Attachment 1: Section 32AA Assessment

Recommended Amendment	Options Evaluated	S32AA Assessment
TRA – Rule Activity Status • Amend TRA-R2 – R13 to default to restricted discretionary activities where compliance with the standards is not achieved, with specified matters of discretion as set out in **Attachment 2**.	• **Option 1:** Notified provisions – Discretionary Activity Status for TRA-R2 – R13 where compliance is not achieved. • **Option 2:** Recommended revised provisions – Restricted Discretionary Activity Status for TRA-R2 – R13 where compliance is not achieved, with specific matters of discretion for each rule. • **Option 3:** Alternative revision – Restricted Discretionary Activity Status for TRA-R2 – R13 where compliance is not achieved, with the same matters of discretion for each rule.	**Costs and benefits** Economic Option 1 has the highest economic cost associated with consenting costs for a discretionary application. Options 2 and 3 have similar economic costs with Option 2 being slightly lower costs as more specific matters of discretion would enable a more targeted assessment. Environmental, Social and Cultural Option 1 would be the most effective in managing adverse environmental, social and cultural costs associated with these activities as a discretionary activity status would enable a wider assessment of applications. However, these rules manage fairly specific activities with well-known and identifiable effects which can be addressed through the matters of discretion. Therefore, all options have similar environmental, social and cultural costs and benefits. **Efficiency** Option 2 is the most efficient as it enables targeted assessment through restricted discretionary application with specific matters of discretion. Option 3 is more efficient than Option 1, but generic matters of discretion could lead to uncertainty when preparing and assessing applications and could result in a de facto discretionary assessment. **Effectiveness** The options are all equally effective in achieving the TRA objectives as the rules manage discrete and familiar RMA issues that can be appropriately assessed as restricted discretionary activities. **Risks** There is no known risk due to insufficient information.

TRA – Integrated Transport Assessments **Amendments to the Integrated Transport Assessment Provisions** • Amend TRA-R15, R16, REQ1 and REQ2 as set out in **Attachment 2**.	• **Option 1:** Notified provisions – Retain TRA-R15, R16, REQ1 and REQ2 as notified. • **Option 2:** Recommended revised provisions – Minor amendments to TRA-R15 and R16 for clarity and rewrite TRA-REQ1 and REQ2 as set out in **Attachment 2**. • **Option 3:** Alternative revision – Increase the thresholds in TRA-R15 and R16 to not require ITAs for smaller scale developments. • **Option 4:** Alternative revision – Delete TRA-R16 and TRA-REQ2 and rely on a single rule (TRA-R15) to require ITAs.	**Costs and benefits** <u>Economic</u> Option 4 provides the highest short term economic benefits by reducing consenting costs. Option 3 is similar in that fewer activities would require consent. However, Options 1 and 2 have the highest long term economic costs by better managing effects on the transport network and integrating land use and transport planning. This will help reduce long term maintenance and installation costs related to the transport network. <u>Environmental, Social and Cultural</u> Options 3 and 4 will provide a more enabling rule framework for ITAs and may better enable people to provide for their social wellbeing. However, Options 1 and 2 best manage environmental, social and cultural effects. Options 1 and 2 also aim to promote a multi-modal transport system to improve accessibility for the public. This may provide increased opportunities for public and active transport and could reduce travelling costs. **Efficiency** Option 1 is not effective as there are technical wording issues with the rules that could cause uncertainty. Additionally, the information requirements under Option 1 are too similar and do not efficiently distinguish the different levels of ITA requirements. There are no identified inefficiencies with the thresholds in Option 2 to justify their amendment. Option 4 lacks efficiency in the sense that there would only be one set of information requirements to apply to developments of all sizes. This could lead to disproportionately large or small assessments based on the scale of activity. **Effectiveness** Options 1 and 2 are the most effective in managing adverse effects on the transport network and achieving the notified TRA objectives and policies. Option 4 would not provide a clear distinction between the ITA requirements for relatively small scale developments compared to larger scale developments and could result in adverse effects on the transport network. **Risks** There is no known risk due to insufficient information.

