



greater WELLINGTON
REGIONAL COUNCIL

Section 32 Report

Regional form, design and function

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1. Introduction

This report presents the Section 32 evaluation in accordance with the Resource Management Act 1991, “Consideration of alternatives benefits and costs” for the proposed Regional Policy Statement on the topic of ‘regional form, design and function’. Section 32 states:

32 *Consideration of alternatives, benefits, and costs*

(1) In achieving the purpose of this Act, before a proposed plan, proposed policy statement, change, or variation is publicly notified, a national policy statement or New Zealand coastal policy statement is notified under section 48, or a regulation is made, an evaluation must be carried out by—

.....

(c) the local authority, for a policy statement or a plan (except for plan changes that have been requested and the request accepted under clause 25(2)(b) of Part 2 of Schedule 1); or

(3) An evaluation must examine—

(a) the extent to which each objective is the most appropriate way to achieve the purpose of this Act; and

(b) whether, having regard to their efficiency and effectiveness, the policies, rules, or other methods are the most appropriate for achieving the objectives.

....

(4) For the purposes of [[the examinations referred to in subsections (3) and (3A)]], an evaluation must take into account—

(a) the benefits and costs of policies, rules, or other methods; and

(b) the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods.

(5) The person required to carry out an evaluation under subsection (1) must prepare a report summarising the evaluation and giving reasons for that evaluation.

(6) The report must be available for public inspection at the same time as the document to which the report relates is publicly notified or the regulation is made.

1.1 Structure of this report

Section 2 of this report outlines the regionally significant issues identified and the process of identification.

Section 3 outlines the objectives proposed in response to each issue and evaluates the appropriateness of each objective in accordance with the Resource Management Act.

Section 4 evaluates the appropriateness of the policy and method options proposed to achieve each objective. When evaluating the policy and method options, the range of options available is outlined first, and then each option is evaluated. There are four types of options discussed in each instance. These are:

(a) **Regulatory direction to district and/or regional plans and/or the Regional Land Transport Strategy**

This is where a regional policy directs matters that must be provided for within district and/or regional plans, or the Regional Land Transport Strategy. The method sets out when the provisions are to be included.

(b) **Regulatory direction as to matters to be given particular regard in resource management decision making**

This is where a regional policy sets out specific matters that are to be given “particular regard” when making resource management decisions. The method sets out when these matters are to be considered. This may include resource consent decisions, decisions on notices of requirements or when making decisions about reviewing, varying, replacing or otherwise changing district and/or regional plans.

(c) **Non-regulatory options**

This is where a regional policy and a method specifies non-regulatory programmes or action that will be put in place. The non regulatory methods include:

- (a) provision of information or guidance
- (b) integrating management
- (c) identification or investigation
- (d) providing support.

(d) **Doing nothing**

This is where no intervention, either regulatory or non-regulatory will occur.

Determining the most appropriate policies and methods is based on an assessment of the *effectiveness* and *efficiency* of the policy and method options, and the risks of acting or not acting when there is uncertain or insufficient information.

Effectiveness is a measure of how much influence a resource management intervention has or how successful it is in addressing the issues, in terms of achieving the desired environmental outcome. When evaluating the *efficiency* of the policy and method options both the benefits (social, economic and environmental) and costs (social, economic and environmental) are outlined. Each option is then deemed to be either efficient or inefficient. The following diagram outlines how this assessment is undertaken.

Effectiveness is a cumulative value, derived from the range of types and scope of influences or impacts of an intervention, towards achieving intended results and environmental outcomes. The effectiveness of an option is not able to be assessed as an absolute value. Rather, options are appraised as to whether they exhibit the qualities which contribute to ‘effectiveness’ and to what degree, and a determination is made as to the cumulative effect of the pertinent attributes in terms of high, medium or low ‘effectiveness’.

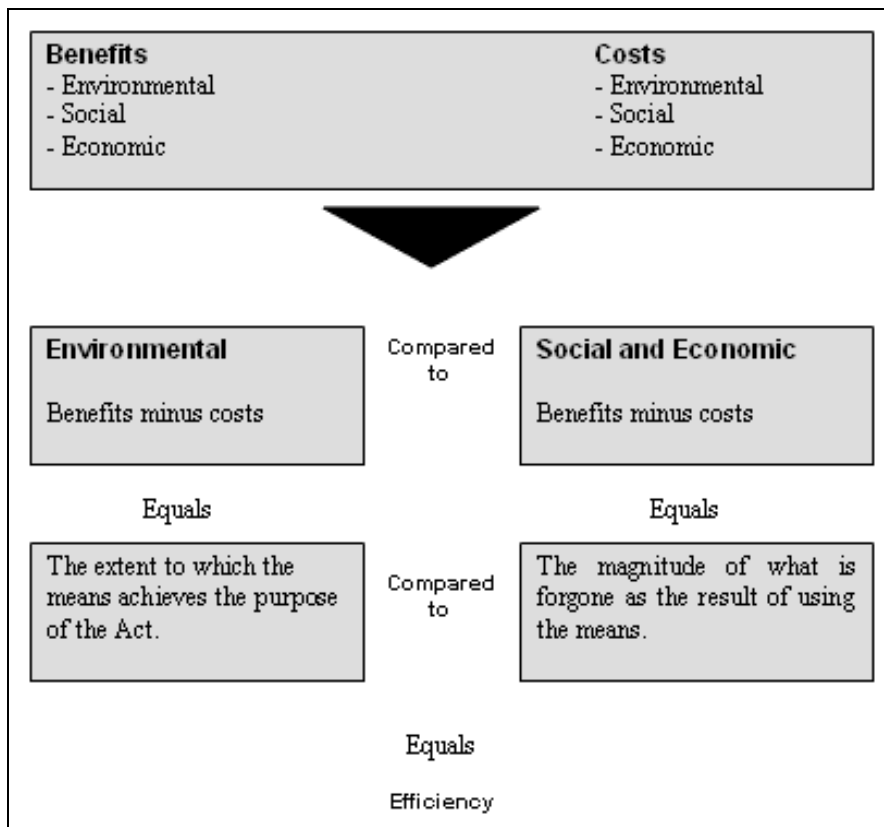


Figure 1: Deriving efficiency from benefits and costs

The evaluation of 'efficiency' will result in either a positive or negative result in terms of efficiency. Alternatively, if efficiency is expressed as a cost/benefit ratio, it will be either greater than or less than 1. In the event the ratio is considered to be less than 1, the option can be considered efficient, in that the sum of the benefits outweigh the sum of the costs. In the event the ratio is deemed to be greater than 1, the option can be considered to be inefficient, in that the sum of the costs outweigh the sum of the benefits. It is important to note that in this evaluation of 'efficiency', absolute values for each of the variables considered pertinent (i.e. identified as either a cost or a benefit within the evaluation of the options) are not available. Rather, the analysis has endeavoured to present an accurate appraisal of the relative costs and benefits between the options, in order to determine which are efficient and which are not. A simple yes or no is used to differentiate the options as efficient or inefficient.

2. Regionally significant issues

As part of the review the built environment and transportation chapter, in the Regional Policy Statement for the Wellington region 2005, the issues were evaluated then reviewed using:

- Measuring up: The state of the environment report for the Wellington region (2005) and the Built environment and transportation background report (2005)
- Regional Policy Statement Evaluation Report for Built Environment and Transportation (2006)
- Our region – their future: A discussion document on the review of the Regional Policy Statement for the Wellington Region (2006)
- Wellington Regional Strategy (2007)
- Criteria to ensure the issues are regionally significant, are ‘resource management’ matters and appropriate for inclusion in the Regional Policy Statement (see Appendix 1 for a copy of the criteria).

The resulting three issues proposed for inclusion in the Regional Policy Statement are:

1. Poor quality urban design

Poor quality urban design in the region can adversely affect public health, social equity, land values, the vibrancy of local centres and economies, provision and access to civic services, sustainable use of non-renewable resources and increase vehicle emissions.

2. Sporadic and uncoordinated development

Uncoordinated and sporadic development (including of infrastructure) can adversely affect the region’s compact form. In the Wellington region this can, among other things, result in:

- (a) new development that is poorly located in relation to existing infrastructure (such as roads, sewage and stormwater systems) and is costly or otherwise difficult to service
- (b) development in locations which restrict access to the significant physical resource in the region - such as aggregate
- (c) the loss of rural or open space land valued for its productive, ecological, aesthetic and recreational qualities
- (d) insufficient population densities to support public transport and other public services

- (e) new infrastructure that can encourage development in locations which undermine existing centres and industrial employment areas.

