

2.22 Future Urban zone - section 32 evaluation for the Proposed Auckland Unitary Plan

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1 Overview and Purpose

This evaluation should be read in conjunction with Part 1 in order to understand the context and approach for the evaluation and consultation undertaken in the development of the Proposed Auckland Unitary Plan (the Unitary Plan).

1.1 Subject Matter of this Section

This report assesses the key policy approaches of the Future Urban zone. The Future Urban zone is essentially a holding pattern that identifies rural land suitable for urban development in the future. This holding pattern will remain in place until a plan change and concurrent structure plan release the land for live urban zoning. For the assessment of higher level growth management refer to the urban form and land supply section 32 report.

The first of the key policy approaches is the use of the prohibited activity status for all subdivision in the Future Urban zone, except for network utilities, minor boundary adjustments and amendments to cross leases. The Future Urban zone is also identified as a donor site in the transferable rural site subdivision rules. Refer to the rural subdivision section 32 for the assessment of transferable rural site subdivision. The second key policy approach is the use of the non-complying activity status for more than one dwelling per site.

1.2 Resource Management Issue to be Addressed

The Rural Urban Boundary (RUB) will set a long-term limit to the expansion of the city for the next 30 years. The RUB will accommodate up to 40 per cent of the region's growth in greenfield areas outside the existing metropolitan area. This is a greater amount of greenfield land than has been identified at any one time previously in the Auckland region. This greenfield land will be given a Future Urban zone. Some of this future urban land may not be released for development for 30 years. The comprehensive planning and urban development of this greenfield land is a significant resource management issue.

1.3 Significance of this Subject

The Future Urban zone in the Unitary Plan has two significant policy approaches that justify section 32 evaluation. The first of these significant policy approaches is subdivision as a prohibited activity, except subdivision for network utilities, minor boundary adjustments and amendments to cross leases. The Future Urban zone is also identified as a donor site in the transferable rural site subdivision rules. Refer to the rural subdivision section 32 for the assessment of transferable rural site subdivision. This represents a significant shift to a more restrictive approach than that used in the legacy district plans.

The second key policy approach is the use of the non-complying activity status for more than one dwelling per site. This approach is already used in a number of the legacy District Plans. Although two of the legacy District Plans have more permissive approaches in relation to minor household units, and secondary and subsidiary dwellings. The Future Urban zone is essentially a rural zone that identifies land suitable for urban development in the future. The zones provisions are based on the Rural Production zone. More than one dwelling in the Rural Production zone in the Unitary Plan is a discretionary activity. Therefore the approach of the Future Urban zone is a significant departure from the approach of the Rural Production zone. This warrants being addressed in the section 32 report.

Both policy approaches will create environmental, economic and social benefits; however they will also result in some economic, social and cultural costs. The benefits include preventing premature subdivision and development from compromising the eventual development of greenfield land, maximising efficient use of greenfield land and infrastructure, minimising the environmental effects of eventual urban development, supporting rural activity and giving effect to the directives of the Auckland Plan. The policy approaches create short and medium term costs in terms of subdivision, development and

opportunity costs for landowners, social costs of restricting housing development, and cultural impacts on freehold Maori land and Māori land that will not remain within a hapū.

1.4 Auckland Plan

The Rural Urban Boundary (RUB) defines the urban extent of Auckland to 2040. The Auckland Plan states that greenfield land within this RUB will be released in an orderly and sequenced manner (paragraph 533).

Directive 10.4 of the Auckland Plan seeks to locate and develop greenfield areas as sustainable liveable neighbourhoods in a way that:

- a) demonstrates the most efficient use of land
- c) provides community facilities, open space, infrastructure (including transport, communications, power and water utilities) in a timely and efficient manner.

1.5 Current Objectives, Policies, Rules and Methods

The approaches taken by the legacy District Plans to subdivision and the number of dwellings per site in the Future Urban zone (or equivalent) are outlined below.

Subdivision approach in legacy District Plans

The legacy approaches to subdivision in Future Urban zone (or equivalent) can be grouped for assessment by their similarities into three distinct approaches. These approaches, which have been assessed separately, are:

- Subdivision in the Future Urban zone (or equivalent) in the Manukau, North Shore and Papakura District Plans as a non-complying activity (aside from a few exceptions). There is no minimum lot size specified in the Future Urban zone (or equivalent) in these district plans.
- Subdivision in the Future Urban zone (or equivalent) down to a 4 hectare minimum lot size in the Rodney District Plan as a restricted discretionary activity.
- Subdivision in the Future Urban zone (or equivalent) down to a 2500m² minimum lot size in the Franklin District Plan as a discretionary activity.

Dwellings approach in legacy District Plan

The legacy approaches in terms of the number of dwellings enabled per site in the Future Urban zone (or equivalent) can be grouped for assessment by their similarities into three distinct approaches. These approaches, which have been assessed separately, are:

- More than one dwelling per site in the Future Urban zone (or equivalent) as a non-complying activity in Manukau, Papakura, Rodney, North Shore and Franklin District Plans. Exceptions to this in North Shore and Franklin are outlined below and are assessed separately.
- A minor household unit on sites 600m² or larger is permitted in the North Shore District Plan.
- A secondary dwelling on sites larger than 40ha is permitted in the Franklin District Plan. A subsidiary dwelling for farm workers or aged or infirm relatives is also a restricted discretionary activity.

1.6 Information and Analysis

The information and analysis undertaken in developing the approach to the Future Urban zone includes;

- Review of the Future Urban zone approaches taken by the legacy District Plans.
- Review of Auckland Plan directives for greenfield growth.
- Consultation as detailed in section 5.2.
- Review of recent Environment Court decisions
- Capacity modelling to determine subdivision and development capacity of alternatives.

1.7 Consultation Undertaken

The development of the Unitary Plan was based on extensive stakeholder and public consultation, together with political decision-making. Initial consultation for the Unitary Plan began in October 2011 and until August 2012 represented a targeted and prioritised engagement approach. From September 2012 onwards consultation on the Unitary Plan has followed an enhanced engagement programme. Consultation undertaken has been over and above the statutory requirement set out in clauses 2 – 3C in schedule 1 of the RMA. Details of the consultation programme for the Unitary Plan is outlined in section 1 of wider s32 report. Consultation on the Future Urban zone, as part of wider consultation on growth, was undertaken with iwi, adjoining Local Authorities, Local Boards, infrastructure providers, various stakeholders and the community. During the engagement on the draft Unitary Plan from March to May 2013, the Future Urban zone attracted 58 individual pieces of feedback. Further details of this consultation, including changes made to the zone in response to feedback received, are provided in section 5.2.

1.8 Decision-Making

Issues papers were developed outlining significant resource management issues facing the region went before the Unitary Plan Political Working Party (PWP). Using issues papers and direction provided by the PWP options papers an outcomes matrix was developed. The outcomes matrix was a tool to identify outcomes different zones across the region were seeking to achieve. The PWP, Local Boards and Council Controlled Organisations were able to amend and add to the outcomes matrix. Tensions between competing outcomes were identified and were addressed by the PWP. The outcomes matrix was used as the base for developing the provisions of the Unitary Plan including the Future Urban zone. The provisions of the Unitary Plan which relate to greenfield development and the Future Urban zone were endorsed by the PWP on a number of occasions. Refer to section 5.3 for a detailed outline of the political decision making that occurred in relation to the Future Urban zone.

1.9 Proposed Provisions

The Unitary Plan proposes a prohibited activity status for all subdivision in the Future Urban zone, aside from small scale boundary adjustments, subdivision for network utilities and amendments to cross leases. The Future Urban zone is also identified as a donor site in the transferable rural site subdivision rules. A non-complying activity status for more than one dwelling per site is also proposed for the Future Urban Zone. The proposed provisions are further detailed in section 2.2.2 of this report.

1.10 Reference to other Evaluations

- 2.1 Urban form and land supply
- 2.35 Rural subdivision

2 Objectives, Policies and Rules

2.1 Objective – Unitary Plan RPS level

The following objectives are proposed:-

Objective 2.3.4 of Chapter B – The development of land zoned future urban within the RUB occurs in an orderly, timely and planned manner.

Refer to the assessment of this objective and relevant policies in the section 2.2 Rural urban boundary location of the wider s.32 report that assesses the rural urban boundary, land supply and development capacity.

2.2 Objective – Unitary Plan District Level

The following objectives are proposed:-

Objective 4.2 of Chapter D - Future urban development is not compromised by premature subdivision, use and development

Appropriateness of the Objective

Relevance

Addressing the key draft Unitary Plan issues

The objective addresses the following issues contained in the RPS section of the Unitary Plan:

- 2.1.1 – enabling quality urban growth
- 2.1.5 – sustainably managing our natural resources
- 2.1.4 – addressing issues of significance to Mana Whenua.

Achieving the purpose of the Act

The purpose of the RMA, contained in s.5 is 'to promote the sustainable management of natural and physical resources'. The objective is in accordance with this purpose. The greenfield land that accommodates future urban development and the infrastructure that services this development are both physical resources. Ensuring greenfield land and infrastructure provision is not compromised by premature subdivision, use and development is the sustainable management of these physical resources.

Section 6 of the RMA lists a number of matters of national importance that must be recognised and provided for by all those exercising powers and functions under the Act. The matters of national importance considered of relevance to this objective are listed below:

- clause (e) – the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga.

It is considered that these matters of national importance are recognised and provided for by the objective.

There are a number of other matters, listed in s.7 of the Act, which must be given particular regard in relation to managing the use, development and protection of natural and physical resources. A number of these matters are relevant to the objective:

- clause (a) – kaitiakitanga
- clause (b) – the efficient use and development of natural and physical resources
- clause (c) – the maintenance and enhancement of amenity values
- clause (f) – maintenance and enhancement of the quality of the environment
- clause (g) – any finite characteristics of natural and physical resources

It is considered that in the development of the objective these matters were given adequate regard.

Section 8 relates to Mana Whenua who have been a key part of engagement on the Unitary Plan. In consultation events in October 2012, Mana Whenua confirmed they have an interest in the development of Greenfield land. Particular concerns raised by Mana Whenua during this consultation, in relation to greenfield development, included reverse sensitivity towards rural activities and increased pressure on undeveloped areas for recreational use. It was also raised that there is an expectation to be involved in decision-making on suitable areas for urban development and for greenfield growth to recognise Mana Whenua values. While the objective does not explicitly address these concerns, several policies that sit directly under this objective have been drafted to do so.

Achieving the strategic direction of the Auckland Plan

The objective is consistent with achieving the following directives of the Auckland Plan:

- Directive 10.4 – Locate and develop greenfield areas as sustainable liveable neighbourhoods in a way that:
 - a) demonstrates the most efficient use of land
 - c) provides community facilities, open space, infrastructure (including transport, communications, power and water utilities) in a timely and efficient manner.

Usefulness

The objective will be useful in setting the direction that the policies and rules of the Future Urban zone will give effect to. The objective will also be useful in guiding consent applications and assessments.

It is not considered that this objective will impact on any other issues or objectives; however it will assist in achieving a number of positive outcomes. These outcomes are identified in sections 2.2.3 of this report, under costs and benefits.

Achievability

The objective is in accordance with the council's functions as a territorial authority under s. 31(1) of the RMA. The methods used by the Unitary Plan to achieve this objective include:

- zoning
- policies
- rules
- assessment criteria
- structure plan guidelines.

The methods outside of the Unitary Plan considered to contribute to the achievement of the objective include:

- land release strategy
- integrated forward land and infrastructure delivery programme
- structure plans
- long-term plans
- annual plans
- funding and management plans of infrastructure providers
- sub-regional analysis to prioritise areas for structure planning and land release.

