Proposed Plan Change 57:
Brightwater Strategic Review
Section 32 Evaluation Report

1.0 Introduction

The purpose of this Plan Change is to update future land requirements for urban development at Brightwater. The Plan Change takes account of population projections, available land and information on flood hazard risk from the Brightwater Wakefield Flood Modelling Study 2013. The provisions in the Plan Change include a revised set of policies, subdivision and building measures in the most flood prone parts of the existing business zones and new zone and area maps (including indicative roads and walkways).

2.0 Resource Management Act 1991 (the Act)

2.1 Section 32 Evaluation Report

Before a proposed plan change is publicly notified, the Council is required under Section 32 of the Act to evaluate whether the objectives of the proposal are the most appropriate way of achieving the purpose of the Act; whether the provisions in the proposal are the most appropriate way to achieve the objectives; identifying options/alternatives for achieving the objectives; and identifying and assessing the costs and benefits of the proposed change, including opportunities for economic growth and employment.

Section 32 sets out what the evaluation report must do —

(1)(a) the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of this Act; and

(b) whether the provisions are the most appropriate way to achieve the objectives by -

(i) identifying reasonably practicable options for achieving the objectives

(ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives

(iii) summarising reasons for deciding on the provisions

(2) an assessment under Subsection 1(b)(i) must –

(a) identify and assess the benefits and costs of the environmental, economic and cultural effects that are anticipated from implementing the provisions, including the opportunities for –

(i) economic growth that are to be provided or reduced; and

(ii) employment that are anticipated to be provided or reduced; and

(b) if practicable, quantify the benefits and costs referred to above; and

(c) assess the risks of acting or not acting if there is insufficient information about the subject matter

3.0 Evaluation of the Plan Change

The evaluation of the Plan Change is undertaken in four steps. The first step describes the provisions. The second step looks at whether the general zoning method is appropriate to meet the Plan Change objectives. The third step of the assessment evaluates the appropriateness of some site specific amendments that are sought through the plan change. The final step evaluates whether the overall intent of the plan change is the most appropriate way to meet the purpose of the Act.

As there are no new objectives proposed in this plan change, the existing framework of objectives in the Tasman Resource Management Plan (TRMP) is relevant.

In summary, the most relevant objectives for urban growth are those in Chapter 6 of the TRMP, Urban Environment Effects:

6.1 Sustainable urban design and development

6.2 Land effects from urban growth

6.3 Urban infrastructure services

6.5 Land for industrial activities

6.7 Settlement character and design

3.1 Step 1: Description of the Provisions

The proposed changes to the TRMP outlined in the Proposed Plan Change Explanatory Statement and Schedule of Amendments, and shown on the planning maps (Zone Map and Area Map 90) are summarised below:

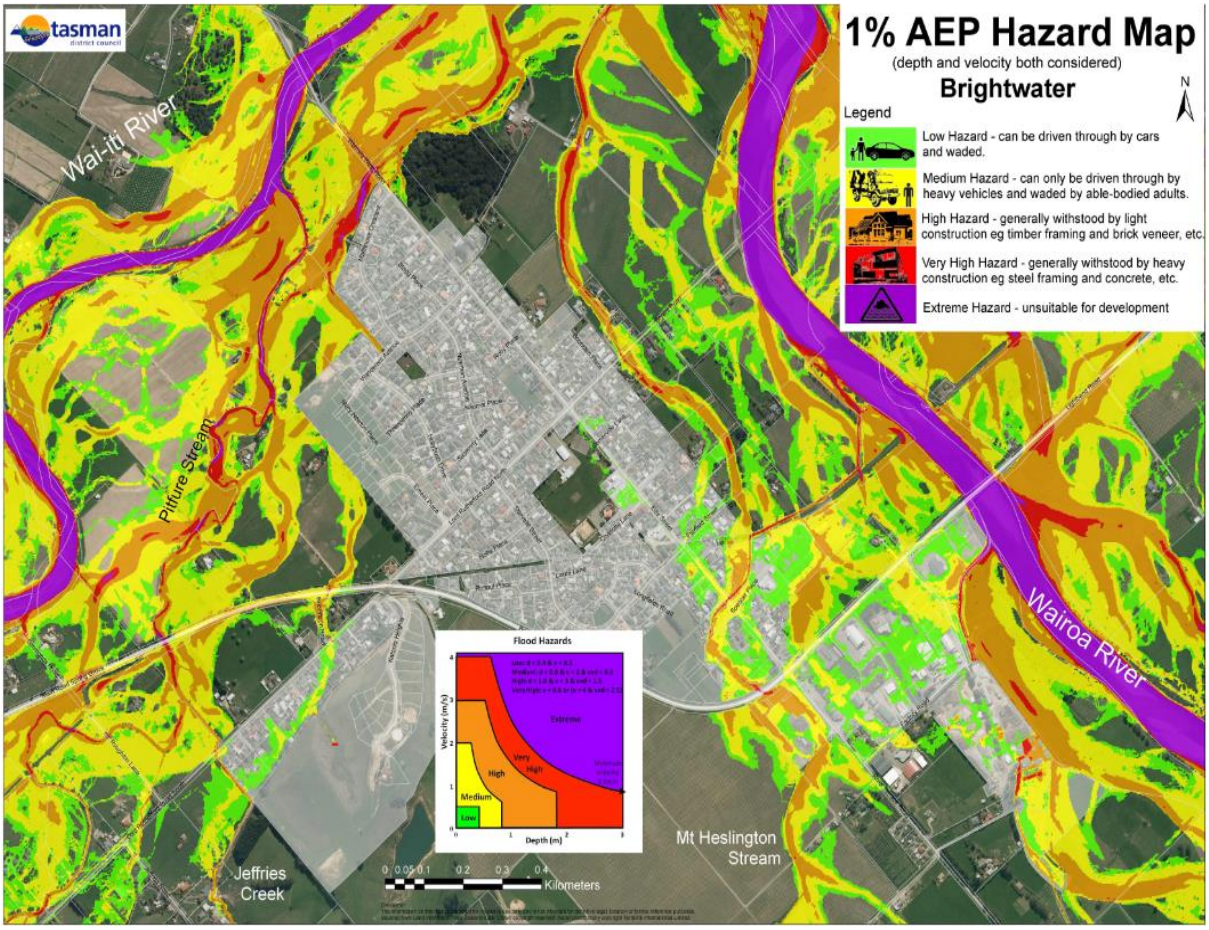
- A revised Section 6.16 for Brightwater, describing issues, policies and rationale for the zoning, policy and rule changes
- New zoning and area maps 90 (showing indicative roads and walkways)
- New Residential Zones (with deferment for water and other services) southeast of Snowdens Bush and between Wanderers Avenue and Lord Rutherford Road.
- Change from Commercial Zone to Residential Zone for dwellings on the south side of Charlotte Lane
- New Industrial Zone (with deferment for water services) between Factory Road and River Terrace Road
- Proposed closed zones (no further subdivision other than boundary adjustments) for those parts of the Light Industrial Zones and Rural Industrial Zone that are subject to medium to high flood hazard risk
- Maximum building coverage reduction from 90 percent to 60 percent in the Light Industrial Zone and to 15 percent in the Light Industrial Closed Zone at Brightwater