3. Integration of land use and transportation

A lack of integration between land use and the region's transportation network can create patterns of development that increase the need for travel, the length of journeys and reliance on private motor vehicles, resulting in:

- (a) increased emissions to the air from a variety of pollutants, including greenhouse gases
- (b) increased use of energy and reliance on non-renewable resources
- (c) reduced opportunities for alternate means of travel (such as walking and cycling) and increased costs associated with upgrading roads
- (d) increased road congestion, restricting movement of goods and services across and within the region, and compromising the efficient operation of the transport network.

3. Extent to which the objective is the most appropriate

The proposed regional form, design and function objective is:

Objective 21: A compact, well designed and sustainable regional form, served by an integrated, safe and responsive transport network that has:

- (a) a viable and vibrant regional central business district in Wellington city;
- (b) an increased range and diversity of activities in and around the regionally significant centres¹;
- (c) sufficient industrial-based employment locations or capacity to meet the region's needs;
- (d) urban development in existing urban areas, or when beyond urban areas, development that reinforces the region's existing urban form;
- (e) strategically planned rural development;
- (f) a range of housing (including affordable housing)
- (g) integrated public open spaces;
- (h) integrated land use and transportation;
- (i) improved east-west transport linkages; and
- (j) efficient use of existing infrastructure (including transport network infrastructure).

To follow is an outline of the extent to which the regional form, design and function objective is the most appropriate way to achieve the purpose of the Resource Management Act.

3.1 Objective 21

- Objective 21 addresses all three regional form, design and function issues in a comprehensive and integrated way.
- The objective addresses a key aspect of Issue 1 (about the quality of urban design) by seeking that the region achieves a compact regional form that is 'well designed'. Objective 21 includes the elements to be achieved from a well designed regional form. This includes that the Wellington central business district be viable and vibrant (a), that the range and diversity of activities in and around the regionally significant centres be increased (b) that public open spaces be integrated (g) and that the region's form support a range of housing (including affordable housing).

¹ Upper Hutt city centre; Lower Hutt city centre; Porirua city centre; Paraparaumu town centre; Masterton town centre; Petone; Kilbirnie; and Johnsonville.

- The objective also addresses a key aspect of Issue 2 (about sporadic and uncoordinated development) by seeking a ‘compact’ and ‘sustainable’ regional form. The elements within the objective seek that new urban development reinforces the region’s existing urban-rural form (d), that rural development be strategically planned (e), and that there be efficient use of existing infrastructure (j). The objective also seeks an increased range and diversity of activities around the regionally significant centres to reinforce the region’s compact form (a) and (b).
- The objective addresses a key aspect of Issue 3 (about integration of land use and transportation) by seeking that the region’s form be ‘compact’ and served by an ‘integrated, safe and responsive’ transport network. The objective also specifically seeks that the region’s form must integrate land use with transport and that east-west transport linkages are improved. Additional important elements in addressing issue 3 include increasing the range and diversity of activities in and around the regionally significant centres (b), a compact regional form that supports sufficient industrial based employment locations (c), urban development in existing urban areas (d) and strategically planned rural development (e). These elements seek that land uses are integrated with and reinforce the existing transport network, and that the transport network is responsive to the region’s desired land uses.
- Measuring up (2005) reported on progress towards the objectives in the Regional Policy Statement for the Wellington region (1995). There were three objectives in the built environment and transportation chapter. The objectives sought that resources be used efficiently and demand for finite resources be moderated (objective 1), that adverse effects from urban areas, transportation and infrastructure be avoided (objective 2), and that the environmental quality of urban areas be maintained and enhanced (objective 3). Measuring up (2005) and the Built environment and transportation background report (2005) outlined that:
 - the region has the highest use of passenger transport in New Zealand
 - resident’s pride in the look and feel of Wellington city was the highest across the region and country
 - local authorities, business and iwi in the region were working together (through the Wellington Regional Strategy) to look at how the region could grow sustainably
 - city and district councils in the region are producing documents to provide guidance on location and design of infrastructure, urban design and urban growth areas; however,
 - nearly two thirds of commuter in the region still drove to work in private vehicles;

- urban sprawl was cumulatively occurring as a result of a number of smaller development; and
- The region's total energy use was continuing to increase (petrol and diesel had increased by 8 per cent between 1998 and 2004).

For further information on 'Measuring up' see:

<http://www.gw.govt.nz/section1768.cfm>

And, on the built environment and transportation see:

<http://www.gw.govt.nz/story13105.cfm?>

- Our region – their future (2006) was a discussion document on the review of the Regional Policy Statement for the Wellington region. Feedback was sought on the issues that need to be addressed by the next regional policy statement. Feedback relevant to the region's form, design and function included concerns about:
 - Transport - dependence on private vehicles, improving public and active transport, encouraging wiser car use;
 - Subdivision development – impacts on infrastructure, green spaces and where growth is occurring; and
 - Integration of land use with infrastructure – planning for future growth.

For further information on 'Our region – their future' see:

<http://www.gw.govt.nz/section2101.cfm>

And, a summary of feedback in response see:

http://www.gw.govt.nz/story_images/5010_RPSNewsletterNo_s10086.pdf

- Objective 21 responds to the findings in Measuring up (2005) and concerns identified in response to Our region – their future (2006) by seeking to reinforce the region's generally compact form: by requiring the maintenance and enhancement of the vitality and vibrancy of the region's central business district in Wellington city and maturing the centres of regional significance, increasing the density and mix of development in key centres and locations with good access to the strategic transport network, and seeking the protection of key industrial employment locations; and by promoting quality urban design, urban development within existing urban areas (except where planned), the management of development in rural areas, and the integration of land use and transportation.
- The Regional Policy Statement Evaluation Report for Built environment and Transportation (2006) reported on the effectiveness of the built environment and transportation chapter provisions in the Regional Policy Statement for the Wellington region (1995). The report stated that there was poor performance against all the objectives and that there were a number of difficulties with measuring achievement, due to the 'high' level (unspecific) outcomes described in the objectives. Objective 1, about using resources efficiently and moderating demand for finite resources, was concluded as 'not achieved'. Objective 2, about avoiding adverse effects from urban areas, transportation and infrastructure also, had not been achieved; however, the report noted that it was difficult to assess

performance against this objective. Objective 3, about maintaining and enhancing the quality of urban areas, was considered to have had progress made towards the objective; however, this outcome was considered to have been achieved through actions independent to the Regional Policy Statement. The report noted that the outcomes sought by the objectives were still valid at a generic level, but that there would be significant benefits in making the objectives more targeted and clear about what the region is specifically seeking to see in its form, design and function (i.e. what would it 'look and work like'). Objective 21 responds to the findings in the evaluation report. This objective is more specific, targeted and describes how the region's form, design and function should look and work.

- The Wellington Regional Strategy (2007) is a sustainable economic growth strategy for the Wellington region. It focuses on leadership and partnership, growing the region's economy and good regional form. It was developed by the region's nine local authorities, in conjunction with the region's iwi authorities, central government and business, education, research and voluntary sector interests. The Strategy recognised that the region's form is a key component to making greater Wellington 'internationally competitive'. The 'Investment in good regional form' actions of specific relevance are:

- a strong central business district supported by regional centres
- quality urban design
- integrating transport with urban and rural needs
- land for business growth
- rural industry growth
- more homes close to city centres and transport links
- a range of housing (including affordable housing)
- rural lifestyle
- interconnected open spaces
- regional focus areas

The issues and actions in response to 'Investment in good regional form' in the Strategy are reflected in objective 21. For further information on these actions see:

http://www.wrs.govt.nz/growth_framework_introduction/regional_form/

- The 'key outcomes' in the Regional Land Transport Strategy (2007) are also of relevance to objective 21 and the specific policies on planning and

integration (section 8.5). For further information on the outcomes and policies see: <http://www.gw.govt.nz/section2372.cfm>

- Objective 21 meets Part II of the Resource Management Act by seeking to achieve sustainable management of the region's form, design and function. A number of principles in Part II are relevant.

- Particular principles (within Part II of the Resource Management Act) of direct relevance include:

7(b) The efficient use and development of natural and physical resources

7(c) Maintenance and enhancement of amenity values

7(f) Maintenance and enhancement of the quality of the environment.

