



## District Plan Change 39

### Maximum Building Coverage – Residential Environment and Nukuhau General Residential

### Section 32 Evaluation Report

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## 1 INTRODUCTION

Proposed Plan Change 39 (PC39) seeks to increase the percentage of maximum building coverage in the Residential Environment and Nukuhau General Residential, from 30% to 35%. The table below identifies what parts of the Residential Environment Chapter are included and excluded from this Plan Change.

RESIDENTIAL ENVIRONMENT	INCLUDED IN THIS PLAN CHANGE
All properties in the district zoned Residential Environment (See the district plan map for more information).	✓
Nukuhau General Residential	✓
Kinloch Residential, Kinloch Low Density and Kinloch Rural Residential	✗
Low Density Residential	✗
High Density Residential	✗
Nukuhau Medium Density Residential	✗
Lake Ohakuri Development Zone	✗
Pukawa C Development Zone	✗
Neighbourhood shops	✗
Properties with site specific coverage requirements (i.e through consent notices)	✗

The current standard is resulting in landowners seeking larger buildings subsequently requiring resource consent to exceed building coverage. Resource consent is generally granted therefore this process is creating unnecessary additional costs and adding time to the development process.

This Section 32 report should be read in conjunction with the plan change document.

## 2 STATUTORY FRAMEWORK

The preparation of PC39 has been undertaken in accordance with the First Schedule of the Resource Management Act 1991 (RMA).

Sections 74 of the RMA sets out the requirements for changes to district plans, while section 75(3) and section 75(4) sets out the following matters:

*(3) A district plan must give effect to—*

- (a) any national policy statement; and*
- (b) any New Zealand coastal policy statement; and*
- (ba) a national planning standard; and*
- (c) any regional policy statement.*

*(4) A district plan must not be inconsistent with—*

- (a) a water conservation order; or*
- (b) a regional plan for any matter specified in section 30(1).*

These requirements are addressed in the following sections of this report.

Section 74(1) directs that Council must undertake changes to its district plan in accordance with s31, provisions under Part 2 and s32. PC39 is considered to be in accordance with s31(a) and (b) as increasing the percentage of building coverage in the residential area is achieving integrated management of the effects of the use and development of the natural resources of the district and the control of any actual or potential effects of use or development. An evaluation of PC39 has also been undertaken in accordance with Section 32 of the RMA and is appended to this report.

Clauses 1 to 20A of the First Schedule to the RMA sets out the procedures for a plan change, including consultation and notification requirements. Clauses 3 and 3B set out the relevant procedures for consultation. Clause 3(1) states that during the preparation of a proposed policy statement or plan, the local authority concerned shall consult with the Minister for the Environment, other Ministers of the Crown who may be affected by the plan change, local authorities who may be so affected, and the Tangata whenua of the area who may be so affected, through iwi authorities, and the board of any foreshore and seabed reserve in the area. Clause 3(2) sets out that “a local authority may consult anyone else” in preparing a plan change, subject to Clause 3(4) which requires that such consultation must be undertaken in accordance with Section 82 of the Local Government Act 2002 ('LGA'). Accordingly, Council must consult with the parties identified in clause 3(1) but retains discretion to consult with anyone else. If Council elects to undertake discretionary consultation, it must do so in accordance with the principles in section 82 of the LGA. Clause 3B relates to consultation with iwi authorities.

Details of the consultation undertaken for PC39 are provided in Section 2.3 of this report. The consultation meets the requirements of the First Schedule.

Clauses 5 to 11 of the First Schedule set out procedures for notification, receipt of submissions, hearings and notification of decisions in relation to plan changes. In processing the plan change, it will be necessary for compliance to be achieved with the requirements of these provisions.

## **2.1 Relevant Planning Documents**

The relevant planning documents are assessed below.

### **2.1.1 Vision and Strategy - Ngāti Tūwharetoa, Raukawa and Te Arawa River Iwi Waikato River Act 2010.**

This legislation records that the Waikato River and its contribution to New Zealand's cultural, social, environmental and economic wellbeing is of national importance.

The overarching purpose of the Ngāti Tūwharetoa, Raukawa and Te Arawa River Iwi Waikato River Act is to restore and protect the health and well-being of the Waikato River for future generations. The Act provides for the establishment of a Vision and Strategy for the Waikato River and co-governance and co management arrangements to achieve the overarching purpose of Ngāti Tūwharetoa, Raukawa and Te Arawa River Iwi Waikato River Act.

The act recognises the significance of the Waikato River to Ngati Tuwharetoa, Raukawa, and Te Arawa River Iwi:

- (a) recognises the vision and strategy for the Waikato River:
- (b) establishes and grants functions and powers to the Waikato River Authority:
- (c) establishes the Waikato River Clean-up Trust:
- (d) acknowledges and provides a process that may recognise certain customary activities of Ngati Tuwharetoa, Raukawa, and Te Arawa River Iwi:
- (e) provides co-management arrangements for the Waikato River.

