

Te Tai o Poutini Plan
Section 32 Evaluation

Report Eleven Residential Zones
Ngā Takiwā Noho



Te Tai o Poutini
P L A N

A combined district plan for the West Coast

Table of Contents

EXECUTIVE SUMMARY	3
1.0 OVERVIEW AND PURPOSE	4
1.1 INTRODUCTION TO THE RESOURCE MANAGEMENT ISSUE	4
1.2 REGULATORY AND POLICY DIRECTION	6
1.2.1 RESOURCE MANAGEMENT ACT	6
1.2.2 NATIONAL INSTRUMENTS	6
1.2.3 NATIONAL PLANNING STANDARDS AND/OR GUIDANCE DOCUMENTS.....	7
1.2.4 REGIONAL POLICY AND PLANS.....	8
1.2.5 LOCAL POLICIES, PLANS AND STRATEGIES.....	8
1.2.6 POUTINI NGĀI TAHU IWI MANAGEMENT PLANS.....	9
2.0 RESOURCE MANAGEMENT ISSUES AND ANALYSIS.....	10
2.1 BACKGROUND	10
2.2 EVIDENCE BASE – RESEARCH, CONSULTATION, INFORMATION AND ANALYSIS UNDERTAKEN	10
2.2.1 RESEARCH	10
2.2.2 CONSULTATION AND ENGAGEMENT	13
2.2.3 POUTINI NGĀI TAHU ADVICE	14
2.3 OPERATIVE DISTRICT PLAN PROVISIONS	14
2.3.1 BULLER DISTRICT PLAN	14
2.3.2 GREY DISTRICT PLAN	16
2.3.3 WESTLAND DISTRICT PLAN	17
2.3.4 ANALYSIS OF COMBINED OPERATIVE DISTRICT PLAN APPROACHES	19
2.4 ANALYSIS OF BEST PRACTICE – HOW OTHER COUNCILS ARE ADDRESSING THE SAME ISSUE.....	19
2.5 SUMMARY OF ISSUES ANALYSIS.....	22
3.0 SCALE AND SIGNIFICANCE EVALUATION.....	24
3.1 EXPLANATION SUMMARY.....	24
4.0 EVALUATION.....	25
4.1 EVALUATION OF OBJECTIVES.....	25
4.2 EVALUATION OF THE PROPOSED POLICIES, RULES AND METHODS	27
4.2.1 DESCRIPTION OF THE RESIDENTIAL ZONES AND APPROACH USED FOR ZONING AND REZONING	27
4.2.2 DESCRIPTION OF POLICIES, RULES AND METHODS AS RELATE TO RESIDENTIAL ZONES	29
4.2.3 EVALUATION OF OPTIONS AROUND RESIDENTIAL ZONE POLICIES, RULES AND METHODS.....	36
5.0 SUMMARY	40

Executive Summary

Section 32 of the Act requires objectives in district plan proposals to be examined for their appropriateness in achieving the purpose of the Resource Management Act 1991 (RMA), and the policies and methods of those proposals to be examined for their costs, benefits, efficiency, effectiveness and risk in achieving the objectives. The analysis set out in this report is to fulfil the obligations of the Council under s32 of the Act.

The three Operative District Plans suites of objectives, policies and rules in relation to Residential Zones have remained largely unchanged since the Plans were made operative.

The research undertaken as part of this report has highlighted four key resource management issues:

- The need to provide for additional residential housing – with a wider range of housing typologies in order to accommodate the changing demographics of the West Coast;
- The need for residential development to support the town centres and settlements;
- Ensuring that options are available for residential development away from the significant risks of natural hazards, including providing for managed retreat;
- Maintaining the quality of amenity provided within residential areas so that residents can continue to use, develop and enjoy their properties without their amenity being adversely affected by neighbouring development and use.

The review of the residential topic has focused on reviewing the existing provisions and establishing a framework that will address the key resource management issues. The Operative District Plans Residential zones structure is largely carried over to the Proposed District Plan.

However these are renamed the Large Lot Residential Zone (LLRZ) and the General Residential Zone (GRZ) in accordance with the National Planning Standards. In addition a new zone – the Medium Density Residential Zone, has been identified in areas of Hokitika and Greymouth. Collectively the three proposed zones are referred to as the Residential Zones.

It is important to note is that while all residential areas on the West Coast are subject to a change in zone name (i.e. to either Low Density Residential or General Residential zone) they are not considered 'rezoned' for the purposes of this s32 report. Only areas that have been zoned a Residential Zone from Rural Zone in the operative plans, and the areas zoned Medium Density Residential have been considered "rezoned" in this report.

The provisions for residential zones are intended to provide a framework for land use and development activities within these zones, setting out the outcomes sought within these zones, the direction as to how the outcomes desired are to be achieved and a suite of requirements to manage activities within each zone. Activities that are envisaged within residential zones include minor residential units, home based businesses, housing options that cater for changing demographics and appropriate non-residential activities such as educational and community facilities, and small scale commercial activities in appropriate locations.

The Residential Zones will assist the TTPP Committee to fulfil its statutory functions and responsibilities as required by the RMA through the following proposed objectives, policies and rules:

- Objectives that describe the function and character of the proposed residential zones.
- Policies that provide guidance on the types of activities that are anticipated in the residential zones and how these activities are to be managed.
- Rules that provide greater certainty in regard to what activities are permitted, restricted discretionary, discretionary or non-complying within each zone and requirements which manage the scale, bulk and location of development and matters for control/discretion where development may trigger these standards.
- Definitions for the various forms of development anticipated within the Residential Zones.
- Zones and overlays on Planning Maps that identify those areas which have a residential zoning.

1.0 Overview and Purpose

This s32 evaluation report should be read in conjunction with the s32 'Overview Report', which also includes an overview of the s32 legislative requirements, the methodology and approach to the s32 evaluations and the process that the TTPP Committee has undertaken to date through the development of Te Tai o Poutini Plan, including consultation and engagement.

Development of the Residential Zone chapters and associated objectives, policies and rules have considered the current growth and development pressures on the West Coast and the potential risks associated with uncontrolled or piecemeal residential land use and development into the future.

The provisions have been developed on the premise that the towns and settlements of the West Coast are going to grow, and it is not the role of the RMA to limit growth and residential development, but to manage its form and location to promote sustainable management of natural and physical resources.

The Residential Zones are essential to well-functioning urban areas, and include maintaining the heritage, character and cohesion of these areas, whilst accommodating anticipated growth and residential developments. The Residential Chapters are also inherently linked to the Part 2 Strategic Objectives of the Proposed TTPP, as well as the Subdivision chapter.

1.1 Introduction to the Resource Management Issue

While the three West Coast Councils do not meet the definitions of Medium or High Growth Councils, there has been significant growth in housing since the three operative District Plans were put in place. One of the first issues identified in the development of Te Tai o Poutini Plan was that the current land for housing was constrained, and that growth was occurring around the three main centres in particular in an unplanned way.

A major reason for this, is that many infill opportunities within the main centres are not being utilised and most growth is occurring on the edges of the towns, despite the fact that many sites are large enough to accommodate two dwellings as a Permitted Activity. There are a range of reasons for this, but a major one is economic – the cost of infill (moving off the existing dwelling and replacing it with two dwellings – with associated servicing) can be quite high, relative to the value of the properties once redeveloped. Alongside this, the current rules in the operative plans act as a barrier to infill development. For example, the requirements around substantial setbacks on all boundaries and no allowance for party walls as a Permitted Activity mean that infill is not able to be optimally designed to achieve an appealing outcome for the home buyer. Instead greenfield subdivision is preferred because it is less constrained in terms of dwelling size, location and typology. Despite the costs of infrastructure connection it also appears more economically appealing for development.

However, the result of this is that while there has been a reasonable amount of residential growth over the last 10-15 years, it has mainly been in the lifestyle category and for households earning medium to high incomes. There has been very little development of affordable housing for low-middle income households on the West Coast, and very little development of housing suitable for downsizing and use by older adults.

In developing the provisions for residential zones on the West Coast therefore a key focus has been on enabling the development of low-medium value properties alongside the higher value sites, and to ensure that a range of housing typologies and locations are provided for so that all the community needs for housing can be met.

Alongside this, a key consideration for TTPP development has been the need to support the ongoing viability – and redevelopment – of the main centres. The four main towns were all first built in the mid 1860s and have developed over the last 150 years with waves of different types of development. In Greymouth, in particular, there has been a "hollowing out" of the town centre over time as a result of industrial development during the boom times – so that few households are within easy walking access of the town centre. However there is substantial infrastructure which has been developed within these areas, and the costs to the community of building new infrastructure on the edges of the main towns is considerably greater than the cost of connecting more dwellings to the existing

infrastructure – particularly where this is sized for significant industrial uses that are no longer occurring,

Intensifying the towns, particularly Greymouth, in such a way that more people are easily able to access the main retail and commercial areas, and infrastructure is utilised more efficiently is a key strategic direction for TTPP as outlined in Strategic Objective UFD – 1 Urban Form and Development.

This Strategic Objective states:

To have urban environments and built form on the West Coast/Tai o Poutini that:

- a. Are attractive to residents, business and visitors;*
- b. Have areas of special character and amenity value identified and their values maintained;*
- c. Support the economic viability and function of town centres;*
- d. Recognise the risk of natural hazards whereby new development is located in less hazardous locations;*
- e. Promote the re-use and re-development of buildings and land, including private and public land;*
- f. Improve overall accessibility and connectivity for people, transport (including opportunities for walking and cycling) and services;*
- g. Promote the safe, efficient and effective provision and use of infrastructure, including the optimisation of the use of existing infrastructure;*
- h. Maintain the health and wellbeing of waterbodies, freshwater ecosystems and receiving environments; and*
- i. Protect and enhance the distinctive character of the districts' settlements.*

Accordingly the following areas have been rezoned from a residential zone to a Medium Density Residential Zone:

- The area around Chapel, Mount and Willis Streets and Alexander Terrace near the Greymouth Town Centre.
- A substantial area in Greymouth South around Shakespeare Road, the Westland Recreation Centre and the Hospital.
- Revell Street in Hokitika.
- Part of the Hokitika racecourse

Alongside this intensification prerogative, TTPP does provide for new areas of residential zones, on land that is currently zoned for rural uses. In particular these are:

- The Alma Road terrace above Westport (General Residential Zone)
- Around Coulson Road and Jamieson Road at Paroa in Greymouth (Large Lot Residential Zone)
- Kaiata Park inland from Greymouth (General Residential Zone)
- The Seaview terrace above Hokitika (General Residential Zone + Medium Density Residential Zone)

In addition Hokitika outskirts towards Kaniere area – which is currently zoned Small Settlement. has been rezoned to a General Residential Zone.