- In addition, the following principles within Part II are also promoted to:

6(a) – the preservation of natural character of the coastal environment, wetlands, and lakes and rivers and their margins and protection from inappropriate subdivision, use and development

6(b) – protection of outstanding natural features and landscapes from inappropriate subdivision, use and development

6(c) – the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna

6(f) Protection of historic heritage from inappropriate subdivision, use and development

- Relevant sub sections to Section 30 “Function of regional councils” for Objective 21 include:

30(1)(a) the establishment, implementation, and review of objectives, policies and methods to achieve integrated management of the natural and physical resources of the region

30(1)(b) the preparation of objectives and policies in relation to any actual or potential effects of the use, development, or protection of land which are of regional significance

30(1)(gb) the strategic integration of infrastructure with land use through objectives, policies and methods.

- The following policies in the New Zealand Coastal Policy Statement 1994 are relevant to Objective 21:

Policy 1.1.1 - It is a national priority to preserve the natural character of the coastal environment by:

(a) encouraging appropriate subdivision, use or development in areas where the natural character has already been compromised and avoiding sprawling or sporadic subdivision, use or development in the coastal environment;

(b) taking into account the potential effects of subdivision, use, or development on the values relating to the natural character of the coastal environment, both within and outside the immediate location;
and

(c) avoiding cumulative adverse effects of subdivision, use and development in the coastal environment.

Policy 1.1.3 - It is a national priority to protect the following features, which in themselves or in combination, are essential or important elements of the natural character of the coastal environment:

(a) landscapes, seascapes and landforms, including:

(i) significant representative examples of each landform which provide the variety in each region;

(ii) visually or scientifically significant geological features; and

(iii) the collective characteristics which give the coastal environment its natural character including wild and scenic areas;

(b) characteristics of special spiritual, historical or cultural significance to Maori identified in accordance with tikanga Maori;
and

(c) significant places or areas of historic or cultural significance.

Policy 3.1.3 - Policy statements and plans should recognise the contribution that open space makes to the amenity values found in the coastal environment, and should seek to maintain and enhance those values by giving appropriate protection to areas of open space.

Policy 3.2.1 - Policy statements and plans should define what form of subdivision, use and development would be appropriate in the coastal environment, and where it would be appropriate.

Policy 3.2.2 - Adverse effects of subdivision, use or development in the coastal environment should as far as practicable be avoided. Where complete avoidance is not practicable, the adverse effects should be mitigated and provision made for remedying those effects, to the extent practicable.

Policy 3.2.4 - Provision should be made to ensure that the cumulative effects of activities, collectively, in the coastal environment are not adverse to a significant degree.

Policy 3.2.5 - Subdivision, use and development in the coastal environment should be conditional on the provision of adequate services (particularly the disposal of wastes), and the adverse effects

of providing those services should be taken into account when preparing policy statements and plans and when considering applications for resource consents.

- The New Zealand Urban Design Protocol provides for a voluntary commitment to urban design initiatives by signatory organisations. Greater Wellington is a signatory to the Protocol, as are most of the city and district councils within the region. The Protocol aims to make our towns and cities more successful by using quality urban design principles to help them become:
 - competitive places that thrive economically and facilitate creativity and innovation
 - liveable places that provide a choice of housing, work and lifestyle options
 - a healthy environment that sustains people and nature
 - inclusive places that offer opportunities for all citizens
 - distinctive places that have a strong identity and sense of place
 - well-governed places that have a shared vision and sense of direction.

The seven essential design qualities outlined in the Protocol have been considered when developing objective 21. For further information on the Protocol and the seven essential design qualities see:

<http://www.mfe.govt.nz/issues/urban/design-protocol/index.html>

On the basis of the above, objective 21 is the most appropriate for achieving the purpose of the Resource Management Act.

3.2 Analysis of which are the most appropriate objectives

Final chosen objective	Other alternatives?	Why <u>not</u> the most appropriate to achieve the Resource Management Act
<p>Objective 21. Compact, well designed and sustainable regional form</p> <p>A compact, well designed and sustainable regional form, served by an integrated, safe and responsive transport network that has:</p> <ul style="list-style-type: none"> (a) a viable and vibrant regional central business district in Wellington city; (b) an increased range and diversity of activities in and around the, regionally significant centres²; (c) sufficient industrial-based employment locations or capacity to meet the region's needs; (d) urban development in existing urban areas, or when beyond urban areas, development that reinforces the region's existing urban form; (e) strategically planned rural development; (f) a range of housing (including affordable housing) (g) integrated public open spaces; (h) integrated land use and transportation; (i) improved east-west transport linkages; and (j) efficient use of existing infrastructure (including transport network infrastructure). 	<p>Alternative 1. No objective in Regional Policy Statement on regional form. Management objectives left to individual city and district councils</p> <p>Alternative 2. The objective(s) in the existing 1995 Regional Policy Statement which seek that:</p> <ul style="list-style-type: none"> ▪ resources be used efficiently and demand for finite resources moderated (objective 1), ▪ adverse effects from urban areas, transportation and infrastructure are avoided (objective 2), and ▪ the environmental quality of urban areas be maintained and enhanced (objective 3). <p>Alternative 3. An objective which states that urban development is to be contained, within defined (and mapped) urban limits along with limits to rural and coastal settlements.</p> <p>Alternative 4: Separating the elements within this comprehensive and integrated objective into discrete objectives, such that each can be promoted without the need to reference each and all of the other elements.</p>	<p>Alternative 1 is not the most appropriate as the Regional Policy Statement would not play a role in providing regional direction on promoting the sustainable management of the regions form, design and function. Greater Wellington would also not be carrying out its function in accordance with section 30(1)(gb) 'the strategic integration of infrastructure with land use through objectives, policies and methods'.</p> <p>Alternative 2 is not the most appropriate as these objectives were assessed (as part of the review) to be unspecific and unclear as to what was the desired development form for the region.</p> <p>Alternative 3 is not the most appropriate way for the Wellington region to promote sustainable management of the regions form, design and function. The region's local authorities have made a commitment, through the Wellington Regional Strategy, to work co-operatively in 'investing in good regional form'. The Regional Policy Statement clarifies and provides a resource management policy framework that describes the direction and outcomes sought for the region's form, design and function. However, the specific detail and decision making is left to be determined by local authorities in conjunction with their community.</p> <p>Alternative 4 is not the most appropriate to achieve the purpose of the Resource Management Act, as it would fail to provide integrated management of the many and varied natural and physical resources associated with form, design and function of urban and urban-rural places. Each element would be treated in isolation, so that the important operational inter-relationships between these elements would not be explicitly recognised and provided for. The chosen objective promotes integrated management as it acknowledges the inter-relationships between these elements as they contribute</p>

² Upper Hutt city centre; Lower Hutt city centre; Porirua city centre; Paraparaumu town centre; Masterton town centre; Petone; Kibimie; and Johnsonville.

		to the form, design and function of places within the region, and the region as a whole.
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Table 1: Analysis of which is the most appropriate objective

4. Evaluation of policies and methods to achieve Objective 21

The appropriateness of the policies and methods to achieve Objective 21 are evaluated by looking at the effectiveness and the efficiency of the policy and method options, and the risks of acting or not acting if there is uncertain or insufficient information.

4.1 The range of policy and methods options to achieve Objective 21

Objective 21 seeks to deliver a compact, well designed and sustainable regional form, served by an integrated, safe and responsive transport network.

In addressing this objective, the primary focus is to determine the most appropriate way(s) to achieve the objective. That is, whether it can be best achieved through regulatory direction to plans, or through regulatory direction as to matters to be considered when making resource management decisions, or through non-regulatory programs, or by doing nothing.

The following is a list of options for the each of ways the objective could be implemented. Each option is assessed in the table below.

4.1.1 Regulatory direction to district and/or regional plans and the Regional Land Transport Strategy

Option 1 – Direction to district plans to maintain a compact, well designed and sustainable regional form for all themes

This option requires district plans to control land use to maintain a compact, well designed and sustainable regional form for each and all of the following themes:

- maintaining and enhancing a strong central business district in Wellington city and in the maturing the centres of regional significance
- quality of urban design
- integrating transport and land use
- protecting industrial employment locations
- managing urban development beyond the region's urban areas
- managing rural development
- encouraging higher density and mixed use development in appropriate locations
- a range of housing (including affordable housing) to meet the region's needs
- recognising and enhancing the role of the region's open space
- managing development of the Regional Focus Areas identified in the Wellington Regional Strategy.