This Act is part of three acts which establish co-governance arrangements for the Waikato River.

The Act recognises the “Vision and Strategy” for the Waikato River and establishes the scope of the vision and strategy. The Vision and Strategy for the Waikato River is Te Ture Whaimana o te Awa o Waikato. Te Ture Whaimana o te Awa o Waikato is fundamental to the settlement of claims in respect of the Waikato River and the restoration and protection of the health and wellbeing of the Waikato River for future generations. It has been accorded statutory status via Section 5 of the Ngāti Tūwharetoa, Raukawa and Te Arawa River Iwi Waikato River Act 2010:

*The vision and strategy is intended by Parliament to be the primary direction setting document for the Waikato River and activities within its catchment affecting the Waikato River.*

Schedule 1 of the Act contains Te Ture Whaimana o Te Awa o Waikato – the Vision and Strategy for the Waikato River, while Section 12 requires that Te Ture Whaimana be inserted into the Waikato Regional Policy Statement (RPS). Section 13 establishes that the vision and strategy prevails over any inconsistent provision in a National Policy Statement. Accordingly, PC39 must give effect to the Vision and Strategy in the RPS pursuant to section 75(3)(a) of the RMA.

PC39 has considered the effect on stormwater and the effects these changes may have on the Waikato River. There will be no increase in impermeable surface as a result of the proposed change to the building coverage, particularly as the total coverage standards are remaining which manage the amount of impermeability on each site. “Total coverage” is defined in the Plan as:

*the maximum amount of the allotment permitted to be covered, regardless of the surface material, which is required in complying with the Performance Standards in relation to vehicle movements, parking and building coverage but excluding any land used for right-of-way or access lots.*

Consequently the proposed plan change will not have any effect on the amount of stormwater runoff created, or the Waikato River.

### **2.1.2 National Policy Statement on Urban Development**

The National Policy Statement for Urban Development (NPS-UD) came into force on 20 August 2022. It is the government’s policy direction to ensure sufficient development capacity and well-functioning urban environments to meet the different needs of people and communities.

PC39 gives effect to the National Policy Statement on Urban Development (NPS-UD) by enabling a variety of homes that meet the needs, in terms of type, price, and location, of different households. The plan change is responding to the changing housing needs of the community while enabling and efficient use of the urban land resource in accordance with Policy 1 of the NPS-UD.

### **2.1.3 National Policy Statement for Freshwater Management 2020**

The NPSFM 2020 came into effect on 3 September 2020 and provides direction on how freshwater should be managed under the RMA. The NPSFM 2020 supports improved freshwater management in New Zealand by directing regional councils to establish objectives and set limits for fresh water in their regional plans. The fundamental concept, objectives and policies of the NPSFM 2020 are discussed below.

Te Mana o te Wai is the fundamental concept underpinning the NPSFM 2020. It recognises that protecting the health of freshwater protects the health and well-being of the wider environment and protects the mauri of the wai. Te Mana o te Wai involves restoring and preserving the balance between the water, the wider environment, and the community.

The objective of the NPSFM 2020 is to ensure that natural and physical resources are managed in a way that prioritises:

- a) First, the health and wellbeing of water bodies and freshwater ecosystems;
- b) Second, the health needs of people (such as drinking water); and
- c) Third, the ability of people and communities to provide for their social, economic, and cultural wellbeing, now and in the future.

As the proposed change to building coverage will have no effect on the generation of stormwater, the NPS on Freshwater is not relevant.

#### 2.1.4 Regional Policy Statement

Pursuant to section 75(3)(c) of the RMA, a District Plan must give effect to any operative Regional Policy Statement. While Taupo District is covered by four different regional councils, only the Waikato Regional Policy Statement is considered relevant and is assessed below. This is because the jurisdiction of Waikato Regional Council covers the urban environment to which this plan change relates.

PC39 gives effect to the Waikato Regional Policy Statement by being an efficient use of urban land (RPS Objective 3.10), responding to changing land use pressures outside the Waikato region which may impact on the built environment within the region (RPS Objective 3.12(h)) and maintaining amenity (RPS Objective 3.21).

Other relevant provisions are in Section 6 Built Environment:

- Policy 6.1 Planned and co-ordinated subdivision, use and development
- Policy 6.11 Implementing Taupo District 2050
- 6A General development principles

#### 2.1.5 Iwi Management Plans

There are four iwi management plans:

- Ngati tahu Ngati Whaoa Iwi Management Plan
- Ngati Tuwharetoa Iwi Management Plan
- Te Rautaki Taiao a Raukawa
- Whakamarohitia ngā wai o Waikato Te Arawa River Iwi Trust Environmental Plan

As this proposed plan change will not result in any change to the creation of stormwater, the plan change is considered to take into account the matters contained in the iwi management plans in accordance with section 74(2A) of the RMA.

