

Section 32 Report

SECTION 32 REPORT

INTRODUCTION

Section 32(1)(a) of the Resource Management Act 1991 (the RMA) requires an assessment of 'the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act...' It is considered that the proposed plan change is an appropriate action to achieve the overall purpose of the RMA through the following:

Relevance

The proposed plan change is relevant to important resource management issues which relate to growth management and land development to provide significant new housing supply for Invercargill. At a high level the proposal is consistent with the Invercargill City Council's 2018-2028 Long Term Plan, the proposed Invercargill City Council's 2021-2031 Long Term Plan, the Southland Regional Development Strategy, and relevant objectives of the National Policy Statement for Urban Development associated with housing supply.

Usefulness

The proposed plan change will provide for the needs of the community by not only providing housing supply during the current period of accelerating growth in house/property prices¹, but also providing housing diversity in a sustainable manner. Recreational opportunities and transport linkages will be created via new reserves, roads, and walkways within the development site. Ecological values will be enhanced in partnership with Iwi, and cultural values respected when the site is developed. The site is located immediately adjacent to the south-western edge of the urban area of Invercargill and the proposal is considered to be a sustainable development option which achieves the purpose of the RMA.

Reasonableness

The proposed plan change is considered to be reasonable as the site is already identified within the Invercargill City District Plan 2019 as being appropriate for future growth, subject to an approved plan change. The proposed plan change provides certainty as to how growth within the Invercargill City District can be achieved in a manner which is consistent with national, regional, and territorial policies. Through the proposed residential zone, medium density residential zone, and retirement village precinct, the proposed plan change also provides for diversity of housing choice to meet the needs of the community. The proposed plan change seeks to safeguard the life supporting capacity of air, water, soil and ecosystems through the new objectives, policies, and rules, thereby achieving the purpose of the Act.

Achievability

The outcomes of the proposed plan change can be achieved through sustainable development of the site in the manner promoted within the plan change request, which is consistent with national, regional, and territorial policy.

¹ Ministry of Housing & Urban Development dashboard: <https://huddashboards.shinyapps.io/urban-development/>

The proposed plan change includes an integrated set of changes to the Invercargill City District Plan 2019, including a requirement for a masterplan to govern the overall layout of key infrastructure within the proposed plan change area. The proposed plan change also contains rules, information and design requirements for future subdivision applications. The level of detail included within this Section 32 evaluation is considered to be commensurate with the scale and significance of the environmental, economic, social and cultural effects anticipated through the proposed plan change.

Consultation has been undertaken with Iwi and other stakeholders through the process of preparing the plan change request. Section 7 of the plan change request prepared by Bonisch Consultants² summarises the consultation undertaken with respect to these parties.

EVALUATION OF OVERALL DEVELOPMENT OPTIONS:

The original plan change request² includes a Section 32 evaluation of the overall options to develop the site. This Section 32 evaluation is reproduced in tables 1 to 4 below. The plan change request has subsequently been modified and now includes creation of a new Residential 1B (Te Puawai Medium Density) zone (RES1BZ) to facilitate the higher density of residential development within parts of the site, rather than adopting the Residential 1A zone which already exists within the operative Invercargill City District Plan 2019.

Section 32(3) of the Resource Management Act 1991 requires that any evaluation undertaken to satisfy this section shall examine whether the objective of the proposed plan change is the most appropriate way to achieve the purposes of the Act, and to what extent the methods proposed are the most appropriate for achieving this objective.

Table 1:

Option 1 – Status Quo	
Benefits	Appropriateness in achieving objectives
<p><i>Environmental</i> Open space will be retained for the neighbouring landowners.</p> <p><i>Economic</i> The land will continue to be operated as productive small holding farmland.</p> <p><i>Social</i> None identified.</p> <p><i>Cultural</i> Existing view shafts from the Murihiku Marae will be retained.</p>	<p><i>Efficiency and Effectiveness</i> No cost in formulating and implementing the proposed plan change and therefore can be considered to be highly efficient from an economic perspective.</p> <p><i>Effectiveness</i> The status quo would not contribute towards the achievement of any of Regional Policy Statement and District Plan objectives that relate to providing for residential development whilst, consolidating urban form.</p>
<p>Costs</p> <p><i>Environmental</i> Existing flooding concerns on neighbouring properties will continue.</p>	<p>The status quo is not an efficient way to achieve the purpose of the Plan Change as any residential development would require consent. It is likely that such a consent would be notified</p>