Option 2 – Direction to district plans to maintain a compact, well designed and sustainable regional form for selected themes

This option requires district plans to control land use for only selected themes from among those outlined in option 1 (above), so as to maintain a compact, well designed and sustainable regional form.

Option 3 – Direction to the Regional Land Transport Strategy to support a compact, well designed and sustainable regional form as described in objective 21

This option requires the Regional Land Transport Strategy to support a compact, well designed and sustainable regional form as described in objective 21.

4.1.2 Regulatory direction as to matters to be given particular regard in resource management decision making

Option 4 – Consider maintaining a compact, well designed and sustainable regional form for all themes

This option requires local authorities to have particular regard to maintaining a compact, well designed and sustainable regional form for each and all of the following themes:

- maintaining and enhancing a strong central business district in Wellington city and maturing the centres of regional significance
- quality of urban design
- integrating transport and land use
- protecting industrial employment locations
- managing urban development beyond the region's urban areas
- managing rural development
- encouraging higher density and mixed use development in appropriate locations
- a range of housing (including affordable housing) to meet the region's needs
- recognising and enhancing the role of the region's open space
- managing development of the Regional Focus Areas identified in the Wellington Regional Strategy.

Option 5 – Consider maintaining a compact, well designed and sustainable regional form for selected themes

This option requires local authorities to have particular regard to only some selected themes from among those outlined in option 4 (above) in order to maintain a compact, well designed and sustainable regional form.

4.1.3 Non-regulatory options

Option 6 – Non regulatory action to maintain a compact, well designed and sustainable regional form for all themes

This option is to use a variety of non-regulatory actions to maintain a compact, well designed and sustainable regional form for each and all of the following themes:

- maintaining and enhancing a strong central business district in Wellington city and maturing the centres of regional significance
- quality of urban design
- integrating transport and land use
- protecting industrial employment locations
- managing urban development beyond the region's urban areas
- managing rural development
- encouraging higher density and mixed use development in appropriate locations
- a range of housing (including affordable housing) to meet the region's needs
- recognising and enhancing the role of the region's open space
- managing development of the Regional Focus Areas identified in the Wellington Regional Strategy.

Option 7 – Non-regulatory actions to maintain a compact, well designed and sustainable regional form for selected themes

This option is to use a variety of non-regulatory actions to maintain a compact, well designed and sustainable regional form in relation to only some of the selected themes outlined in option 6 (above).

4.1.4 Do nothing

Option 8 – No intervention

This option offers no intervention for maintaining a compact, well designed and sustainable regional form.

4.2 Evaluation as to the effectiveness and efficiency of the policy and method options to achieve objective 21

Policy and method options	Analysis of effectiveness	Effectiveness Rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
Regulatory direction to district and/or regional plans and the Regional Land Transport Strategy					
Option 1 Direction to district plans to maintain a compact, well designed and sustainable regional form for all themes	Establishes a consistent policy framework within which to develop regulatory provisions and/or actions within plans; requires all pertinent plans to promote certain policy and related actions (rules and/or methods); sets out specific principles to be applied Promotes a level of general certainty for individual applicants, community of interested parties, and for councils on regional form, design and function.	Med	Resource management decisions are still made on a case by case basis at the local level, but within a consistent policy framework across the region for the region's 'form, design and function'. All relevant parties will work to achieve the 'regional form, design and function' objective (21) which will improve social, economic and environmental outcomes for individuals and the community. Provides information for community about all the regional outcomes being sought in relation to the regions 'form design and function'.	There are human and economic resource costs for councils and communities, associated with research, analysis, interpretation, consultation, governance and decision making processes to formulate and establish the consequent regulatory frameworks for <u>each and all themes</u> . On-going implementation costs for councils – to implement, to monitor compliance, to take enforcement action, to monitor delivery and environmental outcomes to enable an evaluation of the effectiveness of the intervention. The cause-effect relationship is not direct and clear for all themes and the costs of any remedy are not able to be attached directly to specific activities. Could act as a disincentive or discouragement to innovation, which has potential to derive alternative solutions to regulatory intervention. Provisions would be overly simplified and lead to additional costs as proposals are seen as variants or exceptions.	No
Option 2 Direction to district	Seeks to influence particular types of activities (themes) in specific ways, and/or particular 'effects' of activities or aspects	High	Resource management decisions are still made on a case by case basis at the local level, but within a consistent	There are human and economic resource costs for councils and communities, associated with research, analysis,	Yes

Policy and method options	Analysis of effectiveness	Effectiveness Rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
<p>plans to maintain a compact, well designed and sustainable regional form for specified selected themes</p> <p>of 'effect' – allowing the intervention by local authorities in the region to be targeted – based on available information and an agreed approach.</p> <p>Resource management planning responses are attributed to specific issues (themes) identified through the development of the Wellington Regional Strategy.</p> <p>Establishes a consistent policy framework within which to develop regulatory provisions and/or actions within plans; requires all pertinent plans to promote certain policy and related actions (rules and/or methods); sets out specific principles to be applied</p> <p>Sets out clear direction on appropriate regional form, design and function issues (themes), both in intent and in terms of the parameters considered necessary to be addressed by plans.</p> <p>Promotes greater certainty for individual applicants, the community of interested parties, and for councils on regional form issues (themes) of significance to the region that need to be addressed by plans.</p>		<p>policy framework across the region for the region's 'form design and function'.</p> <p>All relevant parties will work to achieve the 'regional form, design and function' objective (21) which will improve social, economic and environmental outcomes for individuals and the community.</p> <p>Establishes a clear intent for where regulatory intervention and changes to plan on 'regional form, design and function' is required – this assists local authorities in establishing local regulatory frameworks.</p> <p>Provides information for the community about what are the most important regional outcomes being sought in relation to the region's 'form, design and function' and helps to expedite the statutory processes.</p> <p>The direction is targeted and clearly attributed to issues identified through the development of the Wellington Regional Strategy and assessed as being able to be acted on (i.e. information is available and approach agreed on) – helping to reduce time, money and other resources on process.</p> <p>Less conflict, debate or contesting of the advantages and disadvantages of particular planning responses or proposals, as like or similar proposals</p>	<p>interpretation, consultation, governance and decision making processes to formulate and establish the consequent regulatory frameworks for the selected themes, which must implement the regional policy statement.</p> <p>On-going implementation costs for councils – to implement, to monitor compliance, to take enforcement action, to monitor delivery and environmental outcomes to enable an evaluation of the effectiveness of the intervention.</p> <p>Potential users and developers are informed about the significant issues for the region to maintain the regions form, and the type of interventions likely, which may bring additional cost.</p> <p>The cause-effect relationship is direct and clear and the costs of any remedy are able to be attached directly to specific activities.</p>		

Policy and method options	Analysis of effectiveness	Effectiveness Rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
Option 3 Direction to the Regional Land Transport Strategy to support a compact, well designed and sustainable regional form	<p>Establishes a consistent policy framework across resource management plans and the Regional Land Transport Strategy; requiring both to promote shared policy outcomes and specific principles to be applied</p> <p>Promotes a level of general certainty for individual applicants, the community of interested parties, and for councils on regional form, design and function.</p>	Med	<p>are able to be categorised and the likely resource management responses are indicated generally, which helps to reduce conflict.</p> <p>All relevant parties will work to achieve the 'regional form, design and function' objective (21) which will improve social, economic and environmental outcomes for individuals and the community.</p> <p>Provides information for community about all the regional outcomes being sought in relation to the regions 'form design and function' through both resource management and transport management.</p> <p>Transport decisions are still made on a case by case basis in accordance with the transport planning framework, but there is a consistent policy framework across the region for the region's 'form, design and function'.</p>	<p>There are human and economic resource costs associated with research, analysis, interpretation, consultation, governance and decision making processes to formulate and establish the planning framework to be consistent with the regional policy statement.</p> <p>On-going implementation costs for implementation and monitoring delivery and environmental outcomes to enable an evaluation of the effectiveness.</p> <p>Transport decisions are informed about the significant issues for the region to maintain the regions form, and the type of interventions likely, which may bring additional cost.</p>	Yes
Regulatory direction as to matters to be given particular regard in resource management decision making					
<p>Option 4</p> <p>Consider maintaining a compact, well designed and sustainable regional form for all themes</p>	<p>Policies are unlikely to be effective by themselves when making decisions as matters would be broad and generic in trying to address all themes.</p> <p>Establishes a set of matters which must be given particular regard in resource management consideration, leading to decision making on regional form, design</p>	Med	<p>Provides a consistent framework with regard to 'considerations' across the region.</p> <p>Requires development to address specified matters.</p> <p>Allows some discretion and thus variation in interpretation and implementation. The management</p>	<p>While clarifying the matters for consideration, specifying the full extent of matters may not lead to simplicity or certainty. Rather, it may add to complexity.</p> <p>Costs will be borne by some proposals as a result of their activity status as an application for resource consent, and the matters around which discretion and/or</p>	No

