

TIMARU



DISTRICT COUNCIL
Te Kaunihera ā-Rohe
o Te Tihi o Maru



YOUR PLAN OUR FUTURE
TIMARU DISTRICT PLAN REVIEW

Open Space and Recreation Zone S.32 May 2022



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TIMARU DISTRICT PLAN REVIEW
LAND USE PLAN

Timaru District Council

Section 32 Report

Open Space and Recreation Zones

May 2022

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1 Open Space and Recreation Zone

1.1 Introduction

The district has a diverse range of open and recreational spaces in its rural and urban areas that are used for informal and formal, indoor, and outdoor, active, and passive recreation activities as well as community activities such as community halls and temporary activities such as fetes and fairs. These spaces encompass neighbourhood parks, natural areas, and amenity parks where it is generally anticipated there is a dominance of openness, landscaping, and indigenous vegetation with a low density of built development. Whereas some of the sports facilities in the district support large-scale buildings along with car parking, lighting and signage and can create large volumes of traffic and noise. The holiday huts at Butlers Huts, Milford Huts, Waipopo, Rangitata, Stratheona and part of Blandswood are also located in the Open Space Zone of the Operative District Plan.

Major facilities such as the Southern Trust Events Centre, not only provide for sport and recreational activities, but also act as a venue for exhibitions, concerts, theatre, and other public events. Caroline Bay, an iconic attraction in Timaru for both residents and visitors alike, also support a broad range of activities including a playground, a venue for concerts and theatre as well as a pedestrian link between the town centre, Benvenue cliffs and the coast. It is important to manage activities to minimise adverse effects on its sense of spaciousness and its coastal setting.

The Butlers, Milford, Waipopo, Rangitata, Stratheona huts are in generally peaceful river and coastal locations and the Blandswood huts are located in Peel Forest. These holiday huts have a character that is distinct from the residential zones in the district as they have developed in an ad hoc manner over time. The layout of the hut's areas tends to be informal with a diversity of housing styles, but without a range of other uses.. These settlements are also not serviced by wastewater systems and in some cases, a reliable and safe potable water supply. The exceptions being the Rangitata holiday huts where the Council has drilled a new potable water bore, Statheona which is serviced by a rural water supply and Waipopo which has a pumping station supplying potable water to all huts. All the huts at Waipopo also have septic tanks.

Most of the holiday huts are located on Council owned, and in the case of Waipopo, some of the huts are on Māori owned and/or former Māori reserve land. Most hut owners pay a lease to the landowner and generally have a right to occupy their hut for 180 days per year with a few people having the right to reside permanently in their hut. Many of the huts at Waipopo, given they are located on former Māori Reserve Land, have now been included within the Proposed Māori Purpose Zone. Although there is a collection of privately owned huts on privately owned land within the Ōpihi Reserve at Waipopo.

The Butlers and Stratheona holiday huts are at significant risk from surface and river flooding and Milford and Rangitata holiday huts are at significant risk from river and coastal flooding as well as coastal erosion. The majority of the holiday huts at Waipopo are at significant risk from river flooding but some areas could be developed subject to mitigation i.e., minimum floor heights. The Blandswood holiday huts are at risk from periodic flash flooding but otherwise are less vulnerable than the other holiday huts. However, access via the ford in the Kōwhai Stream to the holiday huts on its west bank can be difficult, if not impossible at times. For these reasons, the Council's policy has been to generally avoid all new development of holiday huts.

Te Aitarakihi Multicultural Centre just south of Waitarakao (Washdyke Estuary) is Māori Land, containing a long-established community and cultural facility that is used for events, tangi, hui, recreation, education programmes and school groups amongst other uses. The Centre sits amongst a variety of neighbours including the railway line, an industrial zoning for the meatworks, a Large Format Retail Zone on the former showgrounds site and residential zoning across the street. The Centre is a valuable community and cultural asset.

The Council has a duty to provide for the health and wellbeing of the community and it can partially achieve this through the provision of well-managed and diverse open space and recreation spaces. Such spaces also contribute to the vitality and life of the district, providing venues for events and gathering places for the community to enjoy and partake in sports.

This chapter addresses the reasons for the proposed Open Space and Recreation Zones and the Caroline Bay, Holiday hut and Te Aitarakihi Precincts, and associated objectives, policies and methods that seek to manage the effects of activities in these zones and on adjoining sites.

1.2 Community / Stakeholder / Iwi Engagement

Three main issues were identified by the Council for the purposes of consultation with the community. Feedback, including that gathered on the Draft District Plan received on those is summarised below, as well as other matters raised by the community:

1. Zoning of land used for recreational purpose:
 - both support and opposition for rezoning land zoned Recreation but not being used for recreation purposes. Concern was raised that any rezoning should be widely notified to residents, and it was questioned where such rezoning may occur.
 - both support and opposition for renaming the Recreation Zone as 'open space' and then split into passive and active zones. Some respondents considered renaming the zone would complicate the Plan and cause confusion. The renaming may also 'lock in' present day uses, or it could leave some passive areas open to being changed more easily when rezoning.
 - support for 'no build zones' to manage natural hazards, although at least one respondent sought that Blandswood retained its underlying Recreation 1 Zone.
 - concern that green spaces provide for a diversity of type and size to meet the current and future recreational, cultural, health and wellbeing needs of the community.
 - a view that land off Maryburn Place be zoned Recreation as the Council swapped the reserve identified on the subdivision plan for the current reserve, but it was not rezoned as recreation. The land is currently held by the Council, although it is uncertain if the land has been gazetted as a reserve.
 - Te Aitarakihi Trust requested that the zoning for their site at 50 Bridge Street, be changed from recreation to Māori Purpose Zone, or that a precinct enabling urban Marae facilities to be created.
 - Kainga Ora suggested that riparian margins and esplanade reserves ought to have an Open Space Zoning.
 - Freshpork Bay City requested a switch from Sports and Recreation Zone to Open Space Zone for the land adjacent their 67 Pacific Street, Timaru.
2. Large scale recreation activities:
 - General support for including a 'major facilities zone' to manage large recreation facilities such as Caroline Bay, the Caroline Bay Trust Aoraki Centre and the Southern Trusts Event Centre.

- General support for managing building scale rather than controlling the activity itself. One respondent seeks the use of management plans to manage the use and buildings for large scale recreation activities
 - Both support and opposition to increasing boundary setbacks and recession plane standards; and including impermeable surface controls and hours of operation control. Concern was raised about limiting the ability to operate, use and develop large scale recreation facilities.
 - Some respondents seek a 'container' cafe and camping to be provided for at Caroline Bay (within Port Loop and next to roller blade rink) as well as a cafe at the Aigantighe Art Gallery.
 - Building height was questioned as the height limit of OSZ-S3 was identified as needing a rethink.
 - In the Draft District Plan, car parking areas are non-complying which doesn't make sense because parking areas are ancillary and expected for recreation activities.
3. Provision of Cemeteries:
- There was general support for both rezoning cemeteries as a 'special purpose zone', and retaining the current underlying zone with designations or a schedule for cemeteries.
 - One respondent considered an 'open space zone' was disrespectful and that it should be referred to as a 'special purpose zone'. Another respondent considered cemeteries could be provided for by way of resource consent rather than a plan change.

1.3 Strategic directions

The strategic direction of relevance to this topic is:

SD-O1 Community and Open Space

A range of recreational, social and community facilities and open spaces that meet the long-term needs of the community are enabled, including:

1. the provision of public access to and along the coastal marine area and margins of identified rivers; and
2. the provision of a network of facilities and open spaces to support densification and new growth areas, including co-location.

The Strategic Objective seeks to provide for a range of recreational, social and community facilities and open spaces that support the well-being of the community. These spaces and facilities need to be located within or in proximity to existing and future communities and should recognise the ability for the co-location of activities.

1.4 Problem definition

1.4.1 The efficiency and effectiveness of the Operative Plan

The Operative District Plan has three Recreation Zones: Recreation 1 (Holiday Residential), Residential 2 (Urban) and Residential 3 (Rural). The Recreation 1 Zone includes the holiday huts at Butlers Huts, Milford Huts, Waipopo, Rangitata, Stratheona and part of Blandswood. Recreation 2 includes recreational land and open space along the coast, within urban areas and those recreational activities adjacent to residential zones where regard should be had to any adverse effects on residential zones. Recreation 3 (Rural) includes recreational land in rural areas.

There are two objectives that seek to provide for recreational activities and avoid or mitigate the adverse effects arising from recreational activities. The policies address the management of subdivision and development adjacent to and within Recreation Zones, require the taking of

esplanade reserves or esplanade strips alongside waterways on subdivision where significant recreational benefit is foreseen, set the purpose of the zones, protect the visual amenities of recreation areas, manage activities within the holiday hut areas in relation to natural hazards, provide for the continued operation of existing recreation activities and promote the enhancement of recreational land and facilities.

Policy 5.1.2.3 sets out the purpose of the Recreation 1 zone as to retain the existing peaceful character of these areas and that no further residential development occur in the holiday hut areas except for a part of the South Rangitata Holiday huts, and the Milford Huts area, because of the threat posed by flood hazard. The wording of this Policy appears to enable the building of new huts at South Rangitata and Milford. Furthermore, Policy 5.1.2.4 allows the reconstruction or modification of existing household units including holiday huts at Milford Huts subject to obtaining resource consent where such reconstruction or modification is not allowed under s10 of the Resource Management Act.