² Refer to "Plan Change Documents": <https://icc.govt.nz/tepuawaiplanchange/>

<p><i>Economic</i> The site is currently underutilised. There are lost opportunity costs associated with retaining the Rural zoning given the demand for housing in Invercargill and the lack of appropriately zoned land in Invercargill.</p> <p><i>Social</i> None identified.</p> <p><i>Cultural</i> None identified.</p>	<p>and under the current framework, would be unlikely to succeed.</p>
<p>Sufficiency and certainty of information and risk of acting/not acting</p>	<p>There is considered to be sufficient and certain information regarding the application of the Rural Zone framework. There is considered to be a low level of risk associated with this option, as the provisions and any potential effects resulting from their application would be unchanged.</p>
<p>Recommendation: This option is not recommended as it is considered that is neither efficient nor effective in achieving the purpose of the objective of the plan change. Furthermore, the assessment above shows that the costs of this option outweigh its benefits.</p>	

Table 2:

<p>Option 2 – Rezone the whole site as Residential 1</p>	
<p>Benefits</p>	<p>Appropriateness in achieving objectives</p>
<p><i>Environmental</i> Residential development is provided for adjoining the existing Invercargill urban zone. The development can be master planned and undertaken in a coordinated manner with services and transportation infrastructure provided efficiently.</p> <p>Existing flooding concerns on neighbouring properties can be addressed through stormwater management.</p> <p><i>Economic</i> Benefits to the Invercargill community during the ongoing construction phase of the development. Ongoing benefits in local area and wider Invercargill resulting from increased population.</p> <p><i>Social</i> New residents with connections to existing community providing for increase in social activity in immediate area.</p>	<p><i>Efficiency and Effectiveness</i> Higher and medium density development significantly improves the efficiency and therefore effectiveness of the provision of infrastructure. It is problematic and costly to service infrastructure, particularly roading, wastewater, potable water, community facilities, public transport, and schools in lower density areas.</p> <p>This option is an effective method of achieving additional residential land but is not effective in providing for wide sectors of the community and for services to support the community.</p>

<p><i>Cultural</i> Existing view shafts from Marae provided for in master planning of site development.</p>	
<p>Costs</p>	
<p><i>Environmental</i> Loss of open space rural land and consequent effects on visual amenity. Provision for a range of housing and section typologies including retirement village is not provided for, limiting the range of residents for the site.</p> <p>Potential for an inefficient use of urban zoned land. A neighbourhood shopping area is not provided, reducing the walkability and ease of use of the site for residents and increasing the need to vehicular transportation with the consequent costs on wider Invercargill infrastructure and the environment.</p> <p><i>Economic</i> Underutilisation of the site and provision of neighbourhood shops and services for the site and the neighbouring community is not provided for.</p> <p><i>Social</i> The range of residents from first home buyers to retirees is not provided for. Social gathering areas around the neighbourhood shops zone are not available.</p> <p><i>Cultural</i> Loss of existing open space and views to culturally important landscapes are somewhat reduced.</p>	
<p>Sufficiency and certainty of information and risk of acting/not acting</p>	<p>It is considered that there is sufficient information to act as the provisions of the Residential 1 Zone are well documented.</p>
<p>Recommendation: This option is not an appropriate way to achieve the objective.</p>	

Table 3:

<p>Option 3 – Resource Consents</p>	
<p>Benefits</p>	<p>Appropriateness in achieving objectives</p>
<p><i>Environmental</i> None identified.</p>	<p><i>Efficiency and Effectiveness</i> Applying for multiple resource consents and providing infrastructure in a sporadic,</p>
<p><i>Economic</i></p>	