Policy and method options	Analysis of effectiveness	Effectiveness Rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
	<p>and function.</p> <p>Sets out matters to be considered as appropriate to the 'regional form, design and function' issues (themes), both in intent and in terms of the parameters needing to be considered.</p> <p>Provides an ability to critique what is considered important and relevant within decision making processes, and thus increase understanding of pertinent factors and intent. Transparent as to how these matters are to be treated in decision making. Improves understanding and enhances equity within resource management activity.</p> <p>The intervention may only be triggered for certain resource consent applications (where discretion is retained over such issues), which means a different set of benefits and costs to those arising from application at the plan making stage.</p>		<p>responses can be adapted to the specific proposal under consideration.</p> <p>While certain triggers or prompts demand certain considerations must be made, the responses or action that results is less certain than specific direction as to matters to be addressed by plans.</p> <p>The resource management response is less predictable or formulaic as might be anticipated under the earlier direction to district plans options, as decision makers exercise discretion in how they respond to considerations. This option allows for greater variance within the management response, to the triggers presented within a proposal.</p>	<p>control are reserved.</p> <p>Costs will be borne by councils and resource consent applications as they must secure sufficient information pertinent to undertaking the required considerations, within decision making processes.</p> <p>Costs associated with investigations to deliver sufficient information to the decision making process.</p> <p>Will demand more information and investigation than absolutely necessary.</p> <p>Flexibility carries some costs, as it might be thought necessary to treat each application as unique, rather than allowing a standardised response to develop.</p>	
<p>Option 5</p> <p>Consider maintaining a compact, well designed and sustainable regional form for selected themes</p>	<p>Establishes a set of specific matters which must be given particular regard in resource management consideration, leading to decision making on regional form design and function.</p> <p>Clarifies which issues/themes around regional form design and function need to be given particular regard in decision making – so both the policy intent and parameters needing to be considered are</p>	<p>Med</p>	<p>Provides a consistent framework with regard to 'considerations' across the region.</p> <p>Requires development to address specified matters.</p> <p>Less conflict and debate about what is relevant or pertinent and what is not, to considerations.</p> <p>Allows some discretion and thus</p>	<p>Costs will be borne by some proposals as a result of their activity status as an application for resource consent, and the matters around which discretion and/or control are reserved.</p> <p>Costs will be borne by councils and resource consent applicants as they must secure sufficient information pertinent to undertaking the required considerations, within decision making processes.</p>	<p>Yes</p>

Policy and method options	Analysis of effectiveness	Effectiveness Rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
<p>clear to all interested parties.</p> <p>Provides an ability to critique what is considered important and relevant within decision making processes, and thus increase understanding of pertinent factors and intent. Transparent as to how these matters are to be treated in decision making. Improves understanding and enhances equity within resource management activity.</p> <p>Sets out matters to be considered on appropriate 'regional form, design and function' issues (themes), both in intent and in terms of the parameters needing to be considered.</p> <p>Easily able to be interpreted and implemented, and limits the ability to contest or re-interpret what it intends to achieve, or how it intends to influence resource management activity.</p> <p>The intervention may only be triggered for certain resource consent applications (where discretion is retained over such issues), which means a different set of benefits and costs to those arising from application at the plan making stage.</p>		<p>variation in interpretation and implementation. The management responses can be adapted to the specific proposal under consideration.</p> <p>While certain triggers or prompts demand certain considerations must be made, the responses or action that results is less certain than specific direction as to matters to be addressed by plans.</p> <p>Less conflict and debate about what is relevant or pertinent and what is not, to considerations.</p> <p>The resource management response is less predictable or formulaic as might be anticipated under the earlier direction to district plans options, as decision makers exercise discretion in how they respond to considerations. This option allows for greater variance within the management response, to the triggers presented within a proposal.</p> <p>The decision will account for each of the matters specified and so a rationale as to how treated within the decision is available. This improves transparency in the process, which further informs and guides future proposals (which prompt the need for consideration), and thus improves the ability to develop tailor made solutions or responses, and to learn and adapt future solutions over</p>	<p>Flexibility carries some costs, as it might be thought necessary to treat each application as unique, rather than allowing a standardised response to develop.</p>		

Policy and method options	Analysis of effectiveness	Effectiveness Rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
Non-regulatory options					
<p>Option 6</p> <p>Non regulatory action to maintain a compact, well designed and sustainable regional form for all themes</p>	<p>Could be effective if all relevant local authorities commit to doing them.</p> <p>However actions may not get appropriately resourced.</p> <p>Sets out the information considered relevant and pertinent, and would provide guidance for interpretation and implementation of the policy framework or the method, or more simply 'good practice', to achieve the objective and/or to address the issue. However, the response to this information is entirely discretionary and voluntary by the recipient, so there is considerable variance as to what it will mean in practice.</p> <p>The intervention is likely to be applied at a generic and/or generalised scale across all issues/themes.</p> <p>Can provide clarity when there are contentious or confusing matters at play and address duplication, overlaps, or gaps, that need to be managed.</p> <p>Establishes a common or standardised methodology for relevant research necessary to progress the objective within the region and/or to address the issue.</p>	<p>Low</p>	<p>Allows for flexibility of approach rather than imposition of regulatory policies.</p> <p>Recognises that people can "do the right thing" without compulsion.</p> <p>Economically efficient if financial support stimulates private effort and commitment.</p>	<p>The application of relevant works in local authority developments may increase public spending on public developments, activities and infrastructure.</p> <p>Could lead to protracted negotiations and potentially poor results.</p> <p>Could provide for too broad brush an approach or constrain developing targeted and purposeful pro-active or responsive programmes</p> <p>Potential environmental costs because of a lesser commitment to get things done.</p>	<p>Yes</p>

Policy and method options	Analysis of effectiveness	Effectiveness Rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
<p>Option 7</p> <p>Non-regulatory actions to maintain a compact, well designed and sustainable regional form for selected themes</p>	<p>Could be effective if all relevant local authorities commit to doing them.</p> <p>However actions may not get appropriately resourced.</p> <p>Sets out the information considered relevant and pertinent, and would provide guidance for interpretation and implementation of the policy framework or the method, or more simply 'good practice', to achieve the objective and/or to address the issue. However, the response to this information is entirely discretionary and voluntary by the recipient, so there is considerable variance as to what it will mean in practice.</p> <p>Can provide clarity when there are contentious or confusing matters at play and address duplication, overlaps, or gaps, that need to be managed.</p> <p>Establishes a common or standardised methodology for relevant research necessary to progress the objective within the region and/or to address the issue.</p>	Med	<p>Allows for flexibility of approach rather than imposition of regulatory policies.</p> <p>Enables a targeted and purposeful, proactive and responsive programmes in relation to key selected themes</p> <p>Recognises that people can "do the right thing" without compulsion.</p> <p>Economically efficient if financial support stimulates private effort and commitment.</p>	<p>The application of relevant works in local authority developments may increase public spending on public developments, activities and infrastructure.</p> <p>Could lead to protracted negotiations and potentially poor results.</p> <p>Potential environmental costs because of a lesser commitment to get things done.</p>	Yes
<p>Doing Nothing</p>		Low	<p>Local authorities are able to work with their communities to identify on a case-by-case basis what types of intervention is required – without a predetermined regional policy direction.</p>	<p>The issues will continue in the same trend or pattern, and the objective will not be achieved. Doing nothing will not achieve the purpose of the Resource Management Act.</p>	No
<p>Option 8</p> <p>No intervention</p>	<p>This is not effective in resource management terms. Nor could it be argued to be efficient, given the issue continues unabated, and presumably would get worse.</p>				

Policy and method options	Analysis of effectiveness	Effectiveness Rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
				<p>This is not effective resource management given the issue continues without regional direction and will lead to continued unsustainable environmental outcomes, including economic, social and cultural outcomes.</p> <p>Greater Wellington region's form provides an economic advantage – which may be undermined without intervention to ensure the form (and advantages from it) are maintained.</p> <p>As the issue has been found to be regionally significant (refer to criteria in appendix 2) – doing nothing would be a dereliction of function and duty under the RMA.</p>	

