

Section 32 Report

Part 3

Cove Road North Precinct

Prepared for the
Proposed Kaipara District Plan

Prior to Notification

28 April 2025

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ABBREVIATIONS USED IN THIS REPORT

Kaipara District Council Operative District Plan	KDP
Kaipara District Spatial Plan	KDSP
National Environmental Standards	NES
National Planning Standards	NPS
Northland Regional Policy Statement	NRPS
National Policy Statement on Urban Development	NPS:UD
Proposed Kaipara District Plan	PDP
Proposed Regional Plan	PRP
Resource Management Act 1991	RMA
Section 32 of the RMA	s32

1. INTRODUCTION

1.1 Overview

1. This report details the pre-notification evaluation undertaken by Kaipara District Council (**KDC**) in relation to the Cove Road North Precinct Chapter for the Proposed Kaipara District Plan (**PDP**). The report has been prepared in accordance with the requirements of section 32 of the RMA (**s32**) and identifies and evaluates the outcomes sought for the district's residential areas and the proposed provisions to achieve those outcomes.

1.2 Topic Description

2. The Cove Road North (**CRN**) Precinct is an area comprised of 56.9 hectares of land located at Cove Road, Mangawhai approximately 1.8 kilometres north east of the commercial area of Mangawhai Heads.
3. The CRN Precinct is zoned as General Residential Zone under the PDP and includes one sub-precinct, referred to as the 'Northern Sub-Precinct'.
4. This report sets out the issues for the CRN Precinct and provides an overview of the statutory and policy context.
5. The level of detail in this evaluation report is appropriate for the level of effects anticipated.

1.3 Background

6. The CRN Precinct is currently housed in Chapter 16 of the Kaipara District Plan (**KDP**) with the Precinct Plan located in Appendix E Structure Plans/Precinct Maps. The CRN Precinct was introduced into the KDP as the result of a recent private plan change, Plan Change 83 (**PPC83**), made Operative 26 November 2024.
7. As the CRN Precinct was recently made operative, provisions have generally been rolled over, with minor amendments to reflect the PDP format and give effect to the National Planning Standards. The reasoning and conclusions made in the s32 Report prepared by Barker & Associates dated 18 November 2022 for PPC83 remain relevant and valid.

2. SUMMARY OF ADVICE RECEIVED FROM IWI AND CONSULTATION WITH COMMUNITY

8. Section 32 requires evaluation reports to summarise all advice concerning the proposal received from iwi authorities under Clauses 3(1)(d) and 4A of Schedule 1 of the RMA. As the CRN Precinct was made operative in 2024, it is considered that advice from iwi was taken into consideration through the processing of PPC83.
9. Consultation with the community was undertaken via the Exposure Draft District Plan. As the CRN Precinct had recently been approved and made operative through PPC83 in November 2024, it was not included in the draft KDP.

10. Further details on all consultation and engagement undertaken for the development of the PDP are included in the Section 32 Overview Report.

3. PROBLEM DEFINITION

11. As the provisions for the CRN have only recently been approved and made operative through PPC83, it is considered that the relevant considerations for the PDP are:
 - a. The KDP structure and drafting is not consistent with the high- level direction provided in the planning standards, or preferred electronic plan format.
 - b. The KDP provisions reflect an effects based plan which do not align with the hybrid approach which encompasses an effects and activities based plan as proposed under the PDP.
 - c. Some definitions / terminology needs to be amended to reflect the planning standards.

4. STATUTORY AND PLANNING CONTEXT

12. This section provides a key summary of the statutory requirements of relevance to the CRN Precinct, and the relevant planning context.

4.1 Resource Management Act

Section 5 – Purpose

13. Section 75(3) of the RMA requires district plans to give effect to higher order planning instruments, National Policy Statements (NPS), national planning standards, and the Regional Policy Statement for Northland (NRPS). The Section 32 Overview Report provides a more detailed summary of the relevant RMA higher order planning instruments relevant to the PDP.
14. Section 5 of the RMA sets out its purpose, being to promote the sustainable management of natural and physical resources. As applicable to the residential areas within the district, sustainable management includes the use, development, and protection of the natural and physical resources of these areas, to enable people and communities to provide for their social, economic and cultural wellbeing and for their health and safety. This includes avoiding, remedying and mitigating the adverse effects of activities within these zones on the environment (section 5(2)(c)).