The explanation and reasons to Policy 5.1.2.4 explains that the Milford huts are amongst the most hazard prone locations in the district because of the potential that exists for properties within this settlement to be subject to the adverse environmental effects of both river flooding and coastal flooding or inundation. It therefore seems contrary to allow new huts and even enable the rebuilding of huts where these may remain at significant risk from flooding. It also does not support the prohibited activity status for new huts in all holiday hut areas

However, the Plan does not provide a clear understanding of the character and amenity anticipated to be maintained in each zone. Further the policies that address hazard management in the holiday hut areas are long and would be more appropriately written as rules. They are also unclear in their intent and may not achieve the purpose of the Act – to provide for public health and safety and s6(h) the management of significant risks from natural hazards.

There is no specific policy provision for those facilities in the district that provide for a broad range of activities such as Caroline Bay, the Southern Trusts Event Centre and the Te Aitarakahi Centre. There also appears to be a reliance on the explanations to understand the policies. In addition, whilst the explanation to Policy 5.2.2.1 refers to open space 'can protect natural values', this is not clearly provided for in the policies or the rules.

The rules are activity based and activities are generally managed to minimise risks to health, safety, and property from natural hazards.

Permitted activities

Open space, grazing by animals, utility services, road, and bridge construction.

Household units and associated accessory buildings for caretakers or for other uses ancillary to the recreational use.

Discretionary activities

Accessory buildings to household units and holiday huts up to 50m² per residence in all holiday hut areas.

Replacement huts at South Rangitata huts (where the loss of all or part of the household unit is incurred by other than flood or coastal hazard).

The reconstruction of existing household units at Milford Huts which fail to meet the timeframes specified in section 10 of the Resource Management Act (i.e., existing use rights).

In the Recreation 2 and 3 Zones, recreational uses are permitted but clubrooms, grandstands, changing rooms and toilets are discretionary activities. Although it is unclear whether the permitted activity rule also anticipates buildings and structures being included in the term 'recreational uses.'

Prohibited activities

New holiday huts in all holiday hut areas.

Standards

All activities are subject to performance standards that manage matters such as height, access to sunlight, setbacks from road and internal boundaries and light spill.

There are also several General Rules that apply to the Recreation Zones; vehicle access and loading; parking; signs; and natural hazards. No noise standards apply to activities in the Recreation Zones.

The activity standards do not appear to provide for activities that are anticipated in the Open Space and Recreation Zones including some limited commercial activities. Furthermore, consent is required for any scale of building in the Recreation 2 Zone but the minimum building setback from internal boundaries may not be wide enough to manage potential adverse effects on adjoining sites such as over-bearing building bulk and shading.

Cemeteries are provided for as discretionary activities in Rural Zones and non-complying activities in the Residential, Commercial, Industrial and Recreation Zones. They are not subject to any form of specific zoning, overlay, scheduling, or designation.

1.4.2 Issues identified

The Recreation Zone Discussion Document prepared by TDC in November 2016¹ identified the following issues with the operative Plan:

Issue 1: Recreation Zones

The Plan does not provide a clear understanding of the character and amenity anticipated to be maintained in each zone.

Neither does it effectively provide for recreational or established activities especially the larger facilities i.e., the commercial use of recreational facilities such as the hiring of club rooms for private functions and several activities in Caroline Bay require resource consent, for example any commercial uses such as the market and hiring of the Bay Hall. Conversely, the Plan does not adequately manage effects on adjoining sites i.e., light spill, setback of buildings, traffic generation and noise.

The Plan is also inconsistent with the Parks Strategy² in terms of providing sufficient and appropriate open space for future community needs. The zoning of land is also an issue with vacant land being used informally for recreation but not zoned for such use, and in Temuka private land is zoned for recreational purposes due to the flooding hazard.

¹ <https://www.timaru.govt.nz/services/planning/district-plan/district-plan-review/discussion-documents>

² https://www.timaru.govt.nz/_data/assets/pdf_file/0007/46249/Timaru-District-Parks-Strategy-2012-2022.pdf

Issue 2: Cemeteries

The current Timaru cemetery is nearly at capacity and new land needs to be identified to provide for an extension to the existing cemetery or for a new cemetery. Some activities within the cemeteries require resource consent due to the zoning of the land. For example, only the Rural Zone specifically provides for cemeteries. Within all other zones, there is no specific provision for burials and in some zones, a monument may require resource consent depending on its size.

Issue 3: Holiday huts

No issues specific to the holiday huts were identified. However, it was considered appropriate to recognise their distinct character and that they are not generally connected to reticulated water and wastewater systems.

Further consideration of the holiday huts, however, has identified that most are in high hazard areas and are therefore considered in the Natural Hazard and Coastal Environment chapters.

Other issues identified are:

1. The Operative District Plan does not specifically provide for the character, amenity and range of activities that occur at Caroline Bay.
2. The coastal environment and the coastal hazard risk at Caroline Bay are not addressed in the operative plan.

1.4.4 Best Practice /Other Council Approaches

The provision and management of recreation and open space is an issue that has been addressed by councils around New Zealand. The following first and second-generation Plans have been identified to guide TDC as the Districts are similar in size to Timaru and the Plans reflect best practice, having been prepared recently. It is also noted most of these plans' pre-date the National Planning Standards, which means that there are implications re the Zones that could be applied to the Timaru District.

The following table sets out a high-level summary of the provisions:

Plan	Description of Approach
Dunedin City Council Proposed 2 nd Generation District Plan	<p>A strategic objective and supporting policies seek to provide for new and, manage existing recreational activities.</p> <p>Recreational activities are provided for by way of the Recreation Zone. The objectives seek to provide opportunities for a wide range of recreational, sporting, community, and cultural activities and, ensure such areas are used efficiently and effectively, maintain a high standard of on-site amenity for users of the recreation area; and maintain or enhance neighbourhood amenity and the amenity of any surrounding residential properties.</p> <p>The zone provides for a range of activities including forestry, grazing, mining, conservation, small scale community and leisure facilities, sport and recreational activities not involving motor vehicles, facilities ancillary to sport and recreation including restaurants, retail and conference activities and buildings, alterations and additions of up to 350m² with no wall longer than 20m in length. All other activities require consent.</p>

	<p>All activities are subject to performance standards that manage effects on adjoining sites and maintain the overall level of amenity anticipated in the zone and surrounding area.</p> <p>The Major Facilities Zones provides for a range of facilities in the district including the Dunedin Botanical Gardens and Moana Pool, and whilst cemeteries are listed in the definition of Major Facility, there is not a Major Facility Zone applying to cemeteries.</p>
<p>Hamilton City District Plan</p>	<p>There are four Open Space Zones: Natural, Neighbourhood, Sport and Recreation, and Destination Zones. The latter specifically provides for the Hamilton Gardens, Hamilton Lake Domain, Claudelands Park, Civic Square and Garden Place.</p> <p>The relevant objectives that apply to all open zones seek the activities must complement the functions and values of the open space and the surrounding environment, whilst providing for a wide range of functions, be safe and minimise adverse effects on the surrounding environment.</p> <p>Of relevance, changing rooms and clubrooms are provided for as permitted activities in the Sport and Recreation Zone, whilst motor sport and restaurants are discretionary activities.</p> <p>General standards apply to activities in the Open Space Zones including site coverage, building height, number of buildings, setbacks, hours of operations and scale of retail activities.</p> <p>The Major Facilities Zone provides for substantial, distinct entities such as Waikato Stadium, Claudelands Events Centre and Te Rapa Racecourse. New buildings are only permitted when a Concept Plan application has been granted by the Council, otherwise buildings are provided for as a restricted discretionary activity. Activity specific standards also apply.</p>
<p>Operative Ashburton District Plan. Note: This Plan does not give effect to the CRPS, as it was only made operative in 2014.</p>	<p>There are two Open Space Zones: Open Space A provides for neighbourhood parks, the Ashburton Domain where a very low scale of development is generally anticipated and cemeteries, and the Open Space B, which applies to recreational activities including playing fields and club rooms.</p> <p>The objectives are broad, seeking to provide for a range of open spaces that met the needs of the community, whilst not generating significant adverse effects on the environment or the recreation opportunities available in the district.</p> <p>All buildings in the Open Space A Zone and buildings over 100m² in the Open Space B Zone require resource consent. Retail activities (excluding the sale of food and beverages) are also managed by way of resource consent. There are specific site and zone standards that apply to buildings, impermeable surfacing, lighting, hours of operation and tree removal.</p> <p>Private recreational facilities such as the A and P Showgrounds, sports clubs, racecourses, and golf clubs are scheduled activities with an underlying residential or rural zoning.</p>