Table 2: Evaluation as to the effectiveness and efficiency of policy and method options to achieve objective 21

4.3 Results of evaluation as to the most appropriate policy and method options to achieve objective 21

Policy and method options	Effectiveness	Efficient?	Selected option(s)	Proposed policies and methods
Regulatory direction to district and/or regional plans and the Regional Land Transport Strategy				
Option 1 Direction to district plans to maintain a compact, well designed and sustainable regional form for each and all themes	Med	No	X	
Option 2 Direction to district plans to maintain a compact, well designed and sustainable regional form for selected themes	High	Yes	✓	Policies 29, 30 and 31, and method 1
Option 3 Direction to the Regional Land Transport Strategy to support a compact, well designed and sustainable regional form	Med	Yes	✓	Policy 32 and method 3
Regulatory direction as to matters to be given particular regard in resource management decision making				
Option 4 Consider maintaining a compact, well designed and sustainable regional form for each and all themes	Med	No	X	
Option 5 Consider maintaining a compact, well designed and sustainable regional form for selected themes	Med	Yes	✓	Policies 53, 54, 55, 56, 57 and 58, and method 4
Non-regulatory options				
Option 6 Non regulatory action to maintain a compact, well	Low	No	X	

designed and sustainable regional form for each and all themes				
Option 7 Non-regulatory actions to maintain a compact, well designed and sustainable regional form for selected themes	Med	Yes	✓	Methods 16, 18, 25, 39, 40, 41, 42, 44, 45, 46 and 67.
Doing Nothing				
Option 8 No intervention	Low	No	X	

Table 3: Results of evaluation as to the most appropriate policy and method options to achieve objective 21

4.4 Discussion on selected options

Overall a package of options is selected as the most appropriate to achieve Objective 21. To follow is a general discussion on the approach to selecting policy and method options. These are discussed under the following themes:

- maintaining and enhancing a strong central business district in Wellington city and maturing the centres of regional significance.
- quality of urban design
- integrating transport and land use
- protecting industrial employment locations
- managing urban development beyond the region's urban areas
- managing rural development
- encouraging higher density and mixed use development in appropriate locations
- a range of housing (including affordable housing to meet the region's needs)
- recognising and enhancing the role of the region's open space
- managing development of the Regional Focus Areas identified in the Wellington Regional Strategy.

This section is concluded with a discussion about the risks of acting or not acting.

4.4.1 The approach to selecting appropriate policy and method options

The region's form, design and function is a new topic for inclusion in the proposed Regional Policy Statement for the Wellington region. The current Regional Policy Statement (1995) contains a chapter on 'Built environment and transportation'. This chapter sought that resources be used efficiently and demand for finite resources be moderated (objective 1), that adverse effects from urban areas, transportation and infrastructure be avoided (objective 2), and that the environmental quality of urban areas be maintained and enhanced (objective 3).

As part of the review of the Regional Policy Statement, 'Measuring up, 2005' and the findings of the evaluation report, it can be concluded that there was poor performance against objectives 1 and 2 and that success in environmental quality³ was achieved through actions independent to the Regional Policy Statement. The evaluation also concluded that the current policies had generally been ineffective within in resource management decision making and a number of methods were not implemented.

The review discussion document 'Our region – their future, 2006' received a response from the community that highlighted that there was growing concern about the region's growth in single occupancy private vehicle use (even with our good use of public transport), impacts from urban expansion on infrastructure, open spaces, and the quality of

³ Environmental quality is described in the Regional Policy Statement for the Wellington region 1995 as 'a function of high levels of public amenity, good urban design and the presence and health of natural elements within the urban environment.'

air and water bodies and concern about how and where development was occurring and is to be managed in the future.

The Wellington Regional Strategy, 2007 (as a sustainable economic growth strategy) focused on leadership, growing the economy and good regional form. That Strategy recognised that ‘good regional form’ is a key component to not only the ‘economic competitiveness’ of the region, but also its sustainability. The Strategy identified a range of issues and actions for the region’s local authorities in conjunction with business, central government and iwi authorities for ‘Investment in good regional form’.

The region’s form is generally compact and has a corridor pattern. This form is a strength for the region, as it currently reinforces local centres, supports public transport, reduces energy use and makes services more accessible. In a number of locations development is constrained by the region’s topography. However, in specific parts of the region growth pressures exist and the region’s edges are ‘fraying’ which is eroding the benefits of the region’s form.

Having regard to the factors above, including the region’s local authority commitment to partnership through the Wellington Regional Strategy, key principles were used when deciding on appropriate regional form, design and function policies and methods in the proposed Regional Policy Statement for the Wellington region. The principles include:

- add value to the management of the region’s form design and function (not duplicate or unnecessarily conflict with local management)
- reflect the issues identified in the Wellington Regional Strategy (where they are resource management matters) and compliment the actions using the tools available to a regional policy statements
- provide regional direction, while leaving specific decision making to district and city councils and their communities.

4.4.2 Maintaining and enhancing a strong central business district in Wellington city and maturing the centres of regional significance

The following are the most appropriate options in order to maintain and enhance a strong central business district in Wellington city and mature the centres of regional significance and achieve objective 21:

- Requiring that district plans include policies, rules or other methods to encourage a range of land use activities that maintain and enhance the viability and vibrancy of the regional central business district in Wellington city and the centres of regional significance at the time of their next plan review⁴ (option 2, policy 29 and method 1).
- The non-regulatory Wellington Regional Strategy actions (option 7) of all city and district councils:
 - creating individual visions for these centres, then a joint regional vision (method 41); along with
 - principles for the management of retail activities (method 42).

⁴ See Appendix 2 for the dates in which city and district councils in the region are required to commence full review their district plan in accordance with section 79 of the Resource Management Act 1991

Clear regulatory direction in relation to the centres of regional significance supported with non-regulatory actions is considered to be the most appropriate option as these centres form a key role in the region's form and function.

The regionally significant centres were identified through the Wellington Regional Strategy process. The central business district in Wellington city is recognised as the central business district for the region. Its continued viability and vibrancy is important to the whole region. The centres of regional significance include the civic centres of Upper Hutt city centre, Lower Hutt city centre, Porirua city centre, Paraparumu town centre and Masterton town centre and other major centres of Petone, Kilbirnie and Johnsonville. Maintaining and enhancing (or 'maturing') these centres will reinforce the region's compact form and function. An increased range and diversity of activities will also strengthen the sense of place, prosperity and resilience of the centres.

Seeking that the regionally significant centres be given particular regard, (through option 4 or 5) when making resource management decisions, was not selected as appropriate. These options would be ineffective without clear guidance as to what types of activities are considered to be appropriate or inappropriate. It is also considered most appropriate that city and district councils work with their communities to determine what activities are desirable in order to maintain and enhance each centres viability and vibrancy.

4.4.3 Quality urban design

Seeking that a set of 'regional urban design principles' (based on the New Zealand urban design principles) be given particular regard when making resource management decisions (resource consents, designations and when changing or varying plans) (option 5, policy 53 and method 4) along with the non-regulatory Wellington Regional Strategy action of all Council's signing the New Zealand Urban design protocol and preparing a joint action plan (option 7, policy 67 and method 38) are the most appropriate options to promote quality urban design and achieve objective 21.

The Wellington Regional Strategy outlines the desire for the region to show leadership in quality urban design. The New Zealand Urban Design Protocol and a number of other supporting publications have clearly described the range of benefits and efficiencies that can result from quality urban design.

A series of 'regional urban design principles' (based on the New Zealand Urban Design Protocol principles) were developed by Greater Wellington and the region's city and districts to ensure the principles in the regional Policy Statement are appropriate to the Wellington region. These are included in Appendix 2 in the proposed Regional Policy Statement.

Direction to require district and regional plans to promote urban design principles for subdivision and development is not considered appropriate (i.e. option 1 or 2). Such an option would not be clear about how the principles are to be translated into activity based provisions in district plans.

4.4.4 Integrating transportation and land use

The following options, in combination, are the most appropriate policy and method options to promote integrated transportation and land-use and achieve objective 21:

- requiring that the Regional Land Transport Strategy (option 3, policy 32 and method 3) support the maintenance and enhancement of a compact, well designed and sustainable regional form (as described in objective 21)
- seeking that, when making resource management decision, that particular regard be given to achieving the key outcomes in the Regional Land Transport Strategy (option, 5, policy 56 and method 4) and the sequencing of land use and coordination with development and operation of new infrastructure (option 5, policy 54 and method 4); supported by,
- non- regulatory guidance on provision for walking cycling and public transport (option 7, method 25) .