Monitoring of the subdivision and development in the Future Urban zone will determine the Unitary Plan's success in achieving this objective. This monitoring will be ongoing as part of council's capacity for growth study. No specific timeframe can be placed on when the objective can be considered a success because the uptake of future urban land for development depends on the market.

Reasonableness

The objective is reasonable as the expected long-term benefits outweigh the short term costs.

Benefits:

- enables comprehensive planning, efficient land use and good urban form
- infrastructure provision is less costly, less technically difficult, more efficient and likely to have less environmental impacts
- prevents reverse sensitivity issues and supports rural activity prior to urbanisation.

Costs:

- short-medium term cost associated with restricting landowner's ability to develop their land prior to urbanisation.

2.2.1 Unitary Plan Policies

- Policy 4.2 in Chapter D - *Enable subdivision for network utilities, amendments to a cross lease and minor boundary adjustments and not for other types of subdivision.*
- Policy 4.3 in Chapter D - *Avoid activities that:*
 - a. compromise the efficient and effective operation of the surrounding transport network*
 - b. require the provision, or extension of the transport, wastewater, water supply, stormwater networks or other infrastructure ahead of the time it is needed for urban development*
 - c. create or extend infrastructure out of sequence or that is not contiguous with the existing network infrastructure*
 - d. attract a high proportion of users beyond the local community*
 - e. will give rise to reverse sensitivity issues when urban development occurs.*
- Policy 4.6 in Chapter D - *Avoid additional dwellings on a site.*

Policies 4.2, 4.6 and 4.3 achieve objective 4.2 in Chapter D. The policy approach to subdivision in the Future Urban zone is contained in Policy 4.2. Policy 4.3 sets out the approach of avoiding activities that may compromise the future development of the Future Urban zone. The policy approach to multiple dwellings on a single site in the Future Urban zone is contained in Policy 4.6. These policies are both efficient and effective. Policy 4.2 is effective as only enabling subdivision for network utilities, amendments to cross leases and minor boundary adjustments, and not other types of subdivision will assist in successfully achieving the objective of ensuring future urban land is not compromised by subdivision, use and development. Policy 4.3 is effective as avoiding activities that will compromise existing infrastructure, require or create additional infrastructure, attract a high proportion of users or have the potential to create reverse sensitivity issues will assist in successfully achieving the objective of ensuring future urban land is not compromised by subdivision, use and development. Policy 4.6 is effective as avoiding additional dwellings on a site will assist in successfully achieving the objective of ensuring future urban land is not compromised by subdivision, use and development. It is considered that these policies are efficient as the benefits they achieve outweigh the costs they incur. The costs and benefits are outlined in section 2.2.3 below.

2.2.2 Rules and other methods

The proposed provisions are summarised in 1.9 above. The prohibited activity status for subdivision, with a few exceptions, in the Future Urban zone achieves Policy 4.2. Using a non-complying activity status for more than one dwelling per site in the Future Urban zone achieves Policy 4.6. Refer to sections 3.1 and 3.2 where the proposed rules have been assessed in terms of their efficiency and effectiveness.

2.2.3 Costs and Benefits of Proposed Policies and Rules

It is not considered that the proposed policies have costs and benefits in their own right. The following costs and benefits of the rules were determined after the alternatives assessment in sections 3.1 and 3.2 of this report established that they were the most appropriate options. There has been no analysis which monetises these costs and benefits.

Prohibited subdivision

Costs:

- Cultural impact on Māori land held in freehold title
- Significant ecological area protection foregone
- Significant subdivision and development costs for the landowner
- Significant opportunity cost of subdivision (and thus development)

Benefits:

- Prevents subdivision that would create smaller lot sizes
- No additional demand for infrastructure
- Encourages amalgamation of titles through the transferable rural site subdivision process
- Supports rural activity prior to urbanisation
- Gives effect to Auckland Plan directives
- Is a consistent approach across region

Non-complying more than one dwelling per site

Costs:

- Cultural impact on Māori land held in freehold title
- Restrictive approach impedes landowners ability provide for their economic well-being
- Reverse sensitivity effects on rural activities
- Non-complying resource consent costs
- Opportunity cost of development that would otherwise occur

Benefits:

- Does not create smaller lot sizes in the Future Urban zone
- Minimises infrastructure costs associated with premature development
- Enabling additional housing development in the short term provides a significant social benefit
- Gives effect to Auckland Plan directives
- Consistent approach in Future Urban zones across region

2.2.4 Adequacy of Information and Risk of Not Acting

At the time of writing this report the Unitary Plan provisions had not been signed off by the Governing body and were therefore subject to change. The capacity modelling results are based on the draft Unitary Plan provisions. Further modelling work will be undertaken following adoption of the Unitary Plan for notification, noting that changes may be made as a result of Council's decision on the Unitary Plan. Following this, capacity modelling will be further refined. It is likely the capacity results for subdivision in the future urban zone as outlined in section 3.1 and 3.2 will be adjusted downwards once all constraints are factored into the modelling. This high level capacity modelling does result in a small degree of uncertainty in the information underpinning this report.

There is a risk of not acting until more refined modelling can be undertaken and this uncertainty is resolved. Subdivision prior to urbanisation in the Future Urban zone can cause significant issues for the eventual urbanisation of this land. These issues are outlined in the assessment of alternatives below. Some of these issues are difficult to resolve. An example of this is when subdivision results in smaller lot sizes that compromise the urbanisation of a future urban area. Once this occurs it is inherently difficult to reverse before urbanisation takes place. Therefore the risk of not acting is that the Future Urban zone will be compromised by premature subdivision and development.

3. Alternatives

As discussed above, there are two evaluations within this report.

- an evaluation of the potential approaches to subdivision in the Future Urban zone (section 3.1).
- an evaluation of the potential approaches in terms of dwellings in the Future Urban zone (section 3.2).

The proposed preferred alternatives for these are discussed in 2.0 above. The status quo alternatives are outlined in 1.5 above.

3.1. Evaluation of the potential responses, in terms of subdivision in the FUZ to the issues identified in Part 2 of this report

The alternatives evaluated for the approach to subdivision in the Future Urban zone in section 3.1 are:

Alternative 1 Status quo approach – Retain legacy district plan policy approaches to subdivision in Future Urban zones (or equivalent) across the Auckland Region. The legacy district plan approaches can be grouped for assessment by their similarities into three distinct approaches. These approaches, which have been assessed separately, are:

1a. Manukau, North Shore and Papakura

Subdivision in the Future Urban zone (or equivalent) in the Manukau, North Shore and Papakura District Plans is a non-complying activity (aside from a few exceptions – see link below). Even with this non-complying activity status subdivision may still occur in the Future Urban zone. The non-complying activity status will not prevent subdivision from occurring, even with a policy framework strongly discouraging subdivision. This is because an application that is successfully argued to have no more than minor effects would be granted consent under s104D of the RMA. There is no minimum lot size specified in the Future Urban zone (or equivalent) in these district plans.

1b. Rodney

Subdivision in the Future Urban zone (or equivalent) down to a 4 hectare minimum lot size in the Rodney District Plan is a restricted discretionary activity. Capacity modelling undertaken has determined that a 4 hectare minimum lot size would theoretically enable the creation of an additional 1221 lots in the Future Urban zone. Therefore enabling this lot size may result in a significant amount of subdivision.

1c. Franklin

Subdivision in the Future Urban zone (or equivalent) down to a 2500m² minimum lot size in the Franklin District Plan is a discretionary activity. Applications for subdivision must demonstrate they do not compromise the future form or urban development of the wider area. Capacity modelling undertaken has determined that a 2500m² minimum lot size would theoretically enable the creation of an additional 51251 lots in the Future Urban zone. Therefore enabling this lot size will result in substantial subdivision.

Alternative 2 Prohibited approach - Prohibited activity status for all subdivision in the Future Urban zone, aside from small scale boundary adjustments, subdivision for network utilities and amendments to cross leases. The Future Urban zone is also identified as a donor site in the transferable rural site subdivision rules. Capacity modelling has determined this would theoretically enable the transfer of the development rights to 681 parcels out of the Future Urban zone. Refer to the rural subdivision section 32 for the assessment of transferable rural site subdivision.

Note: the assessment below will simply refer to this alternative as 'prohibiting subdivision'. Small-scale boundary adjustment, subdivision for network utilities and amendments to cross

leases will be enabled in the Future Urban zone as restricted discretionary and controlled activities.

Alternative 3 Rural Production zone approach – Subdivision is enabled for open space and reserves, network utilities, road realignment and boundary adjustments as discretionary activities. Transferable rural site subdivision (TRSS) is enabled as a discretionary activity. TRSS enables the amalgamation of two sites in exchange for the development potential to be transferred to another location. This approach may result in the transfer of extinguished rural titles into and out of the Future Urban zone. Capacity modelling has determined this would theoretically enable the transfer of the development rights to 681 parcels out of the Future Urban zone. TRSS also enables the permanent protection of a Significant Ecological Area (SEA) in exchange for the transfer of an additional title to a Countryside Living site. All other subdivision are prohibited activities. This is the subdivision approach taken by the Rural Production zone.

The tables below discuss each alternative compared to the Proposed Alternatives.

	Alternative 1 - Status Quo	Alternative 2 – Prohibited subdivision	Alternative 3 – Rural Production zone approach
Appropriateness	<p><i>Objective 2.3.4 of Chapter B (RPS level) – The development of land zoned future urban within the RUB occurs in an orderly, timely and planned manner.</i></p> <p>1a. Manukau, North Shore and Papakura – Non-complying approach</p> <ul style="list-style-type: none"> For subdivision to be granted consent as a non-complying activity it must either be consistent with the relevant objectives and policies of the plan or be shown to have no more than minor effects. Subdivision in the Manukau, North Shore or Papakura Future Urban zones that is not consistent with greenfield development occurring in an orderly, timely and planned manner could still occur if it is successfully argued to have no more than minor effects. Such subdivision would be granted consent. Therefore the Manukau, North Shore and Papakura district plan approach to subdivision in Future Urban zones does not support this objective. <p>1b & 1c. Rodney and Franklin – 4ha and 2500m² minimum lot sizes</p> <ul style="list-style-type: none"> Enabling subdivision down to 4ha or 2500m² lots (Rodney and Franklin respectively) cannot be said to achieve an objective of greenfield development occurring in an orderly, timely and planned manner. Subdivision in Future Urban zones as enabled in the Rodney and Franklin legacy plans will occur in an uncoordinated ad-hoc manner. Neither of these options will support this objective. <p><i>Objective 4.2 of Chapter D (District level) - Future urban development is not compromised by premature subdivision, use and development</i></p> <p>1a. Manukau, North Shore and Papakura – Non-complying approach</p> <ul style="list-style-type: none"> For subdivision to be granted consent as a non-complying activity it must either be consistent with the relevant objectives and policies of the plan or be shown to have no more than minor effects. Subdivision in the Manukau, North Shore or Papakura Future Urban zones that is not consistent with the objective to avoid compromising future urban development through premature subdivision could still occur if it is successfully argued to have no more than minor effects. Such subdivision would be granted consent. A number of these subdivisions in the same area would have the cumulative effect of compromising the future urban development in that area. Therefore the Manukau, North Shore and Papakura district plan approach to subdivision in Future Urban zones does not support this objective. <p>1b & 1c. Rodney and Franklin – 4ha and 2500m² minimum lot sizes</p> <ul style="list-style-type: none"> Enabling subdivision down to 4ha or 2500m² lots (Rodney and Franklin respectively) will compromise future urban development. Therefore neither of these options supports the objective of avoiding premature subdivision that would compromise this development. 	<p><i>Objective 2.3.4 of Chapter B (RPS level) – The development of land zoned future urban within the RUB occurs in an orderly, timely and planned manner.</i></p> <ul style="list-style-type: none"> This approach will ensure subdivision of greenfield land cannot occur before a plan change releases the land for development. Preventing subdivision also minimises the opportunities for additional development. Therefore this option does support the objective. <p><i>Objective 4.2 of Chapter D (District level) - Future urban development is not compromised by premature subdivision, use and development</i></p> <ul style="list-style-type: none"> This approach will ensure subdivision of greenfield land cannot occur prior to a plan change releasing the land for development. Preventing subdivision also minimises the opportunities for additional development in the Future urban prior to urbanisation. Therefore this option does support the objective. 	<p><i>Objective 2.3.4 of Chapter B (RPS level) – The development of land zoned future urban within the RUB occurs in an orderly, timely and planned manner.</i></p> <ul style="list-style-type: none"> Due to the prohibited activity status in the Future Urban zone for the majority of subdivision, it is unlikely this option enables any subdivision of additional developable lots. However, there is the possibility of transferable rural site subdivision resulting in additional lots in the Future Urban zone prior to urbanisation. Enabling subdivision for public open space may also result in development of public open space prior to comprehensive planning for urbanisation. Therefore, this approach does not support this objective. <p><i>Objective 4.2 of Chapter D (District level) - Future urban development is not compromised by premature subdivision, use and development</i></p> <ul style="list-style-type: none"> As discussed above, this option may result in subdivision and development in the Future Urban zone prior to urbanisation. Therefore this option does not support this objective.
Effectiveness	<p><i>Objective 2.3.4 of Chapter B (RPS level) – The development of land zoned future urban within the RUB occurs in an orderly, timely and planned manner.</i></p> <p>1a. Manukau, North Shore and Papakura – Non-complying approach</p>	<p><i>Objective 2.3.4 of Chapter B (RPS level) – The development of land zoned future urban within the RUB occurs in an orderly, timely and planned manner.</i></p> <ul style="list-style-type: none"> This approach will ensure subdivision of greenfield land cannot occur before a plan change. Therefore this option will achieve an objective 	<p><i>Objective 2.3.4 of Chapter B (RPS level) – The development of land zoned future urban within the RUB occurs in an orderly, timely and planned manner.</i></p> <ul style="list-style-type: none"> As discussed above under Appropriateness, this option may result in subdivision and development in the Future