<p>Benefits to the Invercargill community during the ongoing construction phase of the development. Ongoing benefits in local area and wider Invercargill resulting from increased population.</p> <p><i>Social</i> New residents with connections to existing community providing for increase in social activity in immediate area.</p> <p><i>Cultural</i> Existing view shafts from Marae possibly allowed for in subdivision layout.</p>	<p>potentially uncoordinated manner will be highly inefficient.</p> <p>A series of non-complying resource consent applications would be required which will result in an inefficient use of resources.</p> <p>Given the existing planning provisions for this site, it is unlikely that resource consents would be granted, and this option would therefore be ineffective at providing for residential growth in the District.</p>
<p>Costs</p>	
<p><i>Environmental</i> Development occurs on an ad hoc basis and may result in inefficient use of land and provision of infrastructure.</p> <p>Stormwater management is not provided in a manner which efficiently provides for the full development of the site.</p> <p>Potential for larger 2ha subdivision which would remove the land from productive rural use but not provide the level of housing required in Invercargill and would not provide for affordable housing.</p> <p><i>Economic</i> Costly processes to apply for successive resource consents for a non-complying activity. In efficient servicing and roads may lead to additional costs to replace infrastructure not correctly sized for higher density development.</p> <p><i>Social</i> None identified.</p> <p><i>Cultural</i> Potential for ad hoc development overtime to increase effects of residential housing in close proximity to the marae and closing off of viewshafts to culturally important landmarks.</p>	
<p>Sufficiency and certainty of information and risk of acting/not acting</p>	<p>It is considered there is sufficient information to act as the existing provisions for the Rural and Residential 1 Zones are well documents.</p>
<p>Recommendation: This option is not considered an appropriate way to achieve the objective given the costs identified above.</p>	

Table 4:

Option 4 – Rezoning of the site as proposed	
Benefits	Appropriateness in achieving objectives
<p><i>Environmental</i></p> <p>Existing flooding concerns on neighbouring properties can be addressed through stormwater management. Areas can be set aside for reserve and parks providing amenity for neighbours and residents.</p> <p>A cohesive urban development of the site can be undertaken providing for the full range of housing and section typologies and providing for affordable housing as well as higher end development.</p> <p>Higher density development can be located appropriately around service nodes and transport routes promoting alternative forms of transport.</p> <p><i>Economic</i></p> <p>Benefits to the Invercargill community during the ongoing construction phase of the development. Ongoing benefits in local area and wider Invercargill resulting from increased population.</p> <p>Benefits resulting from employment opportunities in the neighbourhood through the retirement village and neighbourhood shops zone. While resource consents will still be required from Invercargill City Council to develop a retirement village as a controlled activity (if all bulk and location standards are met), it must be approved providing financial certainty to the developer.</p> <p>Provision of rules within the Residential 1A zone will result in reduced application and consenting costs as the more directive framework provides clearer direction for residential development in that zone.</p> <p><i>Social</i></p> <p>New residents with connections to existing community providing for increase in social</p>	<p><i>Efficiency and Effectiveness</i></p> <p>Given the benefits identified above this option is an efficient method of achieving the desired outcomes of provision of a new suburb of Invercargill which incorporates a range of section and housing typologies, at a range of price points, including affordable housing and incorporating neighbourhood shops and services, parks and reserves.</p> <p>The plan change as proposed is considered an effective method of implementing the objective for the site. The rule framework reflects the amenity anticipated for the Residential 1A zone and the Retirement Village Precinct and provides certainty to developers; the adoption of existing zones for the majority of the residential land and the neighbourhood shops reduces the introduction of new provisions into the District Plan while enabling the type of development and amenity proposed for the site; development of the site is able to be realised provided they are appropriate to the specific zone.</p>

activity in immediate area. Cafes and services locating within the neighbourhood shopping zone and parks and reserve, providing community meeting points.

Increased health opportunities through provision of walkways and cycle paths around and throughout the site. Provision of a retirement village precinct provides an opportunity for elderly persons to remain in the local area.

The mixed density housing provides for affordable housing opportunities for residents and families.

Cultural

Existing view shafts from Marae provided for in master planning of site development. Wetland areas able to be managed by iwi. Medium density zone providing for kaumatua housing in close proximity to the marae and the neighbourhood shops zone.

Costs

Environmental:

Development occurs on an ad hoc basis and may result in inefficient use of land and provision of infrastructure.

Stormwater management is not provided in a manner which efficiently provides for the full development of the site. Potential for larger 2ha subdivision which would remove the land from productive rural use but not provide the level of housing required in Invercargill and would not provide for affordable housing.