	<p>The hut settlements at Lake Clearwater (Te Puna-O Taka), Rakaia Huts, Hakatere Huts and Rangitata Huts are zoned as Residential B. The objectives and policies mainly provide for residential development but do seek to avoid or mitigate the potential effects of natural hazards on residential areas and development as some of the hut settlements are vulnerable to coastal erosion, inundation from the sea and flooding.</p> <p>Minimum floor height requirements apply to new buildings and extensions to existing buildings in areas identified as being at risk from flooding, with some exceptions applying to new buildings or extensions to buildings in the Residential B Zone with a gross floor area up to and including 30m². It is a non-complying activity to construct or relocate additional residential units into the hut settlements.</p>
Hurunui District Plan	<p>Reserves and Recreational facilities are provided for as permitted activities in the Residential and Rural zones. There is also an Open Space Zone that provides for reserves and recreational activities and facilities, recreational activities, community amenity facilities, temporary activities and ancillary buildings, structures, signs and earthworks as permitted activities. Effects on the environment are managed by way of standards that control height, landscaping, noise, duration of temporary activities, building length, signs, car parking, vehicle access and vehicle movements. Cemeteries are designated with an underlying rural zoning.</p> <p>The Hurunui District has a hut settlement at Loch Katrine. It is provided for through Policy 3.14, which seeks to enable small-scale publicly available huts within the Loch Katrine reserve, while avoiding, remedying or mitigating adverse effects on the environment. A new private hut and alterations which increase floor area or any means of maintaining exclusive private space around a building are a Discretionary Activity or a Non-Complying Activity if the minimum density standard is not met under the Rural Zone rules. Additional controls apply under the Landscape rules as the Loch lies within an Outstanding Natural Landscape.</p>
Mackenzie District Plan (operative, 1 st generation)	<p>The Mackenzie District Plan has 5 recreation and open space zone: Recreation P (Passive) zone, Recreation A (Active) zone, Open Space - Heritage zone, Special Travellers Accommodation Zone (Lake Tekapo and Twizel) and Open Space - Glentanner zone.</p> <p>The objectives seek to provide for a range of public spaces that meet the diverse needs of residents and visitors to the district, a continuous reserve of open space and passive recreational areas located along Lake Tekapo, an area of low-density visitor accommodation building within walking distance of the Tekapo Village Centre, and an area of low-density visitor accommodation activity near Lake Ruataniwha.</p> <p>The policies seek that such spaces are accessible, activities manage adverse effects on character, amenity, natural character and views and accommodation related facilities do not detract from use of retail opportunities in the town centre.</p> <p>In the Recreation P Zone, permitted activities are limited to passive recreation.</p>

	<p>In the Recreation A Zone, a range of activities are permitted subject to standards including open spaces, planting, outdoor recreation activities, footpaths, cycle tracks, driveways, bridges, public carparks, and buildings and structures.</p> <p>The following activities are permitted (subject to standards) in the Special Travellers Accommodation zone: camping activities, picnic areas, paths, routes for pedestrians and cyclists, and retail sales directly associated with visitor accommodation.</p> <p>Otherwise, all other activities require resource consent. The hut settlement at Lake Alexandrina lies within the Mackenzie Basin Subzone. The settlement is zoned as Rural and lies in a Lake Protection Area and a Site of Natural Significance.</p> <p>The objectives and policies seek to protect and enhance the outstanding natural landscape of the Mackenzie Basin subzone by limiting residential development, while recognising the significance of the lakes of Te Manahuna/the Mackenzie Basin, their margins, and settings to Ngāi Tahu. This means that any new hut and the extension of an existing hut is a non-complying activity.</p> <p>In addition, Lake Alexandrina is recognised as a proposed flood hazard but is not identified on the planning maps as being in a hazard area. As such no specific hazard rules apply.</p>
<p>Selwyn District Proposed District Plan notified in October 2020</p>	<p>Neither the Operative or Proposed Selwyn District Plan has an open space or recreation zones.</p> <p>Within the Proposed District Plan, the Rakaia Huts are within the Settlement Zone however, much of which fall within a Flood Inundation Overlay, Tsunami Overlay area and Plains Flood Management Overlay. In such areas, the minor repairs and maintenance of existing residential buildings are permitted, providing the work required is not due to the direct action of the sea. Any other work or new building is a Discretionary Activity. The area also Upper and Lower Selwyn Huts which are in the Plains Flood Management Overlay where buildings have “a minimum building finished floor level 300mm above a 200-year Average Recurrence Interval (ARI) flood hazard event is identified a maximum of 2 years before the relevant building consent application is formally received by Council, and the building finished floor level is at or above that level”. If the building does not comply, it is a RDIS activity.</p>

1.5 Statutory and Planning Context

District plans are part of a hierarchy of RMA policy and planning instruments. The RMA prescribes how district plans are to align with other instruments, and this is summarised in the table below.

Statutory document	Alignment requirement for Proposed District Plan	Comment
NZCPS	Give effect to	Implement according to the applicable policy statement’s intentions.
NPS/NES		
CRPS		

Regional Coastal Environment Plan	Not be inconsistent with	Are the provisions of the Proposed DP compatible with the provisions of these higher order documents?
Canterbury Land and Water Plan		Do the provisions alter the essential nature or character of what the higher order documents allow or provide for?
Specific management plans and strategies prepared under other legislation	Have regard to	Give genuine attention and thought to the matter As above.

<p>Ashburton District Plan</p> <p>Waimate District Plan</p> <p>Westland District Plan</p> <p>Mackenzie District Plan</p>	<p>Have regard to the extent to which there is a need for consistency</p>	
<p>Iwi Management Plan of Kati Huirapa</p> <p>Te Whakatau Kaupapa Ngai Tahu Resource Management Strategy for the Canterbury Region</p>	<p>Consider</p>	<p>Address the matter and record That has been done in our decision; but weight is a matter for judgment considering the evidence.</p>

1.6 Resource Management Act 1991 (RMA)

The key provisions of the Resource Management Act of direct relevance to this topic include:

Section 6 – Matters of national importance

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance:

- (a) *the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development.*
- (d) *the maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers.*

It is noted that these s6 matters are more substantively addressed through the relevant chapters. However, they are relevant to consider in the appropriateness of the Open space and recreation chapter.

The zoning of land as open space can assist in preserving the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and to protect them from inappropriate subdivision, use, and development by only providing for appropriate development.

Some of the holiday huts are in areas that are subject to significant risk from natural hazards including coastal erosion, and coastal and river inundation. Therefore, the provisions for these clusters of holiday huts will need to ensure that any risk to property and human life from flooding and coastal erosion is appropriately managed including avoiding development in high-risk areas.

The zoning of land as open space can maintain and enhance public access to and along the coastal marine area, lakes, and rivers. It is just that the open spaces may increase the likelihood of public access being retained/maintained to the CMA and the Ōpihi and Rangitata Rivers.

Furthermore, any provisions applying to the holiday huts must preserve the natural character of coastal environment and the Ōpihi and Rangitata Rivers, recognising that the existence of these clusters of holiday huts may have already influenced natural character.

Section 7 – Other matters

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have regard to—

- (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.*

Open space can contribute to the overall amenity of an area by providing relief from built development as well as being a pleasant place to view and use. They can also often contribute positively to the quality of the surrounding environment.

The clusters of holiday huts have their own character and amenity values, which are valued by the community and are distinct from the residential zones of the district. They are often in contrast to their rural and natural surroundings but have no greater visual effect than a ‘residential’ settlement. It will be important to ensure that these clusters of holiday huts retain a reasonable quality of development and maintenance of huts can be undertaken.

Section 31 – Functions of territorial authorities

- (1) Every territorial authority shall have the following functions for the purpose of giving effect to this Act in its district:*
 - (a) the establishment, implementation, and review of objectives, policies, and methods to achieve integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district:*
 - (b) the control of any actual or potential effects of the use, development, or protection of land, including for the purpose of—*
 - (iia) the prevention or mitigation of any adverse effects of the development, subdivision, or use of contaminated land.*

Provisions in the Plan will manage the potential adverse effects of activities and built form in the Open Space and Recreation Zones to minimise impacts on the surrounding area and the character, amenity, and purpose of sites.

1.7 National Policy Statements

A territorial authority must prepare and change its district plan in accordance with national policy statements.³ The proposed District Plan must give effect to National Policy Statements.⁴ The following National Policy Statements are of relevance to the Open space and recreation topic.

<p>National Policy Statement for Electricity Transmission</p>	<p>Policy 7 seeks that the planning and development of the transmission system should minimise adverse effects on urban amenity and avoid adverse effects on town centres and areas of high recreational value or amenity and existing sensitive activities.</p> <p>Policy 8 seeks that in rural environments, planning and development of the transmission system should seek to avoid adverse effects on areas of high recreation value and amenity and existing sensitive activities.</p>
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³ RMA section 74(1)(ea)

⁴ RMA section 75(3)(a)

New Zealand National Coastal Policy Statement	Matters relevant to natural character in the NZCPS will be addressed in the section 32 report for the Coastal Chapter.
NPS for Freshwater Management 2014 (amended 2017)	The zoning of land such as esplanade reserves as open space creates a buffer between waterbodies and activities, and Limiting the ability for the number of holiday huts to increase and therefore minimising the need for additional wastewater discharges may assist the Council in meeting its water quality requirements under the NPS-FM.

1.7.1 National Environmental Standards

A territorial authority must prepare and change its district plan in accordance with any regulations.⁵ The following National Environmental Standards are regulations and are of relevance to the Open space and recreation topic:

National environment standard	Relevance
Resource Management (National Environmental Standard for Plantation Forestry) Regulations 2018	The National Environment Standard for Plantation Forestry 2017 permits forestry to be planted across the district and consent for this activity except that under clause 6 (1) a rule in a plan may be more stringent than these regulations if the rule gives effect to— (a) an objective developed to give effect to the National Policy Statement for Freshwater Management; (b) any of policies 11, 13, 15, and 22 of the New Zealand Coastal Policy Statement 2010. Policy 13 of the NZCPS relates to the preservation of natural character and therefore more stringent rules can be applied to areas with outstanding, very high and high natural character.
Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2010	The NES set out a national framework of permissions and consent requirements for activities on existing electricity transmission lines. They specify <ul style="list-style-type: none"> consent requirements for activities which fail to meet the permitted activity conditions that electricity transmission activities are permitted, subject to terms and conditions to ensure that these activities do not have significant adverse effects on the environment the resource consent requirements for electricity transmission activities that do not meet the terms and conditions for permitted activities. Activities that are permitted include: <ul style="list-style-type: none"> operating existing transmission lines maintaining conductors (wires) and adding a limited number of conductors provided limits on electric and magnetic fields are not exceeded signs on transmission line support structures (within specified size limits)

⁵ RMA section 74(1)(f)

	<ul style="list-style-type: none"> strengthening, upgrading and replacing support structures and foundations.
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1.7.2 National Planning Standards

A territorial authority must prepare and change its district plan in accordance with any regulations.⁶ The National Planning Standards require that all District Plans must include an Open Space and Recreation Zone chapter if relevant to the district.⁷ This chapter must be included under the Zones section of the District Plan, in Part 3: Area Specific Matters.⁸

As the Timaru District has open space and recreation spaces, an Open Space and Recreation Zones chapter should be provided that:⁹

- only contains the zones listed in table 13 consistent with the description of those zones
- provisions developed for each zone must manage the use, development, and protection of natural and physical resources in it, in accordance with Part 2 of the RMA.