Within the residential zones themselves, the process of aligning the three district council approaches has led to some changes to the types of activities provided for. These are most notable in terms of the differences between TTPP and the operative Buller District Plan. The operative Buller District Plan envisages an “interweaving” of non-residential activities within the Residential Zone – in part because this zone was applied more widely than just the main centres, and was also used in all the small townships. TTPP uses the Settlement Zone for the small townships (refer the Rural Zones s32 report) and with the residential zones being confined to the main centres, this “interweaving” of non-residential activities within the residential zone is more restricted than the operative Buller Plan, with home occupations being the main non-residential activity provided for.

The other area of significant change around activities is around short term visitor accommodation or the type provided through websites such as Air BnB and Book a Bach. When the three operative plans were written this kind of visitor accommodation was not anticipated. There has however been a large amount of it established, particularly within Hokitika – much of it unlawfully, as a Discretionary Activity resource consent is required in both Westland and Grey Districts. No enforcement action under the District Plans has been taken by the Councils in relation to this activity.

While the legal status of short term visitor accommodation in the residential zone in Buller District is not clear (the author of this report considers strict interpretation of the operative Plan would be that it is a Discretionary Activity) the Buller planners have used their discretion under Section 87BB of the RMA and the marginal non-compliance, and generally allowed for these to occur without resource consent.

As a consequence of public consultation on this matter – where there was strong concern from the community about the effect of short term visitor accommodation on the availability of housing stock, particularly in Buller, the Plan has relaxed the requirements around short term visitor accommodation in Westland and Grey, but increased them in the Buller District.

1.2 Regulatory and Policy Direction

1.2.1 Resource Management Act

In carrying out a s32 analysis, an evaluation is required of how the proposal achieves the purpose and principles contained in Part 2 of the RMA. Section 5 sets out the purpose of the RMA, which is to promote the sustainable management of natural and physical resources.

Sustainable management includes managing the use, development, and protection of natural and physical resources to enable people and communities to provide for their social, economic and cultural wellbeing and for their health and safety.

In achieving this purpose, authorities need also to recognise and provide for the matters of national importance identified in s6, have particular regard to other matters referred to in s7 and take into account the principles of the Treaty of Waitangi referred to in s8.

There are no s6 matters that are directly relevant to the Residential chapter, but the following provisions in s7 'Other Matters' are relevant:

(b) the efficient use and development of natural and physical resources:

(c) the maintenance and enhancement of amenity values:

(f) maintenance and enhancement of the quality of the environment:

Section 8 requires the Council to take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi). Consistent with the practice followed in the development of the Proposed TTPP, the s 8 principles of most relevance to this topic is the duty to make informed decisions through consultation. Poutini Ngāi Tahu though the Rūnanga kaiwhakahaere have been involved in the governance and development of TTPP and their planners have collaborated in the development of the TTPP provisions. Alongside this Poutini Ngāi Tahu been consulted as part of the review process and the obligation to make informed decisions based on that consultation is noted.

All of the above matters are relevant when considering Residential Zone issues and ensuring the ongoing operation and development of activities and facilities in this zone.

1.2.2 National Instruments

National Policy Statement on Urban Development 2020 (NPS – UD)

The NPS-UD came into effect on 20 August 2020. It recognises the national significance of urban environments and provides direction to decision-makers on planning for urban environments and seeks to establish well-functioning urban environments that respond to the changing needs of people, communities and future generations.

Objective 1 of the NPS-UD seeks that well-functioning urban environments enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

Objective 2 seeks that planning decisions improve housing affordability by supporting competitive land and development markets.

Objective 3 seeks that district plans enable more people to live in an urban environment that is in or near a centre zone or other area with employment opportunities, or where well-served by existing or planned public transport.

Objective 4 seeks that urban environments are provided that, over time, develop and change in response to the changing needs of people and communities and future generations.

Policy 1 seeks that planning decisions contribute to well-functioning urban environments that, as a minimum have or enable a variety of homes that meet the needs of different households and have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport.

Policy 3 seeks to enable building heights and density of urban form commensurate with the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services or the relative demand for housing and business use in that location.

Policy 6 recognises that the planned urban built form may involve significant changes to an area, and those changes may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types and that these are not, of themselves, an adverse effect. The residential zones are intended to provide a vital role in giving effect to the requirements of the NPSUD.

1.2.3 National Planning Standards and/or Guidance Documents

National Planning Standards

The following aspects of the National Planning Standards are relevant to this topic:

4: District Plan Structure Standard, which requires that the zones chosen must be included in the order that they are set out in Table 4. This is relevant to how the residential zone provisions are ordered.

8: Zone Framework Standard, which specifies that the Council can only use the zones which are provided for within the standard. While the objectives, policies and rules specific to a particular zone can be determined by the Council, these need to meet the expectations of the zone purpose statement specified in this standard. Of particular relevance to the Residential sections are the Large Lot Residential Zone, the Medium Density Residential Zone and the General Residential Zone.

12: District Spatial Layers Standard, which sets out the spatial layers that can be used within the Proposed TTPP. These allow for the use of zones, overlays, precincts, specific controls, development areas, designations and heritage areas where these meet the function of the layer described in Table 18. This is relevant to the residential zone provisions because they include the use of precincts, specific controls and development areas.

14: Definitions Standard, which sets out standard definitions that must be applied if used in the District Plan. Of particular relevance to the Residential sections are the definitions for residential activity, residential building, residential unit, minor residential unit, retirement village, home business, community facility, visitor accommodation and building coverage.

New Zealand Urban Design Protocol

The Urban Design Protocol is a voluntary commitment by central and local government, as well as property developers, investors, design professionals, educators, institutes and other groups, to undertake specific urban design initiatives in order to make New Zealand towns and cities more successful through quality urban design. It identifies seven essential design qualities that together create quality urban design – context, character, choice, connections, creativity, custodianship and collaboration

1.2.4 Regional Policy and Plans

West Coast Regional Policy Statement

Under Section 75(3)(c) of the RMA, TTPP must give effect to the Regional Policy Statement. The Regional Policy Statement (RPS) must also give effect to the NPS- UDC, but no changes have occurred to the RPS to reflect the NPS-UDC to date.

Nevertheless the RPS does contain policies relevant to residential development and sustainable urban environments.

Chapter Four addresses Resilient and Sustainable Communities. This chapter recognises that due to a historical reliance on the export of commodities from the region, our towns and communities' populations have fluctuated - dramatically in some cases. When employment declines people often move away, and communities can lose their sense of identity. Less money is available and towns and settlements can become run down, losing their amenity values.

Policy 4.4 seeks to promote the sustainable management of urban areas and small settlements, along with the maintenance and enhancement of amenity values in these places.

This policy seeks to promote a range of amenity values to present choices to meet the diverse needs of residents throughout the region. It is important to not only apply this in the recognised urban towns but the smaller settlements with which people feel a strong connection to, and identity with.

Chapter Eight addresses Land and Water and includes direction on how this interfaces with urban development through Policy 8.7 which states:

8.7 Encourage the coordination of urban growth, land use and development including the provision of infrastructure to achieve integrated management of effects on fresh and coastal water.

1.2.5 Local Policies, Plans and Strategies

Te Whanaketanga Te Tai Poutini West Coast 2050 Strategy

Te Whanaketanga is a collaborative document developed by Development West Coast, West Coast Councils and Poutini Ngāi Tahu. It sets out key strategic directions for the West Coast around economic development, regional identity and stronger communities.

Housing affordability and access is identified as a key issue addressed in the Strengthen Our Communities wero, with a rapidly aging population, poor housing quality and a lag in supply – particular needs are identified as:

- Improving the condition, security, energy efficiency and suitability of existing homes.
- Increasing the capacity of sustainable aged care.

Greymouth CBD Redevelopment Plan

The Greymouth CBD Redevelopment Plan was developed through a community consultation process and is supported by Māwhera Incorporation, the major landowner in the town. The Plan outlines a spatial approach to revitalisation of the Greymouth CBD – recognising that the current zoning and land uses were developed for a different economic time, and no longer meet the needs of the Greymouth community.

There are a wide range of recommendations and actions in the CBD Redevelopment Plan across a range of areas. Some are significant in terms of input to the development of the proposed TTPP Residential zoning and other provisions in the for Greymouth. These include:

Recommendation 8: Stimulate residential development opportunities by rezoning of land

Other key actions which implement the CBD Redevelopment Plan that are addressed are:

- Encouraging higher density, innovative housing and accommodation options with some mixed use in an inner city neighbourhood

Some of these matters are also addressed in other sections of the proposed TTPP (e.g. Commercial and Mixed Use Zones, Historic Heritage and Sites and Areas of Significance to Māori).

1.2.6 Poutini Ngāi Tahu Iwi Management Plans

The RMA requires that when preparing a District Plan, the territorial authority must take into account any relevant planning document recognised by an iwi authority and lodged with the territorial authority, to the extent that its content has a bearing on the resource management issues of the district (section 74(2A)). There are three iwi management plans on the West Coast – the Te Rūnanga o Makaawhio Pounamu Management Plan, the Ngāti Waewae Pounamu Management Plan and the Lake Māhinapua Management Plan.

While these documents focus on specific issues they also contain wider information about the overall approach to sustainability and kaitiakitanga of resources and Poutini Ngāi Tahu values. Natural landscapes may have cultural values such as pā, kāinga, ara tawhito (traditional trails), pounamu, mahinga kai, and wāhi ingoa (place names). The traditions of Ngāi Tahu tūpuna (ancestors) are embedded in the landscape.

2.0 Resource Management Issues and Analysis

2.1 Background

The following key issues have been identified in relation to the Residential Chapter:

1. Planning for population and economic change.
2. Reinforcing the town centres and retaining the character of settlements.
3. Natural hazards limit the options for development in some locations and mean decisions around managed retreat need to be made.
4. Maintaining urban amenity.