Section 6 – Matters of national importance

15. Section 6 of the RMA provides direction on how matters of national importance are to be managed. In general these matters relate to areas that contain significant landscape, ecological, heritage, or cultural values. Section 6(c) recognises the protection of areas of significant indigenous vegetation, and is relevant to the CRN Precinct, which includes specific provisions which seek to manage the potential effects of use and development on indigenous vegetation.

Section 7 – Other Matters

16. Section 7 lists matters to which persons exercising functions and powers under the RMA are to have particular regard to. Section 7(b) relates to the efficient use and development of natural and physical resources, and s7(f) seeks to maintain and enhance the quality of the environment, which are relevant to this topic, as the CRN Precinct includes specific area based provisions developed through the PPC83 process to manage the effects of use and development.
17. The various documents considered, and the relevant requirements are set out below:

4.2 District Plan must give effect to	
Document	Relevance
National Policy Statement on Urban Development 2020 (NPS-UD)	<p>The NPS-UD directs local authorities in relation to development of urban environments. The Kaipara District Council has decided that the NPS-UD does not apply to the Kaipara district due to no settlement at the present time meeting the definition of an 'urban environment' in the NPS. The existing townships are sufficiently separated that they do not collectively form a single housing and employment market that would cross the 'urban environment' definition threshold.</p> <p>Whilst the NPS-UD does not therefore have to be given effect to in Kaipara District, it nonetheless contains useful direction on how urban growth should be managed, along with the need to provide sufficient zoned and infrastructure ready capacity to accommodate that growth. These aspects are addressed in the Strategic Direction section of the plan.</p>
National Planning Standards 2019	<p>Section 75(3)(ba) of the RMA requires that district plans give effect to the Planning Standards. The Planning Standards were gazetted in April 2019 and the purpose is to assist in achieving the purpose of the RMA and improve consistency in the structure, format and content of RMA plans. The following standards and directions in the Planning Standards are of direct relevance to the CRN Precinct:</p> <ul style="list-style-type: none"> • In accordance with Mandatory Direction 12.2, a precinct must spatially identify and manage an area where additional place-based provisions apply to modify or refine aspects of the policy approach or outcomes anticipated in the underlying zone. In this case, the CRN Precinct includes place-based provisions developed through the PPC83 process which modify and/or refine the provisions of the underlying General Residential Zone and District Wide chapters. Accordingly, the relevant provisions have been included in the PDP as a new precinct. • In accordance with Mandatory Direction 7.5, any provisions relating to energy, infrastructure and transport, that are not specific to the Special purpose zones

	<p>chapter or sections, must be located in one or more chapters under the Energy, infrastructure and transport heading. The CRN provisions in the KDP include rules and standards that relate to transport. As such, to align with the Mandatory Directions 7.5 these provisions are proposed to be transferred to the District-Wide Transport Chapter.</p> <ul style="list-style-type: none"> In accordance with Mandatory Direction 7.24, Subdivision provisions must be located in one or more chapters under the Subdivision heading. The CRN provisions in the KDP include rules, standards and information requirements that relate to Subdivision. As such, to align with the Mandatory Directions 7.24 these provisions are proposed to be transferred to the District-Wide Subdivision Chapter.
Northland Regional Policy Statement (NRPS)	<p>The NRPS promotes sustainable management of Northland's natural and physical resources by providing an overview of the region's resource management issues; and setting out objectives, policies and methods to achieve integrated management the natural and physical resources of the region. Further assessment of the CRN Precinct against the provision of the NRPS is contained in the s32 Assessment prepared by Barker & Associates dated 18 November 2022. Overall, the provisions of the CRN Precinct Chapter will give effect to the NRPS, and in particular Objective 3.11 Regional form which seeks sustainable built environments.</p>

4.3 District Plan must take into account	
Document	Relevance
Iwi management plan(s)	<p>In preparing the District Plan, the Council must take into account the two Iwi Management Plans (Nga Ture mo Te Taiao o Te Roroa – review 2019 and Te Uri o Hau Kaitiakitanga o te Taiao 2011), as they are relevant planning documents recognized by iwi authorities, to the extent that it is relevant to the resource management issues of the district.</p> <p>Te Uri o Hau Kaitiakitanga o te Taiao contains a section on Growth and Development which includes policies on Memoranda of Understanding or other forms of agreements with resource consent applicants, developers and land-holders to determine how development will proceed, and which may include processes to be followed in the event of a culturally significant site and /or taonga being discovered and to ensure practical solutions are provided for the mitigation or remediation of adverse effects of any growth and development.</p>
National Adaptation Plan and Emissions Reduction Plan	<p>The CRN Precinct Chapter is considered to be generally consistent with the NAP and ERP, specifically in relation to enabling urban development in proximity to existing amenities and</p>

	services within Mangawhai, and through provisions for enhanced cycling and walking connections.
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4.4 District Plan Must have regard to:

Document	Relevance
Long Term Plan (2024-2034)	The LTP is the Council's lead document and sets out all its activities and future spending priorities. It includes a financial strategy, details performance measures and provides the rationale for delivery of activities, amongst other things. Further detail on the LTP is located within the Section 32 Overview Report.

