Clearly identifies types of effects from temporary activities which need to be managed. • Tailored standards for different areas and situations provide greater protection where needed without requiring assessment where not needed. • Provides objective standards that, for most small scale events, can be implemented without needing complex assessments, and can be enforced using resources routinely available to council. • Enables economic growth and social and cultural well-being through providing for the benefits of temporary activities. • Manages cumulative effects. <p>Costs</p>

- Through providing for a wide range of temporary activities, some adverse effects will not be able to be avoided.
- Adverse effects will occur through violations of the plan that are not practical to monitor and enforce.
- Leaving some effects management to other processes (e.g. council's role as road controlling authority) increases complexity of applying for and managing large events.

Overall assessment

The provisions are effective in implementing the outcomes expressed in the objectives. Providing for the benefits of temporary activities and managing effects on the environment may in some circumstances lead to conflicting outcomes. The provisions provide guidance as to how resource consent applications may resolve tension between these outcomes.

Reasonably practicable alternatives

- **Simpler, stricter rule framework**

The rule framework could be based on a simpler rule framework which does not vary by area, and controls all but the smallest scale events, requiring resource consent assessment. This would however trigger a larger number of resource consent applications, with associated costs, and Council opted not to pursue this approach as its experience is that most consent applications for temporary activities are already of little value and are routinely approved.

9 Summary

(78) This report, including the evaluation, has been prepared to set the context for the Temporary Activities chapter of the proposed District Plan. The evaluation has been undertaken in accordance with section 32 of the RMA in order to identify the need, benefits and costs and the appropriateness of the proposed chapter, having regard to its effectiveness and efficiency relative to other means in achieving the purpose of the RMA. The evaluation demonstrates that this proposal is the most appropriate option as it:

- Largely continues the operative plan approach to the extent that approach has been successful,
- Recognises and provides for the benefits of temporary activities,
- Sets objectives that are relevant, useful, reasonable and achievable,
- Manages the adverse effects of temporary activities on the environment, in a way that recognises the different characteristics of different environments, particularly urban, suburban, rural, and natural areas,
- Minimises compliance and enforcement costs,
- Provides adequate direction for resource consent applications,
- Is consistent with other council policies and strategies, and
- Is consistent with the requirements of the National Planning Standards.