Economic:

Costly processes to apply for successive resource consents for a noncomplying activity. In efficient servicing and roads may lead to additional costs to replace infrastructure not correctly sized for higher density development.

Social:

None identified.

Cultural:

Potential for ad hoc development overtime to increase effects of residential housing in close

proximity to the marae and closing off of viewshafts to culturally important landmarks.	
Sufficiency and certainty of information and risk of acting/not acting	It is considered that there is sufficient information to act, as the provisions are largely in place in the District Plan and the implications are well documented. Where there are new provisions proposed these are in keeping with the intentions as set by the objectives and policies of the Residential 1A Zone.
Recommendation: This option is considered the most appropriate way to achieve the objective of the Plan Change and the desired outcomes of the District Plan for providing for urban development within areas identified as appropriate, given the benefits and costs identified above.	

CONCLUSION

In summary it is considered that the benefits of progressing with the proposed plan change will outweigh the costs. The zoning as proposed allows for a range of housing and section typologies which will cater for first home buyers to retirees and everything in between. The development of the site enables services and recreation areas to be accessed within walking distance, encouraging community and social engagement and a healthy community less reliant on vehicular transport. Provision of reserve and wetland areas protect cultural values.

EVALUATION OF PROPOSED RESIDENTIAL 1B ZONE:

The proposed Residential 1B (Te Puawai Medium Density) zone promotes numerous distinct provisions which differ from the existing medium density Residential 1A zone contained in the operative Invercargill City District Plan 2019, and consequently contains a number of new objectives, policies, rules, and performance standards. Given the significance of this change it is considered appropriate to undertake an additional Section 32 analysis of the provisions relating to the proposed Residential 1B (Te Puawai Medium Density) zone.

RESIDENTIAL 1B (TE PUAWAI MEDIUM DENSITY) ZONE OBJECTIVES:

The Objectives of the Residential 1B zone are outlined as follows:

Existing:

- **RURZ-O3** - New urban development within the Rural Zone only occurs within the areas identified in APP6 – Appendix 6 Outline Development Plan Areas and in general accordance with an operative outline development plan included in the District Plan through an approved Plan Change, and only when adequate servicing and infrastructure are available.

Proposed:

- All Objectives and Policies that apply to the Residential 1 Zone also apply to the Residential 1B Zone.
- **RES1BZ-O1** - The opportunity for medium density housing as a residential redevelopment option is provided for within the zoned areas.

- **RESBZ-O2** - Medium density housing developments are well designed, offering a high level of amenity to the residents in the new units and maximising beneficial effects, and minimising adverse effects, on the surrounding neighbourhood.
- **RES1BZ-O3** - Performance standards are provided for greenfield medium density residential development within the Te Puawai site.

RESIDENTIAL 1B (TE PUAWAI MEDIUM DENSITY) ZONE POLICIES:

In order to support the proposed objectives stated above, the following policies are proposed:

- **RES1BZ-P1** - The Residential 1B (Te Puawai Medium Density) Zone provides for well-designed medium density housing in the Residential 1B Zone in the area identified on the Te Puawai Outline Development Plan located within walking distance of the neighbourhood shopping precinct and reserve areas.

Explanation: Medium density housing (housing on lots smaller than 350m²) is an appropriate option for provision of affordable housing. It should be located within walking distance of local amenities.

- **RES1BZ-P2** - In the Residential 1B (Te Puawai Medium Density) Zone encourages comprehensively designed, high quality, medium density residential development, which is attractive to residents, responsive to housing demands, and provides a positive contribution to its environment.

Explanation: Medium density housing needs to be planned comprehensively and is differentiated from the Residential 1A zone by adhering to appropriate performance standards in order to provide a satisfactory level of amenity.