#### 2.1.6 TD2050 - Growth Management Strategy

The Taupo District 2050 - Growth Management Strategy outlines where Council prefers future urban growth to occur and the nature and scale of such growth. The amendment proposed with this plan change has appropriate regard to the anticipated outcomes of this strategy.

#### 2.1.7 Waikato Regional Plan

In accordance with Section 75(4)(b) of the RMA, an operative plan change must not be inconsistent with a regional plan for any matter under section 31. PC39 is not inconsistent with the Waikato Regional Plan, taking into account that this plan change is limited to changes in percentage of building coverage only.

## 2.2 Taupo District Operative Plan Approach

The Performance Standards-Development Controls for the Residential Environment and Nukuhau General Residential Environment is currently a maximum of 30%.

The Residential Environment chapter has a suite of performance standards that manage bulk and location of buildings of which building coverage is one. The performance standards managing building bulk and design and outlined in the table below.

	Residential	Purpose
4a.1.1 Building Coverage	30%	Manages how much of the site is covered by buildings

4a.1.2 Plot Ratio	40%	Manages the size and design of multiple story buildings
4a.1.3 Total Coverage	50%	The maximum amount of the allotment permitted to be covered, regardless of the surface material, which is required in complying with the Performance Standards in relation to vehicle movements, parking and building coverage but excluding any land used for right-of-way or access lots.
4a.1.4 Minimum Building Setback – Front Boundary	5m	Results in the bulk of the building being separated from the road and allows room to park a car in front of the building.
4a.1.5 Minimum Building Setback – All other boundaries	a. 1.5m b. 5m Fore-shore Protection Area boundary.	Manages the setback of buildings from the boundaries.
4a.1.6 Minimum Building Setback – common wall boundaries	0m	Exempts buildings with a common wall from needing to be setback from the boundary
4a.1.7 Maximum Building Height	a. 8m b. 5m within Height Restricted Areas unless otherwise indicated on planning map D2	Controls the bulk of buildings
4a.1.8 Maximum Height to Boundary	2.5m height at the boundary with a 45° recession plane except for common wall boundaries.	Controls the bulk of buildings and ensures that neighbouring properties have adequate access to sunlight.

Table 1: Performance standards

## 2.3 Technical Context

No outside technical work was commissioned. Staff undertook the following analysis:

- resource consents from 2014-2018 and 2021 that were for infringements of the building coverage rule;
- assessed TDC building coverage standards against other district plans of similar size, and
- made comparison calculations on lot sizes to understand how 35% coverage would affect different property sizes.

### 2.3.1 2014 – 2018 Resource Consent Analysis

When considering this plan change an analysis was undertaken for previous years for non-compliance of this standard. Between 1 January 2014 and 1 October 2018 there was a total of 440 land use consents granted, 178 of these land use consents included non-compliances to exceed maximum building coverage of 30% with the majority of the land use consents sought and approved were for between 30% and 36% building coverage. The graph below illustrates the full 178 land use

consents sought and approved for exceeding 30% building coverage. It is acknowledged that a number of these land use consent would have been approved based on written approvals from neighbours.