4.5 Other relevant documents and reports

18. There are no other relevant documents or reports of particular relevance to the CRN Precinct.

5. APPROACH TO EVALUATION

19. Section 32(1)(b) requires an evaluation of whether the provisions are the most appropriate way to achieve the objective by identifying other reasonably practicable options, assessing the efficiency and effectiveness of the provisions in achieving the objective, and summarising the reasons for deciding the provisions. The assessment must identify and assess the benefits and costs of environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions, including opportunities for economic growth and employment. The assessment must, if practicable, quantify the benefits and costs and assess the risk of acting or not acting if there is uncertain or insufficient information available about the subject matter.

5.1 Scale and Significance of the Effects

20. The s32 evaluation must contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal. To determine the scale and significance, the following criteria have been used:

TABLE 1: ASSESSMENT OF SCALE AND SIGNIFICANCE OF EFFECTS		
Criteria	Summary of effects	Evaluation (1 is low and 5 is high)

TABLE 1: ASSESSMENT OF SCALE AND SIGNIFICANCE OF EFFECTS

Reason for change	<ul style="list-style-type: none"> The KDC is undertaking full plan review. Amendments to the CRN Precinct have been made to reflect the National Planning standards and required electronic plan format. 	1
Degree of shift from status quo	<ul style="list-style-type: none"> The CRN area will be provided for in the PDP by way of a new Precinct. The KDP includes specific provisions for CRN in Chapter 13. The PDP proposes to include these provisions within a new Precinct Chapter, in accordance with Mandatory Direction 12.2 of the National Planning Standards. Other District Wide provisions are also proposed to be relocated to Part 2 of the PDP, in accordance with Mandatory Directions 7.5 and 7.24. Minor formatting and style amendments are proposed to achieve consistency and coherency with the PDP. Overall, the wording of provisions has generally been rolled over from the KDP as they apply to CRN. 	1
Who and how many will be affected, geographic scale of effects	<ul style="list-style-type: none"> As the provisions of the CRN Precinct Chapter are generally a roll over from the relevant provisions of Chapter 13 under the KDP, the scale of effect is considered to be low. 	1
Degree of impact on or interest from Maori	<ul style="list-style-type: none"> The changes proposed will likely be of interest to the owners and residents of the CRN Precinct. As such, the scale of effects resulting from the change is deemed low. 	1
Timing and duration of effects	<ul style="list-style-type: none"> The provisions seek to manage the CRN Precinct area in both the short and long term. As such the effect of the change will be on-going and into the future. However, the proposed provisions retain the status quo under the KDP in relation to the management of environmental effects. 	2

TABLE 1: ASSESSMENT OF SCALE AND SIGNIFICANCE OF EFFECTS

Type of effect:	<ul style="list-style-type: none"> Effects will relate to future use, development, and subdivision enabled within the CRN Precinct and adjacent land. 	2
Degree of risk or uncertainty:	<ul style="list-style-type: none"> Overall, the PDP approach aligns with the Planning Standards, with many of the changes attributed to consequential format and structure. Regardless, the CRN Precinct is considered to pose low policy risk due to the provisions being a rollover of the KDP provisions as determined through the PC83 process. 	1
Total (out of 35):		9

6. EVALUATION OF OBJECTIVES

6.1 Appropriateness in Terms of Purpose of RMA

21. Council must evaluate in accordance with s32 of the RMA the extent to which each objective proposed in the PDP is the most appropriate way to achieve the purpose of the RMA.
22. Table 2 contains the sole objective proposed for the CRN Precinct.

TABLE 2: S32 ASSESSMENT OF PROPOSED RESIDENTIAL ZONE OBJECTIVE

Proposed Cove Road North Precinct Objective	
PRECX-O1 Cove Road North Precinct Residential Living: Residential living opportunities and housing choice is enabled in the Cove Road North Precinct whilst landscape, ecological, infrastructure, transport, and character and amenity effects are managed.	