- **RES1BZ-P3** – Urban Design:

To encourage the following urban design issues be addressed in the design and planning of medium density housing:

1. Neighbourhood character - the relationship of the development with the surrounding neighbourhood and how well the development integrates with its neighbourhood
2. Connectivity - how the development links to the neighbourhood and the wider community
3. Site layout - provision, orientation, access, layout and function of outdoor spaces
4. Building location - optimising amenity while making best use of the site, and also being a good neighbour
5. Relationship to neighbouring buildings
6. Visual and acoustic privacy - design to mitigate overlooking and unwanted noise
7. On-site outdoor space - relationship of outdoor spaces to houses with respect to privacy, outlook, sunlight and landscape treatment
8. Entries to buildings - visibility, shelter and security
9. Site facilities - provision for services and utilities
10. Landscape treatment - design for quality living environment.

Explanation: Achieving good development will require designers to consider the design issues (above) and reach informed conclusions. Comprehensive design is needed to achieve the best outcomes on the small sites that characterise the completed development.

SECTION 32 ANALYSIS:

Section 32(1)(b) of the RMA requires an assessment of ‘whether the provisions in the proposal are the most appropriate way to achieve the objectives...’, and subsections (i)-(iii) set out the requirements for that assessment. There are two potential alternative options identified in relation to the provision of medium density residential development within the site, and Tables 1 – 3 below consider the costs and benefits associated with the preferred option, and alternative options. The assessment within Tables 5 to 7 relates to the provisions and objectives of the Plan Change and include the following options:

Medium Density Residential Zone Options:

- **Option 1** – Residential 1B Zone (the preferred option)
- **Option 2** – Residential 1A Zone
- **Option 3** – Residential 1 Zone (the “do nothing” option)

The costs, benefits, efficiency and effectiveness and associated risks of each option are set out in the tables below:

Table 5:

Option 1 – Residential 1B Zone (preferred option)		
Key parameters:		
<ul style="list-style-type: none"> • Medium density residential zone. • Minimum density of one residential unit per 250m² net site area. • The proposed zone contains specific land use rules and provisions which are designed to enable permitted medium density residential developments. • Enables development of residential units with common walls (i.e. duplex or terraced-style developments). 		
	Costs	Benefits
Environmental	<p>Medium density residential development will change the character and amenity of the site when compared with that associated with the density of nearby established residential areas.</p> <p>Medium density residential development may exacerbate environmental effects associated with stormwater runoff, waste generation, water and wastewater treatment if infrastructure is not adequately designed. It may also exacerbate effects related to energy consumption and air quality.</p>	<p>Medium density development minimises the environmental effects of urban growth, when compared with low-density urban sprawl development which requires a much larger land area to accommodate the same size of population.</p> <p>Medium density development may support increased uptake of public transport and use of active transport modes, reducing reliance on the private motor vehicle.</p> <p>Inclusion of land use rules and provisions within the proposed Residential 1B zone provides certainty/clarity around medium</p>

		density development forms which are appropriate for greenfield development, instead of using a resource consent process that would apply if the provisions of the Residential 1A zone were adopted.
Social	The development will result in a change to the environment of those living closest to the site, and there may be some short-term effects associated with undertaking the physical works to facilitate the development.	<p>Medium density development increases the potential for more affordable living options and helps respond to rising house prices in Invercargill.</p> <p>The location of the medium density residential zone is situated near the proposed Business 4 Zone and along key transport linkages, and helps avoid demand for housing being met in locations further removed from urban areas where living costs (such as those associated with travel) may be higher.</p>
Cultural	Nil	<p>The plan change request states that ongoing consultation will be undertaken with iwi as the project develops.</p> <p>Full consideration will be given to protecting cultural values associated with the site.</p>
Economic	Medium density development requires provision of appropriate infrastructure and may require upgrade to existing systems. However, these costs are considered to be typically less than for servicing traditional low-density development on the edges of urban areas.	<p>Enabling greater development intensities close to the proposed Business 4 zone should help support the economy of this centre by creating a permanent population with easy access to it.</p> <p>Providing certainty around rules for development and removing the requirement for resource consents and associated processing costs, within the medium density residential zone, assists with investment decisions by developers.</p>
Appropriateness in achieving objectives		
Effectiveness & Efficiency	Provision of land development rules and avoiding the need for resource consent for medium density residential development within a greenfield development site, are considered to be effective and efficient methods of providing capacity for medium density development.	
Risk of acting or not acting	By not providing a medium density residential zone (outlined in Option 3, below) there is a risk that the community is adversely affected to a higher degree through continued increase in the cost of housing and restricted economic growth. Also, by not providing land use rules and provisions as	

	proposed within the Residential 1B zone which is targeted at greenfield development, there is uncertainty for developers in relation to what is considered appropriate development.
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Table 6:

Option 2 – Residential 1A Zone		
Key parameters:		
<ul style="list-style-type: none"> • Medium density residential zone. • No minimum residential density but requires a minimum 2000m² site for development. No limit on the number of residential units. • Medium density development is a discretionary activity and requires resource consent for any medium density proposal. • The zone objectives, policies, and provisions are designed to enable cohesive and comprehensive infill development near the Central Business District and the South City Business 2 Zone. 		
	Costs	Benefits
Environmental	<p>Medium density residential development will change the character and amenity of the site when compared with the density of nearby established residential areas.</p> <p>Medium density residential development may exacerbate environmental effects associated with stormwater runoff, waste generation, water and wastewater treatment if infrastructure is not adequately designed. It may also exacerbate effects related to energy consumption and air quality.</p> <p>The absence of land use rules and provisions within the Residential 1A zone provides uncertainty for developers in relation to the form of acceptable medium density development within the Te Puawai site.</p>	<p>Medium density development minimises the environmental effects of urban growth, when compared with low-density urban sprawl development which requires a much larger land area to accommodate the same size of population.</p> <p>Medium density development may support increased uptake of public transport and use of active transport modes, reducing reliance on the private motor vehicle.</p> <p>Making medium density development a discretionary activity arguably provides greater flexibility for developers, provided that a large enough site is available to facilitate comprehensive development and the development is well designed.</p>
Social	<p>The development will result in a change to the environment of those living closest to the site and there may be some short-term effects associated with undertaking the physical works to facilitate the development.</p>	<p>Medium density development increases the potential for more affordable living options and helps respond to rising house prices in Invercargill.</p> <p>The location of the medium density residential zone is situated near the proposed Business 4 Zone and along key transport linkages, and helps avoid demand for housing being met in</p>

		locations further removed from urban areas where living costs (such as those associated with travel) may be higher.
Cultural	Nil	The plan change request states that ongoing consultation will be undertaken with iwi as the project develops. Full consideration will be given to protecting cultural values associated with the site.
Economic	Medium density development requires provision of appropriate infrastructure and may require upgrade to existing systems. However, these costs are considered to be typically less than for servicing traditional low-density development on the edges of urban areas. Requiring resource consents for medium density development within a greenfield site adds additional costs to development projects.	Enabling greater development intensities close to the proposed Business 4 zone should help support the economy of this centre by creating a permanent population with easy access to it.
Appropriateness in achieving objectives		
Effectiveness & Efficiency	Applying for resource consents for a large greenfield site would be repetitive and likely result in inefficient process for marginal gain, as the different constraints are fully considered. It may lead to inefficient use of Council staff time in processing multiple different resource consent applications for similar activities which have already been fully considered and deemed appropriate.	
Risk of acting or not acting	Adopting the Residential 1A zone for medium density residential development within the site means that all medium density development is a discretionary activity and requires resource consent. This consenting framework has an uncertain risk of outcome which is inappropriate for a large greenfield site.	

Table 7:

Option 3 – Residential 1 Zone		
Key parameters:		
<ul style="list-style-type: none"> • Low density residential zone. • Minimum density of one residential unit per 400m² net site area. • The “do nothing” option - medium residential density development not permitted, and low density residential would occur across the site. 		
	Costs	Benefits
Environmental	Low density development does not support increased uptake of public transport and use of active transport modes, therefore maintains reliance on trips via private motor vehicle.	Low density residential development will not change the character and amenity of the site when compared with the density of nearby established residential areas.

