

Section 32 Report

Part 3

Trifecta Special Purpose Zone

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
Private Plan Change 81	PPC81
Proposed Kaipara District Plan	PDP
Proposed Regional Plan	PRP
Resource Management Act 1991	RMA
Section 32 of the RMA	s32
Trifecta Special Purpose Zone	TSPZ

1. INTRODUCTION

1.1 Overview

1. This report details the pre-notification evaluation undertaken by Kaipara District Council (**KDC**) in relation to the Trifecta Special Purpose Zone(**TSPZ**) 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. TSPZ is an area comprised of approximately 47ha of land located at the corner of State Highway 14 and Awakino Point North Road and is located to the northeast of Dargaville. It is being developed as a mixture of residential, light industrial, neighbourhood centre and open space using a development area plan.
3. This report sets out the issues for the TSPZ and provides an overview of the statutory and policy context.
4. The level of detail in this evaluation report is appropriate for the level of effects anticipated.

1.3 Background

5. The TSPZ is currently housed in Chapter 16A of the Kaipara District Plan (**KDP**) with a development area plan identifying the area of the zone (Appendix E) and was introduced into the KDP as a result of a private plan change, Plan Change 81 (**PPC81**), made operative on 24 September 2024.
6. As Chapter 16A was recently made operative, provisions have generally rolled over, with minor amendments to reflect the PDP format and give effect to the National Planning Standards. The reasoning and conclusions made by Lands & Survey (2022)¹ in the s32 reports prepared for PPC81 remain relevant and valid.

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

7. 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 provisions were recently made operative in 2024, it is considered that advice from iwi was taken into consideration through the processing of PPC81.
8. Consultation with the community was undertaken via the Exposure Draft District Plan. As the provisions were recently made operative in 2024, it was not considered necessary to include in the draft KDP.

¹ Section 32 Assessment prepared by Lands & Survey dated February 2022.

9. 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

10. As the provisions for the TSPZ have only recently been approved and made operative through PPC81, it is considered that the relevant considerations for the PDP are:
 - The KDP structure and drafting is not consistent with the high- level direction provided in the planning standards, or preferred electronic plan format.
 - Some provisions reference old standards and rules.
 - Some definitions / terminology needs to be amended to reflect the planning standards.

4. STATUTORY AND PLANNING CONTEXT

11. This section provides a key summary of the statutory requirements of relevance to the TSPZ Chapter, and the relevant planning context.

4.1 Resource Management Act

Section 5 – Purpose

12. 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 s32 Overview Report provides a more detailed summary of the relevant RMA higher order planning instruments relevant to the PDP.
13. 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

14. 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 TSPZ, which includes specific provisions which seek to manage the potential effects of use and development on indigenous vegetation.

Section 7 – Other Matters

15. 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 TSPZ Chapter includes specific area based provisions developed through the PPC81 process to enable, and manage the effects of use and development.
16. 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 the 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 TSPZ:</p> <ul style="list-style-type: none"> • In accordance with Mandatory Direction 8.3, the Trifecta area has been incorporated as a Special Purpose zone as the operative provisions: <ul style="list-style-type: none"> ○ Will enable a scale of development that is significant to the district; ○ Are impractical to be managed through another zone or a combination of spatial layers as they were designed through the PPC81 process to apply as standalone provisions. In addition, the timing of the PPC81 provisions becoming operative did not provide for sufficient time to further develop the underlying planning maps.