The relevant open space and recreation zones are:

- Natural open space.
- Open space; and
- Sport and active recreation.

The National Planning Standards sets out the spatial layers for district plans (Table 18). Of specific reference to the Open space and recreation chapter, Table 18 states that a precinct spatially identifies and manages an area where additional place-based provisions apply to modify or refine aspects of the policy approach or outcomes anticipated in the underlying zone(s).¹⁰ If used, precincts that apply to only one zone must be located within the relevant zone chapter or section¹¹.

There are several terms defined in the National Planning Standards, but none have relevance to the Open space and recreation chapter.

1.7.3 Canterbury Regional Policy Statement 2013

The key provisions of the Regional Policy Statement of direct relevance to this topic include:

Chapter 5 - Land Use and Infrastructure

The CRPS includes policies seeking:

5.2.1 Objective – Location, design, and function of development (Entire Region)

Development is located and designed so that it functions in a way that:

- achieves consolidated, well designed, and sustainable growth in and around existing urban areas as the primary focus for accommodating the region’s growth; and
- enables people and communities, including future generations, to provide for their social, economic, and cultural well-being and health and safety; and which:
 - maintains, and where appropriate, enhances the overall quality of the natural environment of the Canterbury region, including its coastal environment, outstanding natural features, and landscapes, and natural values;
 - enables rural activities that support the rural environment including primary production.

⁶ RMA section 74(1)(ea)

⁷ National Planning Standards, District Plan Structure Standard, Mandatory direction 3.

⁸ National Planning Standards, District Plan Structure Standard, Table 4

⁹ National Planning Standards, Zone Standard Framework, Mandatory direction 1

¹⁰ National Planning Standards, District Spatial Layers Standard, Mandatory direction 10

¹¹ National Planning Standards, Zone Standard Framework, Mandatory direction 1

5.3.2 Development conditions (Wider Region)

To enable development including regionally significant infrastructure which:

2. avoid or mitigate:
 - a. natural and other hazards, or land uses that would likely result in increases in the frequency and/or severity of hazards
 - b. reverse sensitivity effects and conflicts between incompatible activities, including identified mineral extraction areas.
- To ensure that substantial developments are designed and built to be of a high-quality, and are robust and resilient:
 1. through promoting, where appropriate, a diversity of residential, employment and recreational choices, for individuals and communities associated with the substantial development; and
 2. where amenity values, the quality of the environment, and the character of an area are maintained, or appropriately enhanced.

RPS Chapter 5 (Land Use and Infrastructure) addresses the provision of recreation and community facilities in terms of providing sufficient, and a choice of such facilities in urban areas. There is no detail as to how much or what facilities should be provided. It also addresses development which should avoid or mitigate natural and other hazards, or land uses that would likely result in increases in the frequency and/or severity of hazards.

The policies also require that development is appropriately and efficiently served for the collection, treatment, disposal or re-use of sewage and stormwater, and the provision of potable water, by:

1. avoiding development which will not be served in a timely manner to avoid or mitigate adverse effects on the environment and human health; and
2. requiring these services to be designed, built, managed, or upgraded to maximise their on-going effectiveness.

1.7.4 Iwi Management Plan of Kāti Huirapa

The Iwi Management Plan of Kāti Huirapa sets out a series of outcomes in relation to Mahika Kai, water quality and quantity, the protection and restoration of ecological biodiversity, indigenous vegetation removal, discharges to air, and place names. None of these matters are directly related to the provision and management of open space. However, there may be opportunities for planting in open spaces that will improve water quality and habitats for indigenous species.

1.7.5 Te Whakatau Kaupapa Ngāi Tahu Resource Management Strategy for the Canterbury Region

Te Whakatau Kaupapa Ngāi Tahu Resource Management Strategy is a statement of Ngāi Tahu beliefs and values and was prepared while the then Ngāi Tahu claim was before the Waitangi Tribunal, and prior to the RMA being enacted. It includes an overview of values and attitudes relating to natural resources, and policy statements concerning their future management. There is also a specific section on Arowhenua, including a case study of the Opihi River and catchment addressing abstraction, pollution, results of mismanagement, and future aspirations.

There are no specific policies that relate directly to providing for and managing open space. However, the proposed policies and rules in the Open space and recreation chapter may assist in achieving policies that seek to retain vegetation along the margins of rivers and lakes, provide habitats for indigenous flora and fauna and protection of urupā.

1.8 Other relevant documents

The other relevant documents for this topic include:

Documents	Relevance
National Guidelines for Crime Prevention through Environmental Design (CPTED)	Spaces for recreation activities or with high amenity values are used by the public to connect to other places or to spend time or play sports. Such public spaces must be designed and developed to reasonably prevent crime. All seven qualities identified in the CPTED are of relevance to the Open Space and Recreation Zone.
Parks Categories and Levels of Service	This document prepared by The New Zealand Recreation Association (NZRA) identifies categories for parks and reserves which are used by councils to identify and manage the level of service for each category. These categories could be relevant to the approach used in the Timaru Plan as they provide the basis for the proposed zoning of open space and recreation zone in the district.
Timaru District Council Parks Strategy 2012-2022	<p>This is a high-level document to identify existing land resources, to identify the need for additional park land to meet future demographic changes, and to support requirements for reserves contributions arising from development. The Park Strategy is a vision for parks in the Timaru district that, while not binding, gives an indication of Council's intentions for the future provision of park land.</p> <p>The Parks Strategy:</p> <ul style="list-style-type: none"> • Provides an overall framework for reserve management plans to be prepared. • Provides general development standard guidelines for each park category. • Analyses current future demand for parks • Identify current deficiencies and future needs for each type of park category. • Provide the context and framework for development contribution requirement • Establish levels of service for each park category.
Local Government Act 2020	<ul style="list-style-type: none"> • The purpose of this Act is to provide for democratic and effective local government that recognises the diversity of New Zealand communities. • Section 11A – The Council is required to have regard to the contribution that reserves, and other recreation facilities and community amenities make to its communities. • S198 – S211 – enable the taking of development contribution to provide for, amongst other services, open space and recreation facilities.
Reserves Act 1977	<p>The Reserves Act 1977 is administered by the Department of Conservation and local authorities (such as TDC) for the purposes of providing for the preservation and management of areas of New Zealand possessing recreation use or potential, whether active or passive, or natural, scenic, scientific, educational, community, or other special features or value. In addition to the preservation of access for the public to and along the seacoast, its bays and inlets, and offshore islands, lakeshores, and riverbanks.</p> <p>Its intent reflects that of the RMA, and it is implemented through the preparation of reserve management plans.</p>

Camping Ground Regulations 1958	Camping grounds must comply with the provisions of these regulations, which control the marking of sites (clause 5), minimum size of camping sites (clause 6) and cabins (clause 7) lighting (clause 8) and all-weather access from the entrance to the camping ground to the site of every relocatable home (clause 12)/
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2 Evaluation of Objectives

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

The assessment must identify and assess the benefits and costs of environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including opportunities for economic growth and employment. The assessment must, if practicable, quantify the benefits and costs and assess the risk of acting or not acting if there is uncertain or insufficient information available about the subject matter.

The proposed provisions relevant to the Open Space and Recreation chapter have been assessed in accordance with the following issues:

1. Issue 1 - The need to provide a clear understanding of the character and amenity anticipated to be maintained in each zone and to recognise the unique characteristics of the precincts.
2. Issue 2 – The need to specifically provide for cemeteries in the urban areas of the district.
3. Issue 3 – The need for clear objectives, policies and rules that manage activities within the clusters of holiday huts to avoid or minimise risks to human life and property from river flooding, coastal erosion, and inundation, and differentiate the distinct character of the holiday huts from the residential zones of the district.
4. Issue 4 – Recognise the distinct character and importance of Caroline Bay as well as its location within the coastal environment.

2.1 Scale and significance

The table below sets out the scale and significance of managing the open space and recreation areas in the district in terms of Council’s statutory obligations, who may be affected by any proposed changes to the management regime, the type of effects that may occur and where in the district is mostly likely to be affected by the proposed changes to the District Plan. This will inform the nature and extent of the analysis of the proposed changes to the Open space and recreation zone provisions. For example, proposed provisions that will result in an overall high level of scale and significance will require a more in-depth analysis of proposed objectives, policies and rules including, potentially, an economic analysis, compared to changes that will have a low-level significance.