	Alternative 1 - Status Quo	Altern	
	<ul style="list-style-type: none"> As discussed above under Appropriateness, these approaches may result in subdivision that cannot be described as orderly, timely or planned. Therefore this approach does not achieve this objective. <p>1b & 1c. Rodney and Franklin – 4ha and 2500m² minimum lot sizes</p> <ul style="list-style-type: none"> As discussed above under Appropriateness, enabling subdivision to these lot sizes cannot be said to support an objective of greenfield development occurring in an orderly, timely and planned manner. Therefore, neither of these options will achieve the objective. <p><i>Objective 4.2 of Chapter D (District level) - Future urban development is not compromised by premature subdivision, use and development</i></p> <p>1a. Manukau, North Shore and Papakura – Non-complying approach</p> <ul style="list-style-type: none"> As discussed above under Appropriateness, this approach may result in subdivision in greenfield areas prior to scheduled urbanisation. The cumulative effect of a number of such subdivisions would compromise future urban development. Therefore this approach does not achieve the objective. <p>1b & 1c. Rodney and Franklin – 4ha and 2500m² minimum lot sizes</p> <ul style="list-style-type: none"> As discussed above under Appropriateness, enabling subdivision to these lot sizes will compromise future urban development. Therefore neither of these options will achieve the objective. <p>Conclusion The risks associated with the legacy district plan approaches are discussed under the “Risk” section below. It is not considered that the achievements of any of the legacy district plan approaches outweigh the risks.</p>	<p>for urban development to occur in an orderly, timely and planned manner.</p> <p><i>Objective 4.2 of Chapter D (District level) - Future urban development is not compromised by premature subdivision, use and development</i></p> <ul style="list-style-type: none"> This approach will ensure future urban development cannot be compromised by subdivision prior to a plan change. Preventing subdivision also minimises the opportunities for additional development in the Future urban prior to urbanisation. Therefore this option will achieve the objective. <p>Conclusion The risks and uncertainties of this approach are identified in the “Risks” section below. It is considered that the achievements of this approach outweigh the risks.</p>	<p>Urban zone prior to urbanisation. Therefore this option does not achieve this objective.</p> <p><i>Objective 4.2 of Chapter D (District level) - Future urban development is not compromised by premature subdivision, use and development</i></p> <ul style="list-style-type: none"> As discussed above under Appropriateness, this approach may result in subdivision and development in the Future Urban zone prior to urbanisation. Therefore this approach does not achieve this objective. <p>Conclusion The risks and uncertainties of this approach are outlined in the Risks section below. It is considered that the achievements of this approach do not outweigh the risks.</p>
<p>Efficiency</p> <p>Note: The costs and benefits weighed up in this section are outlined in further detail in the following Costs and Benefits section.</p>	<p>1a. Manukau, North Shore and Papakura – Non-complying approach These approaches are not considered to be efficient as the costs incurred outweigh the benefits achieved.</p> <p>Costs</p> <ul style="list-style-type: none"> Subdivision and therefore smaller parcels of land in the Future Urban zone Infrastructure provision prior to urbanisation Cultural impact on Māori land held in freehold title Reverse sensitivity effects on rural activities Non-complying resource consent costs Opportunity cost of subdivision (and thus development) that would occur if subdivision was more enabling Inconsistent with Auckland Plan directives Inconsistent approach across region <p>Benefits</p> <ul style="list-style-type: none"> Non-complying activity status may deter some subdivision and therefore smaller lot sizes Non-complying activity status may deter some subdivision and therefore infrastructure costs More permissive approach supports economic well-being <p>1b. Rodney – 4ha minimum lot size</p>	<p>This approach is considered to be efficient as the significant benefits of the approach outweigh the costs.</p> <p>Costs:</p> <ul style="list-style-type: none"> Cultural impact on Māori land held in freehold title Significant ecological area protection foregone Significant subdivision and development costs for the landowner Significant opportunity cost of subdivision (and thus development) <p>Benefits:</p> <ul style="list-style-type: none"> Prevents subdivision that would create smaller lot sizes No additional demand for infrastructure Encourages amalgamation of titles through the transferable rural site subdivision process Supports rural activity prior to urbanisation Gives effect to Auckland Plan directives Is a consistent approach across region 	<p>This approach is considered to be efficient as the benefits of the approach outweigh the costs.</p> <p>Costs:</p> <ul style="list-style-type: none"> Cultural impact on Māori land held in freehold title Transferable rural site subdivision and smaller lot sizes Transferable rural site subdivision significant, protection of significant ecological areas and compromise of Future Urban land. Public open space developed prior to urbanisation Subdivision and development costs for the landowner Opportunity cost of subdivision (and thus development) <p>Benefits:</p> <ul style="list-style-type: none"> Prevents subdivision that would create smaller lot sizes No additional demand for infrastructure Supports rural activity prior to urbanisation Gives effect to Auckland Plan directives Is a consistent approach across region

	Alternative 1 - Status Quo	Alternative 2 – Prohibited subdivision	Alternative 3 – Rural Production zone approach
	<p>This approach is not considered to be efficient as the significant costs incurred outweigh the benefits achieved.</p> <p>Costs</p> <ul style="list-style-type: none"> • Subdivision and therefore smaller parcels of land in the Future Urban zone • Infrastructure provision prior to urbanisation • Cultural impact on Māori land held in freehold title • Reverse sensitivity effects on rural activities • Restricted discretionary resource consent costs • Inconsistent with Auckland Plan directives • Inconsistent approach across region <p>Benefits</p> <ul style="list-style-type: none"> • Permissive approach enables landowners to provide for their economic well-being <p>1c. Franklin – 2500m² minimum lot size</p> <p>This approach is not considered to be efficient as the huge costs incurred outweigh the benefits achieved.</p> <p>Costs</p> <ul style="list-style-type: none"> • Significant subdivision and therefore smaller lot sizes prior to urbanisation • Significant infrastructure provision prior to urbanisation • Cultural impact on Māori land held in freehold title • Significant reverse sensitivity effects on rural activities • Discretionary resource consent costs • Inconsistent with Auckland Plan directives • Inconsistent approach across region <p>Benefits</p> <ul style="list-style-type: none"> • Very permissive approach enables landowners to best provide for their economic well-being 		
Costs	<p>1a. Manukau, North Shore and Papakura – Non complying approach</p> <p>Smaller lot sizes</p> <ul style="list-style-type: none"> • This approach may result in subdivision in the Future Urban zone prior to urbanisation. This would result in smaller land parcels in the zone. Smaller lot sizes constrain the ability of the council or private sector to purchase and comprehensively plan future urban areas for development. • Greenfield land that has been subdivided into smaller lots also makes the provision of public infrastructure more difficult and costly as more land parcels need to be acquired to accommodate this infrastructure. • Future urban land that has been subdivided into smaller lots can compromise good urban form when that land is urbanised. • All these factors make it difficult to develop land as efficiently. As the draft Unitary Plan has an aim of 30-40 per cent of growth to occur beyond the metropolitan area in existing in 2010, less efficient use of land to accommodate this growth will result in more of a loss of rural land to urbanisation. Loss of this rural land carries the opportunity cost of a loss in rural productivity. <p>Infrastructure provision prior to urbanisation</p> <ul style="list-style-type: none"> • This approach may result in subdivision in the Future Urban zone and therefore demand for infrastructure provision prior to urbanisation. This infrastructure will either be on-site or private, as such the costs will fall on the landowner, or public 	<p>Cultural impact</p> <p>Treaty Settlement Land will not be affected by the proposed prohibited subdivision rule in the Future Urban zone, because the Treaty Settlement Land Auckland Wide Rules override the Future Urban Zone rules. Maori land administered under the Te Ture Whenua Maori Act 1993 will not be affected by the proposed prohibited subdivision as this land is dealt with entirely under the Maori Land Court. Section 11(2) RMA exempts Maori land from the subdivision provisions in the RMA.</p> <p>Land held in general title owned by Maori will be affected by the prohibited subdivision provisions in the future urban zone, until such a time that the land is rezoned for future urban development. The transferable title subdivision rules will apply which enable lots to be amalgamated and the development right to be transferred into a specified zone.</p> <p>Significant ecological area protection</p> <p>A key difference for this approach is that it does not enable the permanent protection of a significant ecological area (or equivalent in legacy district plan) in exchange for additional subdivision rights. This is a significant cost on the landowner who would otherwise gain a subdivision right in the Rural Production zone approach and a number of the legacy district plan approaches.</p> <p>It is expected that SEA's in the Future Urban zone in this alternative will be protected during the structure planning process. The structure plan guidelines elevate SEA's to a matter which should be protected during</p>	<p>Cultural impact</p> <p>Refer to cultural impact costs under alternative 2.</p> <p>Transferable rural site subdivision</p> <p>Another key difference between this approach and alternative 2 is that this approach enables the Future Urban zone to be a receiver site in the transferable rural site subdivision rules. This enables the amalgamation of two sites in a rural zone and the development potential to be transferred into the Future Urban zone. This approach may result in the transfer of extinguished rural titles into the Future Urban zone. Therefore this may result in smaller lots in the Future Urban zone. Refer to the smaller lot size costs under alternative 1a.</p> <p>Another key difference between the transferable rural site subdivision in alternatives 2 and 3 is the Significant Ecological Area (SEA) protection provisions. TRSS in alternative 3 enables the permanent protection of a SEA in exchange for the transfer of an additional title to a Countryside Living site. This aspect of the TRSS system is not enabled in alternative 2. Permanently protecting an SEA in the Future Urban zone prior to that area being structure planned could compromise the efficient urban development of that land in the future. Refer to the assessment of costs under Smaller Lot sizes in alternative 1a for the associated cost of this. An example of this would be where the structure</p>