2.2 Evidence Base – Research, Consultation, Information and Analysis undertaken

2.2.1 Research

The Council has reviewed the current District Plan, commissioned technical advice, obtained assistance from various internal and external experts and utilised this, along with internal workshops and community feedback to assist with setting the plan framework. This work has been used to inform the identification and assessment of the environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions. This advice includes the following:

Title	Built Form – Main Towns Character Analysis of the West Coast September 2019
Author	Lois Easton
Brief Synopsis	An analysis of the housing typology and character of the different settlements of the West Coast and the key design aspects that make up this character
Link to Document	https://tppp.nz/wp-content/uploads/2022/01/Built-Form-main-towns-character-analysis-west-coast-Sept-2019.pdf

Title	Te Tai o Poutini Plan Technical Update – Urban Objectives and Policies January 2020
Author	Lois Easton
Brief Synopsis	Outlines the key issues facing urban areas of the West Coast and proposes draft Issue statements and objectives for Te Tai o Poutini Plan.
Link to Document	https://tppp.nz/wp-content/uploads/2020/01/Agenda-31-January-2020.pdf

Title	Te Tai o Poutini Plan Technical Update – Proposed Urban Zones January 2020
Author	Lois Easton
Brief Synopsis	Reviews the potential urban zones provided for in the National Planning Standards and how these might be used in Te Tai o Poutini Plan.
Link to Document	https://tppp.nz/wp-content/uploads/2020/01/Agenda-31-January-2020.pdf

Title	Te Tai o Poutini Plan Technical Update -Urban Policies, Performance Standards and Rules March 2020
Author	Lois Easton

Brief Synopsis	Outlines key policy matters and analyses rule options. Proposes draft Policies for Te Tai o Poutini Plan
Link to Document	https://tpp.nz/wp-content/uploads/2020/03/TTPP-March-Agenda.pdf

Title	Te Tai o Poutini Plan Technical Update – Non Residential Activities May 2020
Author	Lois Easton
Brief Synopsis	Looks at the different types of non-residential activities located in residential areas and discusses the potential options for management of these within Te Tai o Poutini Plan.
Link to Document	https://tpp.nz/wp-content/uploads/2020/05/TTPP-Agenda-28-May-2020-Final-1.pdf

Title	Te Tai o Poutini Plan Technical Update – General Residential Zone Rules August 2020
Author	Lois Easton
Brief Synopsis	Looks at the operative plans rules for residential zones and what are appropriate draft General Residential Zone rules and performance standards for Te Tai o Poutini Plan
Link to Document	https://tpp.nz/wp-content/uploads/2022/01/Te-Tai-o-Poutini-Plan-Committee-Agenda-13-August-2020.pdf

Title	Te Tai o Poutini Plan Technical Update – Residential Zones Spatial Approach September 2020
Author	Lois Easton
Brief Synopsis	Looks at the range of residential zones available under the national planning standards and how these could be used and where they could be spatially applied within Te Tai o Poutini Plan.
Link to Document	https://tpp.nz/wp-content/uploads/2021/09/Agenda-TTPP-28-September-2021.pdf

Title	Te Tai o Poutini Plan Technical Update – Large Lot Residential Zone Rules September 2020
Author	Lois Easton
Brief Synopsis	Looks at the operative plans rules for residential zones and what are appropriate draft Large Lot Residential Zone rules and performance standards for Te Tai o Poutini Plan
Link to Document	https://tpp.nz/wp-content/uploads/2021/09/Agenda-TTPP-28-September-2021.pdf

Title	Te Tai o Poutini Plan Technical Update – Medium Density Residential Zone Rules October 2020
Author	Lois Easton

Brief Synopsis	Looks at the operative plans rules for residential zones, good practice across other district plans and what are appropriate draft Medium Density Residential Zone rules and performance standards for Te Tai o Poutini Plan
Link to Document	https://tpp.nz/wp-content/uploads/2020/10/TTPPC-Meeting-Agenda-October-2020.pdf

Title	Te Tai o Poutini Plan Feedback on Consultation to Date November 2020
Author	Lois Easton
Brief Synopsis	Reviews the consultation process undertaken to date and the feedback from communities and stakeholders. Identifies that short term visitor accommodation in Residential Areas is one of the most significant concerns raised by the community.
Link to Document	https://tpp.nz/wp-content/uploads/2022/01/Te-Tai-o-Poutini-Plan-Consultation-Feedback-November-2020.pdf

Title	Te Tai o Poutini Plan Short Term Visitor Accommodation Approach in the Plan November 2020
Author	Lois Easton
Brief Synopsis	Discusses the issues around short term visitor accommodation in residential areas. Details the positive and negative environmental effects and the concerns raised by the communities and district council staff around the effects of the activity on communities and the environment on the West Coast towns and settlements. Reviews Building Act requirements, how other Councils have managed the issue, feedback from consultation and options that have been considered by the committee in relation to this issue. Proposes a draft framework that staff considered responds to the matter for consideration as part of Te Tai o Poutini Plan. Note this framework was not adopted by the Committee who preferred a different approach to managing short term visitor accommodation.
Link to Document	https://tpp.nz/wp-content/uploads/2020/11/TTPP-Agenda-13-November-2020.pdf

Title	Te Tai o Poutini Plan Technical Update – Approach to Rezoning May 2021
Author	Lois Easton
Brief Synopsis	Discusses the issues around rezoning of locations across the West Coast. Provides an outline and rationale for a consistent approach to rezoning land.
Link to Document	https://tpp.nz/wp-content/uploads/2021/05/Agenda-TTPP-Committee-25-May-2021.pdf

Title	Te Tai o Poutini Plan Technical Update – Draft Chapter Review Residential Zones July 2021
Author	Lois Easton
Brief Synopsis	Outlines the draft provisions for Residential Zones proposed for inclusion in Te Tai o Poutini Plan.
Link to Document	https://tpp.nz/wp-content/uploads/2021/07/TTPP-Agenda-26-July-2021.pdf

Title	Te Tai o Poutini Plan Technical Update – Residential Visitor Accommodation July 2021
Author	Lois Easton
Brief Synopsis	Brings back feedback from further consultation on residential visitor accommodation. Discusses the issues and options and seeks direction from the Committee on approach in light of these.
Link to Document	https://tppp.nz/wp-content/uploads/2021/07/TTPP-Agenda-26-July-2021.pdf

Title	Te Tai o Poutini Plan Technical Update – Short Term Residential Visitor Accommodation Approach and separate rule options August 2021
Author	Lois Easton
Brief Synopsis	Further discusses issues on residential visitor accommodation. Discusses the options and seeks direction from the Committee on approach in light of these.
Link to Document	https://tppp.nz/wp-content/uploads/2021/09/TTPP-Agenda-2-September-2021.pdf

2.2.2 Consultation and Engagement

Te Tai o Poutini Plan has been the subject of significant consultation and community engagement. Within that, the issues around urban areas and settlements have been the subject of targeted consultation alongside the overall TTPP consultation and engagement process.

This commenced in 2019 with the identification of development stakeholders on the West Coast – local surveyors and planning firms, infrastructure providers, Development West Coast, Māwhera Incorporation and Regional Public Health. A series of place based workshops were held with these stakeholders over October – November 2019 to discuss the place based issues for the major centres and small settlements and urban development needs of those communities.

Numerous one on one meetings were held with individual stakeholders during the Plan drafting, with multi-stakeholder workshops also held. Alongside this there was place based consultation undertaken to enable local community input into both the plan development and draft review phase.

Specific meetings and workshops held were:

Plan Development Phase

19 October 2019 – Westland growth and development workshop

20 October 2019 – Grey growth and development workshop

20 and 21st November 2019 – Buller growth and development workshops

18th March 2020 – Kaniere drop in and Hokitika public meeting (general community)

19 March 2020 - Hokitika and Greymouth town centre, Paroa and Arahura drop ins and Greymouth public meeting (general community)

20th March 2020 – Reefton public meeting

Draft Plan Consultation Phase

17 February 2022 – Reefton community drop in

21 February 2022 – Westport community public meeting

22 February 2022 – multi-stakeholder infrastructure provider workshop

22 February 2022 – Hokitika community drop in

- 23 February 2022 – Arahura community drop in
- 24 February 2022 – multi-stakeholder developer and professional services interests
- 24 February 2022 – Greymouth community drop in
- 11 April 2022 – Hokitika public meeting
- 12 April 2022 – Greymouth public meeting
- 13 April 2022 – Westport public meeting

The draft TTPP was released for public feedback in January 2022 and there was some feedback provided on the Residential Zones Chapter. This chapter was amended following feedback as outlined in a report to the Committee on 29th March 2022.

Title	Te Tai o Poutini Plan: Technical Report Feedback on the Draft Plan: Report to Te Tai o Poutini Plan Committee 29 March 2022
Author	Lois Easton
Brief Synopsis	This report brings the feedback on the draft Plan and recommends amendments to the Plan in response to that feedback.
Link to Document	https://tppp.nz/wp-content/uploads/2022/03/TTPP-Agenda-29-March-2022.pdf

RMA Schedule 1 Consultation

The RMA requires councils to undertake pre-notification consultation with those parties identified in Schedule 1, clause 3, during the preparation of a proposed district plan. These parties include:

- the Minister for the Environment;
- those other Ministers of the Crown who may be affected by the proposed plan;
- local authorities who may be so affected; and
- the tangata whenua of the area who may be so affected, through iwi authorities.

As a result of this consultation, written feedback was received from Department of Conservation, Department of Internal Affairs, Te Rūnanga o Ngāi Tahu and the Ministry for the Environment.

No specific feedback was provided on the Residential Zones topic.

2.2.3 Poutini Ngāi Tahu Advice

Te Rūnanga o Ngāti Waewae and Te Rūnanga o Ngāti Mahaki ki Makaawhio are the two papatipu rūnanga on the West Coast. They are collectively known as Poutini Ngāi Tahu. They have provided clear advice around their expectations in relation to provision for urban land – and in particular the role of cultural landscapes within urban areas, and the importance of provision for papakāinga housing.

2.3 Operative District Plan Provisions

2.3.1 Buller District Plan

The Buller District Plan has two residential zones – the Residential Zone which applies in most towns and settlements across the Buller District, and the Scenically Sensitive Residential Zone which is used for the Punakaiki settlement.

The proposed TTPP does not include settlements in a Residential Zone - it is included in the Settlement Zone and is discussed in the Rural Zones s32 report and is not discussed further here.

In relation to the Buller Residential Zone provisions, Chapter 4.3 – the Built Environment contains the relevant objectives and policies.

There are three relevant Objectives:

4.3.6.1. To recognise, and where possible, protect the distinctive character and heritage values of Buller settlements from the adverse effects of inappropriate development.

4.3.17.1. To ensure that further settlement growth takes place in a manner and location which does not have significant adverse environmental effects.

4.3.27.1. To facilitate the "intermingling" of land use activities within the District's settlements and towns to the extent that this is compatible with protection of amenity values and the sustainability of existing natural and physical resources in urban areas.

There are five policies that are most relevant to the Residential Zone

4.3.7.6 All land and building shall be maintained so as to preserve the amenities of the environment in which they are situated.

4.3.18.1. Existing settlements will be defined as zoned urban and their outer edges defined accordingly.

4.3.28.4. A wide range of business activities shall be permitted to establish within residential activity areas, provided that the scale of activity is appropriate and does not cause conflict with adjoining activities or the sustainability of existing centres.

4.3.28.5. A diversity of residential living opportunities shall be provided for in residential activity areas.

4.3.28.6. Performance standards shall be set that protect the environmental quality of residential living environments.

In terms of rules in the Residential Zone, key Permitted Activity standards are as follow:

- Setbacks from roads and internal boundaries, maximum building coverage, building height.
- Maximum of two dwellings per site – but no minimum density requirements.