Issue: Management of Open and Recreation Space		
Reasons for change in policy	District Plan Review. Approach in National Planning Standards. Having regard to the efficient use and development of natural and physical resources; the maintenance and enhancement of amenity values; and the maintenance and enhancement of the quality of the environment in the Resource Management Act.	High

	Giving effect to higher level RMA document (RPS).	
Relevant Statutory Considerations / Drivers	RMA Sections 6, 7 and 31 RPS Chapter 5.	Medium
Degree of shift from status quo required	A moderate shift to give effect to the zoning approach in the National Planning Standards and to address concerns raised by the community as to the management of adverse effects and the Council as to providing for recreation activities and the holiday hut precinct.	Medium
Who and how many will be affected?	This is likely to be limited to the Council, users of the open space and recreation facilities especially sports clubs, immediately surrounding landowners, hut owners and iwi.	Medium
Degree of impact on, or interest from iwi / Maori	It is likely that iwi will have a particular interest in this topic because they own land at the Waipopo huts and broadly want good design and amenity outcomes, and open spaces may protect sites of significance including urupā.	High
When will affects occur?	Effects will occur on an on-going basis if development and activities are not adequately provided for, and/or potential adverse effects appropriately managed especially about natural hazards.	Medium
Geographic scale of impacts / issue	Open space and recreation areas are found throughout the district from the coast to the lower slopes of Peel Forest. The holiday huts are found along the coast at the mouth of the Rangitata River, along the Ōpihi River and on the lower slopes of Peel Forest.	Low/Medium
Type of effect(s)	The need to obtain consent for a range of recreation activities and facilities could limit the provision of such facilities in the district meaning the Council may fail to provide for the health and wellbeing of the community. Sites adjacent to open space and recreation areas could be adversely affected by light spill, over-bearing building bulk, traffic generation and noise. The character and amenity of Caroline Bay is adversely affected by future development. Increased high level of risk from natural and coastal hazards to development in the holiday hut precinct and Caroline Bay precinct.	Low/Medium
Degree of policy risk, implementation risk, or uncertainty	The open space and recreation areas are long-established, and the effects of associated activities and facilities are known and can be appropriately managed.	Low
Overall Assessment of Scale and Significance		Medium

2.2 Approach to managing the Open Space and Recreation Zones

It is proposed to establish a policy framework that recognises the diverse purposes and character of the open space and recreational spaces in the district. This will enable the potential effects of future activities and development to be assessed against the character and qualities of the zone ensuring that the purpose and level of amenity anticipated by the community is maintained and/or enhanced.

The policy framework also introduces three precincts: The Holiday Hut Precinct, the Caroline Bay Precinct, and the Te Aitaraikihi Precinct. The Holiday Hut Precinct forms part of the Open Space Zone and recognises the unique character of these clusters of holiday huts as well as their location, often in areas that are subject to natural hazards. The precinct seeks to align the activity status of buildings and structures with the natural hazard and coastal environment provisions and essentially discourage the establishment of new huts, thus the precinct provisions are contained within the Open Space Zone.

The Caroline Bay Precinct forms part of the Sport and Active Recreation Zone and is subject to many of the policies and rules of this zone. However, the specific precinct provisions are set out as a separate set of provisions reflecting their extent and the importance of Caroline Bay as an area of open space. The location of Caroline Bay in the coastal environment means it lies within a coastal high hazard area and the precinct seeks to align the activity status of buildings and structures with the coastal environment high hazard provisions.

The Te Aitaraikihi Precinct is within the Open Space Zone. The established nature of the activity and the wide range of uses that take place within the complex, have resulted in objective and policies and rules specific to this area, although the Open Space provisions still apply, unless otherwise noted. Under the Operative Plan, this area had a Recreation 2 zoning. There was a request to include this land as Māori Purpose Zone (MPZ), the process of what land is included within the MPZ is covered within that PDP Chapter and the accompanying S.32.

Natural Open Space Zone

The following are proposed to be permitted activities, subject to standards:

- Recreation activity limited to walking and cycling.
- Park management.
- Planting of vegetation.
- Department of Conservation activity excluding buildings and structures.
- Maintenance of existing tracks.
- Building or structure ancillary to a permitted activity.

Car parking is a discretionary activity and motorsport event, and motorsport facility is prohibited.

Open Space Zone

The following are proposed to be permitted activities, subject to standards:

- Recreation activity.
- Community, cultural and educational activity.
- Commercial activity limited to the sale of food and drink in temporary structures or mobile vehicles and sale of admission tickets for a recreational activity.
- Park management.
- Primary production, providing the activity is limited to grazing (except dairy cows) and the growing and harvesting of grass.
- Burials and cremations associated with existing cemeteries

- Public artwork.
- Playground equipment.
- Buildings and structures ancillary to a permitted activity including fences and facilities ancillary to existing cemeteries.

Car parking and caravan parks are discretionary activities and motorsport event, and motorsport facility is a non-complying activity.

Open Space Zone: Holiday Hut Precinct

The following are proposed to be permitted activities, subject to standards:

- Recreation activity.
- Park management.
- Primary production, providing the activity is limited to grazing (except dairy cows) and the growing and harvesting of grass.
- Public artwork.
- Playground equipment.

Buildings and structures are restricted discretionary activities (other than where natural hazard rules apply), and camping grounds and caravan parks, commercial activities and community activities are non-complying activities.

Open Space Zone: Te Aitarakihi Precinct

The following are proposed to be permitted activities, subject to standards:

- Recreation activity.
- Park management.
- Primary production, providing the activity is limited to grazing (except dairy cows) and the growing and harvesting of grass.
- Public artwork.
- Playground equipment.
- Community, cultural and education uses.
- Commercial, providing it's not industrial, large format retail or visitor accommodation.
- Residential uses for a limited number of nights a month.
- Building and structures are permitted for activities that are permitted (subject to standards).

Camping grounds and caravan parks and car parking are discretionary, while motorsport events area are non-complying activities.

Sport and Active Recreation Zone

The following are proposed to be permitted activities, subject to standards:

- Recreation activity.
- Community activity.
- Park management.
- Playground equipment.
- Public artwork.
- Fences.
- Buildings and structures ancillary to a permitted activity including fences and facilities ancillary to existing cemeteries.
- Commercial activity.

Car parking is a discretionary activity subject to standards and motorsport event and motorsport facility are a discretionary activity at Falvey Road (South Canterbury Car Club

property (Lot 1 DP 72733) and South Canterbury Stock Car Club premise, otherwise they are a non-complying activity.

Sport and Active Recreation Zone: Caroline Bay Precinct

The following are proposed to be permitted activities, subject to standards:

- Commercial activity includes events and functions that must not operate for no more than 90 days over a 12-month period.

Car parking is a discretionary activity subject to standards, and buildings and structures are non-complying.

2.3 Changes proposed

Operative Plan	Proposed Plan
Zones: Recreation 1 (Holiday Residential), Recreation 2 (Urban) and Recreation 3 (Rural).	Natural open space zone. Open space zone including the Holiday hut precinct and Te Aitarakihi precinct. Sport and active recreation zone. Sport and active recreation zone – Caroline Bay precinct.
Objectives and policies that seek to provide for recreational activities, ensure that there is provision for the continuation of existing recreational activities and those recreational opportunities are encouraged. Also, the enhancement of recreational land and facilities is promoted.	Objectives and policies that are specific to each zone and precinct, recognising their distinct purposes, character, and qualities.
Recreation 1	This zone is now the Holiday Hut Precinct with rules that reflect its susceptibility to natural hazards.
Recreation 2 (Urban) Recreation 3 (Rural)	These zones have been replaced with the Open Space and Sport and Active Recreation Zones and the Caroline Bay/Te Aitarakihi Precincts that reflect the purpose, character and qualities of the zone rather than their location in the district.
Recreation 2 (Urban): Household units and associated accessory buildings for caretakers or otherwise ancillary to the recreational use are permitted activities. Clubrooms, grandstands, changing rooms, toilets, shelters, storage facilities or buildings associated with recreational use are discretionary activities.	Buildings and structures for permitted activities are generally provided for, except in the Holiday Hut Precinct and the Caroline Bay precinct where they are non-complying activities due to the high hazard risk.

Recreation 3 (Rural): Changing rooms, toilets, shelters, or storage facilities are permitted activities.	
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2.4 Qualification of Costs and Benefits

Section 32(2)(b) requires that if practicable the benefits and costs of a proposal are quantified. It is considered that the provision of, and adverse effects on open spaces are difficult to quantify in monetary terms, therefore a detailed economic analysis has not been undertaken to assist in the quantification of benefits and costs.

2.5 Choice of Evaluation Method(s)

Given the scale and significance of the issues related to the open space and recreation zones and the regulatory directive to protect people and development from the risks associated with natural hazards, it is proposed to assess the preferred option against five other, feasible and realistic options. The options will be assessed using a cost-benefit analysis, given the discussion above on costs and benefits.

2.6 Proposed objectives

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

Natural Open Space Zone

NOSZ-O1 The purpose of the Natural Open Space Zone

The Natural Open Space Zone primarily provides for the ongoing management of land that has a conservation focus.

NOSZ-O2 Character and qualities of the Natural Open Space Zone

The character and qualities of the Natural Open Space Zone are maintained and improved and include areas::

1. with high visual, natural and cultural values; and
2. of indigenous vegetation, wetlands, riparian areas, and natural landscapes; and
3. With limited opportunities for walking and cycling; and
4. With very limited built form that is complimentary and consistent with the conservation purpose.

Open Space Zone

OSZ-O1 The purpose of the Open Space Zone

The Open Space Zone primarily provides for a range of passive and active recreation activities, as well as community activities, cemeteries and limited associated facilities and structures.

OSZ-O2 Character and qualities of the Open Space Zone

The character and qualities of the Open Space Zone are maintained, and where possible enhanced, and include:

1. areas that are safe and accessible for all users;
2. areas that contribute to the community's health and wellbeing needs;
3. open and spacious sites with a low density of built development;

4. established plantings; and
5. attractive and pleasant places where people can spend time relaxing and socialising.

OSZ-03 Character and qualities of cemeteries

Cemeteries are maintained as quiet places, that are characterised by an overall low density of built form, established plantings, trees and car parking.