	<p>Accordingly, the Trifecta provisions have been rolled over into a Special Purpose Zone under the PDP.</p> <ul style="list-style-type: none"> • In accordance with Mandatory Direction 7.5, any provisions relating to energy, infrastructure and transport, that are not specific to the Special purpose zones chapter or sections, must be located in one or more chapters under the Energy, infrastructure and transport heading. The TSPZ provisions in the KDP include rules and standards that relate to transport. Given that the provisions are associated with a proposed Special Purpose Zone, they are proposed to be included in the Special Purpose Zone chapter in addition to the District-Wide Transport Chapter for plan clarity. • In accordance with Mandatory Direction 7.24, Subdivision provisions must be located in one or more chapters under the Subdivision heading. The TSPZ 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 included in the Special Purpose Zone chapter in place of to the District-Wide Subdivision Chapter. • In accordance with Mandatory Direction 7.32, if provisions for managing light are addressed, they must be located in the Light chapter. The TSPZ provisions in the KDP include rules and standards that relate to artificial light. As such, to align with Mandatory Directions 7.32, these provisions are proposed to be included in the Special Purpose Zone chapter in place of the District-Wide Light Chapter. • In accordance with Mandatory Direction 7.33, if provisions for managing noise are addressed, they must be located in the Noise chapter. The TSPZ provisions in the KDP include rules and standards that relate to noise. As such, to align with Mandatory Directions 7.33, these provisions are proposed to be included in the Special Purpose Zone chapter in addition to the District-Wide Noise Chapter. • In accordance with Mandatory Direction 7.37, if provisions to manage temporary activities, buildings, and events are addressed, they must be located in the Temporary activities chapter. The TSPZ provisions in the KDP include rules and standards that relate to temporary activities. As such, to align with Mandatory Directions 7.37, these provisions are proposed to be included in the Special Purpose Zone chapter in place of the District-Wide Temporary Activities Chapter.
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Northland Regional Policy Statement (NRPS)	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 TSPZ against the provision of the NRPS is contained in the s32 Assessment prepared by Lands & Survey dated February 2022. Overall, the provisions of the TSPZ Chapter will give effect to the NRPS, and in particular Objective 3.11 Regional form which seeks sustainable built environments.
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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	The TSPZ 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 services and through the promotion of active modes of transport.

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 s32 Overview Report.

4.5 Other relevant documents and reports

17. There are no other relevant documents or reports of particular relevance to the TSPZ Chapter.

5. APPROACH TO EVALUATION

18. Section 32(1)(b) requires an evaluation of whether the provisions are the most appropriate way to achieve the objectives by identifying other reasonably practicable options, assessing the efficiency and effectiveness of the provisions in achieving the objectives, 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

19. 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)
Reason for change	<ul style="list-style-type: none"> The KDC is undertaking full plan review. Amendments to the TSPZ 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 TSPZ will be provided for in the PDP by way of a Special Purpose Zone. The KDP includes specific provisions for TSPZ within Chapter 16A. The PDP proposes to include these provisions within a Special Purpose Zone Chapter, in accordance with Mandatory Direction 8.3 of the National Planning Standards. Other District Wide provisions are also proposed to be kept with in the Special Purpose Zone where relevant and in addition to the District Wide chapters, in accordance 	1

	<p>with Mandatory Directions 7.5, 7.24, 7.32, 7.33, and 7.37. Minor formatting and style amendments are proposed to achieve consistency and coherency with the PDP.</p> <ul style="list-style-type: none"> Overall, the wording of provisions has generally been rolled over from the existing TSPZ chapter under the KDP. 	
Who and how many will be affected, geographic scale of effects	<ul style="list-style-type: none"> As the provisions of the TSPZ Chapter are generally a roll over from the relevant provisions existing TSPZ chapter under the KDP, the scale of effect is considered to be low. 	1
Degree of impact on or interest from Māori	<ul style="list-style-type: none"> The changes proposed will likely be of interest to the owners and residents of the TSPZ. 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 TSPZ 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
Type of effect:	<ul style="list-style-type: none"> Effects will relate to future use, development, and subdivision enabled within the TSPZ 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 TSPZ Chapter is considered to pose low policy risk due to the provisions being a rollover of the KDP provisions as determined through the PPC81 process. 	1
Total (out of 35):		9

6. Evaluation of Objectives

6.1 Appropriateness in Terms of Purpose of RMA

20. 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.
21. Table 2 contains the objectives proposed for the TSPZ Chapter.