The standards within the Permitted Activity framework in practice mean it's not possible to develop a range of more modern housing typologies such as duplex or terrace style developments as a Permitted Activity.

Non-residential activities in the Buller Residential Zone

Of particular note in relation to these objectives and policies is that there is a strong direction of providing for "intermingling" of non-residential activities within residential areas. This was in part because the residential zone was applied to numerous small settlements and rural service towns, where business activities intermingled with residential are a relatively normal part of the character of the area.

The application of this approach has however led to concerns over time about the impact of non-residential activities on the residential areas and that it has led to an undermining of the town centres as a place to do business, resulting in inefficient use of commercially zoned land and associated infrastructure as well as a downgrading of the overall amenity of the town centres. The main controls that have limited the number of non-residential activities in the operative plan have been around traffic generation.

A concern that has also arisen is around whole house rentals for short term visitor accommodation and how this has become a very prevalent use in some residential locations with impacts on availability of residential housing stock. While the growth projections for the Buller District are low, these do not appear to have taken into account issues of housing affordability and the impact of greater digital accessibility and working from home. Small increases in people moving into the district for reasons of housing affordability or ability to work from home in their preferred location, has taken up much of the available housing stock. When combined with houses moving out of the housing stock into short term rental accommodation, housing shortages in some locations have arisen. The natural hazard events of recent years, most significantly the floods of 2021 and 2022 have removed further homes from the housing stock, creating an immediate and significant pressure on housing availability. In these combination of circumstances whole house rentals of short term visitor accommodation is having a significant adverse effect which needs to be addressed.

Zoning of land for residential development

In terms of land zoned for residential development, the operative Buller Plan considered that with Buller's very low projected growth rates, there was sufficient land available for residential development. However alongside the issues outlined above, work on natural hazards in the intervening period, and the various natural hazard events that have occurred in recent years it has been identified that nearly all of the existing residential zoned land in Westport is affected by the risks of significant natural hazards. The whole of Westport is affected by flooding, and coastal hazards threaten Carters Beach and other outlying locations. During the Westport 2100 process where the future of Westport and how to manage natural hazards was investigated and discussed widely with the community, it became clear that areas need to be zoned for managed retreat of the community and that this is a matter which needs to be addressed within TTPP.

2.3.2 Grey District Plan

The Grey District Plan has one residential zone – the Residential Environment Area.

The Grey District Plan applies the Residential Environment Area to quite a range of diverse locations with the same rules. These include:

- Greymouth and the adjacent suburbs spreading south to Paroa
- Cobden
- Runanga and Dunollie
- Kaiata and Kaiata Park
- Dobson
- Moana

There are three Objectives associated with this as follow:

1. *To enable a diversity of living environments expressed in built form, density of development, housing types and location.*
2. *To enable a range of non-residential activities in which any adverse effects on the residential environment are avoided, remedied or mitigated.*
3. *To retain the amenities and character of the residential areas.*

Alongside this there are four policies.

The first of these relates to building form, density and site development, recognising that housing choice while appropriate should not impact on the neighbouring properties, character of an area and maintaining the open space and landscaping typical of the area.

The second policy relates to non-residential activities and that they are appropriate within constraints of scale, glare, odour and vehicle movements.

The third relates to property maintenance and the fourth policy is around the national grid.

In terms of rules in the Residential Environment Area, key Permitted Activity standards are as follow:

- Density of 1 unit per 350m² (excl. access) but with provision for increased density to 1 unit /300m² where 2 or more sites are developed and for older adult housing with a density of 1 unit per 200m² provided the gross floor area is a maximum of 65m².
- Setbacks from roads and internal boundaries, maximum building coverage, height in relation to boundary restrictions (but no height limits).
- On-site heavy vehicle storage maximums.

This approach doesn't recognise the range of different types of locations and the different natural and physical characteristics of these locations. While different density and parking requirements are included at Kaiata Park and Moana respectively, the relatively "one size fits all" approach does not provide for local differences.

As Greymouth has grown, and the demographics of the community have changed over the past 20 years, the need for a more nuanced approach to residential zoning in the different residential areas of Grey District has become more evident. In particular there is a significant need to enable greater diversity of housing types within Greymouth itself. While the West Coast remains one of the most

affordable places in New Zealand to buy a house, there is also an increasing issue with housing affordability.

Parts of Greymouth – particularly Central Greymouth and Greymouth South offer a high degree of public amenity and services and would be able to support a higher density of population with smaller lot sizes. There would also be significant potential for redevelopment -provided the economics enable the market to take these actions.

The current provisions around older adult housing (increased density) have created some significant areas where this housing type is prevalent – most notably the Shakespeare Road area but the current plan provisions restrict this to small units (65m²) and does not support the range of medium density housing typologies which are both popular and becoming more prevalent in many other parts of New Zealand.

Comprehensive medium density housing in Greymouth in particular represents a real opportunity to increase the range of types of housing and better address the demands of both an aging population (who may still want a larger home with low section maintenance, not a small “granny flat”), first home buyers and renters who may also be happy to trade off section size for affordability.

Non Residential Activities in the Grey District Plan

In terms of non-residential activities, as part of its “effect based” approach, the Grey Plan focuses its regulation on the key amenity impacts of these activities, rather than the activity itself. Performance standards are in place around:

- External storage;
- Traffic movements;
- Floor area used for the activity;
- Hours of operation.

In practice, these provisions are quite restrictive and non-residential activities within the Residential Environment Area are largely confined to small home businesses.

However, a key area where there has been deviation from the Grey District Plan provisions is the area of Short Term Residential Accommodation (e.g. Air BnB). Where this is the sole use of a dwelling, a Discretionary Activity resource consent would be required – as the floor area and hours of operation standards would be breached. Unfortunately many homeowners have not been aware of these requirements and there are an estimated 140 (April 2021) short term rentals which have established in the Residential Environment Area within the Grey District, most of which are operating without a resource consent. This represents just over 2.5% of the housing stock within the greater Greymouth residential area.

Zoning of land for residential development

In terms of land zoned for residential development, the operative Grey Plan had reasonable provision for residential growth incorporated into it. Further, their Plan Change added a small area of land at Kaiata Park for residential development. By the time of development of TTPP, nearly all the land available for greenfields residential development in and around Greymouth had been developed and it was recognised that additional rezoning was required to meet growth needs of the Greymouth community.

2.3.3 Westland District Plan

The Westland District Plan has two residential zones – the Hokitika Residential Mixed Zone and the Tourist Residential Zone. The Hokitika Residential Mixed Zone was established around the boundaries of the residential area at Hokitika at the time the Westland Plan was developed and did not include any specific allowance for urban expansion, reflecting the low growth projections for the area. Two Plan Changes occurred which added a Residential Mixed Zone identification with some different rules at Kumara Junction and also Racecourse Terraces.

The Tourist Residential Zone is located at Franz Josef, Fox Glacier and Haast townships. The proposed TTPP does not include Franz Josef, Fox Glacier and Haast townships within a Residential Zone – they are included within the Settlement Zone and are discussed in the Rural Zones s32 report and are not discussed further here.

Relevant policies and objectives are found in the Sustainable Communities and The Built Resource sections of the Plan. Specific relevant objectives are:

3.2.1 To establish levels of environmental quality for Westland which enable people and communities to provide for their social, economic and cultural well being, while meeting the principles of sustainable management of natural and physical resources.

3.9.1 To identify, protect and enhance the distinctive Westland character of the District's settlements.

3.9.2 To provide for the "intermingling" of land use activities within Westland's settlements and towns, where this does not detrimentally impact on the amenities, health and safety of residents and workers.

There are 10 policies that are relevant to residential zones and these are found in the Settlement Character, Location of Settlements and Amenity sections of the Plan. These are:

4.2.A A range of activities should be able to locate in the urban areas provided that any adverse effects on the environment or neighbouring land uses are avoided, remedied or mitigated.

4.2.B The status and importance of historic and cultural settlements and parts of settlements should not be adversely affected by development.

4.3.A Urban development should be located in areas of low natural landscape value, low natural hazard risk and areas that do not have high public servicing costs.

4.3.B The unnecessary intrusion of urban activities into the rural environment should be avoided.

4.3.D Any expansion of settlements beyond the current policy unit zone boundaries shall take into account the significant landscape and visual qualities of the area.

4.3.E Any further subdivision or development within the coastal environment should be restricted to areas already significantly modified, or where located in relatively unmodified areas, where any adverse environmental impact can be satisfactorily mitigated.

4.3.F Any future urban subdivision or development within the coastal environment should generally occur only in areas already modified, and any development in unmodified areas must avoid, remedy or mitigate any adverse effects on the natural character of the Westland coastal environment.

4.4.A The effects of activities which can have significant adverse effects on amenities and the well being of residents shall generally be avoided, remedied or mitigated.

4.4.B Noxious, offensive, and/or dangerous activities shall be segregated where there is potential to generate adverse effects on the environment.

4.4.C The development and use of energy efficient design and technology should be encouraged within working, living and leisure environments.

In terms of rules in the Residential Mixed Zone, key Permitted Activity standards are as follow:

- Density of 1 unit per 300m².
- Setbacks from roads and internal boundaries.
- Maximum building heights (with much lower heights for accessory buildings), height in relation to boundary restrictions.

The standards within the Permitted Activity framework in practice mean it's not possible to develop a range of more modern housing typologies such as duplex or terrace style developments as a Permitted Activity.

Non-residential activities in the Hokitika Residential Mixed Zone

Of particular note in relation to these objectives and policies is that there is a strong direction of providing for "intermingling" of non-residential activities within residential areas. This was in part because the residential zone was applied to numerous small settlements and rural service towns,

where business activities intermingled with residential are a relatively normal part of the character of the area.

The application of this approach has however led to concerns over time about the impact of non-residential activities on the residential areas and that it has led to an undermining of commercially zoned land as a place to do business, resulting in inefficient use of commercially zoned land and associated infrastructure.

In terms of non-residential activities performance standards are in place around:

- External storage;
- Number of offsite workers
- Hours of operation.

Traffic generation is not regulated in relation to these activities, and this has been identified as a concern in particular with how non-residential activities have established within the residential areas.

A key area where there has been deviation from the Westland District Plan provisions is the area of Short Term Residential Accommodation (e.g. Air BnB). Where this is the sole use of a dwelling, a Discretionary Activity resource consent would be required – as the floor area and hours of operation standards would be breached. Unfortunately many homeowners have not been aware of these requirements and as of 2021 an estimated 9% of the total housing stock of Hokitika Residential Zone was advertised as short term residential visitor accommodation.