PREC4-01 The character and qualities of the Holiday Home Precinct

The Holiday Hut Precinct is in areas with well-established clusters of buildings and structures located at Butlers Huts, Milford Huts, Waipopo, Rangitata, Stratheona huts and the Blandswood Huts that are characterised by:

1. their river and coastal locations, and in the case of the Blandswood Huts, the forested backdrop; and
2. due to their location at risk from natural hazard events; and
3. an informal and ad hoc layout, with buildings in some cases being located closer than within a residential area; and
4. generally small-scale development that is diverse in character, and uses a range of construction materials; and
5. living accommodation that is generally used on a short-term basis; and
6. land used for informal recreational activities; and
7. a lack of infrastructure, including formed roads, reticulated water supply, reticulated wastewater, and stormwater systems; and
8. activities that generally generate low levels of noise, except for occasional increases in noise levels arising from recreational activities including the use of watercraft and primary production in the adjoining rural zone; and
9. activities that generally generate low levels of vehicle movements.

PREC5-01 The character and qualities of the Te Aitarakihi Precinct

The character and qualities of the Te Aitarakihi Precinct comprise:

1. a moderate building site coverage; and
2. a built form of single or two-storey buildings; and
3. ample space around buildings; and
4. regular cultural, educational and community events.

3 Evaluation of Objectives

3.1 Proposed objectives

The table below sets out how the proposed objectives set out above achieve the purpose of the Act.

Category	Criteria	Comments
Relevance	Directed to addressing a resource management issue	Achieves. The objectives seek to enable a range of open space and recreation zones that provide for the health and wellbeing of the community as well as contributing to the amenity and character of the surrounding area. They also seek to acknowledge the potential effects of the activities and facilities that can occur within the zones, whilst reducing the significant risk from natural hazards to human life and property.
	Focused on achieving the purpose of the Act	Achieves. These objectives achieve s5 in relation to managing the use and development of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their health and safety while avoiding, remedying, or mitigating any adverse effects of activities on the environment. The objectives seek to achieve s6(h) by managing the significant risk from natural hazards on most of the holiday huts. These objectives achieve S7: the efficient use and development of natural and physical resources by maintaining and enhancing amenity values and the quality of the environment.
	Assists a council to carry out its statutory functions	Achieves. The objectives set out the role, purpose, character and qualities of the open space and recreation zones. This sets the framework for the policies and rules. As such, the provisions in the Plan will manage the potential adverse effects of activities and built form in the Open Space and Recreation Zones to minimise impacts on the surrounding area and the character, amenity, and purpose of sites. They will also assist in managing potential and actual adverse effects from natural hazards.
	Within scope of higher-level documents	Achieves. The objectives give effect to the RPS by ensuring that there are recreation spaces and facilities available to communities, and that future development will also be served by open space and recreation areas.

		<p>The higher-level documents do not specifically provide for holiday huts. However, they do seek to manage the impacts of natural hazards on people and property as well as not exacerbate hazard risks. It is considered that the proposed objectives will achieve this.</p>
Feasibility*	Acceptable level of uncertainty and risk	<p>Achieves.</p> <p>The Council has provided for, managed, and maintained open space, sports facilities, natural areas and Caroline Bay for many years. Te Aitarakihi is also long established. Therefore, the level of risk and uncertainty regarding the open space provisions is low.</p>
	Realistically able to be achieved within council's powers, skills, and resources	<p>Achieves.</p> <p>The Council is already achieving the provision and management of open space. Therefore, the proposed objectives can be achieved within Council's powers, skills and resources.</p>
Acceptability	Consistent with identified iwi/Māori and community outcomes	<p>Achieves.</p> <p>The feedback from the community on the discussion document suggests that there is general support for rules to manage the effects of recreation activities and facilities and to maintain the existing extent of the holiday huts and the continuation of uses at Te Aitarakihi. They understand that new development is unlikely to be appropriate within the Holiday Hut Precinct but that the cultural and community significance of Te Aitarakihi is recognised.</p>
	Will not result in unjustifiably high costs on the community or parts of the community	<p>Achieves.</p> <p>The proposed objectives will not result in unjustifiably high costs on the community or parts of the community as they provide a greater level of certainty to the Council and the public as to the character, purpose and amenity values anticipated in each zone. This will assist with preparing applications and decision making.</p>

4 Identification of Options

Option 1: Status Quo

This option involves a continuation of the operative Plan provisions including the current policies and rules.

Option 2: Introduction of revised Open Space and Recreation Zones, the Holiday Hut Precinct, the Caroline Bay Precinct, and the Te Aitarakihi Precinct and a framework within which to consider the effects of activities on the differing amenity, character, and purpose of each area.

This option reflects the National Planning Standard template and introduces three open space and recreation zones: Open Space, Sports and Recreation and Natural Open Space Zones, the Holiday Hut Precinct, the Caroline Bay Precinct and Te Aitarakihi Precinct. Each Zone and the Precincts has its own framework of objectives, policies and rules that reflect the intent and purpose of the zones/precinct.

The main changes to the zones are the recognition of their different purposes, character and amenity values as well as the introduction of performance standards to manage building scale, site coverage and hours of operation. These are intended to maintain the anticipated character and amenity of public spaces, and their ability to be used for recreational activities. However, a greater number of activities may require resource consent due to the introduction of such provisions. That said, the proposed provisions permit a certain scale of building whereas in the Operative Plan Recreation 2 Zone (Urban) buildings for recreational activities generally require consent as a discretionary activity. Consequently, some activities that may have required consent under the Operative District Plan are proposed to be permitted.

The Caroline Bay Precinct and its provisions are intended to reflect the distinctive character of Caroline Bay, its importance to the local community and tourists alike and the broad variety of activities that occur within the Bay. Caroline Bay is zoned as Recreation 2 in the Operative District Plan and as such most buildings and structures require consent except for household units and associated accessory buildings for caretakers or that are otherwise ancillary to the recreational use, and structures to provide pedestrian linkages from Caroline Bay to Stafford Street. No maximum scale or footprint is applied to such buildings and structures, or control over their design and appearance, which given the importance of Caroline Bay is inappropriate. As such, the Caroline Bay Precinct proposes to manage the replacement of existing buildings or structures that are the same scale and height as the building or structure to be replaced, and small scale buildings (36m²) as a restricted discretionary activity to enable consideration of design and appearance, CPTED principles, any reduction in the availability of space for recreation or community activities and the nature and extent of any effects on the character and qualities of Caroline Bay. Whilst small scale buildings could be provided for as permitted activities, there is a risk of undermining the character and amenity of Caroline Bay if a proliferation of such buildings occurred. This is considered to be a small but real risk.

The Te Aitarakihi Precinct has been introduced following feedback on the draft District Plan and recognises the unique set of activities that take place on this site, which is an extremely valuable cultural and community asset. The precinct provisions are somewhat more permissive than the other precincts in that the site is not located within an area subject to natural hazards and the range of uses established on the site, such as residential activities associated with the marae and education facilities, are already established. The facility is multicultural and of value to the wider community. The mixed collection of neighbouring zones, very much dampens any impact that use has on neighbouring properties.

Cemeteries are proposed to be zoned as Open Space rather than Rural to reflect their existing character and qualities, and to enable the appropriate management of buildings and structures whilst retaining a quiet setting.

The Holiday Hut Precinct provides for the hut settlements at Butlers, Milford, Waipopo, Rangitata, Stratheona huts which are located in generally peaceful river and coastal locations and the Blandwood huts which are located in Peel Forest. The holiday huts are zoned as Recreation 1 (Holiday Residential) Zone in the Operative District Plan. The majority of the holiday huts are at significant risk from surface, and river flooding and coastal inundation as well as coastal erosion at South Rangitata. Furthermore, most of the holiday huts are not connected to reticulated potable water and wastewater systems. The rules in the proposed plan are intended to reflect this.

The precinct proposes to reflect the natural hazard and coastal environment provisions by recognising that the holiday huts are generally located in high hazard areas and that they are not generally connected to reticulated water and wastewater systems. As such, buildings and structures in the Holiday Hut Precinct are restricted discretionary, and within the Caroline Bay Precinct are generally a non-complying activity. These rules are supported by policies that seek to manage adverse effects on the character and qualities of the holiday huts and risks to human health and safety.

4.3 Option 3: Reliance on Reserve Management Plans (RMPs) to manage activities within the Open Space and Recreation Zone

This option relies entirely on RMPs to determine appropriate activities and removes any other rules and standards from the Plan. Although the Plan would still need to contain Open Space Zones to give effect to the National Planning Standards.

4.4 Option 4: Apply precincts to all sites in the Open Space and Recreation Zone

This option would retain the Open Space and Recreation Zone but sites would essentially be grouped according to their role, purpose, character and qualities (reflecting the NZRA categories) and rules managing development and activity standards would be tailored to each precinct.

4.5 Option 5: Zone the holiday huts as Residential

Zone the holiday huts as Residential. This option would apply residential zone objectives, policies and rules. Albeit that there could be specific rules applying to the holiday huts.

4.6 Option 6: Include Te Aitarakihi in the Māori Purpose Zone

This option would apply the Proposed Māori Purpose Zone objectives, policies and rules to the Te Aitarakihi facility.