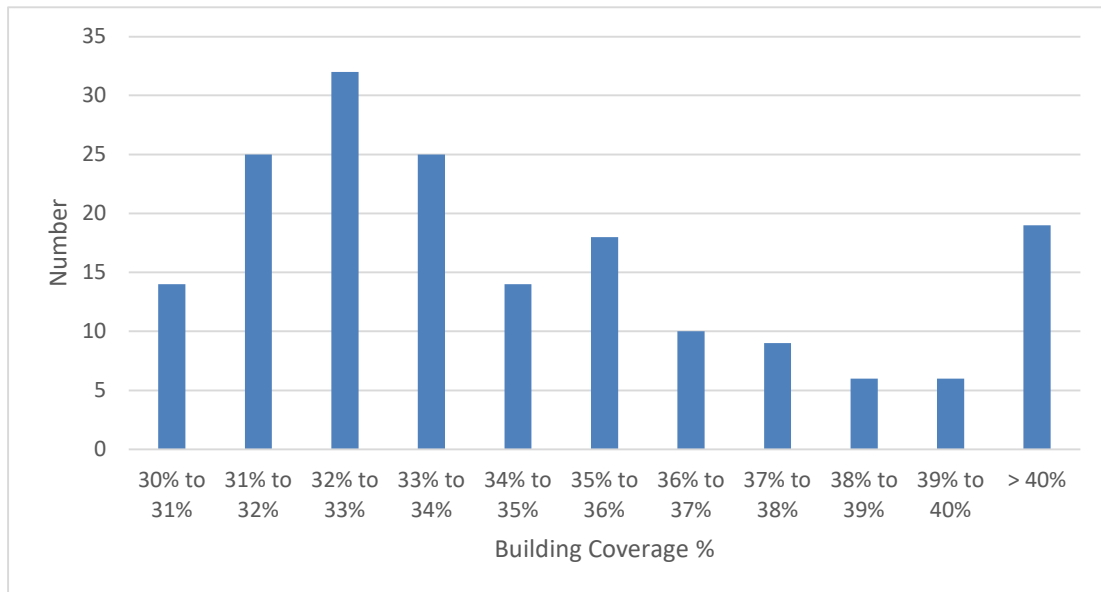


Table 2: 2014-2018 resource consents for building coverage non-compliance

### 2.3.2 2021 Resource Consent Analysis

For the year 2021, 123 land use consents were sought for non-compliances in the Residential Environment and of these there were 59 resource consents seeking dispensation to exceed building coverage. A number of the consents were for approvals on multiple properties and while one resource consent was approved for these properties, the graph below identifies each of the non-compliances. The graph therefore has a total number of 69 to reflect this.

The data from 2021 is similar to the previous resource consent data between 2014 and 2018, however the most common number sought has moved from 32% - 33% to 34% - 35% for 2021 resource consents.

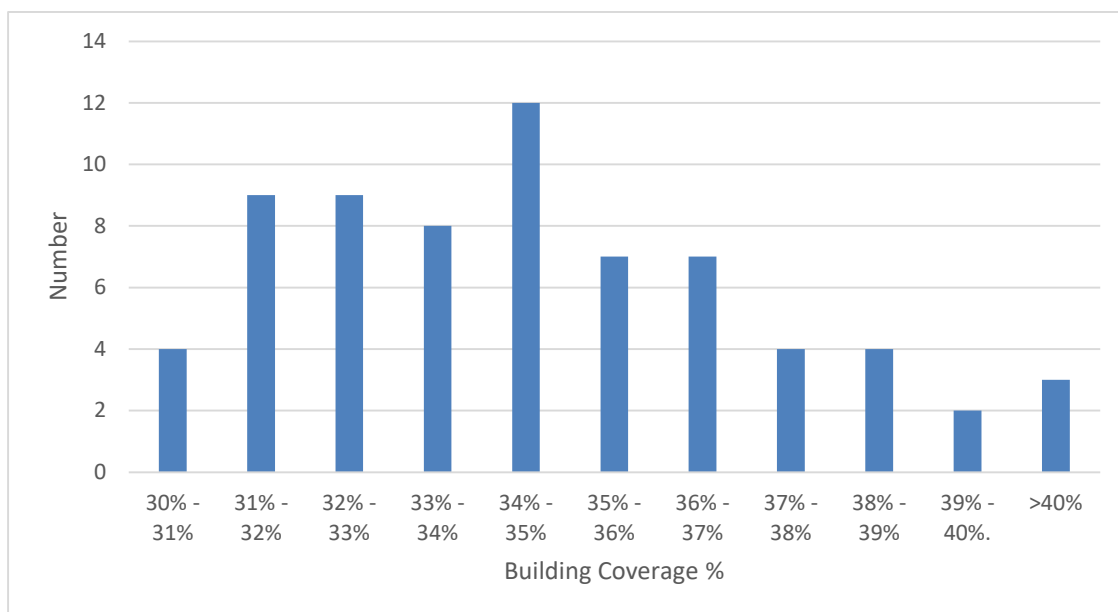




Table 3: 2021 resource consents for building coverage non-compliance

### 2.3.3 District Plan Comparison

The maximum building coverage requirements of the Queenstown, Horowhenua, Whakatane and Matamata-Piako District Plans were used for comparative purposes due to the similarity of these districts' population size with Taupō. The table below illustrates the permitted building coverage for each of these districts and what this equates to using an example of a 400m<sup>2</sup>, this is due to these district plans having a density requirement ranging between 330m<sup>2</sup> - 450m<sup>2</sup>.

District Plan	Permitted Site Coverage	Permitted Building (m <sup>2</sup> ) on 400m <sup>2</sup> allotment
Queenstown	40%	160m <sup>2</sup>
Horowhenua	< less than 500m <sup>2</sup> - 40% > greater than 500m <sup>2</sup> - 35%	160m <sup>2</sup>
Whakatane	40%	160m <sup>2</sup>
Matamata-Piako	35%	140m <sup>2</sup>

Table 4: District plan comparison

Three of the four District Plans listed in the table above provide a permitted coverage of 40% which provides for a dwelling of 160m<sup>2</sup> on a 400m<sup>2</sup> allotment. The 30% building coverage provided for in the Taupō District Plan (**TDP**) allows a building of up to 120m<sup>2</sup>, being 40m<sup>2</sup> less than those building permitted in these other Districts. At 35% as provided for in the Matamata-Piako District Plan, buildings are 20m<sup>2</sup> larger than those permitted under the TDP.