23. Part 2 of the RMA states the purpose and principles of the RMA, and Table 3 identifies the relevant sections of Part 2 of the RMA for the objective in the CRN Precinct.

TABLE 3: RELEVANCE OF PROPOSED RESIDENTIAL ZONE OBJECTIVE WITH PART 2 OF THE RMA

		Cove Road North Precinct Objective
		O1 Cove Road North Precinct Residential Living
RMA Part 2 Sections	5(2)	✓
	5(2)(a)	✓
	5(2)(c)	✓
	S6(c)	✓

	7(b)	✓
	7(c)	✓
	7(f)	✓

24. The following s5 matters have been addressed by the Objective:
- a. s5(2) and s5(2)(a), as by providing for residential living opportunities and housing choice, the objective will provide for natural and physical resources to meet social, economic, and cultural wellbeing of the community and the foreseeable needs of future generations; and
 - b. s5(b), as by requiring landscape, ecological, infrastructure, transport, and character and amenity effects to be managed, the Objective will avoid, remedy, or mitigate adverse effects of activities on the environment.
25. The following s6 matters have been addressed by the Objective:
- a. s6(c) in relation to the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna. In particular, the CRN Precinct identifies areas of indigenous vegetation, wetlands, and intermittent and permanent streams, and the objective seeks to manage potential ecological effects resulting from use and development.
26. The following s7 matters have been addressed by the Objective:
- a. s7(b) in relation to the efficient use and development of natural and physical resources by seeking to enable residential living choices and housing in CRN Precinct;
 - b. s7(c) in relation to the maintenance and enhancement of amenity values by seeking character and amenity effects are managed; and
 - c. s7(f) in relation to the maintenance and enhancement of the quality of the environment by seeking that landscape, ecological, infrastructure, and transport effects are managed.
27. The objective is relevant in that it is the most appropriate way to achieve the purpose of the Act as it will enable residential living opportunities and housing choice in the CRP, providing for the social, economic, and cultural wellbeing of people and communities. The objective will safeguard the needs of future generations, safeguarding the life-supporting capacity of air, water, soil and ecosystems and avoiding, remedying, or mitigating any adverse effects on the environment.
28. The objective is useful as it demonstrates the expected environmental outcomes in terms of what is appropriate development and protection the Cove Road Precinct, and will help the Council carry out its RMA functions and provide clear direction to both the plan users and decisions makers.
29. The objective is reasonable in that the costs associated with implementation will be generated by the requirements to apply for consent, it is considered that the proposed objective does not result in any un-

justifiable costs. It is considered that the objective can be achieved, is consistent with higher order statutory documents and are sufficient to achieve the purpose of the RMA.

6.2 Objectives conclusion

30. Having assessed the proposed objective against Part 2 of the RMA it is considered that it is the most appropriate way to achieve the purpose of the RMA.

7. EVALUATION OF THE PROVISIONS

31. Section 32 assessments must determine whether the proposed provisions are the most appropriate way to achieve the proposed objective. In this instance, the CRN Precinct retains one objective and this s32 assessment must assess whether the proposed provisions are the most appropriate means to achieve this proposed objective.
32. This must include the identification of alternatives, and cost benefit analysis of the economic, social, environmental and cultural effects of the provisions including whether opportunities for economic growth and employment are reduced or increased. The risk of acting or not acting where uncertain information exists must also be considered.
33. The following sections of this report will identify the range of options available, and the efficiency and effectiveness of the preferred provisions.

7.1 Options

34. The CRN Precinct proposes provisions, including policies, rules, standards, assessment criteria, and a Precinct Plan, which have only minor changes from the operative provisions to address the planning standards, e-plan structure and plan wide consistency. The following sections of this report will address the efficiency and effectiveness of the preferred provisions.
35. Changes to provisions include the following:
 - a. Separating the provisions under the KDP to reflect and effects and activities based plan in accordance with the PDP;
 - b. Removing the provisions that relate to district wide matters and transferring them into the relevant District Wide chapters; and
 - c. Terminology changes when the word/activity is best reflected by the planning standard definitions.
36. The following broad options have been identified and assessed with regard to CRN Precinct.
 - a. Option 1 – Do nothing (Status Quo): Insert the provisions into the plan as per the KDP.
 - b. Option 2 – Rely on underlying zoning provisions of the LDRZ and District-wide chapters.
 - c. Option 3 – Proposed approach: Operative structure plan and substantive outcomes carried forward, with provisions redrafted in line with the planning standards and electronic plan consistency.