		Low density residential development will have similar environmental effects of neighbouring areas, such as those associated with stormwater runoff, waste generation, water and wastewater treatment, and air quality.
Social	Low density development does not increase the potential for more affordable living options and therefore does not help respond to rising house prices in Invercargill.	The development will result in a similar urban environment to nearby residential areas and those living closest to the site.
Cultural	Nil	The plan change request states that ongoing consultation will be undertaken with iwi as the project develops. Full consideration will be given to protecting cultural values associated with the site.
Economic	Only permitting low density development within the site does not support the proposed Business 4 zone to the same degree as medium density development.	Low density residential development close to the proposed Business 4 zone does not help support the economy of this centre to the degree that medium density residential development would do.
Appropriateness in achieving objectives		
Effectiveness & Efficiency	Higher and medium density development significantly improves the efficiency and therefore effectiveness of the provision of infrastructure. It is problematic and costly to service infrastructure, particularly roading, wastewater, potable water, community facilities, public transport, and schools in lower density areas. This option is an effective method of achieving additional residential land but is not effective in providing for wide sectors of the community and for services to support the community.	
Risk of acting or not acting	By only zoning the site for low density residential development there is a risk that the community is adversely affected to a higher degree through continued increase in the cost of housing and restricted economic growth.	

CONCLUSION

Taking into account the full range of costs and benefits associated with Options 1-3, it is considered that Option 1 is the preferred option to meet the purpose of the Act and provide sustainable development on a site which has already been identified by Council as suitable for urban expansion and growth. Option 1 allows for meeting the needs of the community to ensure their economic, social and cultural wellbeing, and increases housing supply within Invercargill at a crucial time when housing affordability is declining.

EVALUATION OF PROPOSED MASTERPLAN:

The updated set of provisions for development of the site also promotes two development rules within the subdivision section of the Invercargill City District Plan 2019 which require a masterplan to be prepared for the development of the Te Puawai site as a whole before any subdivision/land use can be undertaken. The masterplan will provide primary infrastructure design and proposed rules SUB-R13 and SUB-R14 require any subsequent resource consents to be in accordance with the Masterplan. Downstream infrastructure is required to be provided where necessary prior to s224c certification. Rule SUB-R14 provides that any subdivision or land use not in accordance with the Masterplan is a non-complying activity.

Given the significance of these provisions, and that they were not evaluated within the original plan change request, it is considered appropriate to undertake an additional analysis of the proposed masterplan provisions in accordance with Section 32 of the RMA.

Masterplan Options:

- **Option 1** – Masterplan (the preferred option)
- **Option 2** – District Plan Design Elements
- **Option 3** – Resource Consents (the “do nothing” option)

The costs, benefits, efficiency and effectiveness and associated risks of each option are set out in the tables below:

Table 8:

Option 1 – Masterplan (preferred option)		
Key parameters:		
	<ul style="list-style-type: none"> • The masterplan option requires a plan to be submitted to and approved by the Council which shows the layout/location of key features of future development within the Te Puawai site. • Major roads, reserves, and areas required for stormwater detention are all indicated on the masterplan and are required to be incorporated into any future subdivision. • Deviating from the approved masterplan would be a non-complying activity. 	
	Costs	Benefits
Environmental	Nil	<p>All key infrastructure is identified early in the development process leading to comprehensive and integrated design.</p> <p>Secondary or minor infrastructure is not necessarily detailed as part of the masterplan, meaning that the developer has some flexibility in how this is accommodated as the development progresses.</p>
Social	Nil	
Cultural	Nil	The plan change request states that ongoing consultation will be

		<p>undertaken with iwi as the project develops.</p> <p>Full consideration will be given to protecting cultural values associated with the site.</p>
Economic	Costs associated with preparation of the masterplan prior to any subdivision or development applications being approved by the Council.	<p>As all key infrastructure is defined early in the development process economies of scale can be created in terms of construction costs.</p> <p>Design of minor infrastructure that is not required as part of the masterplan does not require a land use consent and therefore avoids associated uncertainty and processing costs.</p>
Appropriateness in achieving objectives		
Effectiveness & Efficiency	The provisions will be efficient as they clearly set standards for a permitted activity and recognise the need for integration of infrastructure as the site is developed.	
Risk of acting or not acting	By not adopting the masterplan approach there are risks that infrastructure across the Te Puawai site will not be designed in a comprehensive and integrated way.	