Zoning of land for residential development

In terms of land zoned for residential development, the operative Westland Plan considered that with Westland's very low projected growth rates, there was sufficient land available for residential development. There has however been a growing demand for housing in the Hokitika area, and substantial development of new residential areas outside of the existing Residential Zone.

A plan change occurred in the 2000s which rezoned the Racecourse Terraces area in Hokitika to Residential Zone and this area is now fully developed. New residential development has spilled outwards towards Kaniere over this time in land zoned Small Settlement and Rural Zone – with Kaniere now effectively becoming a suburb of Hokitika.

As Hokitika has grown, and demographics of the community have changed over the past 20 years, there is a clear need identified for an expansion of the types of housing typologies available to provide for community needs. In particular there is a specific need to provide for housing for older adults – which can be smaller homes, or homes with lower maintenance smaller sections that are not easily developed under the current rule framework.

2.3.4 Analysis of combined operative district plan approaches

Generally the residential parts of the three operative plans are considered to be working quite well as relates to amenity within residential areas. The main issues identified are that the provisions, particularly in Buller and Westland, do not sufficiently allow for different types of housing, and that older adult and more affordable housing options are being limited by the boundary and setback provisions in particular.

In relation to non-residential activities, the main concerns arise from the short term residential visitor accommodation activities that were not anticipated and have arisen during the life of the operative plans.

In relation to the extent of residential zoning, the land zoned for residential development in the operative plans has been largely "used up" – and there are currently no options available for managed retreat of residential properties away from the most hazardous locations, particularly in Westport.

2.4 Analysis of Best Practice – How Other Councils are Addressing the Same Issue

A review of current practice in respect of this matter has been undertaken, together with a review of the following District Plans:

- New Plymouth, Porirua, Southland, Whakatane, Queenstown, Hamilton.

These Plans are all recent second generation plans and reflect the approach to residential zones in smaller urban areas. They generally demonstrate current best practice for the matter being investigated. In the case of New Plymouth and Porirua these plans have also been prepared under the national planning standards.

In summary, the findings of the review are:

- Similarities exist between all plans reviewed, but the structure of some were intuitive; it was easy to find the residential building standards and they were structured in a logical way. The provisions were separated into their respective zones so users of the plans only needed to find the zone chapter and all the relevant rules for that zone were in one location. While this may result in duplication within the Plan, there is more certainty for users that all relevant rules have been identified.
- All of the district plans reviewed retained the concept of providing for a minor residential unit, subservient to and on the same site as the main residential unit in residential zones. While there was minor variation in the quantitative provisions, the majority of plans have removed occupancy restrictions.
- Most of the district plans reviewed enable a sliding scale of non-residential activities in residential zones. In all district plans, the objectives and policies recognise that home-based businesses are appropriate so long as they do not adversely affect the amenity and character of the residential area. The Plans also recognise that where non-residential activities including business activities do seek to locate in a residential zone, there is the potential for these activities to detract from the vitality and economic viability of established business centres.

A specific review was undertaken of recent plans in relation to the Short Term Residential Visitor Accommodation issue. This specifically looked at the Queenstown Lakes, Christchurch, Selwyn, Porirua and New Plymouth Plans as outlined in the table below.

District (Date of Plan)	Summary of Rules	Comment
Queenstown Lakes (Decision - Plan Change 2018, Under Appeal)	Permitted Activities: <ul style="list-style-type: none"> • Homestays in all Zones – 5 guest limit, must meet all Permitted standards for parking etc Controlled <ul style="list-style-type: none"> • Unhosted visitor accommodation in a residential unit - Max length of time available for rental is 90 days/calendar year Restricted Discretionary <ul style="list-style-type: none"> • Homestays – more than 5 guests but meeting all Permitted standards for zone • Unhosted residential visitor accommodation in a residential unit – Max length of time available for rental is 180 days/calendar year Non-Complying <ul style="list-style-type: none"> • Homestays breaching Permitted Activity standards for zone (e.g. noise, parking, traffic generation) 	Plan Change introduced because of problems – principally impacts on urban amenity (noise, traffic generation, parking) as well as the substantial effect on the availability of housing for genuine residential uses. The Plan Change aims to allow for people to rent their holiday home for some of the time, but to strongly discourage people purchasing houses for the sole purpose of short-term rental accommodation as this is effectively a commercial business operating in a residential area. 1551 Air BnB rentals in Queenstown and Frankton. 809 in Wanaka.

District (Date of Plan)	Summary of Rules	Comment
	<ul style="list-style-type: none"> Unhosted visitor accommodation in a residential unit where it is available for rental for more than 180 days/year 	
Christchurch (proposed Plan Change 2020)	<p>Permitted Activity</p> <ul style="list-style-type: none"> Homestays in all Zones – up to 6 guests -no check in or check out between the hours of 10pm and 6am; no functions or events where the number of guests exceed the paying guests staying overnight Unhosted residential visitor accommodation in Rural Zones -up to 10 guests for up to 180 days/year – adjacent neighbours must be notified and have manager contact info Visitor accommodation accessory to farming, conservation or a rural tourism activity in Rural Zones -up to 6 guests Visitor accommodation in a heritage item in a Residential Zone– up to 10 guests; permanent resident or manager on site; no check in and check out between 10pm and 6am; no functions or events where the number of guests exceed the paying guests staying overnight <p>Controlled Activity</p> <ul style="list-style-type: none"> Residential (and settlement equivalent) Zone - Unhosted visitor accommodation for up to 60 days per year, maximum 6 guests, no check in or check out between 10pm and 6am; no events as per Permitted Activity std. Visitor accommodation in a heritage item in a Residential/settlement Zone with no onsite manager but meeting all other Permitted Activity standards <p>Discretionary Activities</p> <ul style="list-style-type: none"> Rural Zone – visitor accommodation not meeting Permitted Activity standards Residential/Settlements Homestays where Permitted Standards not met up to 12 guests Residential/Settlements - Unhosted visitor accommodation up to 12 guests/night for a maximum 180 nights per year 	<p>This is a more detailed plan change – rules are much more permissive in rural zones; there is a tiered approach in residential zones and a range of more enabling concessions for heritage items to enable adaptive reuse of heritage buildings.</p> <p>Like Queenstown they have drawn the line of “Commercial” visitor accommodation at 6 months. The Plan Change aims to allow for people to rent their holiday home for some of the time, but to strongly discourage people purchasing houses for the sole purpose of short-term rental accommodation.</p> <p>2034 Air BnB rentals at Christchurch and Banks Peninsula. (1.5% of Christchurch housing stock)</p>

District (Date of Plan)	Summary of Rules	Comment
	<ul style="list-style-type: none"> Residential/Settlements Visitor accommodation in a Heritage item up to 20 guests/night <p>Non-complying activities</p> <ul style="list-style-type: none"> Residential/Settlements Unhosted visitor accommodation that exceeds 12 persons or 180 nights/year Residential/Settlements Homestays and visitor accommodation in a heritage item exceeding max number of guests for Discretionary Activity 	
Selwyn (proposed 2020)	<p>Permitted Activity</p> <ul style="list-style-type: none"> Rural Zone – hosted, max 5 guests Residential Zone -hosted or unhosted max 5 guests Settlement Zone -hosted or unhosted max 5 guests <p>Discretionary</p> <ul style="list-style-type: none"> Visitor accommodation not meeting Permitted Activity standards 	There are 221 Air BnB rentals across the whole of Selwyn District – most in the Greater Christchurch fringe.
Porirua (proposed 2020)	<p>Permitted Activities:</p> <ul style="list-style-type: none"> Residential Zone – hosted or unhosted max 5 guests Rural/Settlement Zone – max 10 guests <p>Restricted Discretionary</p> <ul style="list-style-type: none"> Visitor accommodation not meeting Permitted Activity standards 	There are 115 Air BnB rentals across Porirua City scattered throughout the beach suburbs.
New Plymouth (Decision 2020)	<p>Permitted Activities:</p> <ul style="list-style-type: none"> Boarding Houses with up to 6 residents Other Visitor Accommodation - Max 10 guests/night; No more than 90 days/calendar year; Max 22 vehicle movements/day; Max 8 vehicle movements/hour; Must meet all other zone performance standards (e.g. height, setbacks) <p>Restricted Discretionary Activity if standards not met.</p>	<p>There are 518 Air BnB rentals across New Plymouth District – most clustered around New Plymouth.</p> <p>New Plymouth has a number of large events (e.g. WOMAD) where short term residential rental accommodation is a key part of meeting the visitor accommodation demand.</p>

2.5 Summary of Issues Analysis

The analysis set out above shows that in relation to much of the existing residential areas a merging of the three operative plan provisions is likely to largely meet the needs of the West Coast community. There is some updating needed, but the main areas where a more substantial review is

required is the approach to non-residential activities and enabling a wider range of housing typologies.

The lack of available residential land, and the need for additional types of zones largely has arisen because of growth and development and the need to reflect the changing community demographics on the West Coast.

The standards for site coverage, setbacks, recession planes, and height contribute towards achieving the amenity objectives, and generally align with current best practice. As such it is considered that these should be retained as an effective approach to managing residential bulk and location.

New housing is overwhelmingly large detached houses. There is a need for smaller houses across the district to cater for emerging demographic trends. While the existing generic objectives and policy framework is generally effective at managing residential areas that exhibit a similar amenity and character, it does not provide for alternative housing typologies such as retirement villages or supported residential accommodation, or it only does so in certain areas.

Non-residential activities can impact on the character and amenity of neighbourhoods, including increased noise, traffic and streetscape effects. Business activities in residential areas can also undermine the competitiveness and vibrancy of the commercial and mixed use zones. Therefore, a greater focus is needed on avoiding activities that conflict with the purpose of residential areas.

3.0 Scale and Significance Evaluation

The level of detail undertaken for the evaluation of the Proposed TTPP provisions has been determined by an assessment of the scale and significance of the implementation of these provisions. The scale and significance assessment considers the environmental, economic, social and cultural effects of the provisions. In making this assessment regard has been had to the following, namely whether the provisions:

	Minor	Low	Medium	High
Degree of change from the Operative Plans		x		
Effects on matters of national importance (s6 RMA)	x			
Scale of effects – geographically (local, district wide, regional, national)			x	
Scale of effects on people (how many will be affected – single landowners, multiple landowners, neighbourhoods, the public generally, future generations?)			x	
Scale of effects on those with particular interests, e.g. Tangata Whenua		x		
Degree of policy risk – does it involve effects that have been considered implicitly or explicitly by higher order documents? Does it involve effects addressed by other standards/commonly accepted best practice?		x		
Likelihood of increased costs or restrictions on individuals, businesses or communities		x		

3.1 Explanation Summary

The level of detail of analysis in this report is low to moderate. The evaluation has focused on those provisions that will result in a change to the management of residential zoned land and are of greatest importance to ensure that the objectives of the Residential Zone chapter are achieved.