3.2 Policy Options

3.2.1 Step 2: New Zoning Proposals

3.2.1.1 Managing Residential Growth and Flood Hazard Risk

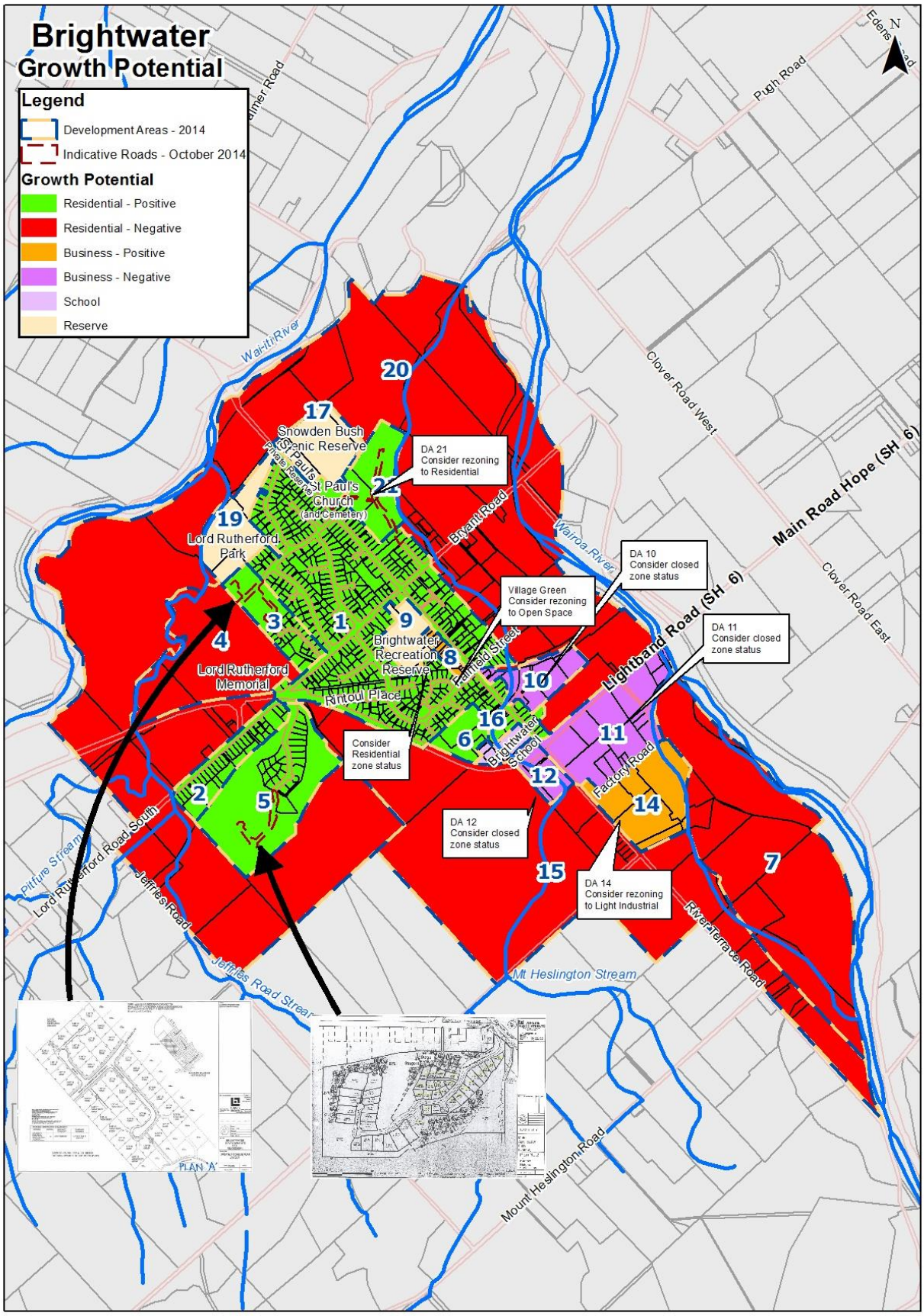
Brightwater is located on a floodplain a short distance from the confluence of the Wairoa and Wai-iti Rivers. Historically these rivers have flooded many times in the last 100 years. Some of the tributaries of these two rivers pass very close to or through Brightwater and are also flood prone – for example the Pitfure and the Mt Heslington Streams. Recent residential subdivisions in the vicinity of Hollybush Drive /Ernest Place have been allowed in previously flood prone areas - subject to mitigation by flood banks and raising of land. Population growth is expected to continue with up to 600 more residents projected by 2039 (Tasman District Council Growth Modelling 2014). One of Council's functions (under Section 31 RMA) is to control the effects of development, including for the purpose of avoiding or mitigating natural hazards. Flood hazard modelling has been carried out to determine areas that may be at risk of river flooding both now and in the future (Brightwater Wakefield Flood Modelling Report SKM 2013). These are shown in the following map:



In 2014 when Council updated its three yearly growth model, it reassessed its population predictions and available land supply, taking flood risk into account. There was a slight decrease in population since 2006. However there is still expected to be a population increase over a 25-year period from 1835 in 2014 to 2412 by year 2039.

The Brightwater Settlement Area map shows 21 Development Areas (DAs). The existing Residential Zone has been divided into DAs where the average minimum lot size is 600 square metres.

The Settlement Area Report for Brightwater is an Appendix to this report. It provides the rationale for the proposed rezoning based on demand projections and available suitable land. The Growth Potential Map is shown below:



Brightwater Settlement Area Map

The residential policy options being considered in Brightwater are:

Policy Option 1:

To rezone no further land to meet residential demand at Brightwater

This option would mean retention of the current residential zoning boundary. Any new residential sites would have to be created in infill subdivisions within the existing zone boundary. This option would be unlikely to fulfil much future demand for residential sites in Brightwater.

Policy Option 2:

To avoid flood hazard risk when rezoning land to meet residential demand at Brightwater

There are relatively few sites around Brightwater that would meet the policy of avoiding flood risk. Some sites that are located on the south side of the Bypass away from the township are flood free but could compromise the through traffic function of the Bypass and the relatively compact nature of the township. There is a relatively small flat area (7 ha) between Snowdens Bush and Snowden Place that is not flood prone (DA 21). It is currently used for vineyard and pasture. It is bounded by Snowdens Bush and an overflow channel of the Mt Heslington Stream. The southern boundary borders a row of dwellings on the north side of Waimea West Road.

Policy Option 3:

To mitigate flood hazard risk when rezoning land to meet residential demand at Brightwater

Under this option sites that have some flood hazard risk would be considered. DA4 located between the Pitfure Stream and Lord Rutherford Road is such a site. Mitigation measures such as bunding or filling would be required. However these measures can have an environmental impact which may include flooding on other properties nearby. Caution is required in exercising this policy.

Options	Costs	Benefits	Effectiveness/efficiency
Res Option 1	▪ Increased risk of private plan changes and ad hoc development. ▪ Council services already provided may be under-utilised.	▪ Some residents who do not want any boundary change will be satisfied. ▪ Some productive land will be retained.	▪ Can be inefficient if staff are diverted to consider unplanned private plan change proposals. ▪ Ineffective in meeting housing demand if the only land available for development is fragmented infill sites.
Res Option 2	▪ Loss of some productive rural land. ▪ Loss of rural outlook for a few properties.	▪ A supply of residential sections that will not be subject to flooding.	▪ Efficient if new development occurs in areas that are known in advance so services can be planned.
Res Option 3	▪ Loss of some productive rural land. ▪ Loss of rural outlook for a few properties. ▪ Additional mitigation costs of land development affecting affordability of sections). Flooding may affect other landowners if mitigation unsuccessful.	▪ A wider number of possible sites but greater likelihood of off-site environmental impacts.	▪ More preparation of land will be necessary if there is some flood risk that needs to be mitigated. This option is less efficient than if the land does not have flood risk.
Risks of Not Acting/Acting	N/A – sufficient information is available on flood hazard risk from river flooding in SKM Brightwater Wakefield Flood Hazard Modelling Report 2013		