A key difference with the TDP is that there is no minimum density or allotment size in the Residential Environments. The TDP operates on the basis that any size allotment is allowable, however compliance with the performance standards needs to be demonstrated. For example, a 200m<sup>2</sup> site, would have a permitted building footprint of 60m<sup>2</sup> unless resource consent was obtained for additional coverage. Therefore the bigger the site the larger building able to be provided as a permitted activity.

It is important to note that these other District Plans also had other standards to manage the bulk and design of buildings in assisting with effects on adjoining and nearby properties. These included maximum building façade lengths and landscaping requirements. These are standards not included in the TDP 'toolbox'.

### 2.3.4 Comparative calculations

To better understand what 35% building coverage would allow, below are some examples of different property sizes and how much additional building would be allowable.

Property Size	30% Building Coverage (m <sup>2</sup> )	35% Building Coverage (m <sup>2</sup> )	Additional m <sup>2</sup>
900m <sup>2</sup>	270m <sup>2</sup>	315m <sup>2</sup>	45m <sup>2</sup>
600m <sup>2</sup>	180m <sup>2</sup>	210m <sup>2</sup>	30m <sup>2</sup>
400m <sup>2</sup>	120m <sup>2</sup>	140m <sup>2</sup>	20m <sup>2</sup>

Table 5: Examples of property sizes and additional building coverage

While the additional coverage may provide for a small sleepout on larger sized properties, the additional coverage on smaller properties between 400m<sup>2</sup> and 600m<sup>2</sup> will typically be smaller than a double garage (36m<sup>2</sup>) and comparable to an additional bedroom or two.

The 5% increase will not provide for a substantial amount of change in terms of building size relative to the size of the site, but enough change to allow landowners the ability to create space they require without additional costs and delays incurred through the resource consent process.

## 2.4 Other residential standards

It is important to note that these other District Plans also had other standards to manage the bulk and design of buildings in assisting with effects on adjoining and nearby properties. These included maximum building façade lengths and landscaping requirements. These are standards not included in the TDP 'toolbox'.

The Residential Environment chapter has a suite of other performance standards that manage bulk and location of buildings:

- 4a.1.2 Plot Ratio;
- 4a.1.3 Total Coverage;
- 4a.1.4 - 4a.1.6 Building Setbacks
- 4a.1.7 Building Height; and
- 4a.1.8 Height to Boundary.

Council recognises that the bulk and location standards are in need of a comprehensive review, they will be dealt with in the wider Residential Environment Plan change which is continuing to be developed. This is due to the complexity of the work required to draft appropriate amendments.

In the meantime however, a separate plan change considering building coverage has the potential to deliver positive outcomes earlier than what is being considered through the more complex wider Residential Environment plan change.

## 2.5 Engagement

Section 3 of the RMA sets out the consultation requirements as below:

*3(1) During the preparation of a proposed policy statement or plan, the local authority concerned shall consult –*

- (a) the Minister for the Environment; and*
- (b) those other Ministers of the Crown who may be affected by the policy statement or plan; and*
- (c) local authorities who may be so affected; and*
- (d) the tangata whenua of the area who may be so affected, through iwi authorities; and*
- (e) any customary marine title group in the area.*

*3(2) A local authority may consult anyone else during the preparation of a proposed policy statement or plan*

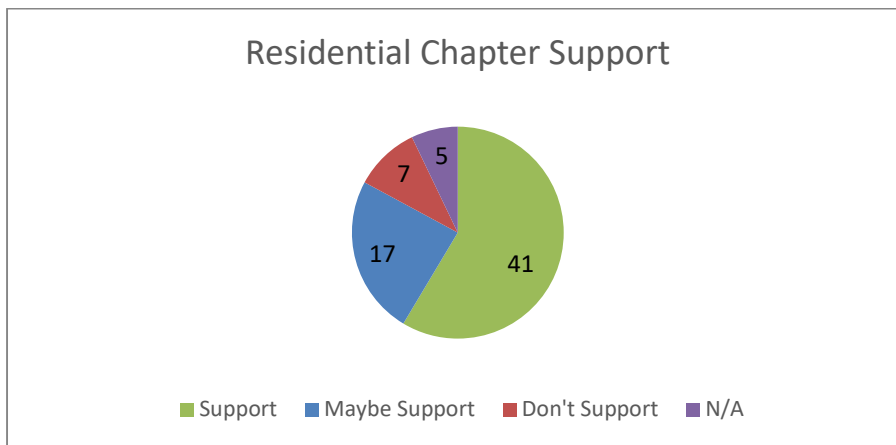
Section 3(1) above is mandatory while Section 3(2) is at the discretion of the Council. In this instance, Council undertook discretionary consultation in relation to this amendment.