Residential areas that provide safe, convenient, pleasant and healthy living environments that meet the full range of needs and preferences of the community are important areas on the West Coast. As such, while the provisions managing these areas directly affect landowners within the defined zones, they indirectly affect the wider community.

The greatest change from the Operative District Plans’ provisions is to expand the existing zone structure to provide for a wider range of housing typologies, and to reflect infrastructure constraints in some locations. Obvious commercial activities (such as dairies) are proposed to be excluded from the Residential Zones and included in a new Neighbourhood Centre Zone to give them certainty of ongoing rights to their activity. The existing bulk and location provisions such as height, building coverage and setbacks are generally being retained (albeit in some cases amended, simplified and streamlined).

4.0 Evaluation

4.1 Evaluation of Objectives

This section of the report evaluates the proposed objectives as to whether they are the most appropriate to achieve the purpose of the Act.

Existing Objectives	Appropriateness to Achieve the Purpose of the Act
<p>Buller District Plan Objectives:</p> <p><i>4.3.6.1. To recognise, and where possible, protect the distinctive character and heritage values of Buller settlements from the adverse effects of inappropriate development.</i></p> <p><i>4.3.17.1. To ensure that further settlement growth takes place in a manner and location which does not have significant adverse environmental effects.</i></p> <p><i>4.3.27.1. To facilitate the "intermingling" of land use activities within the District's settlements and towns to the extent that this is compatible with protection of amenity values and the sustainability of existing natural and physical resources in urban areas.</i></p>	<p>The objectives of the Operative District Plans are not currently achieving the purpose of the RMA nor giving effect to the NPS-UD.</p> <p>The "intermingling" approach of the operative Plans enables a wide range of activities beyond residential in residential zones, provided they manage their effects. This has enabled 'development creep' and activities that are not suitable to residential areas have established. In some cases, the character of the residential neighbourhood has changed and set a precedent for more 'out of zone' activities to co-locate. This is an implementation issue that should be addressed.</p> <p>The objectives in relation to character and amenity are only a partially effective framework for maintaining residential character and amenity for the District. In particular, they do not recognise that housing shapes the quality and character of neighbourhoods and impacts on how people live, work and play. Things like scale, size or design of new housing can impact both positively and negatively on the role, function, character and amenity of residential areas, but is not covered in the objectives.</p>
<p>Grey District Plan Objectives:</p> <ol style="list-style-type: none"> <i>1. To enable a diversity of living environments expressed in built form, density of development, housing types and location.</i> <i>2. To enable a range of non-residential activities in which any adverse effects on the residential environment are avoided, remedied or mitigated.</i> <i>3. To retain the amenities and character of the residential areas.</i> 	<p>In addition, there is no mention of land being available to meet the growing population's demands, or the importance of providing options for smaller houses and smaller lots (housing choice). The review process has identified these are key resource management issues that should be addressed going forward.</p>
<p>Westland District Plan Objectives:</p>	

<p><i>3.2.1 To establish levels of environmental quality for Westland which enable people and communities to provide for their social, economic and cultural well being, while meeting the principles of sustainable management of natural and physical resources.</i></p> <p><i>3.9.1 To identify, protect and enhance the distinctive Westland character of the District's settlements.</i></p> <p><i>3.9.2 To provide for the "intermingling" of land use activities within Westland's settlements and towns, where this does not detrimentally impact on the amenities, health and safety of residents and workers</i></p>	
<p>Evaluation of Alternative Options</p>	<p>Appropriateness to Achieve the Purpose of the Act</p>
<p>Proposed TTPP Objectives: Residential Zones Chapter</p> <p><i>Objective 1 o provide for a variety of housing forms and densities in the main towns of the West Coast/Te Tai o Poutini to enable individual residential lifestyle options while ensuring developments are serviced with all required infrastructure.</i></p> <p><i>Objective 2 To maintain or enhance the distinctive character, amenity and heritage values of residential areas and protect these areas from the adverse effects of inappropriate development.</i></p> <p><i>Objective 3 To provide for a range of non-residential activities within RESZ - Residential Zones where the effects are compatible with the residential character, scale and amenity and the cultural and historic heritage values of the area.</i></p>	<p>These objectives directly relate to the key resource management issues identified. Residential areas are valued as the primary areas where people live and therefore significantly influences wellbeing and lifestyle. Recognising and supporting residential living opportunities contributes to the economic and social wellbeing of the District.</p> <p>Broadly the objectives:</p> <ul style="list-style-type: none"> • Align with the strategic directive for urban development • Manage non-residential activities within residential areas. • Increase the opportunity for new housing development, including infill housing and multi-unit development, within the existing urban area and new greenfield areas. • Provide for a greater range of housing choice and diversity in terms of design and form. • Maintain and achieve residential character and amenity through controls on buildings appropriate to the anticipated residential environment for the area. • Maintain and achieve residential character and amenity through application of design guidance for intensive developments. • In economic terms, the proposed objectives are not anticipated to amount to unjustifiable costs on any part of the community. • There is a relatively high level of certainty around the subject matter of the objectives, and a corresponding low risk of establishing the objectives as proposed. • The proposed objectives are clear, measurable and able to be implemented within the ambit of Council's powers, skills and resources. • The objectives will sustain the potential of physical resources for current and future generations, and maintain

	and enhance amenity values and quality of the environment. The objectives will achieve the purpose of the RMA.
<p>Summary</p> <p>The proposed objectives have been selected because they are considered the most appropriate for achieving sustainable management in relation to the West Coast’s residential areas. They address the identified resource management issues, give effect to the relevant statutory requirements, assist with achieving the Strategic Objectives and do not lead to unreasonable costs. The objectives seek to provide clear direction about the purpose and function of the various residential zones within the district and how they relate to each other.</p>	

4.2 Evaluation of the Proposed Policies, Rules and Methods

This section evaluates the associated policies, rules and methods, as they relate to the Proposed TTPP Residential objectives.

Along with the proposed provisions, the Council has also identified through the research, consultation, information gathering and analysis undertaken in relation to this topic one reasonably practicable alternative option to achieve the objectives.

For each potential approach an evaluation has been undertaken relating to the costs, benefits and the certainty and sufficiency of information (as informed by section 4 of this report) in order to determine the effectiveness and efficiency of the approach, and whether it is the most appropriate way to achieve the relevant objective(s).

For the purpose of this evaluation, the Council has considered the following potential options:

1. The proposed provisions/rezoning.
2. A modified status quo provisions/zoning – recognising that there are currently three operative district plans

4.2.1 Description of the Residential Zones and approach used for Zoning and Rezoning

It is proposed to expand the number of residential areas on the West Coast to three. In addition it is proposed to expand the spatial extent of residential zoning within the West Coast towns of Westport, Greymouth and Hokitika. The individual zone names and descriptions generally reflect the national direction set out in the National Planning Standards.

The proposed residential zones seek to provide a more targeted policy direction. The proposed zones maintain a gradation approach to the density of development which is enabled, based on historic zoning and development patterns, but also a future-focussed approach to promoting urban intensification in appropriate locations.

General Residential Zone

The General Residential zone is predominantly used for residential activities and is predominantly characterised by residential housing.

- The role, function and predominant character of the residential zone is not compromised by incompatible non-residential activities.
- Residential buildings provide occupants and neighbours with high quality amenity and living environments.
- A variety of housing types, sizes and tenures are available in different locations to respond to community needs.
- Adverse effects of conflicting activities are managed to maintain residential amenity.
- Streetscapes, natural features, residential character and/or amenity are not compromised by adverse changes to landform and incompatible built form.

Most of the areas identified within Westport, Reefton, Greymouth and Hokitika which are currently zoned residential are proposed to be included within the General Residential Zone. For the purposes of this s32 report this is not considered to be “rezoning” as the provisions for these areas are similar (although merged and updated) to the current operative plans.

There are new areas of General Residential Zone which are provided for as follows.

1. The Alma Road terrace above Westport is being rezoned from Rural Zone to General Residential Zone. This is to provide for the significant housing shortage in Westport – which has been exacerbated due to the loss of homes from the 2021 and 2022 floods. The Alma Road terrace is generally considered to be an area of much lower risk from natural hazards and a long term managed retreat option for the parts of Westport most seriously affected by natural hazards. The Buller District Council has been developing the infrastructure to support the rezoning of this area.
2. Kaiata Park inland from Greymouth rezoning from Industrial Environment Area to General Residential Zone. Part of this area was rezoned for a prior Plan Change to the Operative Grey District Plan. This Plan Change initially identified a very large area for commercial and industrial development. While some industrial development has occurred, the level of uptake has been substantially lower than expected. With the demand for residential housing in Greymouth being very high, the proposed Plan rezones some of the previously industrial zoned land to General Residential Zone. The area is now fully serviced by water supply, wastewater and stormwater systems and there is no infrastructure barrier to its development. The area is outside any known area at significant risk from natural hazards.
3. The Seaview terrace above Hokitika is being rezoned from Rural Zone to General Residential Zone. Some of this area was previously a large hospital campus operated by the Crown and there are existing resource consents in place to undertake some development in this area. As a large terrace close to the main town centre, but elevated above natural hazard risks, this is a strategic location for the development of more residential activity.
4. Hokitika outskirts towards Kaniere have been rezoned from Small Settlement Zone to General Residential Zone. This area has been the main area for new residential housing development on the edge of Hokitika for perhaps the last decade and the rezoning formalises the activity which is already underway. Flood modelling has been undertaken to ensure that the areas rezoned General Residential are outside of the area at significant risk from the Hokitika River flood hazard.

Medium Density Residential Zone

The Medium Density Residential Zone is predominantly used for residential activities and is characterised by a mix of low and medium density housing.

- The role, function and predominant character of the residential zone is not compromised by incompatible non-residential activities.
- Residential buildings provide occupants and neighbours with high quality and amenity living environments.
- Adverse effects of activities are managed to maintain residential amenity.
- Streetscapes, natural features, residential character and/or amenity are not compromised by adverse changes to landform and incompatible built form.

This zone has been applied in locations where there is good access to community and recreational facilities and to support the Greymouth town centre. The following areas have been rezoned from a residential zone to a Medium Density Residential Zone.

1. The area around Chapel, Mount and Willis Streets and Alexander Terrace near the Greymouth Town Centre.
2. A substantial area in Greymouth South around Shakespeare Road, the Westland Recreation Centre, the Greymouth South shops and the Hospital.
3. Revell Street in Hokitika
4. Part of the Hokitika racecourse

In addition part of the Seaview terrace above Hokitika has been rezoned from Rural Zone to Medium Density Residential Zone.