TABLE 2: S32 ASSESSMENT OF PROPOSED RESIDENTIAL ZONE OBJECTIVES	
Proposed TSPZ Objectives	
TSPZ-O1:	Residential living for all ages and stages.
TSPZ -O2:	Light industrial businesses encouraged.
TSPZ -O3:	Community facilities and services available.
TSPZ -O4:	Commercial activities support the day to day needs of residents and workers.
TSPZ-O5:	Open spaces and Blue Green Network support residents, workers, visitors and a healthy environment.
DEVX-O6:	Hauora (community wellbeing) outcomes guide development.
DEVX-O7:	Activities are compatible.

22. 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 each of the objectives in the General Residential Zone.

TABLE 3: RELEVANCE OF PROPOSED TSPZ OBJECTIVES WITH PART 2 OF THE RMA								
		Proposed TSPZ Objectives						
		O1	O2	O3	O4	O5	O6	O7
RMA Part 2 Sections	5(2)	✓	✓	✓	✓	✓	✓	
	5(2)(a)	✓			✓			
	5(2)(c)					✓		✓
	7(b)	✓	✓	✓	✓	✓		
	7(c)							✓
	7(f)					✓		✓

23. The following s5 matters have been addressed by the TSPZ Chapter:
- s5(2) and s5(2)(a), as by providing for residential, light industrial, community, and commercial activities, the objectives 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
 - s5(2)(c), as by seeking to support a healthy environment, the objective 5 will avoid, remedy, or mitigate adverse effects of activities on the environment.

24. There are no section 6 matters that are directly relevant to the TSPZ Chapter.
25. The following section 7 matters have been addressed by the TSPZ Chapter:
 - 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 the TSPZ, as well as the provision of light industrial, community, and commercial activities;
 - b. s7(c) in relation to the maintenance and enhancement of amenity values by seeking open spaces; and Blue Green Network; and
 - c. s7(f) in relation to the maintenance and enhancement of the quality of the environment by seeking a healthy environment and for activities to be compatible.
26. The objectives are relevant in that they are the most appropriate way to achieve the purpose of the Act as they enable the comprehensive and efficient growth of the TSPZ in a way that will provide for the social, economic and cultural wellbeing of people and communities, while safeguarding 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.
27. The objectives are useful as they demonstrate the expected environmental outcomes in this Special Purpose Zone. These objectives will help the Council carry out its RMA functions and provide direction to both the plan users and decisions makers.
28. The objectives are reasonable in that the costs associated with implementation will be generated by the requirements to apply for consent, it is considered that the proposed objectives do not result in any unjustifiable costs. It is considered that the objectives can be achieved, is consistent with higher order statutory documents and are sufficient to achieve the purpose of the RMA.

6.2 Objectives conclusion

29. Having assessed the proposed objectives against Part 2 of the RMA it is considered that they are the most appropriate way to achieve the purpose of the RMA.

7. EVALUATION OF THE PROVISIONS

30. Section 32 assessments must determine whether the proposed provisions are the most appropriate way to achieve the proposed objectives. In this instance, the TSPZ Chapter retains 6 objectives this s32 assessment must assess whether the proposed provisions are the most appropriate means to achieve those proposed objectives.
31. 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.