May/June 2022: Community consultation was undertaken closing Monday 13 June 2022. As a result of the 70 submissions received, 41 of respondents supported the proposed change, 17 maybe supported while 12 didn't support or considered this was not applicable to their situation.

Of those supporting, some went so far as to say they considered the figure should go as high as 40%. While generally comments were positive some submitters had concerns on:

- possible social issues,
- lack of green space to absorb water, (especially when considering climate change),

- Infill housing putting unnecessary strain on existing infrastructure,
- making changes to the maximum building coverage without also looking at Plot Ratio and Earthworks and they considered amendments should be more extensive.



*Fig 1 Graph showing support for proposed amendment to increasing building coverage for Residential Area.*

### **2.5.1 Iwi Authority Consultation**

Clause 3 of Schedule 1 of the RMA sets out the requirements for local authorities to consult with tangata whenua through and iwi authorities. Details of the consultation undertaken for PC41 are provided in The Taupō District Plan Changes – Background and Engagement Summary Report which covers consultation and engagement for the full suite of plan changes 38-43. No specific feedback was received from iwi partners in relation to residential coverage.

### **2.5.2 Governance**

Governance aspects are covered in the Background and Engagement Summary report which covers the consultation and engagement for the full suite of plan changes 38-43.

## **3 SECTION 32 EVALUATION**

### **3.1 Key Resource Management Issues**

The way people are choosing to live has changed, including larger families looking to live together out of necessity or cultural reasons. In addition, more people are choosing to work from their home and additional floor space will provide increased opportunities for this. Due to the restrictions on the percentage for maximum building coverage, landowners face non-compliance and require resource consents to exceed building coverage. Resource consent is generally granted, however this process is creating unnecessary additional costs and adding time to the development process.

### **3.2 Scale and Significance**

The proposed amendments are minor and while being restricted to the Residential Environment and Nukuhau General Residential Environment will have a degree of significance on landowners who wish to construct larger or additional buildings in that they will no longer need to apply for a resource consent for non-compliance.

The proposed amendments will enable landowners in the Residential Environment Nukuhau General Residential Environment to provide for their social and culture wellbeing through slightly larger houses. The increased floor size also potentially enables people to establish businesses in their home, or space to work from home.

### 3.3 Evaluation of the Objectives

There are no proposed objectives or amendments to objectives and thus an assessment of the objectives against the Purpose of the Act is not required.

### 3.4 Assessment of the Provisions

This section will consider whether, having regard to their efficiency and effectiveness, the proposed provisions are the most appropriate way to achieve the Objectives. The provisions may relate to more than one Objective.

#### Identification of Provision Options

1. Status quo
2. Increase building coverage to 35%
3. Increase building coverage to 40%
4. Delete the standard for building coverage and rely instead on the 50% maximum total coverage

Table 6: Assessment of Provision Options– How effective are the provisions in achieving the objective

Option	Source	Relevance	Recommendation
Option 1: Status quo	Current Performance Standards	Meets the objective in maintain and enhancing the amenity values.  Manages the bulk of buildings.	Discard, as not considered fit for purpose as the way people are choosing to live has changed, with larger families looking to live together out of necessity or cultural reasons. The current levels of building coverage somewhat limit the size of commercial activities / work from home opportunities that can establish as incidental to the primary residential activities.
Option 2: Increase building coverage to 35%	Analysis of resource consent data.  Favoured by the community.	Will meet the objective as the proposed amendment is already accepted and evaluated as part of the Residential Area through granting of previous resource consents. Analysis of resource consent data has shown 35% as being the general level of non compliance.	Preferred option

Option 3: Increase building coverage to 40%	Feedback from consultation.  Analysis of other district plans.	The change to 40% by itself without consideration of other Performance Standards, would be detrimental to maintaining the valued amenity in the Residential Area.	Discard, consider in the wider Residential Environment review.
Option 4: Delete the standard for building coverage and rely instead on the 50% maximum total coverage	Medium Density Residential Standards of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021	Simplifies the standards  Would enable a considerably larger dwelling  Aligns with the Medium Density Residential Standards of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021	Discard, due to the adverse effects on amenity and character of significantly larger buildings in the Residential Environment and Nukuhau General Residential Environment.