Large Lot Residential Zone

This zone has been used in Greymouth around Coulson Road and Jamieson Road at South Beach – Paroa with the areas rezoned from Rural Residential and Rural Zone. These areas are where three waters infrastructure has limited capacity to support more intensive development. The zone also provides additional housing choice in the Greymouth area.

The following areas were zoned Residential Environmental Area or Rural Residential Environmental Area in the Operative Grey Plan but have been rezoned to Large Lot Residential.

1. Properties between Main South Road and Coulson Road – from Lawlor Road to Clough Road, Paroa
2. Properties east of Coulson Road - either side of Jamieson Road, Paroa

4.2.2 Description of Policies, Rules and Methods as relate to Residential Zones

Policies, Rules and Methods that relate to the provision of housing a range of housing forms and densities (Objective 1)

Policy RESZ – P1 which seeks to provide for a range of housing densities forms and types.

Policy RESZ – P7 which seeks to provide housing typologies suitable for senior citizens.

Policy RESZ – P8 which recognises increased density can enable housing for senior citizens.

Policy RESZ – P11 which seeks to enable papakāinga housing.

Policy RESZ – P13 which identifies inappropriate locations for new residential development, include areas at significant risk of natural hazards

Policy RESZ – P14 which provides for expansion of residential development around existing towns.

Rules GRZ – R1, LLRZ – R1 and MRZ – R1 which prescribe density requirements including allowance for minor residential units

Rules MRZ – R11 , MRZ – R13 and GRZ – R15 which provide for medium density housing developments

Zones on the Planning Maps which identify where land is zoned General Residential, Large Lot Residential and Medium Density Residential Zone.

Rules GRZ – R8, LLRZ – R8, MRZ – R8 which relate to retirement homes and supported accommodation

Rules GRZ – R9 and LLRZ – R9 that provide for papakāinga developments

Rules that manage the form and types of activities within each zone, including:

- permitting a range of activities within each zone which are considered to meet the desired character and form of each zone;
- limiting specifically identified activities where further consideration through a consent process is deemed to be appropriate; and
- identifying activities that are considered to be incompatible with the character and function of each zone as non-complying.

Definitions - papakāinga, retirement village, supported residential accommodation

Zones on the Planning Maps which identify where land is zoned General Residential, Large Lot Residential and Medium Density Residential Zone.

Policies and Rules that relate to maintaining urban amenity and character (Objective 2)

Policy RESZ – P2 which outlines a range of amenity and character matters that need to be considered.

Policy RESZ – P3 which supports resilient infrastructure and communities

Policy RESZ – P9 and P10 which relates to servicing with infrastructure

Policy RESZ – P12 which seeks to support accessibility and connectivity

Policy RESZ – P15 which relates to how cultural landscapes should impact on residential development.

Policy RESZ – P16 which identifies locations around strategic infrastructure where residential development is inappropriate.

Policy RESZ – P17 which seeks the relocation of out-of-zone industrial activities

Rules GRZ – R1, LLRZ – R1 and MRZ – R1 (density, height, setbacks, site coverage, outdoor living space, heavy vehicle storage, recession planes and infrastructure connections)

Rules GRZ – R2, LLRZ – R2 and MRZ – R2 (minor structures)

Rules GRZ – R3, LLRZ – R3 and MRZ – R3 (fences walls and retaining walls)

Rules GRZ – R4, LLRZ – R4 and MRZ – R4 (relocated buildings)

Definitions Residential unit, minor residential unit, outdoor living space, residential activity, height in relation to boundary

Policies and rules that relate to management of non-residential activities (Objective 3)

Policy RESZ – P4 which seeks to manage the potential amenity effects of non-residential activities.

Policy RESZ – P5 which identifies inappropriate non-residential activities to be located in residential areas.

Policy RESZ – P6 which relates to community facilities and visitor accommodation within residential areas.

Rules GRZ – R5, LLRZ – R5 and MRZ – R5 which relate to home occupations

Rules GRZ – R6, LLRZ – R6 and MRZ – R6 which relate to residential visitor accommodation

Rules GRZ – R7, LLRZ – R7 and MDZ – R7 which relate to community facilities and educational facilities

Rule GRZ – R8 that provides for commercial visitor accommodation within the Hokitika Visitor Accommodation Area

Definitions – home business, visitor accommodation, community facilities, educational facilities

Rules

Rules	General Residential	Medium Density Residential	Large Lot Residential
Residential Housing	Permitted	Permitted	Permitted
Minor Structures	Permitted	Permitted	Permitted
Relocated Buildings	Permitted	Permitted	Permitted
Home Business	Permitted	Permitted	Permitted
Residential Visitor Accommodation	Permitted In Buller where this is whole house rentals Restricted Discretionary	Permitted	Permitted
Community Facilities and Educational Activities	Permitted within tight standards – most will	Permitted– larger facilities will be	Permitted within tight standards – most will

	be Restricted Discretionary	Restricted Discretionary	be Restricted Discretionary
Retirement Homes and Supported Residential Accommodation	Permitted	Permitted	Permitted
Papakainga Developments	Permitted	Permitted at normal density, Controlled as part of Medium Density Developments	Permitted
Retirement Villages	Restricted Discretionary	Restricted Discretionary	Restricted Discretionary
Medium Density Developments	Restricted Discretionary	Discretionary	Controlled
Commercial Activities	Discretionary	Non-complying	Non-complying
Industrial Activities	Non-complying	Non-complying	Non-complying

Performance Standards

The performance standards described below cover a range of parameters, including height, site coverage, building recession planes, setbacks etc. These are generally a “middle ground” in the process of merging the three operative district plan performance standards. Some standards may be new to a district (e.g. outdoor living space in Grey and Buller) and others have been common to the three operative plans (e.g. height in relation to boundary standards).

Residential Unit Density

Operative Plans	General Residential	Medium Density Residential	Large Lot Residential
<p>Buller: 2 residential units/site</p> <p>Grey: 1 unit per 350m² and 1 unit per 300m² where 2 or more adjoining sites are developed</p> <p>Westland: 1 unit per 300m²</p>	<p>1 residential unit per 350m²</p> <p>1 unit per 300m² where 2 or more adjoining sites are developed</p> <p>1 minor residential unit per site</p> <p>Restricted Activity resource consent to go to 1 unit per 200m² as part of a Medium Density Development</p>	<p>1 residential unit per 350m²</p> <p>1 unit per 300m² where 2 or more adjoining sites are developed</p> <p>1 minor residential unit per site</p> <p>Controlled Activity Resource consent to go to 1 unit per 200m² as part of a Medium Density Development.</p> <p>Restricted Discretionary Activity with no minimum lot size.</p>	<p>1 residential unit per 1000m²</p> <p>1 minor residential unit per 1000m²</p>

Each of the three operative plans only has one residential zone. The operative Buller District Plan does not include density provisions on a per sqm basis, instead it provides for two dwellings per site as a Permitted Activity. The operative Westland District Plan provides for 1 residential unit per 300m². The Grey District Plan provides for 1 unit per 350m² or 1 unit per 300m² where 2 or more

adjoining sites are developed. The Grey District Plan also has a provision for older person housing of 65m² or less at densities of 1 unit per 200m².

Essentially a modified version of the Grey provisions have been taken as the most appropriate approach in the General Residential Zone. Medium density developments are also possible within the General Residential Zone, to allow for future intensification possibilities.

The Medium Density Residential Zone is a new zone, predominantly used in Grey and Westland. Because there is little experience of medium density on the West Coast, a resource consent is required, to ensure good urban design outcomes are achieved. The Restricted Discretionary Activity allows for innovative developments that are smaller than the 200m² lot size to be assessed on a case by case basis.

A larger lot size is required in the Large Lot Residential Zone to cater for stormwater management on site, and also to avoid problems of overloading of wastewater and water supply network capacity.

Height

Operative Plans	General Residential	Medium Density Residential	Large Lot Residential
Buller: 10m Grey: no height limit Westland: 9m for residential units, 3.5m for accessory buildings	10m Restricted Activity resource consent to go to 12.5m as part of a Medium Density Development	10m Controlled Activity 12.5m as part of a Medium Density Development except max 10m within 10m of any adjacent General Residential Zone boundary Restricted Discretionary to exceed Controlled height limits as part of a Medium Density Development	10m

A ten metre height is used across the three zones as providing for a 3 storey building. While currently the Grey District Plan does not have a height limit, in many circumstances the recession plane requirements will restrict building heights against neighbouring residential boundaries.

The resource consent requirement for Medium Density Developments in both the General Residential and Medium Density Residential Zones means that appropriate heights for those developments, and any impacts on neighbouring properties, can be considered.

Site Coverage

Operative Plans	General Residential	Medium Density Residential	Large Lot Residential
Buller: 40% Grey: 50% Westland: 40%	40% Restricted Activity resource consent to go to 50% as part of a Medium Density Development	40% Controlled Activity 50% as part of a Medium Density Development Restricted Discretionary to exceed Controlled site coverage as part of a	40% or 500m ² whichever is the lesser

		Medium Density Development	
--	--	----------------------------	--

Site coverage relates to both amenity and stormwater management and the existing approach in Buller and Westland has been carried over to the proposed Plan. Additional site coverage is allowed for as part of a Medium Density Development and amenity and stormwater considerations are able to be addressed as part of the resource consent process.

Setbacks

Operative Plans	General Residential	Medium Density Residential	Large Lot Residential
Buller: 5m from road, 1m from other boundaries. Roof overhang of 750mm allowed for Grey: 4.5m from road Westland: 4.5m from road (except 3.5m or 1.5m for garages) . One side boundary of 1.5m and one of 3m. Rear boundary setback of 3m.	4.5m from roads 1m from other boundaries except for duplexes or where neighbour's written consent is provided. Setbacks can be reduced as part of a Restricted Discretionary Activity Medium Density development.	4.5m from roads 1m from other boundaries except for duplexes or where neighbour's written consent is provided. Setbacks can be reduced as part of a Controlled Activity Medium Density development.	10m from road 4m from other boundaries except where neighbour's written consent is provided.

Building setbacks proposed are intended to enable the density provisions to be met on sites in the General and Medium Density Residential Zones and enable intensification – either through infill, or the development of minor residential units.

The operative District Plan setbacks in Westland for example, make it hard to achieve minimum lot sizes while also meeting the Permitted Activity setbacks – creating a barrier to infill development.

The large setbacks in the Large Lot Residential Zone are intended to provide for a low intensity character in that zone.

Outdoor Living Space

Operative Plans	General Residential	Medium Density Residential	Large Lot Residential
Buller: no requirement Grey: no requirement Westland: 30m ² /unit	30m ² /unit and an extra 12m ² / minor residential unit	30m ² /unit and an extra 12m ² / minor residential unit	No requirement

Ground level open space can sometimes be an afterthought (i.e. long narrow strips of land around the exterior of a building), or substituted to make room for vehicle manoeuvring space. The result is a lack of open and green space, and a perception that the buildings dominate the site.