	<p>where the costs will fall to council. Landowners that have invested in on-site or private infrastructure may be unwilling to pay for and connect to the public network once this is developed for urbanisation. This may compromise the economic viability of the public network.</p> <ul style="list-style-type: none"> • Development of public infrastructure prior to urbanisation may incur significant debt servicing costs where the initial investment by council is not paid back until that land is urbanised in the future. This could be up to 30 years. Providing public infrastructure prior to urbanisation may also be technically difficult, due for example, to low flow rates in wastewater systems requiring additional pumping facilities and maintenance. This increases costs, decreases viability and may result in additional adverse effects such as odour issues. • Once this infrastructure is in place it may constrain the development of a public infrastructure network to service urbanisation. Alternatively it may be necessary to remove this infrastructure to make way for the public network to support urbanisation. This is an inefficient use of resources. • The cumulative environmental effect of a number of on-site or package wastewater treatment plants is likely be greater than a widespread network designed to service an entire area. This environmental effect also applies for other types of infrastructure such as stormwater and roading. In addition to this wastewater treatment plants require maintenance to ensure they operate efficiently and effectively to minimise environmental impacts. There is no guarantee that on-site or package treatment plants will be maintained sufficiently by the landowner or community that infrastructure serves. • Urbanisation will be guided by structure plans. Technical work such as catchment management plans will inform the development of these structure plans. Structure plans will ensure urbanisation avoids or mitigates the impact impervious surfaces have on water quality and the environment. Subdivision will create opportunities for more development which may create additional impervious surfaces. Subdivision prior to urbanisation will not be guided by a holistic document like a structure plan. Therefore the additional impervious surfaces created may have a greater environmental impact than similar development informed by a structure plan. <p>Cultural impact</p> <ul style="list-style-type: none"> • Treaty Settlement Land will not be affected by the subdivision rules in the Future Urban zone, because the Treaty Settlement Land Auckland Wide Rules override the Future Urban Zone rules. Maori land administered under the Te Ture Whenua Maori Act 1993 will not be affected by the proposed prohibited subdivision as this land is dealt with entirely under the Maori Land Court. Section 11(2) RMA exempts Maori land from the subdivision provisions in the RMA. • Land held in general title owned by Maori will be affected by the subdivision provisions in the future urban zone, until such a time that the land is rezoned for future urban development. <p>Reverse sensitivity</p> <ul style="list-style-type: none"> • This approach may result in subdivision and therefore the opportunity for more dwellings to be developed in the Future 	<p>Alternative 2 – Prohibited subdivision</p> <p>structure planning. The key difference between this approach and alternative 3 is that relying on a structure plan does leave the SEA vulnerable to being balanced against competing pressure for urban development. This could potentially lead to protection of an SEA being foregone so infrastructure provision or urban development can occur.</p> <p>Subdivision and development costs</p> <p>This approach will prevent subdivision in the Future Urban zone. These restrictions could potentially remain in place for up to 30 years. Prohibiting subdivision rather than giving it a non-complying or discretionary activity status forces landowners to go through the plan change process if they wish to subdivide prior to scheduled urbanisation. The plan change process is a significant cost and time barrier when compared with the resource consent process.</p> <p>The opportunity cost of this option is the subdivision and therefore development that could occur under a more enabling approach. The legacy plan zoning enables further capacity of 762 dwellings in addition to the 2215 existing dwellings in the area zoned Future Urban within the RUB. This is the opportunity cost of subdivision under this approach. This can be balanced against the anticipated 99,661 dwellings that will be developed once the Future Urban zone within the RUB is entirely urbanised. It is noted that not all the Future Urban zoned land in the region is within the RUB. Future Urban zoned areas such as Clarks Beach and Wellsford are not included within the RUB.</p> <p>This is also a social cost in terms of the additional housing, and associated social benefit, which could have been developed under a more enabling approach. These short to medium term costs can be balanced against the long term benefit of gaining more development rights once the land is to be urbanised. It is acknowledged that in some cases the land parcel may be too small or constrained to gain more development potential that would be provided under the status quo or alternative 3.</p> <p>The greatest development opportunity cost will be to sites that were zoned countryside living (or equivalent) in the legacy district plans. Such sites which have subdivision potential under the legacy plan but have not taken this potential up with be the greatest affected by the restrictive subdivision approach. It is difficult to identify the exact cost imposed on these specific sites as it is not possible to identify how the site will be developed once urbanised until this has been established through the structure planning process.</p>	<p>Alternative 3 – Rural Production zone approach</p> <p>planning process identifies an area required for bulk infrastructure to locate, which has been permanently protected as an SEA through the TRSS system. It is expected that in alternative 2 SEA's in the Future Urban zone will be protected through the structure planning process. Alternative 2 essentially retains flexibility to assess that SEA in the context of integrated urban development of the wider area as a whole.</p> <p>Public open space and urban form</p> <p>A key difference between this approach and alternative 2 is that this approach enables subdivision for public open space and reserves. The location and size of open space and its relation to other uses is a key component of good urban form. Subdivision to create public open spaces prior to urbanisation may compromise good urban form when the area is urbanised.</p> <p>Subdivision and development costs</p> <p>Refer to subdivision and development costs under alternative 2.</p>
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		Alternative 2 – Prohibited subdivision	Alternative 3 – Rural Production zone approach
	<p>Urban zone. Development of additional dwellings may result in reverse sensitivity effects on rural uses in the zone. This could impact on existing rural uses ability to continue operating and discourage investment in rural enterprises prior to urbanisation. This would be inconsistent with policy 4.3 of Chapter D which is to avoid activities that create reverse sensitivity effects.</p> <p>Subdivision and development costs</p> <ul style="list-style-type: none"> • This approach may result in subdivision in the Future Urban zone, where the landowners would be granted a non-complying resource consent. The costs here are those associated with the consent process. This cost will not be as significant as that associated with the plan change process in alternative 2 and 3. • The non-complying activity status will deter a large number of landowners who may otherwise subdivide their property and then develop this additional property. This deterrent could potentially last for a lengthy period of time until the zoning is changed through the plan change process (up to 30 years). The opportunity cost of this is the economic benefit the landowner could otherwise gain in subdividing and developing their land. This is also a social cost as the subdivision could enable the development of additional housing. <p>Auckland Plan directives</p> <ul style="list-style-type: none"> • The Manukau, North Shore and Papakura district plan approaches do not give effect to the following directives of the Auckland Plan: <ul style="list-style-type: none"> - Directive 10.4 – to develop greenfield areas in a way that provides infrastructure in a timely and efficient manner and demonstrates efficient use of land. <p>1b. Rodney – 4ha minimum lot size</p> <p>Smaller lot sizes</p> <ul style="list-style-type: none"> • Capacity modelling has determined this alternative theoretically enables 1221 additional sites in the Future Urban zone. Refer to the smaller lot size costs under alternative 1a. The costs associated with the Rodney approach are similar in nature to those identified in the assessment of alternative 1a. However, as the Rodney approach enables more intensive subdivision the scale of these costs is likely to be greater than identified in the assessment of alternative 1a. Enabling smaller lot sizes also increases the value of land, whether or not it is subdivided prior to urbanisation. Increasing the value of greenfield land negatively impacts on the development economics of that land by increasing development costs and eventual housing prices when that land is urbanised. <p>Infrastructure provision prior to urbanisation</p> <ul style="list-style-type: none"> • Refer to the infrastructure provision prior to urbanisation costs under alternative 1a. The costs associated with the Rodney approach are similar in nature to those identified in the assessment of alternative 1a. However, as the Rodney approach enables more intensive subdivision the scale of these costs is likely to be greater than identified in the assessment of alternative 1a. <p>Cultural impact</p> <ul style="list-style-type: none"> • Refer to cultural impact assessment under alternative 1a. <p>Reverse sensitivity</p>		

	Alternative 1 - Status Quo	Alternative 2 – Prohibited subdivision	Alternative 3 – Rural Production zone approach
	<ul style="list-style-type: none"> Refer to the reverse sensitivity costs under alternative 1a. The reverse sensitivity impacts associated with this are of a similar nature but on a greater scale than those identified in the assessment of alternative 1a. <p>Subdivision costs</p> <ul style="list-style-type: none"> This approach may result in subdivision, where the landowners would be granted a restricted discretionary resource consent. The costs associated with this are those the landowner would have to bear in applying for this consent. This cost will be smaller than that associated with the plan change process in alternative 2 and 3 or the non-complying resource consent costs in alternative 1a. <p>Auckland Plan directives</p> <ul style="list-style-type: none"> Refer to Auckland Plan directives assessment under alternative 1a. <p>1c. Franklin – 2500m² minimum lot size</p> <p>Smaller lot sizes</p> <ul style="list-style-type: none"> Capacity modelling has determined this alternative theoretically enables 51251 additional sites in the Future Urban zone. Refer to the smaller lot size costs under alternative 1a. The costs associated with the Franklin approach are similar in nature to those identified in the assessment of alternative 1a. However, as the Franklin approach enables much more intensive subdivision the scale of these costs is likely to be much greater than identified in the assessment of alternative 1a. Enabling smaller lot sizes also increases the value of land, whether or not it is subdivided prior to urbanisation. Increasing the value of greenfield land negatively impacts on the development economics of that land by increasing development costs and eventual housing prices when that land is urbanised. The 2500m² minimum lot size can be contrasted against the 4000m² minimum lot size of the Large Lot Residential zone in the Unitary Plan. Subdivision down to 2500m² will result in an urban level of development; however it is not an efficient use of the greenfield land resource. <p>Infrastructure provision prior to urbanisation</p> <ul style="list-style-type: none"> Refer to the infrastructure provision prior to urbanisation costs under alternative 1a. The costs associated with the Franklin approach are similar in nature to those identified in the assessment of alternative 1a. However, as the Franklin approach enables much more intensive subdivision the scale of these costs is likely to be greater than identified in the assessment of alternative 1a. <p>Cultural impact</p> <ul style="list-style-type: none"> Refer to cultural impact assessment under alternative 1a. <p>Reverse sensitivity</p> <ul style="list-style-type: none"> Refer to the reverse sensitivity costs under alternative 1a. The reverse sensitivity impacts associated with this are of a similar nature but on a greater scale than those identified in the assessment of alternative 1a. <p>Subdivision costs</p> <ul style="list-style-type: none"> This approach may result in subdivision, where the landowners would be granted a discretionary resource consent. The costs associated with this are those the landowner would have to bear in applying for this consent. This cost will be smaller than that associated with the plan change process in alternative 2 and 3 or the non-complying 		