### Preferred Provision Option

Increase building coverage to 35%	
Benefits and Costs of Effects (s32(2)(a))	
Benefits	Costs
Environmental	
A more efficient use of each site	No environmental costs
Economic	
<p>Allows existing landowners to create additional building space which may be for the purposes of accommodating family, particularly in the current climate where housing affordability is an issue.</p> <p>Reduction of regulatory and consultant costs as part of the development process, ball-park around \$5,000 to apply and process a resource consent.</p> <p>Reduction of red tape for many 'mum and dad' type landowners.</p> <p>Reduced number of consents which will allow staff to focus on more complex issues.</p> <p>Additional floor space enables more businesses to establish from home. This not only is economically beneficial to the homeowner as reduced expenses of travel and</p>	Additional costs to notify a separate plan change for building coverage.

commercial zoned land, but also enables small businesses to establish.	
<b>Social</b>	
<p>Responds to the changing occupancy rates and housing needs of the community</p> <p>Processing separately to the wider Residential Plan Change will allow these benefits to occur faster, possibly a two year wait until Residential Environment Review completed.</p> <p>Enabling families to live together may enable some members of the household to return to the workforce and reduce the reliance on offsite child care.</p> <p>Better work / life balance with increased opportunities to establish businesses / work from home</p>	No social costs
<b>Cultural</b>	
Creates housing choice for different cultures and enables them to meet their needs.	No cultural costs
<b>Economic Growth and Employment Opportunities (s32(2)(a)(i)(ii))</b>	
The proposed change may enable the establishment of small businesses and thus create additional economic activity.	
<b>The efficiency and effectiveness of provisions (s 32(1)(b)(ii))</b>	
<p><u>Efficiency</u>: This approach is pragmatic and practical. It allows development to occur without having a negative impact, as in the most cases increasing the building coverage will have minimal effect on the existing amenity. The amendment means less resource consents for minor non-compliance will be lodged allowing staff to focus on more complex issues. The proposed change also reduces the costs for the landowners by not requiring a resource consent for modest infringements of the building coverage standard.</p>	
<p><u>Effectiveness</u>: The proposed change will be effective in achieving Objective 3a.2.1 which seeks to maintain and enhance the character and amenity of the Residential Environment. The proposed amendment will be less costly which may encourage more landowners to explore their cultural and social needs by choosing alternative ways of living. It will be effective in encouraging landowners and designers to consider differing housing typologies when building. The increase in floor size may allow people to establish businesses from their home or more easily work from home.</p>	
<b>Risk of acting or not acting if there is uncertain or insufficient information (s32(2)(c)):</b>	
There is no uncertainty or insufficient information.	
<b>Appropriateness:</b>	
The amendment is appropriate as it achieves Objective 3a.2.1	
<b>Reasons for deciding on the provisions (s32(1)(b)(iii))</b>	
The proposed 5% increase in building coverage will not result in a substantial amount of change in terms of building size relative to the size of the site, but will allow more flexibility for slightly larger residential units. The proposed amendment will allow landowners the ability to create space they require without additional costs and delays incurred through the resource consent process. The proposed amendment will achieve the purpose of the Act by enabling people and communities to provide for their social, economic, and cultural well-being and for their health and safety.	

## 4 Conclusion

While a comprehensive review of the residential provisions is progressing, increasing the maximum building coverage from 30% to 35% through a separate plan change process has the potential to deliver positive outcomes earlier than the more complex district plan review. A 5% increase will balance the demand for extra space without significantly altering building coverage or having adverse effects on character or amenity. While the proposed change may not provide for a substantial amount of change in terms of building size relative to the size of the site, it allows more flexibility to create additional space without additional costs and delays incurred through the resource consent process.

An increase in building coverage to 35% is considered the most appropriate way for achieving Objective 3a.2.1, having considered:

- (i) other reasonably practicable options for achieving the objective; and
- (ii) assessing the efficiency and effectiveness of the provision in achieving the objective.

## APPENDIX A - SIGNIFICANCE OF THE EFFECTS

Pursuant to section 32(1)(c), an evaluation report must contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal (section 32(1)(c)). This means that the scale and significance of the effects of the Proposal is the key factor influencing the level of detail required for a section 32 evaluation.

Considerations and criteria for determining scale and significance		Ranking High/Medium/Low
<b>1. Reasons for the change</b>	Increasing the maximum building coverage area from 30% to 35% reflects the reality of demand for slightly larger dwellings. It enables optimising use of each residential site.	<ul style="list-style-type: none"> <li>• Low</li> </ul>
<b>2. Degree of shift from the <i>status quo</i> (<i>status quo</i> defined as the current approach)</b>	<ul style="list-style-type: none"> <li>• Minimal</li> </ul>	<ul style="list-style-type: none"> <li>• Low</li> </ul>
<b>3.Environmental effects</b>	<ul style="list-style-type: none"> <li>• The increase is unlikely to result in detrimental environmental effects.</li> </ul>	<ul style="list-style-type: none"> <li>• Low</li> </ul>
<b>4. Economic effects</b>	<ul style="list-style-type: none"> <li>• The increase is likely to be beneficial to landowners in that they may not require resource consent for non-compliance with the building coverage standard, therefore reducing their building costs. It enables flexibility to create additional space without additional costs and delays incurred through the resource consent process.</li> <li>• The increased floor area may also enables more businesses to establish from home, as well as enabling additional space to work from home.</li> </ul>	<ul style="list-style-type: none"> <li>• Medium</li> </ul>