The intention of the standard is to require open space to be provided on site in order to provide spaciousness needed for a quality residential development. The standard recognises that a minimum outdoor living space requirement is needed for all residential units, but recognises that the size of a Large Lot Residential site means that it will be adequately provided for without further need for specification.

This standards allows outdoor living space not just on ground level but also at an upper level balcony or roof deck and that the area of private open space varies depending on the form of housing.

Having some outdoor space attached to every house is a fundamental part of the 'building blocks' for a quality, liveable residential development. The key benefits include:

- Ensuring that a setting for the new dwelling is provided on site
- Integration of the new development into the neighbourhood
- Softening the visual impact of new buildings
- Providing space for landscaping
- Creation of some on-site, private outdoor amenity for residents. T

The standard will work in combination with site coverage and the car parking requirement to manage the density of development on a site. Although preferable, the land does not necessarily need to be "usable" so that steep sites are still able to comply with the rule.

Height in Relation to Boundary

Operative Plans	General Residential	Medium Density Residential	Large Lot Residential
Buller: Variable recession plane to commence 2.5m above site boundaries Grey: Variable recession plane to commence 2.5m above site boundaries Westland: Variable recession plane to commence 2.5m above site boundaries	Variable recession plane to commence 2.5m above site boundaries	Variable recession plane to commence 2.5m above site boundaries	Variable recession plane to commence 2.5m above site boundaries

The three operative plans have the same rule requirement and this has been carried over into the proposed plan

Heavy Vehicle Storage

Operative Plans	General Residential	Medium Density Residential	Large Lot Residential
Buller: no requirement Grey: One per site Westland: no requirement	One per site	One per site	Two per site

Heavy vehicle storage is currently only regulated in the operative Grey District Plan and this rule has been brought into the proposed TTPP. As the residential areas become more intensively developed it can be a significant amenity issue, particularly as the nature of work on the West Coast means there are large number of heavy vehicles in use. Because the large lot residential sites have more space and significant setbacks, there is more allowance for heavy vehicles.

Infrastructure Connections

There are two new performance standards around this – one in relation to community water supply and wastewater systems and the other in relation to stormwater requirements. These are new standards proposed, reflecting the issues that the three Councils are currently having with infill development. The Councils have invested significantly in water and wastewater infrastructure and there is a need for all residential development to connect to that infrastructure to avoid adverse environmental effects.

In relation to stormwater, not all parts of all Residential Zoned areas have adequate public stormwater networks. There are insufficient public stormwater networks in the Large Lot Residential Zone in particular. Because of the very high rainfall on the West Coast this can be a significant problem, and it is important that stormwater is disposed of in such a way that it does not adversely affect neighbouring properties, or flood the road network.

4.2.3 Evaluation of Options around Residential Zone Policies, Rules and Methods

Option	Benefits	Costs	Efficiency and Effectiveness	Risk of acting/not acting
<p>Option A: Modified Status quo</p> <ul style="list-style-type: none"> - have one residential zone that applies to all residential land across the West Coast. - Standardise provisions across the three districts - Retain the “intermingling” of non-residential and residential activities with current standards - Provide no new residential zoned areas for development 	<ul style="list-style-type: none"> • Plan users and landowners are familiar with current provisions, resulting in reduced costs in understanding and complying with the Residential sections of the plan. • Cost savings to landowners with no or minimal additional compliance costs, processing delays or participation in plan process. • Gives landowners flexibility to use and develop properties for the most efficient purpose • Bulk and location rules standards (e.g. setbacks, noise controls) provide some level of certainty in terms of the level of effects that can be generated. This benefits landowners undertaking activities or constructing new buildings wanting to maximise use of their land, and protecting 	<ul style="list-style-type: none"> • Limited policy guidance, direction or emphasis on site layout, design and streetscape impacts resulting in varied outcomes, some low quality design outcomes and limited consideration of site and neighbourhood context. • Limited variety in the type of housing being built. • Options for managed retreat of residential homes away from significant natural hazards are not available in Westport • Greater potential for inconsistent decision making • Permitted activity rules may not control all adverse effects, so some impacts on neighbours 	<ul style="list-style-type: none"> • Due to limited policy guidance, lack of integration between planning and urban design, the status quo delivers varying amenity and streetscape outcomes. • The lack of direction in the plan leads to inconsistent decision-making and lack of control over certain activities. • This option fails to meet the growth demands of the West Coast and does not provide any managed retreat options for Westport • Therefore, this option is not considered to be the most efficient, effective or appropriate option to achieve the objectives. 	<ul style="list-style-type: none"> • If the proposed policy approach is not taken now, the risk of not acting is that development may occur on an ad hoc basis which could lead to a reduction in environmental quality and adverse character and amenity outcomes. • It is considered that the risk of acting on these provisions outweighs the risk of not acting. There is sufficient information not to act on this approach.

	neighbours from unreasonable impacts.			
<p>Option B: Proposed Plan</p> <p>Three residential zones which accommodate different densities and residential environments. Policies that:</p> <ul style="list-style-type: none"> • allow/manage activities that are compatible/incompatible with the role and function of each zone • provide a variety in different housing types • Create high amenity living environments, including managing privacy, height in relation to boundary, private outdoor space, noise etc • Provide for community and educational facilities, aged care, home occupations and residential visitor accommodation where this is compatible with the amenity values and character of the location. 	<p>The approach helps to address residential growth in the district by:</p> <ul style="list-style-type: none"> - Managing infill housing and multiunit development, within the Residential Zone - increasing housing density in the Medium Density Residential Zone - controlling infill housing requirements in Large Lot Residential Zone areas <ul style="list-style-type: none"> • Gives effect to the “sustainable communities” policies of the RPS. • Gives effect to short to long-term requirements under the NPS-UD • Residential growth is focussed within urban boundaries and key identified greenfield areas • Provides certainty for communities as to the future level of change or development they can expect • Streamlined, simplified rules/standards that are easier for plan users to 	<ul style="list-style-type: none"> • A gradual change in character for the areas identified in the Medium Density Residential Zone. • Activity lists with rules/standards may potentially limit some activities and development, particularly if they are not anticipated in residential areas. • Potential for applications for multi-unit development resource consents in unsuitable locations. • Stronger emphasis on building layout, design and streetscape impact reduces flexibility for developers, and may reduce development yield and associated financial benefits. 	<ul style="list-style-type: none"> • This approach is effective and efficient as it would allow residential development to proceed with an appropriate assessment of environmental effects of the proposal. • Rules and standards are considered effective in that they clearly set out what is allowed to occur and what requires resource consent. They effectively outline requirements for activities and development taking into account the expectations, characteristics and values of residential areas. • Rules and standards are considered efficient and effective as they provide a high level of certainty to landowners, residents, neighbours, the community and Council about the nature and level of activities and development allowed. This option is considered to be the most efficient and effective to achieve the objectives. 	<p>The risk of not acting is that the current implementation issues with the Operative Plans approach continue and incrementally result in loss of amenity values and quality of the residential environment. This includes:</p> <ul style="list-style-type: none"> • A range of residential living options are not available • Options for managed retreat of residential homes away from significant natural hazards are not available in Westport • The residential amenity and character is compromised by incompatible commercial activities. • Inefficient use of land resource and infrastructure. <p>Overall, it is considered that there is sufficient information to act, and that risks of not acting are outweighed by the benefits of acting.</p>

	<p>interpret and apply. The reduction in ambiguity is expected to result in increased compliance and effective compliance monitoring.</p> <ul style="list-style-type: none"> • Activities for each zone can be tailored to match the likely environment • Bulk and location standards can be tailored for each zone to enable a certain form of development. For example taller buildings will be enabled in the Medium Density Residential Zone • Better quality housing layout and design, connectivity, and associated neighbourhood and community environments which results in economic and social benefits for new residents. • Provides opportunities to encourage more sustainable building forms, with less demand on infrastructure, water and energy use. 			
--	--	--	--	--

Quantification

Section 32(2)(b) requires that if practicable the benefits and costs of a proposal are quantified. The evaluation in this report identifies where there may be additional cost(s), however the exact quantification of the benefits and costs discussed was not considered necessary, beneficial or practicable.

Summary

Option A – Modified Status Quo (retention and harmonisation across the three districts of the existing provisions) is not recommended on the grounds that research (and increasing concerns from residents) has indicated that some of the current District Plans' provisions are not able to ensure that new developments will maintain and enhance the residential character of the residential areas. In addition, the existing framework does not adequately help to address growth and aid in providing a variety of housing choice across the West Coast. Therefore Option A is not favoured.

Option B – Proposed Plan builds on the established Operative District Plans' performance standards and addresses the issues that have arisen over time in relation to their application. It recognises that there is a need for additional zones to provide for intensification to support the main town centres, as well as the infrastructure issues that face some areas. It also seeks to ensure, that as part of a wider growth strategy, the existing residential areas help cater for West Coast's urban growth needs, is an efficient use of land, provides housing choice, achieves development that reflect good quality community environments, are compatible with the role, function and predominant character of the area, and minimises any adverse effects on the environment. Furthermore, Option B is not a radical shift in operative provisions, and the structure of the provisions, whilst amended still provide an appropriate balance between providing for growth, and protecting residential character and amenity on the West Coast. For this reason, drastic change to the operative provisions (such as removing amenity controls) has also not been considered as a feasible (or desirable) alternative option.

Accordingly Option B is recommended and best meets the requirements of section 32 of the Resource Management Act as it represents the most appropriate means of achieving the residential objectives of Te Tai o Poutini Plan.

5.0 Summary

This evaluation has been undertaken in accordance with Section 32 of the Act in order to identify the need, benefits and costs arising from the District Plan Review relating to the Residential Chapter provisions and the appropriateness of the current and proposed methods and rules having regard to their effectiveness and efficiency relative to other means in achieving the purpose of the Act.

The evaluation demonstrates that this proposal is the most appropriate option as the objectives provide certainty to all Proposed TTPP users on the outcomes expected in the residential zones, with a focus on providing for housing choice and maintaining and enhancing residential amenity and character.

The policies, rules, standards and other methods clearly implement the objectives, including by articulating a range of activities anticipated within the residential zones together with direction about the appropriateness of effects associated with those activities.

Overall, it is considered that the set of preferred provisions is the most appropriate given that the benefits outweigh the costs, and there are considerable efficiencies to be gained from adopting the preferred provisions relative to the alternatives considered. The subject matter of the provisions is well understood, and the risk of not acting is that development may occur on an ad hoc basis which could lead to a reduction in environmental quality and adverse character and amenity outcomes.