EARTH-R1 – Subdivision • Comprehensive amendments to EARTH-R1 and deletion of EARTH-REQ1 as detailed in **Attachment 4**.	• **Option 1:** Notified provisions – A restricted discretionary activity status where compliance is achieved and a discretionary activity status where compliance is not achieved. • **Option 2:** Recommended revised provisions – Amended activity statuses and compliance standards and consequential amendments to the matters of control/discretion and information requirements as set out in **Attachment 4**. • **Option 3:** Alternative revision – Delete EARTH-R1.2 and R1.3 and EARTH-REQ1 and rely on the Subdivision Chapter rules and matters of control to manage adverse effects. • **Option 4:** Alternative revision – Include technical engineering standards within the rule which must be complied with as a controlled activity and map instability areas.	**Costs and benefits** Economic Option 1 has high economic costs with the most stringent consenting requirements and strict information requirements for every application. Options 2 and 3 reduce these costs by providing a controlled activity status and information requirements that are appropriate for the scale of the development. Option 4 has the highest economic costs related to the mapping of instability hazards across the district. Environmental and Social Option 3 has the highest environmental and social costs as the SUB Chapter does not sufficiently manage instability. Options 1, 2 and 4 have similar environmental and social costs and benefits but different mechanisms of achieving them. Cultural None identified. **Efficiency** Option 4 is inappropriate due to its inefficiency. The costs of mapping instability hazards across the district outweigh the benefits. Similarly, identifying appropriate standards to include within the rule would be difficult. Site suitability/geotechnical reports need to assess sites on a case by case basis rather than applying a one-size-fits-all set of rules. Option 1 is inefficient due to the high consenting costs of every application having to complying with detailed information requirements even when this may not be necessary. Options 2 and 3 are similarly efficient and more consistent with the status quo approach. **Effectiveness** Option 3 is ineffective because the matters of control referring to hazards and building and access location in the How the Plan Works Chapter[71] are not sufficient. Options 1, 2 and 4 are all effective methods of managing instability. However, as discussed in the s42A Report, it is anticipated that these provisions may be further reviewed as part of future rolling review plan changes. **Risks** There is no known risk due to insufficient information.

[71] HPW-R7.1(m), (n) and (t).

EARTH – Kauri dieback • ***Amendment to EARTH-R1*** Where: 1. The ~~E~~earthworks associated with subdivision do not occur within: …c. Three times the radius of the canopy root zone of a New Zealand Kauri tree (agathis australis). …	• **Option 1:** Notified provisions – Include no provisions relating to New Zealand Kauri Trees. • **Option 2:** Recommended revised provisions – Include a new rule relating to New Zealand kauri trees. • **Option 3:** Alternative revision – Include a new objective, new policy and new rule relating to New Zealand kauri trees as requested by DOC.	**Costs and benefits** Economic Option 1 has the lowest economic costs with no additional consenting costs or increased economic costs where consent is required. Option 3 has the highest economic costs by introducing a new consenting requirement and including additional objectives and policies to assess. Environmental, Social and Cultural Options 2 and 3 have the most environmental, social and cultural benefit by introducing a new rule to manage kauri dieback. Option 1 has the highest environmental, social and cultural costs with no management of kauri dieback. **Efficiency** Option 1 is efficient as there would be no rules or provisions to assess. Option 2 is more efficient than Option 3 because it avoids duplicative objectives and policies by relying on Chapter 17 to set the district wide policy framework. It is anticipated that Chapter 17 will be reviewed under the Significant Natural Areas plan change as part of the rolling review. **Effectiveness** Option 1 is not effective in managing kauri dieback. Options 2 and 3 are equally effective in managing the spread of plant pathogens **Risks** There is economic risk associated with Options 2 and 3 due to uncertainty of how many properties would be affected by the new rule.