The need for efficient operation of the region’s road, rail, air and sea transport networks and a transport system that supports the regionally significant centres, our industrial business locations, the port, the airport and key services (schools, hospitals, etc) was identified as a significant theme in the Wellington Regional Strategy and has been reinforced in the Regional Land Transport Strategy. Greater Wellington’s monitoring of both the Regional Policy Statement and the Regional Land Transport Strategy also show that consumption of transport fuel is still steadily increasing (despite increasing fuel prices), congestion is worsening and vehicle related emissions continue to rise. Community feedback (in response to Our region – their future (2006)) included concern about the impacts of land use on transportation. The Regional Policy Statement is an important policy mechanism to ensure that transport policy (through the Regional Land Transport Strategy) considers land use needs and resource management decision making considers the transport outcomes sought by the region.

Options 1 and 2, directing district plans to integrate land use with transport are not considered appropriate. Such an option would not be clear enough to ‘give effect to’ in district plans. It is also considered that a range of other policies selected for this chapter, will assist with achieving integration of land use and infrastructure. For example, (option 2, policy 29) ‘Maintaining and enhancing the viability and vibrancy of the regionally significant centres’, (option 2, policy 30) ‘Identifying and promoting higher density and mixed use development’, (option 2, policy 31) ‘Identification and protecting key industrial employment locations’, (option 5, policy 53) ‘Achieving the region’s urban design principles’, (option 5, policy 54) ‘Maintaining a compact, well designed and sustainable regional form’, (option 5, policy 55) ‘Managing development in rural areas’ and last but not least, (option 5, policy 58) ‘Managing the Regional Focus Areas’.

4.4.5 Protecting industrial employment locations

Options 2, requiring that district plans ‘should’ identify key industrial employment locations and include policies, rules or other methods to protect these areas at the time of their next plan review (policy 31 and method 1) in combination with an analysis of industrial employment locations in the region (method 43) is considered the most appropriate way to protect industrial employment locations and achieve objective 21.

The Wellington Regional Strategy notes that an important goal for the region is to have more employment close to where people live, reducing pressure on transport and strengthening communities. The Strategy also highlights that the price of industrial land in the region is rising due to competition as a result of retail and residential demands. Regulatory management is therefore considered appropriate.

The use of the term 'should' is considered more appropriate than 'shall' for policy 30 as it is not clear whether all districts contain any key industrial employment locations that reinforce the achievement of objective 21. 'Should' sets out an expectation that the implementation of this policy needs to be further investigated.

Options 4 and 5, seeking that particular regard be given to the need to protect industrial employment locations, in all resource management decisions making, is not considered appropriate as without clear knowledge as to what are the region's key locations, there would very likely be varying interpretation within the policy making.

4.4.6 Managing urban development beyond the region's urban areas

Seeking that particular regard be given to managing urban development beyond the region's existing urban areas (option 5, policy 54 and method 1) when making resource management decisions, in conjunction with regional guidance on structure planning (option 7, method 18) are considered the most appropriate way to manage urban development beyond the region's urban areas and achieve objective 21.

Policy 54 seeks, among other things, that particular regard be given to whether the urban development is the most appropriate to achieve objective 21 and whether it is consistent with a council's growth strategy and/or development framework, or a structure plan has been prepared. This policy applies to urban development beyond the region's urban areas as at March 2009. March 2009 is used to align with the time of releasing of the proposed Regional Policy Statement. Both urban development and urban areas are defined in the proposed Regional Policy Statement to assist with implementation.

The Regional Policy Statement Evaluation Report for Built Environment and Transportation (2006) outlined that policies in the current regional policy statement did not provide regional direction as to where and how the region's urban development should be managed. Feedback in response to Our region – their future (2006) indicated a community concern about urban growth and impacts on infrastructure, green spaces. The Wellington Regional Strategy discussion document (2006) also highlighted that the region's strong urban corridor pattern was starting to break down, with risks of reduced transport efficiency and a weakening of existing centres. It is therefore appropriate that the proposed Regional Policy Statement provide direction as to how urban growth in the region should be considered.

Requiring, however, that district plans restrict urban development beyond defined (urban containment) areas is not considered the most appropriate option for the Wellington region. Based on current knowledge, it would not be possible to robustly determine where boundaries should be set. The region's urban areas, in a number of locations, are constrained by topography and the region's overall growth is not rapid. Where topography is not a constraint and/or there is more growth pressure it is also considered more appropriate that city and district councils work with their communities to determine how urban growth should be managed.

4.4.7 Managing rural development

Seeking that particular regard be given to managing rural development (option 5. policy 55 and method 4) when making resource management decisions, in conjunction with the Wellington Regional Strategy action of developing principles to guide the identification and release of sustainable rural residential development (option 7, method 44) is considered the most appropriate way to manage rural development and achieve objective 21.

The Wellington Regional Strategy identifies “Rural industry growth’ and ‘Rural lifestyle’ as two key elements to “Investing in good regional form”. The Strategy notes, in particular, that there are benefits to the region from encouraging rural lifestyle development in certain areas, but that there are threats to the environment from such development. This includes loss of quality soils (Class I and II in particular) out of rural production, and the loss or degradation of sensitive ecosystems and aesthetic and open space areas valued by communities. The most appropriate option is, therefore, considered to be a policy direction (for all rural development types) about matters which needs to be given particular regard and the development of principles to guide development (i.e. option 5).

Options 1 and 2, requiring that district plans restrict types of rural development to defined areas are not considered appropriate options for the Wellington region as there is currently no robust information on where different types of rural development have the highest benefits and least effects. In addition, as for urban development, it is also considered more appropriate that city and districts councils work with their communities to determine how rural development should be managed in specified locations.

4.4.8 Encouraging higher density and mixed use development in appropriate locations

Requiring district plans to identify key centres and locations with good access to the strategic public transport network and include policies, rules or other methods to encourage higher density and/or mixed use development in and around these location at the time of their next plan review (option 2, policy 30 and method 1), along with non-regulatory information (from Greater Wellington) about key locations with good access to the strategic transport network (option 7, method 16) is considered the most appropriate way to encourage higher density and mixed use development in appropriate locations and achieve objective 21.

The need to encourage more homes close to city centres and transport links is identified as a key element to “Investing in the region’s form” in the Wellington Regional Strategy. The proposed combination of regulatory direction to district plans to identify appropriate locations for higher density and mixed use development, while also leaving the specific decision as to what are the key centres and locations (with good access to the strategic public transport network) up to city and district councils.

‘Key centres’ have been defined in the proposed Regional Policy Statement as the regionally significant centres, as well as any/all other significant local centres that a city or district council considers are integral to the functioning of the region’s or district’s form. Locations with good access to the strategic public transport network and the ‘strategic public transport network’ are also defined to assist with effective implementation.

Options 4 and 5, seeking that the need to encourage higher density and mixed use development in ‘appropriate locations’ be given particular regard, when making resource management decisions, are not selected as appropriate options. Such options would be ineffective without clear guidance as to where the appropriate locations are. It is also considered more appropriate that city and district councils work with their communities to determine which locations are appropriate in order to maintain and enhance the district and/or region’s form.

4.4.9 A range of housing (including affordable housing) to meet the region’s needs

The non-regulatory Wellington Regional Strategy action of completing a region wide study of housing supply and analysis of affordable housing (option 7, policy 67 and method 46) is the most appropriate way to begin to tackle issues around housing types to meet the

region's needs (in the context of managing resources under the Resource Management Act) and achieve objective 21.

The Wellington Regional Strategy notes that research to date shows that there is a gap in the housing types provided within the region. In addition, affordable housing tends to be located at a distance from the regional central business district in Wellington city and other key places of work.

The Regional Policy Statement has a limited number of ways in which it can influence (through plans and resource management decisions) the provision of a variety of housing types in the region. Policy 30 (discussed above) is anticipated, however, will assist in increasing the range of housing in the region. In addition, based on current knowledge and understanding of the issues, additional regulatory options are either not appropriate under the Resource Management Act or will have little influence.

It is considered, therefore, that the most appropriate option for the region is to determine the issues and options, prior to deciding on whether any further regulatory intervention is appropriate under the Resource Management Act.