37. Overall, the preferred option is Option 3 as this approach is in line with the Planning Standards and the use of an E-plan for the PDP. This approach allows integration and consistency with the PDP. Option 1, do nothing approach, would mean that the chapter would be inconsistent with the Planning Standards and the rest of the PDP. Option 2, not using a Precinct, would not allow for the recently operative provisions specific to the CRN Precinct to address the environmental and development considerations for this area.

7.2 Costs, benefits, effectiveness and efficiency

38. The objective has a focus on providing for, and managing use and development within the CRN Precinct. As such the assessment of the provisions that give effect to this objective is provided in a consolidated manner.
39. Table 4 below includes an evaluation of the options against the requirements of s32(1)(b).

TABLE 4: EVALUATION OF PROVISIONS TO GIVE EFFECT TO THE OBJECTIVE

	Option 1 – Do nothing (Status Quo): Insert the provisions into the plan as per the KDP
Benefits	<p>Economic:</p> <ul style="list-style-type: none"> Minimal time and cost in terms of administration to KDC. <p>Social:</p> <ul style="list-style-type: none"> Will provide for residential living opportunities and housing choice within the CRN Precinct. <p>Environmental:</p> <ul style="list-style-type: none"> Will retain the approach under the KDP for the management of the use, development, and subdivision of land within the CRN Precinct, of which the provisions were recently developed through the PPC83 process. <p>Cultural:</p> <ul style="list-style-type: none"> There is no change to the cultural environment through this option.
Costs	<p>Economic:</p> <ul style="list-style-type: none"> As the KDP encompasses an effects based approach, inserting the operative provisions will create inconsistencies with the remainder of the PDP, which adopts a hybrid effects and activities based approach. The provisions of the CRN Precinct Chapter will also be inconsistent with the other area specific chapters in the PDP, where District Wide provisions will be located separately in Part 2 of the PDP. These inconsistencies are likely to add complexity to the PDP and create additional costs to all plan users in terms of implementation and enforcement. <p>Social:</p> <ul style="list-style-type: none"> There are no known social costs as the KDP provisions will be rolled over. <p>Environmental:</p> <ul style="list-style-type: none"> There are no known environmental costs as the KDP provisions will be rolled over. <p>Cultural:</p> <ul style="list-style-type: none"> There is no change to the cultural environment through this option.
Opportunities for economic growth	No direct increase in economic growth is anticipated.
Opportunities for employment	No direct increase in employment opportunities anticipated.
Certainty and sufficiency of information	Through the recent private plan change process, the benefits and costs of the provisions are reasonably certain, and there is sufficient information available to assess the likely impact of adopting the provisions.
Risk of acting or not acting if there is uncertainty or insufficient information.	Not applicable.

Effectiveness in achieving the objective(s)	This option is an effective way of achieving the objective as it will provide for residential development within the CRN Precinct while managing the potential effects of use, development, and subdivision on the surrounding environment.
Efficiency in achieving the objective(s)	This option is not an efficient way of achieving the objective as the format of provisions under the PDP is not consistent with the PDP approach or National Planning Standards. While it retains the KDP approach that existing plan users may be familiar with, in the long term, this will create implementation and enforcement inefficiencies for plan users.
Option 2 – Rely on underlying zoning provisions of the LDRZ and District-wide chapters	
Benefits	<p>Economic:</p> <ul style="list-style-type: none"> Minimal time and cost in terms of administration to KDC. <p>Social:</p> <ul style="list-style-type: none"> Will provide for residential living opportunities and housing choice within the CRN Precinct. <p>Environmental:</p> <ul style="list-style-type: none"> Will manage the environmental effects of use, development, and subdivision in accordance with the Residential Zone and District Wide Chapters, however excludes specific area-based provisions determined through the PPC83 process. <p>Cultural:</p> <ul style="list-style-type: none"> There is no change to the cultural environment through this option.
Costs	<p>Economic:</p> <ul style="list-style-type: none"> The place-based provisions, including rules, policies, and matters of discretion specific to the CRN Precinct provide direction and certainty to plan users on the anticipated outcomes in the CRN Precinct. The exclusion of these provisions is likely to add increased time and cost inefficiencies to the resource consent process. <p>Social:</p> <ul style="list-style-type: none"> As this option excludes a number of place-based provisions specific to the CRN Precinct, the resulting development outcomes may adversely affect people and communities compared to Option 3. <p>Environmental:</p> <ul style="list-style-type: none"> While environmental effects can be managed in accordance with the provisions of the General Residential Zone and District Wide Chapters, this option will not provide for the place-based provisions specific to the CRN Precinct which were recently determined through the PPC83 process. <p>Cultural:</p> <ul style="list-style-type: none"> There is no change to the cultural environment through this option.
Opportunities for economic growth	No direct increase in economic growth is anticipated.
Opportunities for employment	No direct increase in employment opportunities anticipated.