		Alternative 2 – Prohibited subdivision	Alternative 3 – Rural Production zone approach
	<p>resource consent costs in alternative 1a.</p> <p>Auckland Plan directives</p> <ul style="list-style-type: none"> Refer to Auckland Plan directives assessment under alternative 1a. <p>All legacy plan policy approaches</p> <p>Inconsistent approach</p> <ul style="list-style-type: none"> The legacy plan approaches represent an inconsistent approach to subdivision in Future Urban zones (or equivalent) across the region. Maintaining the status quo misses the opportunity to develop a consistent and rationalised set of policies and rules to subdivision in the Future Urban zone across the region. Rationalising the resource management system across the region was one key benefit identified for the Auckland local government restructure. 		
Benefits	<p>1a. Manukau, North Shore & Papakura – Non-complying approach</p> <p>Economic well-being</p> <ul style="list-style-type: none"> This option is more permissive in terms of subdivision in the short term than alternatives 2 and 3. This will allow landowners to better provide for their economic well-being over the short term (until urbanisation). <p>1b. Rodney – 4 hectare minimum lot size</p> <p>Economic well-being</p> <ul style="list-style-type: none"> This option is much more enabling in terms of subdivision than the Manukau, North Shore and Papakura approaches as well as alternatives 2 and 3. This will allow landowners to better provide for their economic well-being over the short term (until urbanisation). <p>1c. Franklin – 2500m² minimum lot size</p> <p>Economic well-being</p> <ul style="list-style-type: none"> This option is much more enabling in terms of subdivision than the Manukau, North Shore and Papakura approaches as well as alternatives 2 and 3. This will allow landowners to better provide for their economic well-being over the short term (until urbanisation). Franklin district plan has the most permissive approach to subdivision in a Future Urban zone or equivalent and therefore enables landowners to best provide for their economic well-being prior to urbanisation. 	<p>No smaller lot sizes</p> <p>This approach will prevent subdivision and thus smaller lot sizes in the Future Urban zone. The benefit of this approach is that it avoids the costs identified in the assessment of alternative 1a in section 3.1 of this report.</p> <p>The benefits of this approach, which arise from avoiding the costs under alternative 1a, can be summarised as follows:</p> <ul style="list-style-type: none"> Providing less of an opportunity for smaller lots ensures purchase and comprehensive planning of Future Urban land can still occur and maximises the efficient use of that land for development. Provision of public infrastructure may be less costly as less land parcels likely to have to be acquired to establish public network. Prohibiting subdivision and thus opportunities for additional housing minimises the likelihood of dwellings being removed to accommodate the public infrastructure network for urbanisation. Less intensive subdivision and development prior to urbanisation enables the best urban form to be developed when that area is urbanised. Providing less of an opportunity for smaller lots maximises the efficient use of that land for urban development. This maximises yield and minimises the amount of rural land needed to accommodate Auckland's growth. <p>Transferable rural site subdivision</p> <p>A difference between this approach and alternative 3 is that this approach enables the Future Urban zone to be used only as a donor site in the transferable rural site subdivision process. This enables the amalgamation of two sites in the Future Urban zone and the development potential to be transferred to one of the receiver sites. The Future Urban zone is not one of the receiver sites. This approach may result in the amalgamation of titles in the Future Urban zone which will have the corresponding benefits identified above under no smaller lot sizes. Capacity modelling has determined that this would theoretically enable the development potential of 681 sites to be transferred out of the Future Urban zone and into the receiver sites.</p> <p>No infrastructure provision prior to urbanisation</p> <p>This approach will prevent premature demand for infrastructure prior to urbanisation created by subdivision. Thereby avoiding the costs associated with this infrastructure. The benefit of this approach is that it avoids the costs outlined in the assessment of alternative 1a.</p>	<p>No smaller lot sizes</p> <p>Aside from transferable rural site subdivision, significant ecological area protection subdivision, network utilities, public open space and reserves, road realignment and boundary adjustments, other subdivision is prohibited. Subdivision that will create additional developable lots aside from the SEA protection subdivision is therefore prohibited. Refer to the smaller lot size benefits under alternative 2.</p> <p>No infrastructure provision prior to urbanisation</p> <p>Refer to the infrastructure provision prior to urbanisation benefits under alternative 2. The key difference, in relation to infrastructure provision, between this approach and alternative 2 is outlined under the public open space and urban form cost above.</p> <p>Supporting rural activity prior to urbanisation</p> <p>Refer to the supporting rural activity prior to urbanisation benefits under alternative 2</p> <p>Auckland Plan directives</p> <p>Refer to the Auckland Plan directives assessment in the benefits section in alternative 2</p> <p>Consistent approach</p> <p>Refer to the consistent approach benefits under alternative 2.</p>

	Alternative 1 - Status Quo	Alternative 2 – Prohibited subdivision	Alternative 3 – Rural Production zone approach
		<p>The benefits of this approach, which arise from avoiding these costs under alternative 1a, can be summarised as follows:</p> <ul style="list-style-type: none"> • no cost of providing infrastructure prior to urbanisation • public infrastructure network required for urbanisation is more viable • may reduce technical difficulty in providing infrastructure network for large number of users • efficient use of resources as one infrastructure network is developed to service area • may reduce environmental impact of development as widespread infrastructure network is designed to service an entire area. A public infrastructure network also ensures maintenance is carried out to keep the infrastructure working efficiently and effectively • may reduce environment impact as subdivision and development will be holistically guided by structure plans underpinned by technical work such as catchment management plans. <p>Supporting rural activities prior to urbanisation This approach prevents subdivision in the Future Urban zone prior to urbanisation. The benefit of this is that it encourages rural uses of the land to continue up until that land is released for development. This ensures rural communities in Future Urban areas are able to continue to provide for their social and economic well-being until urbanisation.</p> <p>Preventing subdivision and thus the creation of opportunities for additional dwellings in the Future Urban zone also avoids the reverse sensitivity effects such development may have on existing rural activities. This approach will therefore support the continued operation of rural uses, such as farming and horticulture, prior to urbanisation. Therefore also supporting the rural communities that rely on such activities for their social and economic well-being.</p> <p>Auckland Plan directives This approach gives effect to the following directives of the Auckland Plan:</p> <ul style="list-style-type: none"> • Directive 10.4 – to develop greenfield areas in a way that provides infrastructure in a timely and efficient manner and demonstrates efficient use of land. <p>Consistent approach This option represents a consistent approach to subdivision in the Future Urban zone across the region. Rationalising the resource management system across the region was one key benefit identified for the Auckland local government restructure.</p>	
Risks	<p>At the time of writing this report the Unitary Plan provisions had not been signed off by the Governing body and were therefore subject to change. The capacity modelling results are based on the draft Unitary Plan provisions. Further modelling work will be undertaken following adoption of the Unitary Plan for notification, noting that changes may be made as a result of Council's decision on the Unitary Plan. Following this, capacity modelling will be further refined. It is likely the capacity results for subdivision in the future urban zone as outlined in section 3.1 and 3.2 will be adjusted downwards once all constraints are factored into the modelling. This high level capacity modelling does result in a small degree of uncertainty in the information underpinning this report.</p> <p>There is a risk of not acting until more refined modelling can be undertaken and this uncertainty is resolved. Subdivision prior to urbanisation in the Future Urban zone can cause significant</p>	<p>The uncertainties and the risk of not acting have been identified in the risks section of the status quo alternative. This uncertainty and risk is equally valid to this alternative. The risk of not acting is that the Future Urban zone will be compromised by premature subdivision and development.</p>	<p>The uncertainties and the risk of not acting have been identified in the risks section of the status quo alternative. This uncertainty and risk is equally valid to this alternative. The risk of not acting is that the Future Urban zone will be compromised by premature subdivision and development.</p>

	Alternative 1 - Status Quo	Alternative 2 – Prohibited subdivision	Alternative 3 – Rural Production zone approach
	<p>issues for the eventual urbanisation of this land. These issues are outlined under the Costs section above. Some of these issues are difficult to resolve. An example of this is when subdivision results in smaller lot sizes that compromise the urbanisation of a future urban area. Once this occurs it is inherently difficult to reverse before urbanisation takes place. Therefore the risk of not acting is that the Future Urban zone will be compromised by premature subdivision and development.</p>		

Based on the above discussion, the following conclusions are drawn. The significant costs associated with alternatives 1a, 1b and 1c (the three status quo approaches) outweigh the benefits. The benefits of alternatives 2 and 3 are considered to outweigh the costs. However, as alternative 2 has comparatively more benefits and less costs than alternative 3 it is the most efficient approach.

Alternatives 1a, 1b, 1c and alternative 3 are not considered to achieve the objectives in section 3 of this report. Alternative 2 is considered to achieve these objectives. The lack of information applies equally to all alternatives. The risk of not acting also equally applies to all alternatives. Therefore on the sum of achievements and risks alternative 2 is the most effective.

Therefore alternative 2, prohibiting all subdivision in the Future Urban zone, aside from small scale boundary adjustments, subdivision for network utilities and amendments to cross leases, is the most appropriate method to address the objectives in terms of efficiency and effectiveness.

3.2. Evaluation of the potential responses, in terms of dwellings in the FUZ, to the issue through the proposed provisions

The alternatives evaluated for the approach to the amount of dwellings in the Future Urban zone in section 3.2 are:

Alternative 1 Status quo - Retain the legacy district plan approaches in terms of the number of dwellings enabled per site in the Future Urban zone (or equivalent). The legacy district plan approaches can be grouped for assessment by their similarities into three distinct approaches. These approaches, which have been assessed separately, are:

1a. Manukau, Papakura, Rodney, North Shore and Franklin

More than one dwelling per site in the Future Urban zone (or equivalent) is non-complying. Exceptions to this in North Shore and Franklin are outlined below and are assessed separately. Even with this non-complying activity status multiple dwellings may still be developed on single sites in the Future Urban zone. The non-complying activity status will not prevent this from occurring, even with a policy framework strongly discouraging multiple dwellings on single sites. This is because an application that is successfully argued to have no more than minor effects would be granted consent under s. 104D of the RMA. In some cases, landowners may subdivide around each dwelling in order to create separate titles. This would require a non-complying consent in all legacy district plans, except for 4ha lot sizes in Rodney (restricted discretionary) and 2500m² in Franklin (discretionary).

1b. North Shore

A minor household unit on sites 600m² or larger is permitted. Capacity modelling has determined this would theoretically enable 3584 additional dwellings in the Future Urban zone. Therefore this approach may result in the development of a significant number of minor household units.

1c. Franklin

A secondary dwelling on sites larger than 40ha is permitted. A subsidiary dwelling for farm workers or aged or infirm relatives is a restricted discretionary activity. Capacity modelling has determined this would theoretically enable 22 secondary dwellings on sites over 40ha. Therefore this approach may result in the development of a small number of secondary dwellings on 40ha sites and subsidiary dwellings.

Alternative 2 Prohibited approach - More than one dwelling per site is a non-complying activity in the Future Urban zone. The key difference between this approach and the non-complying approach in the legacy District Plans is that subdivision, with a few exceptions, in the Unitary Plan is prohibited.

Alternative 3 Rural Production zone approach - Enabling more than one dwelling per site in the Future Urban zone as a discretionary activity. This is the control used in the Rural Production zone in Unitary Plan. It is anticipated that a significant number of sites will be developed with multiple dwellings in the Future Urban zone under this control. Subdivision through the transferable rural site subdivision process or significant ecological protection rules may enable in subdivision around any additional dwellings. The Rural Production zone has no other provision for subdivision of developable lots.

The tables below discuss each alternative compared to the Proposed Alternative.