4.4.10 Recognising and enhancing the role of the region's open spaces

The non-regulatory Wellington Regional Strategy action of identifying major gaps and opportunities to improve integration of the region's public open spaces (option 7, policy 67 and method 40) is the most appropriate way to recognise and enhance the role of the region's open spaces and achieve objective 21.

The Wellington Regional Strategy identified quality open spaces as being fundamental to world class cities and that there are opportunities to improve the region's open space network. In addition, as noted above, one of the concerns raised by the community in response to "Our region – their future" (2006) was the loss of open space values as a consequence of urban expansion. The identification of major gaps and opportunities to improve integration of the region's public open spaces is considered to be the most appropriate way to gain a more comprehensive understanding of the role of the region's public open spaces as part of the region's form.

Requiring district plans to include policies that require financial contributions (land or money) for subdivisions on the edge of urban areas, so as to offset adverse effects from urban expansion (and contribute the region's public open spaces) could be effective. However, this approach would require knowledge about where further public open space ought to be located. In the Wellington region this has not been determined so such a direction is not appropriate at this time. The option of seeking that particular regard must be given, when making resource management decisions, to enhancing the region's public open spaces is considered to be of little influence or effect.

4.4.11 Managing development of the Regional Focus Areas identified in the Wellington Regional Strategy

Seeking that particular regard be given to the management goals for the Regional Focus Areas described in the Wellington Regional Strategy (option 5, policy 58 and method 4) when making resource management decisions, in conjunction with the Wellington Regional Strategy action of each council completing planning frameworks for the Regional Focus Areas (option 7, method 45) are the most appropriate way to manage the development of the Regional Focus Areas and achieve objective 21.

The Wellington Regional Strategy identifies eight areas in the region as “Regional Focus Areas” (see Figure 3 in the proposed Regional Policy Statement).

These areas have been assessed as likely to come under significant development pressure, or to represent opportunities for further development to support the region’s form. The appropriate management of these areas needs to be determined by local authorities with their communities so the most appropriate approach is that each council complete planning frameworks or structure plans with their communities. There is, however, a risk for these locations that, in the interim, development could occur in a form that does not support a compact, well designed and sustainable regional form. It is therefore important that policy 58 raises awareness of the pressures and opportunities in these areas, should development precede prior to the development frameworks or structure plans being completed and then reflected in plans.

Requiring that district plans identify and manage the pressures or opportunities identified for the ‘Regional Focus Areas’ is not considered an appropriate option as the Wellington Regional Strategy does not clearly spell out what the required management should be. It is also considered that the management regime should be determined with local communities.

4.4.12 Risk of acting or not acting if there is uncertain or insufficient information

(a) Risk of acting

As noted in a number of sections above there are several themes within objective 21 about which there is uncertain or insufficient information. The risk of acting or not acting has been considered in each of these circumstances. In some circumstances the risks have had a direct bearing on particular approaches being considered inappropriate at this time, even though they may be, in theory, more effective and efficient. For example:

- Requiring that the regional urban design principles be promoted in district plans is not considered the most appropriate response to the issue or to achieve the objective, as such a policy is not yet supported by sufficient information as to how to achieve the promotion, or what promotion would mean in practise.
- Requiring district plans to promote land use decisions that integrate land use decisions with transportation is also not considered to be the most appropriate response to the issue or to achieve the objective, as there is not yet sufficient information for local authorities to effectively implement such a broad, generic policy.
- Requiring district plans to identify and protect key industrial employment locations was only considered an appropriate response if the policy stated ‘shall’, as there is uncertainty as to whether all districts have key industrial employment locations that reinforce achievement of objective 21.
- Requiring district plans to restrict urban development to defined urban containment areas is not considered the most appropriate response as the region’s growth is already constrained by topography and by its rate. Where topography is not a constraint and/or there is more growth pressure, it is also considered not appropriate to act in the way described by option 5, as city and district councils need to work with their communities to determine the most appropriate management response to cater for but also manage urban growth patterns and outcomes.
- Requiring district plans to restrict particular types of rural development to defined areas is not considered an appropriate way to manage rural development as there is

currently uncertain and insufficient information as to where the different types of rural development have the highest benefits and least adverse effects.

- Requiring district plans to include provisions requiring financial contributions for subdivisions on the edge of urban areas – so as to be able to offset adverse effects from urban expansion - is not considered the most appropriate way to ‘recognise and enhance the role of the region’s open space’ as there is insufficient information about where further public open space should be required to support the region’s form.
- Requiring district plans to identify and manage future development pressures and opportunities in Regional Focus Areas is not considered the most appropriate response, as the Wellington Regional Strategy does not clearly spell out what the required management of these areas should be. Requiring that the management purposes be given particular regard in resource management decision making is, however, important when considering the risk of not acting.

(b) Risks of not acting (doing nothing)

As noted in section 4.4.1 the following key principles were applied when determining the appropriate role of the Regional Policy Statement in managing the regions form, design and function:

- add value to the management of the region’s form design and function (not duplicate or unnecessarily conflict with local management)
- reflect the issues identified in the Wellington Regional Strategy and compliment the actions using the tools available to regional policy statements
- provide regional direction, while leaving specific decision making to district and city.

Taking these principles into account, the significance of the issues identified, the desire expressed from the community for regional direction (as part of the review) and the functions of Greater Wellington when developing the Regional Policy Statement under the Resource Management Act, the risk of acting in the way proposed is that some costs will be imposed on local authorities and on applicants for resource consents.

The risk of not acting in the way proposed is that the region’s compact form will continue to fray, as sporadic and uncoordinated developments will occur. This would result in the numerous advantages associated with the region’s current form being lost, with consequent significant adverse effects to the environment, people and economy of the region. There is a risk that poor quality urban design would come to dominate, with consequent adverse affects on public health, social equity, land values, the vibrancy of local centres and economies, the provision and access to civic services, the sustainable use of non-renewable resources and an increase in vehicle emissions. Furthermore, there is a risk that a lack of integration between land use and the region’s transportation network would create patterns of development that increase the need for travel, the length of journeys and reliance on private motor vehicles, resulting in a variety of adverse effects to the people, economy and natural environment of the region.

It is clear to Greater Wellington that the risk of acting is much less than the risk of not acting.

Appendix 1: Criteria used to determine regionally significant issues

The criteria used for determining whether an issue was a resource management issue of regional significance were:

- The issue was a natural or physical resource management problem.
- The issue was to be of regional significance (see further criteria below).
- The issue was about achieving the purpose of the Resource Management Act.
- The issue did not “repeat” the Resource Management Act, the New Zealand Coastal Policy Statement, any other national policy, or another issue in the Regional Policy Statement.
- The issue was explained in the context of the Wellington region.

Regional significance was determined using the following criteria

- The issue concerns a resource which is regionally significant, and the issue requires integrated management at a regional level ; and
- There is a potential shortage of the resource and resultant allocation issues; or
- There is a significant level of conflict over the resource which is either occurring or is foreseeable over the next 10 years; or
- The resource is potentially subject to significant adverse effects at a regional level; or
- There are significant issues in terms of Part 2 of the Resource Management Act which are, or are likely to, arise at a regional scale (eg maintenance and enhancement of access along waterways); or
- The community has signalled that it regards a particular issue as being of regional significance; or
- The issue is one of national significance (eg preservation of natural character) and requires regional intervention; or
- The issue is one of district significance but requires regional intervention; or
- The matter is one which a National Policy Statement or National Water Conservation Order requires to be addressed.

Appendix 2: References

Greater Wellington Regional Council (2005). 2004/5 Annual Monitoring Report on the Regional Land Transport Strategy. Wellington. Publication No WRC/TAP-G-05/216

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Greater Wellington Regional Council (2006). Regional Policy Statement Evaluation Report for Built Environment and Transportation. Wellington. Publication No. GW/EP-G-09/20

Greater Wellington Regional Council (2007) A sustainable region. Detailed information. Amended 2006-16 Ten-Year Plan (incorporating the 2006/7 Annual Plan). Wellington. Publication No. GW/SP-G-07/108

Greater Wellington Regional Council (2007). Wellington Regional Land Transport Strategy 2007-2016. Wellington. Publication No. GW/TSD-G-07/175

Greater Wellington Regional Council (2007). Wellington Regional Strategy: Internationally Competitive Wellington: A Sustainable Economic Growth Strategy for our Region. Prepared by the regions nine local authorities in association with Positively Wellington Business. Wellington. Publication No. GW/SP-G-07/01

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