32. 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

33. The TSPZ Chapter proposes provisions, including policies, rules, standards, and a development area 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.
34. Changes to provisions include the following:
- a. Removing the provisions that relate to district wide matters from the District Wide Chapters and including in the TSPZ chapter and in some cases these provisions will be in addition to the relevant District Wide chapters;
 - b. Deleting cross references to underlying provisions in the KDP which manage district wide matters; and
 - c. Terminology changes when the word/activity is best reflected by the planning standard definitions.
35. The following broad options have been identified and assessed with regard to TSPZ.
- a. Option 1 – Do nothing (Status Quo): Insert the provisions into the plan as per the KDP.
 - b. Option 2 – Rely on the General Residential Zone provisions as prescribed in the planning standards.
 - c. Option 3 – Proposed approach: Operative development area plan and substantive outcomes carried forward, with provisions redrafted in line with the planning standards and electronic plan consistency.
36. 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 retain the provisions as determined through PPC81, however there would be inconsistencies with the Planning Standards and remainder of the PDP, as there are District Wide provisions that are required to be considered as part of the Special Purpose Zone provisions. Option 2, not using a Special Purpose Zone, would not allow for the recently operative provisions specific to the TSPZ to address the environmental and development considerations for this area.

7.2 Costs, benefits, effectiveness and efficiency

37. The objectives are closely linked and have a focus on providing for development within the TSPZ, including residential living, light industrial, community facilities, commercial, community wellbeing, and that the effects of development are appropriately managed. As such the assessment of the provisions that give effect to these objectives is provided in a consolidated manner.

TABLE 4: EVALUATION OF PROVISIONS TO GIVE EFFECT TO OBJECTIVES

	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, light industrial, community facilities and commercial within the TSPZ. <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 TSPZ, of which the provisions were recently developed through the PPC81 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 provisions of the TSPZ chapter will 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. This inconsistency is 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 a less effective way of achieving the objectives as while the provisions of the TSPZ would be rolled over and retained from the KDP, a number of cross references to superseded provisions and chapters under the KDP would be retained.
Efficiency in achieving the objective(s)	This option is not an efficient way of achieving the objectives as the provisions of the TSPZ would be inconsistent with the drafting style of the remainder of the PDP, creating additional complexity for plan users. In addition, retaining the cross references to the KDP will create confusion for all plan users.
Option 2 – Rely on the General Residential Zone provisions as prescribed in the planning standards	
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, light industrial, community facilities, commercial within the TSPZ. <p>Environmental:</p> <ul style="list-style-type: none"> Will manage the environmental effects of use, development, and subdivision in accordance with General Residential Zone Chapter and District Wide Chapters, however, excludes specific area-based provisions determined through the PPC81 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 TSPZ provide direction and certainty to plan users on the anticipated outcomes in TSPZ. 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 TSPZ, 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 Chapter and District Wide Chapters, this option will not provide for the place-based provisions specific to the TSPZ which were recently determined through the PPC81 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 provisions of the General Residential Zone Chapter and District Wide Chapters, they do not include provisions that were recently developed and are specific to the management of future use and development in the TSPZ and in accordance with the development area plan.
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 TSPZ.
	Option 3 – Proposed approach: Operative Development Area 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 and opportunities for light industrial, community, and commercial activities within the TSPZ. <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 PPC81, 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"> There are no known social costs as the PPC81 provisions will be rolled over, with minor amendments to achieve consistency with the drafting and layout style of the PDP. <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 objectives as it will provide for development within the TSPZ while managing the potential effects of use, development, and subdivision on the surrounding environment in accordance with specific provisions developed through the PPC81 process.
Efficiency in achieving the objective(s)	This option is efficient in achieving the objectives as it will retain all provisions developed through PPC81, 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

38. The proposed policies, rules, standards, assessment criteria, and development area plan in the TSPZ Chapter are the most appropriate way to achieve the objectives. They provide for and appropriate level of development whilst protecting the natural environment.
39. The proposed provisions are considered to be the most efficient and effective means of achieving the objectives 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

- 40. Pursuant to s32 of the RMA, the proposed TSPZ objectives have been analysed against Part 2 of the RMA and are considered to be the most appropriate way to achieve the purpose of the RMA.
- 41. The proposed provisions have been comprehensively compared against reasonably practicable options through the PPC81 process and were recently made operative in September 2024. These provisions under the KPD have been rolled over to the proposed provisions of the TSPZ and are considered to represent the most appropriate means of achieving the proposed objectives.