Table 9:

Option 2 – District Plan Design Elements		
Key parameters:		
<ul style="list-style-type: none"> The design elements option involves not only showing the layout/location of key features of future development within the Te Puawai site, but also prescribing the exact form (design elements) of all infrastructure (similar to performance standard rules). Design elements would be specified in the Invercargill City District Plan 2019. Resource consent would be required to deviate from any specified design element. 		
	Costs	Benefits
Environmental	Nil	<p>All key infrastructure is identified early in the development process leading to comprehensive and integrated design.</p> <p>Secondary or minor infrastructure is not necessarily detailed as part of the masterplan, meaning that the developer has some flexibility in how this is accommodated as the development progresses.</p>
Social	Nil	Key infrastructure will be designed in a comprehensive and integrated way
Cultural	Nil	The plan change request states that ongoing consultation will be undertaken with iwi as the project develops.

		Full consideration will be given to protecting cultural values associated with the site.
Economic	Costs associated with preparation of the masterplan prior to any subdivision or development applications being approved by the Council.	As all key infrastructure is defined early in the development process economies of scale can be created in terms of construction costs. Design of minor infrastructure that is not required as part of the masterplan does not require a land use consent and therefore avoids associated uncertainty and processing costs.
Appropriateness in achieving objectives		
Effectiveness & Efficiency	Design element provisions will be efficient as they clearly set standards for a permitted activity and recognise the need for integration of infrastructure as the site is developed.	
Risk of acting or not acting	By adopting the design elements approach there are risks that design of infrastructure within the Te Puawai site will not be as flexible in meeting engineering challenges as they arise during design of the development.	

Table 10:

Option 3 – Resource Consents		
Key parameters:		
<ul style="list-style-type: none"> • This option leaves the design of all infrastructure to the subdivision consent stage. • There is no overall infrastructural design concept for the site. • The “do nothing” option. 		
	Costs	Benefits
Environmental	Key infrastructure is not identified early in the development process, thereby creating a risk to comprehensive and integrated design.	Provides the developer ultimate flexibility in how they may want to design infrastructure for the site as development progresses. Potential for design to evolve alongside changes in engineering standards over the course of the development being built.
Social	There is an overall risk that integrated, interconnected, infrastructure will not be provided to the degree that it would otherwise be designed under Options 1 and 2.	Nil
Cultural	Nil	The plan change request states that ongoing consultation will be undertaken with iwi as the project develops.

		Full consideration will be given to protecting cultural values associated with the site.
Economic	Added complexities to consenting if design for each stage of development is changed, or stages undergo multiple resource consent variations.	Potential for cheaper design options to be adopted over the course of the development being constructed, provided they are supported by changes in appropriate engineering standards.
Appropriateness in achieving objectives		
Effectiveness & Efficiency	By adopting this option there are risks that comprehensive and integrated infrastructure will not be provided to the degree that it would otherwise be designed under Options 1 and 2. Efficiency is also at risk as each due to added consenting complexities if each stage of the development takes a unique approach to design of infrastructure.	
Risk of acting or not acting	By adopting this option (i.e. not acting) there is a risks that comprehensive and integrated infrastructure would not be provided to the degree that Options 1 and 2 provide.	

CONCLUSION

Option 1 is the preferred option as it is considered to best meet the purpose of the Act and provide integrated development within the Te Puawai Outline Development Plan Area. Option 1 best enables the development to meet the needs of the community to ensure their economic, social and cultural wellbeing, and enhances development of the site in a sustainable and integrated direction.

S32 REPORT CONCLUSION:

This report has undertaken an analysis of the proposed Plan Change in terms of Section 32 of the RMA. The objectives of the plan change are consistent with the purpose of the RMA as they provide a balance between providing for growth in Invercargill while maintaining and enhancing environmental values.

Part of sustainable development of the site is enabling people and communities to provide for their social, economic and cultural wellbeing. The proposed objectives and policies directly enable these needs to be met, while also ensuring an adequate supply of housing and recognising the need for housing in different forms for people and the community.

The objectives of the plan change are also consistent with the objectives of the Invercargill City Council's 2018-2028 Long Term Plan, the proposed Invercargill City Council's 2021-2031 Long Term Plan, the Southland Regional Development Strategy, and relevant objectives of the National Policy Statement for Urban Development associated with housing supply.

Lastly, the provisions of the plan change are the most appropriate means of achieving the objectives as they provide a framework which will ensure that the development of the site is comprehensive, integrated and efficient in its layout and form.