	Alternative 1 - Status Quo	Alternative 2 – Prohibited approach	Alternative 3 – Rural Production zone approach
Appropriateness	<p><i>Objective 2.3.4 of Chapter B (RPS level) – The development of land zoned future urban within the RUB occurs in an orderly, timely and planned manner.</i></p> <p>1a. Manukau, Rodney, Papakura, North Shore and Franklin – non-complying approach</p> <p>This approach will discourage more than one dwelling being established on sites in the Future Urban zone. This will limit the dwellings and associated infrastructure that will be developed in the Future Urban zone prior to urbanisation. This restriction on dwellings will remain only until the land is scheduled for urbanisation and a plan change applies live zoning. The approach will therefore support this objective of greenfield development occurring in an orderly, timely and planned manner.</p> <p>1b & 1c. North Shore and Franklin – minor household units, secondary dwellings on 40ha sites and subsidiary dwellings</p> <p>Enabling the development of minor household units, secondary dwellings on larger sites and subsidiary dwellings in the Future Urban zone prior to urbanisation cannot be considered to support this objective.</p> <p><i>Objective 4.2 of Chapter D (District level) - Future urban development is not compromised by premature subdivision, use and development</i></p> <p>1a. Manukau, Rodney, Papakura, North Shore and Franklin – non-complying approach</p> <p>This option will discourage more than one dwelling per site from being developed in the Future Urban zone prior to urbanisation. This will limit the development of additional dwellings as well as the piecemeal infrastructure required to service this development prior to planned urbanisation of the Future Urban zone. Discouraging secondary dwellings on sites will not avoid the creation of additional opportunities for subdivision. This is because if multiple dwellings on a site are granted a non-complying consent, subdivision consent to put these dwellings on individual titles is relatively easy to get. Preventing the development of additional dwellings, piecemeal infrastructure and subdivision opportunities prevents fragmentation and compromise of future urban land. Therefore this approach will not support the objective.</p> <p>1b & 1c. North Shore and Franklin – minor household units, sites larger than 40ha and subsidiary dwellings</p> <p>These approaches enable the development of minor household units or secondary dwellings and subsidiary dwellings in the Future Urban zone. Development of this additional housing will create opportunities for subdivision that are difficult for the council to refuse through individual resource consents. The cumulative effect of this development and any subdivision would be to compromise and fragment this greenfield land. Therefore these approaches are not considered to support this objective.</p>	<p><i>Objective 2.3.4 of Chapter B (RPS level) – The development of land zoned future urban within the RUB occurs in an orderly, timely and planned manner.</i></p> <ul style="list-style-type: none"> This option will discourage more than one dwelling per site from being developed in the Future Urban zone prior to urbanisation. This will limit the development of additional dwellings as well as the piecemeal infrastructure required to service this development prior to planned urbanisation of the Future Urban zone. Therefore this approach will support an objective of greenfield development occurring in an orderly, timely and planned manner. <p><i>Objective 4.2 of Chapter D (District level) - Future urban development is not compromised by premature subdivision, use and development</i></p> <ul style="list-style-type: none"> This option will discourage more than one dwelling per site from being developed in the Future Urban zone prior to urbanisation. This will limit the development of additional dwellings as well as the piecemeal infrastructure required to service this development prior to planned urbanisation of the Future Urban zone. Where more than one dwelling is granted consent to establish on a site the landowners may wish to apply to subdivide the property around these dwellings. Subdivision, aside from minor boundary adjustments, amendments to cross leases and subdivision for network utilities, is proposed to be prohibited in the Future Urban zone. Therefore as the rules stand landowners would not be able to subdivide around each dwelling. Preventing the development of additional dwellings, piecemeal infrastructure and subdivision opportunities prevents fragmentation and compromise of future urban land. Therefore this approach will support the objective. 	<p><i>Objective 2.3.4 of Chapter B (RPS level) – The development of land zoned future urban within the RUB occurs in an orderly, timely and planned manner.</i></p> <ul style="list-style-type: none"> This approach enables significant development to occur in the Future Urban zone prior to urbanisation. Therefore this approach does not support this objective. <p><i>Objective 4.2 of Chapter D (District level) - Future urban development is not compromised by premature subdivision, use and development</i></p> <ul style="list-style-type: none"> This approach enables significant development to occur in the Future Urban zone prior to urbanisation. In some cases once multiple dwellings have been developed on a site, landowners will wish to subdivide around individual dwellings. This kind of subdivision would be prohibited in the Rural Production zone, aside from transferable rural title subdivision. This development prior to urbanisation is likely to significantly compromise future urban development. This approach will therefore not support the objective.
Effectiveness	<p><i>Objective 2.3.4 of Chapter B (RPS level) – The development of land zoned future urban within the RUB occurs in an orderly, timely and planned manner.</i></p> <p>1a. Manukau, Papakura, Rodney, North Shore and Franklin – non-complying</p> <p>As discussed under the Appropriateness section, this option will discourage more than one dwelling per site from being developed in the Future Urban zone prior to urbanisation. This will limit the development of additional dwellings as well as the piecemeal infrastructure required to service this development prior to planned urbanisation of the Future Urban zone. Therefore this approach will achieve an objective of greenfield development occurring in an orderly, timely and planned manner.</p> <p>1b & 1c. North Shore and Franklin – minor household units, secondary dwellings on 40ha sites and subsidiary dwellings</p>	<p><i>Objective 2.3.4 of Chapter B (RPS level) – The development of land zoned future urban within the RUB occurs in an orderly, timely and planned manner.</i></p> <ul style="list-style-type: none"> This approach will discourage more than one dwelling being established on sites in the Future Urban zone. This will limit the dwellings and associated infrastructure that will be developed in the Future Urban zone prior to urbanisation. This restriction on dwellings will remain only until the land is scheduled for urbanisation and a plan change applies live zoning. The approach will therefore achieve this objective of greenfield development occurring in an orderly, timely and planned manner. <p><i>Objective 4.2 of Chapter D (District level) - Future urban</i></p>	<p><i>Objective 2.3.4 of Chapter B (RPS level) – The development of land zoned future urban within the RUB occurs in an orderly, timely and planned manner.</i></p> <ul style="list-style-type: none"> This approach enables significant development to occur in the Future Urban zone prior to urbanisation. The approach will therefore not achieve the objective. <p><i>Objective 4.2 of Chapter D (District level) - Future urban development is not compromised by premature subdivision, use and development</i></p> <ul style="list-style-type: none"> As discussed in the Appropriateness section, this approach enables significant development to occur in the Future Urban zone prior to

	Alternative 1 - Status Quo	Alternative 2 – Prohibited approach	Altern
	<p>Enabling minor household units, secondary dwellings on large sites, and subsidiary dwellings in the Future Urban zone prior to urbanisation cannot be said to achieve the objective of greenfield development occurring in an orderly, timely or planned manner.</p> <p><i>Objective 4.2 of Chapter D (District level) - Future urban development is not compromised by premature subdivision, use and development</i></p> <p>1a. Manukau, Rodney, Papakura, North Shore and Franklin – non complying approach</p> <p>As discussed under the Appropriateness section, this approach may result in the development of additional housing and the potential for subdivision in the Future Urban zone prior to urbanisation. The cumulative effect of this development and further subdivision would compromise and fragment this greenfield land resource. Therefore this approach is not considered to achieve this objective.</p> <p>1b & 1c. North Shore & Franklin – minor household units, sites larger than 40ha and subsidiary dwellings</p> <p>Enabling minor household units, secondary dwellings on large sites, and subsidiary dwellings in the Future Urban zone prior to cannot be said to achieve the objective of ensuring greenfield development is not compromised by premature subdivision, use and development.</p> <p>Conclusion: The risks associated with the legacy district plan approaches are discussed under the Risk section below. It is not considered that the achievements of any of the legacy district plan approaches outweigh the risks.</p>	<p><i>development is not compromised by premature subdivision, use and development</i></p> <ul style="list-style-type: none"> As discussed above under the Appropriateness section, this option will discourage more than one dwelling per site from being developed in the Future Urban zone prior to urbanisation. This will limit the development of additional dwellings and the piecemeal infrastructure required to service this development. It will not create subdivision opportunities as subdivision is prohibited. This prevents compromise of future urban land. Therefore this approach will achieve the objective. <p>Conclusion</p> <p>The risks and uncertainties of this approach are identified in the Risks section below. It is considered that the achievements of this approach outweigh the risks.</p>	<p>urbanisation. Therefore this approach does not achieve the objective.</p> <p>Conclusion</p> <ul style="list-style-type: none"> The risks and uncertainties of this approach are outlined in the Risks section below. It is considered that the achievements of this approach do not outweigh the risks.
<p>Efficiency</p> <p>Note: The costs and benefits weighed up in this section are outlined in further detail in the following Costs and Benefits section.</p>	<p>1a. Manukau, Rodney, Papakura, North Shore and Franklin – non-complying approach</p> <p>These approaches are not considered to be efficient as the costs incurred outweigh the benefits achieved.</p> <p>Costs:</p> <ul style="list-style-type: none"> Smaller parcels of land in the Future Urban zone (if subdivided around dwellings) Cultural impact on Māori land that is held in freehold title Restrictive approach impedes landowners ability provide for their economic well-being Reverse sensitivity effects on rural activities Non-complying resource consent costs Opportunity cost of development that would otherwise occur Inconsistent with Auckland Plan directives Inconsistent approach across region <p>Benefits:</p> <ul style="list-style-type: none"> Minimises infrastructure costs associated with premature development Social benefit of more housing being developed in the short term <p>1b. North Shore – minor household units</p> <p>This approach is not considered to be efficient as the costs incurred outweigh the benefits achieved.</p> <p>Costs:</p> <ul style="list-style-type: none"> Smaller parcels of land in the Future Urban zone (if subdivided around dwellings) Cultural impact on Māori land held in freehold title Reverse sensitivity effects on rural activities Inconsistent with Auckland Plan directives Inconsistent approach across region <p>Benefits:</p> <ul style="list-style-type: none"> Minimises infrastructure costs associated with premature development 	<p>This approach is considered to be efficient as the benefits outweigh the costs incurred.</p> <p>Costs:</p> <ul style="list-style-type: none"> Cultural impact on Māori land that is held in freehold title Restrictive approach impedes landowners ability provide for their economic well-being Reverse sensitivity effects on rural activities Non-complying resource consent costs Opportunity cost of development that would otherwise occur <p>Benefits:</p> <ul style="list-style-type: none"> Does not create smaller lot sizes in the Future Urban zone Minimises infrastructure costs associated with premature development Enabling additional housing development in the short term provides a significant social benefit Gives effect to Auckland Plan directives Consistent approach in Future Urban zones across region 	<p>This approach is not considered to be efficient as the costs incurred outweigh any benefits provided.</p> <p>Costs:</p> <ul style="list-style-type: none"> Significant infrastructure provision prior to urbanisation Cultural impact on Māori land that is held in freehold title. Significant reverse sensitivity effects on rural activities Discretionary activity resource consent costs Inconsistent with Auckland Plan directives <p>Benefits:</p> <ul style="list-style-type: none"> Does not create smaller lot sizes in the Future Urban zone Permissive approach enables landowners to provide for their economic well-being Enabling additional housing development in the short term provides a significant social benefit Consistent approach in Future Urban zones across region