Certainty and sufficiency of information	Through the recent private plan change process, the benefits and costs of the provisions are reasonably certain, and there is sufficient information available to assess the likely impact of adopting the provisions.
Risk of acting or not acting if there is uncertainty or insufficient information.	Not applicable.
Effectiveness in achieving the objective(s)	This option is less effective than Option 3. While use, development, and subdivision, and the management of environmental effects can be provided for within the underlying provisions of the General Residential and District Wide Chapters, they do not include place-based provisions that were recently developed and are specific to the management of natural and physical resources in the CRN Precinct.
Efficiency in achieving the objective(s)	This option is not efficient as the provisions exclude place-based provisions that were recently developed through the private plan change process, and are specific to the management of natural and physical resources in the CRN Precinct.
	Option 3 – Proposed approach: Operative structure plan and substantive outcomes carried forward, with provisions redrafted in line with the planning standards and electronic plan consistency
Benefits	<p>Economic:</p> <ul style="list-style-type: none"> Minimal time and cost in terms of administration to KDC. <p>Social:</p> <ul style="list-style-type: none"> Will provide for residential living opportunities and housing choice within the CRN Precinct. <p>Environmental:</p> <ul style="list-style-type: none"> Will manage the environmental effects of use, development, and subdivision in accordance with the outcomes of PPC83, which were recently determined through the private plan change process. <p>Cultural:</p> <ul style="list-style-type: none"> There is no change to the cultural environment through this option.
Costs	<p>Economic:</p> <ul style="list-style-type: none"> There may be additional compliance and administrative costs as the hybrid effects and activities based approach are a departure from the KPD. <p>Social:</p> <ul style="list-style-type: none"> Social costs may arise through the introduction of a new approach which is not familiar to plan users, however the requirements of the proposed rules and standards are in keeping with the KDP. <p>Environmental:</p> <ul style="list-style-type: none"> There are no known environmental costs as the KDP provisions will be rolled over, albeit within a different format. <p>Cultural:</p> <ul style="list-style-type: none"> There is no change to the cultural environment through this option.

Opportunities for economic growth	No direct increase in economic growth is anticipated.
Opportunities for employment	No direct increase in employment opportunities anticipated.
Certainty and sufficiency of information	Through the recent private plan change process, the benefits and costs of other provisions are reasonably certain, and there is sufficient information available to assess the likely impact of adopting the provisions.
Risk of acting or not acting if there is uncertainty or insufficient information.	Not applicable.
Effectiveness in achieving the objective(s)	This option is an effective way of achieving the objective as it will provide for residential development within the CRN Precinct while managing the potential effects of use, development, and subdivision on the surrounding environment in accordance with the specific provisions developed through the PPC83 process.
Efficiency in achieving the objective(s)	This option is efficient in achieving the objective as it will retain all provisions developed through PPC83, while also achieving consistency with the format of the PDP in accordance with the National Planning Standards.

7.3 Reasons for deciding on the provisions

40. The proposed policies, rules, standards, assessment criteria, and structure plan in the CRN Precinct are the most appropriate way to achieve the objectives. They provide for an appropriate level of development whilst protecting the natural environment.
41. The proposed provisions are considered to be the most efficient and effective means of achieving the objective as together they will:
 - a. Give effect to Part 2 of the RMA and relevant National direction.
 - b. The provisions will ensure potential effects on the environment are appropriately managed as development and subdivision occurs.
 - c. Be consistent with the remainder of the PDP and will be in accordance with the National Planning Standards.

8. CONCLUSION

42. Pursuant to s32 of the RMA, the proposed CRN Precinct objective has been analysed against Part 2 of the RMA and are considered to be the most appropriate way to achieve the purpose of the RMA.
43. The proposed provisions have been comprehensively compared against reasonably practicable options through the PPC83 process, and were recently made operative in November 2024. These provisions under the KPD have been rolled over to the proposed provisions of the CRN Precinct, and are considered to represent the most appropriate means of achieving the proposed objective.