<b>5.Cultural effects</b>	<ul style="list-style-type: none"> <li>The increase is likely to be beneficial to landowners who wish to provide larger homes for families and in accordance with their cultural practices.</li> </ul>	<ul style="list-style-type: none"> <li>Medium</li> </ul>
<b>6.Social effects</b>	<ul style="list-style-type: none"> <li>The amendment will allow people more flexibility in the size and design of houses</li> </ul>	<ul style="list-style-type: none"> <li>Low</li> </ul>
<b>7. Who and how many will be affected?</b>	<ul style="list-style-type: none"> <li>Any landowner in the Residential Area.</li> </ul>	<ul style="list-style-type: none"> <li>Medium</li> </ul>
<b>8. Degree of impact on, or interest from iwi/Māori</b>	<ul style="list-style-type: none"> <li>Will enable Maori to build larger homes enabling them to embrace their cultural and encourage their traditional way of living, with higher housing occupancy.</li> </ul>	<ul style="list-style-type: none"> <li>Medium</li> </ul>

## APPENDIX B – ASSESSMENT OF PROVISIONS AGAINST HIGHER ORDER DOCUMENTS

### REGIONAL POLICY STATEMENT

Assessment of extent to which proposed provisions give effect to the Regional Policy Statement			
Objective	RPS Policy	RPS Implementation methods	Plan change provisions
<b>WAIKATO REGIONAL POLICY STATEMENT</b>			
<b>3.10 Sustainable and efficient use of resources</b>	Policy 6.1 Planned and co-ordinated subdivision, use and development	6.1.1 Regional plans, district plans and development planning mechanisms	PC 39 gives effect to the Waikato Regional Policy Statement by being an efficient use of urban land (RPS Objective 3.10), responding to changing land use pressures outside the Waikato region which may impact on the built environment within the region (RPS Objective 3.12(h)) and maintaining amenity (RPS Objective 3.21).
<b>3.12(h) Built Environment</b>	Policy 6.1 Planned and co-ordinated subdivision, use and development	6.1.1 Regional plans, district plans and development planning mechanisms	
<b>3.21 Amenity</b>	Policy 6.1 Planned and co-ordinated subdivision, use and development	6.1.1 Regional plans, district plans and development planning mechanisms	

### NATIONAL POLICY STATEMENTS

Assessment of extent to which proposed provisions give effect to the National Policy Statement on Urban Development		
Objective	Policy	Plan change provisions
<b>Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.</b>	<p>Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:</p> <p>(a) have or enable a variety of homes that:</p>	The plan change provisions are responsive to the changing housing needs of the community. It will allow a more varied form and type of dwelling and enable choice in how people live.

	<ul style="list-style-type: none"> <li>(i) meet the needs, in terms of type, price, and location, of different households; and</li> <li>(ii) enable Māori to express their cultural traditions and norms;</li> </ul>	
<p><b>Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:</b></p> <ul style="list-style-type: none"> <li>(a) the area is in or near a centre zone or other area with many employment opportunities</li> <li>(b) the area is well-served by existing or planned public transport</li> <li>(c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.</li> </ul>		<p>The proposed amendment will allow a higher occupancy in each dwelling and enable more people to live in the urban areas. This not only responds to the changing need of homes, but also enables more businesses to establish from home.</p>
<p><b>Objective 4: New Zealand’s urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.</b></p>	<p><b>Policy 6:</b> When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:</p> <ul style="list-style-type: none"> <li>(a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement</li> <li>(b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes: <ul style="list-style-type: none"> <li>(i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future</li> </ul> </li> </ul>	<p>The proposed amendment may have a minor effect on amenity by enabling larger dwellings.</p>

generations, including by providing increased and varied housing densities and types; and

- (ii) are not, of themselves, an adverse effect
- (c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)

**APPENDIX C – PROVISION CASCADE**

<b>Issue to be addressed</b>	<b>Objective</b>	<b>Policies</b>	<b>Rules</b>	<b>Standards / Assessment Criteria</b>
<p>Reduce the need for resource consent to exceed building coverage.</p> <p>Enable slightly larger dwellings to respond to a changing need for housing</p>	<p>3a.2.1</p>	<p>3a.2.1 (i)</p>	<p>4a.1.1 Maximum Building Coverage (i)</p>	<p>4a.7.6 a and b.</p>