	Alternative 1 - Status Quo	Alternative 2 – Prohibited approach	Alternative 3 – Rural Production zone approach
	<ul style="list-style-type: none"> No compliance costs Permissive approach enables more economic well-being in the short term Social benefit of more housing being developed in the short-term, particularly as minor household units are low cost form of housing <p>1c. Franklin – sites larger than 40ha and subsidiary dwellings This approach is not considered to be efficient as the costs incurred outweigh the benefits achieved.</p> <p>Costs:</p> <ul style="list-style-type: none"> Smaller parcels of land in the Future Urban zone (if subdivided around dwellings) Some infrastructure provision prior to urbanisation Cultural impact on Māori land held in freehold title Reverse sensitivity effects on rural activities Restricted discretionary resource consent costs for subsidiary dwellings Inconsistent with Auckland Plan directives Inconsistent approach across region <p>Benefits:</p> <ul style="list-style-type: none"> No consent costs for secondary dwelling on 40ha or large sites More permissive approach enables more economic well-being in the short-term than other options Social benefit of more housing being developed in the short-term 		
Costs	<p>1a. Manukau, Papakura, Rodney, North Shore and Franklin – non-complying Smaller lot sizes</p> <ul style="list-style-type: none"> This approach may result in the development of more than one dwelling on a number of sites. In some cases, landowners may subdivide around each dwelling in order to create separate titles. This would require a non-complying consent in all legacy district plans, except for 4ha lot sizes in Rodney (restricted discretionary) and 2500m² in Franklin (discretionary). Refer to the assessment under section 3.1 of this report for the subdivision capacity these minimum lot sizes enable. This would result in smaller land parcels in the Future Urban zone prior to urbanisation. Smaller lot sizes in future urban areas may constrain the ability of the council or private sector to purchase and comprehensively plan that land for development. Greenfield land that has been more intensively developed and subdivided into smaller lots may also make the provision of public infrastructure more difficult and costly as more land parcels need to be acquired to accommodate this infrastructure. Development may need to be removed to make way for this public infrastructure. Enabling the development of additional housing that may then need to be removed to make way for infrastructure is not an efficient use of resources. Future urban land that has been more intensively developed and subdivided into smaller lots can compromise good urban form when that land is urbanised. All these factors make it difficult to develop land efficiently. As the draft Unitary Plan has an aim of 30-40 per cent of growth to occur beyond the existing urban limit, less efficient use of land to accommodate this growth will result in more of a loss of rural land to urbanisation. Loss of this rural land carries the opportunity cost of a loss in rural productivity. <p>Cultural impact</p> <ul style="list-style-type: none"> Making more than one dwelling per site a non-complying activity will constrain the development of Māori land administered under the Te Ture Whenua Maori Act 1993. However, owners of Māori land can apply to the Māori Land Court to subdivide or create partitions on their land therefore unlocking the potential for more dwellings. Land held in general title owned by Maori will be constrained by the Future 	<p>Cultural impact</p> <ul style="list-style-type: none"> The Maori Land overlay in the Unitary Plan applies to Maori land administered under the Te Ture Whenua Maori Act 1993. This overlay enables dwellings as a permitted activity and integrated Maori development as a discretionary activity on Maori land. Therefore the Future Urban zone rules for more than one dwelling per site will not affect Maori land covered by the Maori Land overlay. Land held in general title owned by Maori will be constrained by the Future Urban zone rules for more than one dwelling per site. <p>Economic well-being These costs are similar in nature and scale to the costs outlined in the assessment of alternative 1a in section 3.2 of this report.</p> <p>Reverse sensitivity These costs are similar in nature and scale to the costs outlined in the assessment of alternative 1a in section 3.2 of this report .</p> <p>Development costs These costs are similar in nature and scale to the costs outlined in the assessment of alternative 1a in section 3.2 of this report.</p> <p>The legacy plan zoning enables further capacity of 762 dwellings in addition to the 2215 existing dwellings in the area zoned Future Urban in the Unitary Plan. This is the opportunity cost of subdivision under this approach. This can be balanced against the anticipated 99,661 dwellings that will be developed once the Future Urban zone is entirely urbanised.</p>	<p>Infrastructure provision prior to urbanisation</p> <ul style="list-style-type: none"> This approach may result in the development of a significant amount of additional housing and therefore demand for infrastructure provision prior to urbanisation. This infrastructure will either be on-site or private, as such the costs will fall on the landowner, or public where the costs will fall to council. Landowners that have invested in on-site or private infrastructure may be unwilling to pay for and connect to the public network once this is developed for urbanisation. This may compromise the economic viability of the public network. Development of public infrastructure prior to urbanisation may incur significant debt servicing costs where the initial investment by council is not paid back until that land is urbanised in the future. This could be up to 30 years. Providing public infrastructure prior to urbanisation may also be technically difficult, due for example, to low flow rates in wastewater systems requiring additional pumping facilities and maintenance. This increases costs, decreases viability and may result in additional adverse effects such as odour issues. Once this infrastructure is in place to service development prior to urbanisation it may constrain the development of a public infrastructure network to support urbanisation. Alternatively it may be necessary to remove this infrastructure to make way for the public network to support urbanisation. This is an inefficient use of resources. The cumulative environmental effect of a number of on-site or package wastewater treatment plants is likely to be greater than a widespread network designed to service an entire area. This environmental effect also applies for other types of

		Alternative 2 – Prohibited approach	Altern
	<p>Urban zone rules for more than one dwelling per site.</p> <p>Economic well-being</p> <ul style="list-style-type: none"> This approach is less permissive in terms of development in the short term than alternatives 1b, 1c and 3. This will restrict landowners ability to provide for their economic well-being over the short term (until urbanisation). <p>Reverse sensitivity</p> <ul style="list-style-type: none"> This approach may result in the development of multiple dwellings on single sites in the Future Urban zone. Development of additional dwellings may result in reverse sensitivity effects on rural uses in the zone. This could impact on existing rural uses ability to continue operating and discourage investment in rural enterprises prior to urbanisation. <p>Development costs</p> <ul style="list-style-type: none"> This approach may result in the development of more than one dwelling on a number of sites, where the landowners would be granted a non-complying resource consent. The costs associated with this are those the landowner would have to bear in applying for consent. This cost will not be as significant as that associated with the plan change process in option 2. The non-complying activity status may deter a number of landowners who would otherwise develop a second (or more) dwelling on sites in the Future Urban zone. This deterrent could potentially last for a lengthy period of time until the zoning is changed through the plan change process (up to 30 years). The opportunity cost of this is the economic benefit the landowner could otherwise gain in developing a second dwelling as well as the social benefit associated with the supply of additional housing. <p>Auckland Plan directives</p> <p>This approach does not give effect to the following directives of the Auckland Plan:</p> <ul style="list-style-type: none"> Directive 10.4 – to develop greenfield areas in a way that provides infrastructure in a timely and efficient manner and demonstrates efficient use of land. <p>1b. North Shore – minor household units</p> <p>Smaller lot sizes</p> <ul style="list-style-type: none"> This approach may result in the development of minor household units on a number of sites. Capacity modelling has determined this would theoretically enable 3584 additional dwellings in the Future Urban zone. In some cases landowners will then look to subdivide around each dwelling in order to create separate titles for each. This would require a non-complying consent in the North Shore legacy district plan. There is no minimum lot size in his zone. This would create smaller parcels of land in the Future Urban zone prior to urbanisation. The costs associated with this are similar in nature to those identified in the assessment of alternative 1a in section 3.2. <p>Cultural impact</p> <ul style="list-style-type: none"> This approach will impact on owners of Māori land. Refer to the cultural impact costs under alternative 1a in section 3.2. <p>Reverse sensitivity</p> <ul style="list-style-type: none"> The costs of this approach are similar in nature and scale than the costs outlined in the assessment of alternative 1a in section 3.2. <p>Auckland Plan directives</p> <ul style="list-style-type: none"> Refer to the Auckland Plan directives assessment under alternative 1a in section 3.2. <p>1c. Franklin – sites larger than 40ha and subsidiary dwellings</p> <p>Smaller lot sizes</p> <ul style="list-style-type: none"> Capacity modelling has determined this approach would theoretically enable 22 secondary dwellings in the Future Urban zone. Therefore this approach may result in the development of more than one dwelling, including secondary and subsidiary dwellings, on a number of sites. In some cases 		<p>infrastructure such as stormwater and roading. In addition to this wastewater treatment plants require maintenance to ensure they operate efficiently and effectively to minimise environmental impacts. There is no guarantee that on-site or package treatment plants will be maintained sufficiently by the landowner or community that infrastructure serves.</p> <ul style="list-style-type: none"> Urbanisation will be guided by structure plans. Technical work such as catchment management plans will inform the development of these structure plans. Structure plans will ensure urbanisation avoids or mitigates the impact impervious surfaces have on water quality and the environment at a catchment wide level. Additional housing that creates impervious surfaces prior to urbanisation will not be guided by a holistic document like a structure plan. Therefore the additional impervious surfaces created may have a greater environmental impact at a catchment wide scale than similar development informed by a structure plan. <p>Cultural impacts</p> <p>Refer to cultural impact costs under alternative 2 in section 3.2. The difference between this approach and alternative 1a is that more than one dwelling is discretionary instead of non-complying.</p> <p>Reverse sensitivity</p> <p>These costs are similar in nature and scale to the costs outlined in the assessment of alternative 1a in section 3.2 of this report.</p> <p>Development costs</p> <p>This approach may result in the development of more than one dwelling on sites where the landowners would be granted a discretionary resource consent. The costs associated with this are those the landowner would have to bear in applying for this consent. This cost will be smaller than that associated with the plan change process in alternative 2 or the non-complying resource consent costs in alternative 1a.</p> <p>Auckland Plan directives</p> <p>Refer to the Auckland Plan directives assessment under alternative 1a in section 3.2.</p>

		Alternative 2 – Prohibited approach	Alternative 3 – Rural Production zone approach
	<p>landowners may then look to subdivide around each dwelling in order to create separate titles. This would require a discretionary consent in the Franklin District Plan, where the applicant would have to demonstrate the development does not compromise the future form or urban development of the wider area. The minimum lot size is 2500m² for this zone. Refer to section 3.1 of this report for the subdivision capacity this enables. The cumulative effect of a number of similar subdivisions will still result in smaller lot sizes generally in the Future Urban zone. The costs associated with this are similar in nature but on a smaller scale than those identified in the assessment of alternative 1a in section 3.2.</p> <p>Infrastructure provision prior to urbanisation</p> <ul style="list-style-type: none"> The costs of this approach are similar in nature but on a smaller scale than the costs outlined in the assessment of alternative 1a in section 3.2. <p>Cultural impact</p> <ul style="list-style-type: none"> This approach will impact on owners of Māori land. Refer to the cultural impact costs under alternative 1a in section 3.2. <p>Reverse sensitivity</p> <ul style="list-style-type: none"> The costs of this approach are similar in nature but on a smaller scale than the costs outlined in the assessment of alternative 1a in section 3.2. <p>Development costs</p> <ul style="list-style-type: none"> This approach may result in the development of subsidiary dwellings on a small number of sites, where the landowners would be granted a restricted discretionary resource consent. The costs associated with this are those the landowner would have to bear in applying for this consent. This cost will be smaller than that associated with the plan change process in alternative 2 or the non-complying resource consent costs in alternative 1a in section 3.2. <p>Auckland Plan directives</p> <ul style="list-style-type: none"> Refer to the Auckland Plan directives assessment under alternative 1a in section 3.2. <p>All legacy plan policy approaches</p> <p>The legacy plan approaches represent an inconsistent approach to the development of dwellings in Future Urban zones (or equivalent) across the region. Maintaining the status quo misses the opportunity to develop a consistent and rationalised set of policies and rules for the Future Urban zone across the region. Rationalising the resource management system across the region was one key benefit identified for the Auckland local government restructure.</p>		
Benefits	<p>1a. Manukau, Papakura, Rodney, North Shore and Franklin – non-complying</p> <p>Infrastructure provision prior to urbanisation</p> <p>This approach will discourage premature demand for infrastructure prior to urbanisation created by additional housing development. Thereby minimising the costs associated with this infrastructure. The benefit of this approach is that it avoids the costs outlined in the assessment of alternative 3 in section 3.2. The benefits of this approach, which arise from avoiding these costs, are:</p> <ul style="list-style-type: none"> minimises cost of providing infrastructure prior to urbanisation public infrastructure network required for urbanisation is more viable may reduce technical difficulty in providing infrastructure network for large number of users efficient use of resources as one infrastructure network is developed to service area. may reduce environmental impact of development as widespread infrastructure network is designed to service an entire area. A public infrastructure network also ensures maintenance is carried out to keep the infrastructure working efficiently and effectively may reduce environment impact as development will be holistically 	<p>Smaller lot sizes</p> <p>Where more than one dwelling has been allowed to establish on a site the landowners may apply to subdivide the property around these dwellings. Subdivision, aside from minor boundary adjustments, amendments to cross leases and subdivision for network utilities, is proposed to be prohibited in the Future Urban zone. Therefore as the rules stand landowners would not be able to subdivide around each dwelling. The benefit of this approach is that it avoids the costs identified.</p> <p>The benefits of this approach, which arise from avoiding the costs identified in the assessment of alternative 1a in section 5.1, are:</p> <ul style="list-style-type: none"> discouraging premature development ensures purchase and comprehensive planning of Future Urban land can still occur and maximises the efficient use of that land for development provision of public infrastructure may not be as costly as land likely to have to be acquired to establish public network is less developed. prohibiting the development of additional housing 	<p>Smaller lot sizes</p> <p>The benefits of this approach are similar in nature and scale to those identified in the assessment of alternative 2 in 3.2 of this report.</p> <p>Economic well-being</p> <p>This approach is more permissive in terms of developing a number of dwellings on a single site than all the other options. It will allow landowners to better provide for their economic well-being over the short term (prior to urbanisation).</p> <p>Social well-being</p> <p>This approach will provide the greatest social benefit in the short term, in terms of enabling the development of more housing, than any of the other options.</p> <p>Consistent approach</p> <p>Refer to the consistent approach benefit under alternative 2.</p>