5 Evaluation of Options

5.1 Evaluation table

OPTION 1 <i>Status Quo</i>			
Benefits Environmental	Economic	Social	Cultural
<p>There is one zone that specifically provides for the holiday huts areas and their specific effects. Other types of open space are divided between Rural and Urban Open Space Zones.</p> <p>Many activities require resource consent and therefore potential adverse effects can be assessed on a case-by-case basis.</p> <p>Recognises the potential threat from natural hazards by requiring consent to rebuild and build holiday huts.</p> <p>Enables anticipated amenity values to be maintained and potential effects managed, to some extent</p>	<p>There may be savings in terms of time and cost as the Council and community are familiar with the provisions</p>	<p>Continuation of the existing approach provides familiarity along with a level of certainty to open space users and the community</p>	<p>Some protection and recognition of the cultural significance of some sites may occur in an ad hoc manner</p>
Costs Environmental	Economic	Social	Cultural
<p>The zones are generally applied to urban and rural areas rather than to activity types.</p> <p>The setbacks are quite narrow with the potential for adverse effects on</p>	<p>Commercial activities especially in Caroline Bay and the Southern Trusts Event Centre generally require consent, which is a cost to the landowner (usually the Council) and clubs who lease</p>	<p>The importance of Caroline Bay to the community is not recognised.</p> <p>May not protect all private property from adverse effects such as shading and over-bearing building bulk.</p>	<p>Cultural and historic heritage values are subject to consideration under separate chapters in the Plan and consents may be required in accordance with provisions external</p>

<p>adjoining sites from over-bearing building bulk and shading.</p> <p>Absence of guidance over the scale of building that can be built and extent of impervious surfacing.</p> <p>The wording of the policies is potentially confusing, and they are written as rules rather than policy guidance.</p> <p>Does not provide a framework within which to consider the differing amenity, characteristics, and purpose of the Recreation Zones. This could be costly to the Council and community as activities that undermine the character and amenity of an area could be established</p>	<p>and operate such facilities.</p> <p>Most buildings, even on sites with existing large-scale buildings, require resource consent with costs to the Council in terms of processing and the applicant.</p> <p>It is unclear if any park maintenance activities are permitted, and this could require Council to obtain resource consents to undertake routine works.</p> <p>All replacement holiday huts, and accessory buildings require resource consent with costs to the Council in terms of processing and the applicant in terms of preparation.</p> <p>The ability to build replacement huts at Milford as a discretionary activity despite the high hazard risk</p>	<p>Potential activities such as organised sports could occur in neighbourhood parks/open spaces thus providing little reassurance to the community of the nature and extent of effects anticipated within each open space zone</p>	<p>to the Recreation Zones.</p> <p>Open space and recreation facilities may conflict with cultural and historic heritage values</p>
<p>Efficiency</p>	<p>It is considered that the status quo is not an efficient method of meeting the objectives given the costs identified above and the issues identified with the provisions.</p> <p>However, it does have some merit as the provisions have maintained the existing character and qualities of the holiday huts.</p>		
<p>Effectiveness</p>	<p>The existing provisions do not recognise the range of open space and recreation facilities that exist in the district. The policies, along with many of the standards, are too generic to ensure that the differing character and qualities associated with each Recreation Zone are adequately provided for. The wording of the existing policies and explanations applying to the holiday huts appear to be contradictory and could be confusing to the public as well as decision makers. There is also no clear statement of the purpose, character, and amenity of the clusters of holiday huts.</p> <p>The operative Plan does not give effect to the RPS or implement the National Planning Standards.</p>		

Strategic Direction(s)	This would achieve the strategic objective by providing for a range of recreational uses as well as managing the effects of activities both within sites and on adjoining sites.
Overall Appropriateness of Option 1	This option is not an appropriate way to achieve the preferred objectives as the policies are too narrow in their focus and there is a lack of differentiation in the rules and standards to provide for the characteristics and qualities associated with each of the areas. The approach does not implement the mandatory National Planning Standards.

OPTION 2

Three Open Space and Recreation zones and the Holiday hut, Te Aitarakihi and Caroline Bay Precincts and associated provisions

Benefits Environmental	Economic	Social	Cultural
<p>Provides a framework within which to consider the effects of activities on the differing purpose, character and qualities of areas included in the Open Space and Recreation Zones. This will enable the Council to determine if an activity will be appropriately located (i.e., not undermine the intent of the zone).</p> <p>Recognises the different characteristics and purpose of open space and recreation areas in the district including specific provisions for the distinctive character of the precincts.</p> <p>Provides appropriate control over built form and the location of buildings to facilitate the maintenance and enhancement of the character and</p>	<p>Fewer consents may be required due to more enabling provisions that reflect the use of open spaces.</p> <p>Consenting costs could be reduced as the more directive policy framework provides clearer direction on the intent, purpose, and use of open space.</p> <p>Maintains the value of adjoining private property by managing potential effects such as shading and over-bearing building bulk.</p> <p>Generally, stringent controls on the building of huts within the clusters of holiday huts, which will assist in managing risks from natural hazards</p>	<p>Importance of Caroline Bay to the community is recognised.</p> <p>Protects private property from adverse effects such as shading and over-bearing building bulk.</p> <p>Potential activities such as organised sports cannot occur in neighbourhood parks/open spaces thus providing some reassurance to the community of the nature and extent of effects anticipated within each open space zone.</p> <p>Provides more certainty for the Council in its Parks role, operators in the zones and for adjacent landowners.</p> <p>Continues to provide for the holiday huts as peaceful places that the community values.</p> <p>Protects the health and safety of people and property by avoiding new buildings and structures in areas at</p>	<p>Cultural matters will be enhanced by a permissive set of provisions within the Te Aitarakihi precinct allowing the continuation of an established community and cultural resource.</p>

<p>qualities of sites as well as the surrounding environment.</p> <p>Reduced likelihood of conflict between different activities given the ability to define sites for specific purposes/activities. The community has certainty over the types of activities that may be undertaken in open space areas.</p> <p>Provides for cemeteries rather than these only being provided for in the Rural Zone provisions, where activities could conflict with the anticipated character and qualities.</p> <p>Specifically provides for recreational activities (other than motorsport) instead of open space.</p> <p>Recognises the potential for reverse sensitivity effects on adjoining primary production.</p> <p>Recognises the threat from natural hazards and servicing constraints by requiring consent to build new holiday huts</p>		<p>high risk from natural hazards</p>	
<p>Costs Environmental</p>	<p>Economic</p>	<p>Social</p>	<p>Cultural</p>

<p>Some 'out of zone' activities may require consent.</p> <p>Matters such as noise, traffic, parking, and heritage are contained in separate chapters and consent may be required under different provisions.</p> <p>Open space activities and public access provision may conflict with maintaining and enhancing ecological, landscape, heritage, natural and amenity values.</p> <p>Existing and replacement (cannot extinguish existing use rights) holiday huts remain at risk from natural hazards.</p> <p>Need to continue to provide flood mitigation measures which can generate adverse effects on the environment in terms of visually amenity and impacting on natural processes</p>	<p>Cost to the Council of administering the new provisions in terms of processing consent applications.</p> <p>Costs to developers and the Council of consent for any 'out of zone' activities, along with more stringent built form and activity standards.</p> <p>All development within the holiday hut precinct requires resource consent with costs to the Council in terms of processing, and the applicant</p>	<p>Proposed zoning may limit the use of some open space land where it is used for multiple purposes. This could result in new activities not establishing due to uncertainty and, in turn, result in unanticipated social costs due to less recreation and open space opportunities being available</p>	<p>Cultural and historic heritage values are subject to consideration under separate chapters in the Plan, and consents may be required in accordance with provisions external to the Open Space and Recreation Zone.</p> <p>Open space and recreation facilities may conflict with cultural and historic heritage values.</p> <p>Holiday huts may conflict with cultural values</p>
<p>Efficiency</p>	<p>It is considered that this option is an efficient method of meeting the objectives given the costs identified above.</p>		
<p>Effectiveness</p>	<p>It is considered that this option will achieve the objectives in the Plan because:</p> <ul style="list-style-type: none"> • they enable each zone to be effectively managed, recognising its distinctive amenity and character. • the policies provide clear direction as to the purpose, character and qualities of the holiday huts, Caroline Bay, and Te Aitarakahi. • all relevant provisions are contained in the District Plan, have been subject to consideration under Part 2 of the RMA and are clear and easy to understand. Consequently, there is no need to reference and interpret other documents such as the Council's Parks Strategy. 		

	<ul style="list-style-type: none"> the rule framework reflects the amenity anticipated in each zone by controlling the scale of development that can be built as of right. the standards are aligned with the anticipated nature and scale of built development in each zone.
Strategic Direction(s)	<p>This would achieve the strategic objective by providing for a range of recreational uses as well as managing the effects of activities both within sites and on adjoining sites. It also provides for the holiday huts and Caroline Bay.</p> <p>The proposed approach also gives effect to the RPS and implements the National Planning Standards.</p>
Overall Appropriateness of Option 2	This set of provisions is appropriate given that the benefits outweigh the costs, and there are considerable efficiencies to be gained from adopting these provisions.