	Altern	Altern	Alternative 3 – Rural Production zone approach
	<p>guided by structure plans underpinned by technical work such as catchment management plans.</p> <p>Social well-being This approach may result in the social benefit of more housing being developed in the short term. The non-complying activity status is not enabling of this additional housing development; however, for the reasons outlined in the description of this approach, it is anticipated that the development of more than one dwelling per site may still occur.</p> <p>1b. North Shore – minor household units Infrastructure provision prior to urbanisation Minor household units create less demand for infrastructure and represent less of a capital investment to develop than secondary dwellings. It is anticipated that the infrastructure costs of this approach will be minimised and will be of a similar scale to that identified for alternative 1a in section 3.2</p> <p>Development costs No consent costs as able to develop minor household units without consent (permitted activity)</p> <p>Economic well-being This approach is much more enabling in terms of development than alternatives 1a, 1c, 2 and 3. This will allow landowners to better provide for their economic well-being over the short term (until urbanisation).</p> <p>Social well-being This approach will provide the social benefit of enabling the development of more housing in the short term (until urbanisation). The minor household units this approach enables also represent a low cost form of housing.</p> <p>1c. Franklin – sites larger than 40ha and subsidiary dwellings Development costs No compliance costs for a secondary dwelling on sites larger than 40ha without consent (permitted activity).</p> <p>Economic well-being This approach is more permissive in terms of development in the short term than alternative 1a and 2. This will allow landowners to better provide for their economic well-being over the short term (until urbanisation).</p> <p>Social well-being This approach will provide the social benefit of enabling the development of a secondary dwelling on sites larger than 40 hectares</p>	<p>minimises the likelihood of dwellings being removed to accommodate the public infrastructure network for urbanisation</p> <ul style="list-style-type: none"> • less intensive development prior to urbanisation enables the best urban form to be developed when that area is urbanised • discouraging premature development maximises the efficient use of that land for urban development, which minimises the amount of rural land needed to accommodate Auckland's growth. <p>Infrastructure provision prior to urbanisation The benefits of this approach are similar in nature and scale to those identified in the assessment of alternative 1a in section 3.2 of this report.</p> <p>Social well-being The social benefits of this approach are similar in nature and scale to those identified in the assessment of alternative 1a in section 3.2 of this report.</p> <p>Auckland Plan directives It is considered this approach does give effect to the following directives of the Auckland Plan:</p> <ul style="list-style-type: none"> • Directive 10.4 – to develop greenfield areas in a way that provides infrastructure in a timely and efficient manner and demonstrates efficient use of land. <p>Consistent approach This option represents a consistent approach to development in the Future Urban zone across the region. Rationalising the resource management system across the region was one key benefit identified for the Auckland local government restructure.</p>	
Risks	<p>At the time of writing this report the Unitary Plan provisions had not been signed off by the Governing body and were therefore subject to change. The capacity modelling results are based on the draft Unitary Plan provisions. Further modelling work will be undertaken following adoption of the Unitary Plan for notification, noting that changes may be made as a result of Council's decision on the Unitary Plan. Following this, capacity modelling will be further refined. It is likely the capacity results for subdivision in the future urban zone as outlined in section 3.1 and 3.2 will be adjusted downwards once all constraints are factored into the modelling. This high level capacity modelling does result in a small degree of uncertainty in the information underpinning this report.</p> <p>There is a risk of not acting until more refined modelling can be undertaken and this uncertainty is resolved. Development prior to urbanisation requires servicing which can create significant costs now and once the land is to be urbanised. The investment this development represents means it may become a significant constraint if it compromises the future development of these future urban areas. In addition landowners choosing to subdivide around these dwellings can fragment the land and compromise future development. Once future urban land is compromised it is inherently difficult to reverse before urbanisation takes place. Therefore the risk of not acting is that the Future Urban zone will be</p>	<p>The uncertainty information and the risk of not acting have been identified in the risks section of the status quo alternative. This uncertainty and risk is equally valid to this alternative. The risk of not acting is that the Future Urban zone will be compromised by premature subdivision and development.</p>	<p>The uncertainty information and the risk of not acting have been identified in the risks section of the status quo alternative. This uncertainty and risk is equally valid to this alternative. The risk of not acting is that the Future Urban zone will be compromised by premature subdivision and development.</p>

	Alternative 1 - Status Quo	Alternative 2 – Prohibited approach	Alternative 3 – Rural Production zone approach
	compromised by premature subdivision and development.		

Based on the above discussion, the following conclusions are drawn.

The significant costs associated with alternatives 1a, 1b and 1c (the three status quo approaches) and alternative 3 outweigh the benefits. The benefits of alternative 2 are not outweighed by the costs. Alternative 2 is therefore the most efficient approach.

Alternatives 1, 2 and 3 and alternative 3 are not considered to achieve both the objectives in section 3 of this report. Alternative 2 is considered to achieve both of these objectives. The lack of information applies equally to all alternatives. The risk of not acting also equally applies to all alternatives. Therefore on the sum of achievements and risks alternative 2 is the most effective.

Therefore alternative 2, use of the non-complying activity status for more than one dwelling per site in the Future Urban zone, is considered to be the most appropriate method to address the objectives in terms of efficiency and effectiveness.

4 Conclusion

Based on the above discussion, the following conclusions are drawn:

The following objectives and policies are considered to be the most appropriate way to achieve the sustainable management purpose of the RMA.

- Objective 2.3.4 of Chapter B – *The development of land zoned future urban within the RUB occurs in an orderly, timely and planned manner.*
- *Objective 4.2 of Chapter D (District level) - Future urban development is not compromised by premature subdivision, use and development*
- Policy 4.2 of Chapter D - *Enable subdivision for network utilities, amendments to a cross lease and minor boundary adjustments and not for other types of subdivision.*
- Policy 4.3 of Chapter D - *Avoid activities that:*
 - a) *compromise the efficient and effective operation of the surrounding transport network*
 - b) *require the provision, or extension of the transport, wastewater, water supply, stormwater networks or other infrastructure ahead of the time it is needed for urban development*
 - c) *create or extend infrastructure out of sequence or that is not contiguous with the existing network infrastructure*
 - d) *attract a high proportion of users beyond the local community*
 - e) *will give rise to reverse sensitivity issues when urban development occurs.*
- Policy 4.6 of Chapter D - *Avoid additional dwellings on a site.*

The following are considered to be the most efficient and effective methods to achieve the objectives above:

- The prohibited activity status for subdivision (with exceptions) and
- non-complying activity status for more than one dwellings per site

The assessment of these methods is outlined in sections 3.1 and 3.2 of this report.

5 Record of Development of Provisions

5.1 Information and Analysis

- Review of the Future Urban zone approaches taken by the legacy District Plans – FUZ comparison, *Unitary Plan*, 2013 (Appendix 3.22.1)
- Review of Auckland Plan directives for greenfield growth
- Consultation as detailed in section 5.2.
- Review of recent Environment Court decisions
 1. *Gavin H Wallace Ltd, Makaurau Marae Maori Trust Board Inc, Trustees of the Ernest Ellett Ryegrass Trust and Others, and Evelyn Mendelssohn v Auckland Council* (Decision number 120/2012)
 2. *Gavin H Wallace Ltd, Makaurau Marae Maori Trust Board Inc, Trustees of the Ernest Ellett Ryegrass Trust and Others, and Evelyn Mendelssohn v Auckland Council* (Decision number 283/2012)
 3. *Coromandel Watchdog of Hauraki Incorporated v Chief Executive of the Ministry of Economic Development (2007, 13 ELRNZ 279)*
- Capacity modelling to determine subdivision and development capacity of alternatives – FUZ Scenarios Memo** (Appendix 3.22.2)
- Te Ture Whenua Māori Act 1993
- Resource Management Act 1991

**Note: The capacity modelling results are based on the draft Unitary Plan provisions released for public consultation March 2013. Further modelling work will be undertaken following adoption of the Unitary Plan for notification. Following this, capacity modelling will be further refined. It is likely the capacity results for subdivision in the Future Urban zone as outlined in section 3.1 and 3.2 will be adjusted downwards once all constraints are factored into the modelling. In light of this the modelling numbers in this report can be seen as theoretical maximums.

5.2 Consultation Undertaken

Growth was consulted on as a single topic during the development of the Unitary Plan/. Therefore the consultation undertaken for the Future Urban zone is the same as that undertaken for the land supply provisions of the Unitary Plan. Consultation on the Rural Urban Boundary and growth was also interrelated. Refer to the consultation undertaken segment of the rural urban boundary and land supply section 32 report. During the engagement on the draft Unitary Plan from March to May 2013, the Future Urban zone attracted 58 individual pieces of feedback. Amendments to the Future Urban zone as a result of this feedback include a change in the activity status for more than one dwelling per site from prohibited to non-complying.

5.3 Decision-Making

This section identifies the key political decisions in relation to the Future Urban zone in the Unitary Plan. Section 1 of the wider section 32 report contains further detail on the political decision making process associated with the Unitary Plan as a whole.

Issues papers outlining the significant resource management issues facing the region went before the Unitary Plan Political Working Party in September 2011. Growth was part of the built environment issues paper. Issues and potential policy approaches were outlined and discussed. Using the issues paper and direction from the Political Working Party an options paper was developed, which contained costs and benefits of each policy approach. At this stage it was decided an outcomes matrix would be developed in place of options papers.

The outcomes matrix was a tool developed to identify the outcomes the Unitary Plan should aim to achieve. Outcomes were identified in November and December 2011 and the Political Working Party, Local Boards and Council Controlled Organisations added and amended these outcomes. Tensions between outcomes were identified and then were worked through with the Political Working Party and direction setting papers were prepared. The outcomes matrix was used as the base for developing the objectives of the Unitary Plan including the Future Urban zone. Outcomes for the Future Urban zone include:

- To avoid compromising the future urban use and development of that land
- No more or only minimal subdivision to occur prior to development.

The Unitary Plan provisions were further refined through direction from the Unitary Plan Political Working Party (PWP). The approach to urban development of greenfield land was taken to the PWP in July 2012. The PWP confirmed the proposed approach to defining the RUB and the mechanics of the Future Urban zone including use of plan changes and concurrent structure plans to release land for development. In September 2012 the approach to growth was again taken to the PWP. The PWP endorsed the principles of land release and the approach of avoiding compromising future urban areas by urban activities and subdivision.