OPTION 3

Rely entirely on RMPs to determine appropriate activities

Benefits Environmental	Economic	Social	Cultural
Enables a broader range of effects/issues to be managed as this approach would not be constrained by the RMA. Applications could potentially be more easily declined if they are found to be 'inappropriate'	Applications under the Reserves Act are subject to different notification processes, and there is no requirement for submissions to be heard which could save applicants and the Council time and costs. Potentially enables a broader range of uses and therefore more economic use of open space and recreation land, which would benefit both the Council and applicants.	Open spaces would be developed and managed in accordance with an agreed community document (RMP).	None
Costs Environmental	Economic	Social	Cultural
An Open Space and Recreation Zone or precinct would still be required for some sites, but the rules would refer to an RMP. However, provisions would need to be drafted	Given the need to retain an Open Space and Recreation Zone, this could lead to unnecessary confusion, duplication and increased costs. Some activities would still need to	Could provide for a broad range of activities that undermine the intended purpose of open space and recreation areas	Cultural and historic heritage values may be subject to consideration under separate chapters in the Plan and consents may be required in accordance with

<p>for those sites without an RMP and to address natural and coastal hazards. This type of approach could cause confusion. The Council may not be carrying out its duty/requirements under the RMA to manage the use, development, and management of open and recreation spaces in a way which enables communities to provide for their health and safety while managing the adverse effects of activities on the environment. The matters usually considered under the RMA such as amenity values may not be specifically considered under a Reserve Act process. Activities that could have an adverse effect on the amenity of residential areas would no longer be managed as a resource management function, as approval would only be required under the Reserves Act (presumably administered by the Parks Dept). The focus too may be different given the difference in role, responsibilities and purpose</p>	<p>apply for consent under the Plan especially with regard to natural and coastal hazards</p>		<p>provisions external to the Open Space and Recreation Zones. Open space and recreation activities may conflict with cultural and historic heritage values</p>
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Efficiency	This approach may be efficient in terms of providing for activities in the open space and recreation zones, but it does not give effect to the RMA.
Effectiveness	This approach is not considered to be effective as the Reserves Act, and consequently RMPs, and the RMA have different purposes. RMPs provide for the management of specific sites without necessarily having to consider the management of the effects of activities as required under the RMA. This includes such matters as the provision of public access to waterbodies, amenity values and effects on neighbours.
Strategic Direction(s)	This would likely achieve the strategic objective by providing for a range of recreational facilities and spaces that are attractive, accessible and located across the district. However, the ability to manage the effects of activities which can affect the attractiveness of sites may not be achieved through the Reserves Act as it is not the purpose of this legislation. The proposed approach would not necessarily give effect to the CRPS and would not implement the National Planning Standards.
Overall Appropriateness of Option 3	This is the least appropriate approach given that RMPs are not prepared under the RMA and are not required to address effects on the environment in the same manner as a district plan.

OPTION 4

Apply precincts to all open space and recreation sites, with rules tailored to each precinct

Benefits Environmental	Economic	Social	Cultural
Most potential adverse effects would be managed through specific controls applicable to each precinct. May recognise unique or specific characteristics of the holiday huts, Caroline Bay and Te Aitarakahi	<p>Activities being specifically identified and provided for may lead to a reduction in consent applications and corresponding notification. This may lead to lower costs being incurred by the Council and applicants.</p> <p>If the land is no longer required for open space and recreational activities the precinct can be removed with the provisions of the underlying zone then applying – likely to be residential or rural</p>	Making specific provision for identified activities offers certainty to the community in terms of the use and purpose of open space and recreation areas. Offers a simple plan structure that would be relatively easy for people to understand and use, whilst still providing for open space and recreation activities	None

Costs	Economic	Social	Cultural
Environmental	May not recognise unique or specific characteristics and/or uses of some open spaces and enable too broad a range of activities, particularly in accordance with the underlying zone.	Use of land for activities in accordance with the underlying zone, thereby reducing the area of space available for recreation activities and the amenity and character of the open space zones	Cultural and historic heritage values may be subject to consideration under separate chapters in the Plan and consents may be required in accordance with provisions external to any precinct. Open space and recreation facilities may conflict with cultural and historic heritage values
Efficiency	It is considered that given the costs relative to the benefits, this option has a moderate level of efficiency.		
Effectiveness	<p>Whilst removing complexity, the fact that many of the open space and recreation areas are not unique and are provided for across the district suggests that creating several precincts is not necessarily an effective method.</p> <p>Precincts could be highly effective in applying tailored provisions to the context and use of open space and would also be effective in providing for the use and development of open space anticipated at the time the provisions are prepared. However, this approach could be ineffective in catering for future uses that were not anticipated at the time the precincts were prepared. Furthermore, the policy framework and provisions required to recognise the character and amenity of the open spaces would need to be extensive and the precinct would essentially act as a zone.</p> <p>Consequently, this approach could unduly constrain the use of open space, which would be ineffective in achieving the objective of meeting future community needs.</p>		
Strategic Direction(s)	<p>This would achieve the strategic objective by providing for a range of recreational uses as well as managing the effects of activities both within sites and on adjoining sites.</p> <p>The proposed approach also gives effect to the RPS but may not necessarily implement the intent of National Planning Standards, given that it may not be feasible to only apply 'additional place-based provisions to modify or refine aspects of the policy approach or outcomes anticipated in the underlying zone'. This would depend on the underlying zone i.e. an underlying residential zone may require significant modification of the policy approach to provide for open space and recreational activities.</p>		

Overall Appropriateness of Option 4	The costs and benefits of applying and using precincts is balanced and therefore could be deemed to be an efficient method of managing the Open Space and Recreation Zones. However, the method is considered to be ineffective for the reasons discussed above.		
OPTION 5 <i>Apply precincts to all open space and recreation sites, with rules tailored to each precinct</i>			
Benefits Environmental	Economic	Social	Cultural
New development would be unlikely to meet the required minimum density or other development standards, and therefore would require consideration through a consent pathway to assess its potential effects. This may assist in managing effects on the character and qualities of the clusters of holiday huts	Increase in land value if land can be used for residential purposes	Potentially provides cheaper housing options outside of the main settlements in the district.	None
Costs Environmental	Economic	Social	Cultural
Potentially provides cheaper housing options outside of the main settlements in the district.	May result in pressure being placed on the Council to introduce more flood mitigation measures with consequent costs to the Council and community. In addition, the Council may be pressured to provide reticulated water and wastewater services. May increase consenting costs due to	Could provide for a broad range of activities that undermine the intended purpose of the holiday huts. May put pressure on the Council to enable development in high hazard areas with a consequent increase in potential adverse effects on life and property	None

	less directive or inappropriate policy framework		
Efficiency	This approach would not be efficient given the costs identified above.		
Effectiveness	This approach is not considered to be effective in terms of providing for activities in the clusters of holiday huts as it would not reflect their purpose or character.		
Strategic Direction(s)	This would not achieve the strategic objectives as it would not provide for recreational activities.		
Overall Appropriateness of Option 5	This is the least appropriate approach to managing the clusters of holiday huts given that it does not recognise their purpose, character or amenity values or the significant risks from natural hazards.		
OPTION 6			
<i>Zone the Te Aitarakihi as Māori Purpose Zone</i>			
Benefits Environmental	Economic	Social	Cultural
New development would benefit from lesser setbacks that are in place for the proposed MPZ, however, the main objective behind the MPZ is for residential accommodation, which given the location and amenity of sites surrounding Te Aitarakihi may result in sub-optimal living environments.	Increase in land value if land can be used for residential purposes	Potentially provides cheaper housing options outside of the main settlements in the district.	None
Costs Environmental	Economic	Social	Cultural
Potentially provides cheaper housing options outside of the main settlements in the district.	May result in pressure being placed on the Council to introduce more infrastructure with consequent costs to the Council and community.	Could provide for a broad range of activities that undermine the intended purpose of the precinct, which is predominately recreation and leisure, with open space	Feedback on the draft district plan attracted differing opinions and some conflict as to what was appropriate to zone as MPZ. The Te Aitarakihi precinct appears to provide a more

			appropriate suite of uses than the MPZ currently does.
Efficiency	This approach would not be efficient given the costs identified above.		
Effectiveness	This approach is not considered to be effective in terms of providing for activities as it would not reflect the MPZ overarching objective to provide housing.		
Strategic Direction(s)	This would not achieve the strategic objectives.		
Overall Appropriateness of Option 6	This is not an appropriate approach to managing the range of uses sought by the MPZ, as the existing uses currently undertaken there do not recognise the MPZ's purpose, character, or amenity values. The main objective of the MPZ is to utilise the former Māori Reserves which were set aside for settlement, for settlement purposes.		

5.2 Risk of Acting or Not Acting

Where there is uncertain or insufficient information, an evaluation of the risk of acting or not acting is important. In this case it is considered that there is little uncertainty in the issue or the potential significance of the issue. It is considered that given the use of Open Space and Recreation Zones across New Zealand, the current best practice detailed in section 1.4.4, the Council's Parks Department use of a Park Strategy (based on the NZRA document) and the Council's understanding and knowledge of how its open spaces are used, there is sufficient information to act.

It is therefore concluded that there is a low risk of acting in the proposed manner to introduce updated and replacement provisions to appropriately manage the Open Space and Recreation Zones.

6 Preferred Option

This evaluation has been undertaken in accordance with Section 32 of the RMA to identify the need, benefits and costs and the appropriateness of the proposal having regard to its effectiveness and efficiency relative to other means in achieving the purpose of the RMA. The evaluation demonstrates that Option 2 is the most appropriate option as:

- The proposed provisions will implement the strategic objectives by:
 1. providing attractive, accessible open spaces that will support future residential intensification and the physical, social, and cultural wellbeing of the community.
 2. recognising the clusters of holiday huts and maintaining their character and qualities.
- The proposed zones recognise the range and differing characteristics of open space and recreation areas across the district.
- The objectives and policies set a framework to both provide for and manage three zones and two precincts that recognise the different character and purpose of the open space and recreation zones, the holiday huts and Caroline Bay.
- The policies also enable the consideration of the effects of activities on the different purposes, character and qualities of the Open Space and Recreation Zones, the Caroline Bay Precinct, the Holiday Hut Precinct, the Te Aitarakihi Precinct, as well as managing potential adverse effects from natural hazards.
- The rules and rule requirements reflect and respond to the different types of open space and recreation zones, the Holiday hut precinct and the Caroline Bay precinct and their associated characteristics, thus applying a more targeted approach to managing potential adverse effects.

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. The risks of acting are also clearly identifiable and limited in their extent.