3.2.1.2 Managing Industrial Growth and Flood Hazard Risk

Brightwater is an important centre for industrial development, particularly for construction and manufacturing. The number of paid employees increased 29 percent in the last census period 2006 to 2013. However many of the township's industrial sites are subject to flood risk from the Wairoa River and the Mt Heslington Stream. While the Council is proposing some works on Mt Heslington Stream to reduce flooding on some industrial sites (and the school) north of the State Highway 6, flood risk

will remain on some existing sites south of the State Highway. Recent industrial development has occurred by resource consent on relatively flood-free Rural 1 land on River Terrace Road. Further industrial business growth is expected. The Council could preserve the status quo and do nothing (Option 1) to provide for more land. However it is preferable that new industrial development has the option of locating in areas that are flood free. Some of the existing Rural Industrial Zone at the far south east end of Brightwater is not yet developed and is flood prone. An option would be to rezone this undeveloped land to Rural 1 (Option 2). The corollary would be to zone a flood free area to replace it (Option 3). Other options are to change some of the rules in the industrial zones in Brightwater.

Options	Costs	Benefits	Effectiveness/efficiency
Industrial Option 1: Status quo – no change to Industrial Zone boundaries	High cost of flood damage to industrial and school assets	Avoids the costs of a plan change	Ineffective in that it fails to address known flood hazard which is disruptive to business and the school
Industrial Option 2: Rezone part of Rural Industrial to Rural 1 (2.6ha)	Loss of some development potential	Flood risk for industrial properties downstream is not exacerbated	As the land has not been developed yet, rezoning to Rural 1 would be an efficient way of reducing future flood hazard risk
Industrial Option 3: Rezone Rural 1 to Rural 1 Deferred Light Industrial (River Terrace Road)	Loss of some productive rural land Loss of rural outlook for a few residential properties	Flood risk for industrial properties downstream is not exacerbated Opportunity for new industrial sites with extra employment and economic benefits	The land is partly developed for industrial purposes already and has industrial neighbours to the north and east
Industrial Option 4: Close subdivision other than boundary adjustments in areas of medium /high flood risk	Loss of some development potential	Reduces subdivision demand in areas that have reasonably significant flood hazard risk	Containing subdivisions to boundary adjustments only won't stop development but should slow demand on flood prone parts of zone
Risks of Not Acting/ Acting	N/A – sufficient information is available		

3.2.1.3 Managing Urban Growth and Services Risk

Further urban growth requires adequate services. There is a modest list of Engineering Services projects for Brightwater included in the Long Term Plan, such as the Mt Heslington Stream diversion project to reduce flooding in the town. Some road works at Ellis Street/ Bryants Road intersection are planned but still need to be designated to improve traffic safety at that intersection.

As Brightwater's water supply wells are in the Reservoir water management zone they are affected by the Waimea community dam plan changes. These changes are not yet resolved. Option 1 in relation to services is not to provide any further services at Brightwater. Option 2 is to include zonings that allow for deferment until further services can be provided. There are water policy impediments to further growth until the community dam plan changes are resolved.

Options	Costs	Benefits	Effectiveness/Efficiency
Services Option 1	If services are not improved there will be ongoing costs arising from flooding and complaints	Avoids the cost of a plan change	It is inefficient to continue allowing complaints to arise because services have not been improved.
Services Option 2	There may be some opportunity costs in that the land cannot be developed for a higher value use immediately	Deferments allow an orderly transition from rural to urban zoning when services are programmed but not immediately available	This option can be effective for landowners and the Council
Risks of Not Acting/ Acting	Information is available to show that deferments are an appropriate means of managing future services		

3.2.2 Step 3: Site Specific

The existing Light Industrial Zone which applies across the district allows very high building coverage of up to 90 percent for a site. High building coverage may impede the flow of flood water across a flood prone site and transfer water to other sites. It is important that flood flowpaths are maintained across sites. Generally, current building coverage in Brightwater industrial zones is not high. Concrete slab rather than pile foundations are commonly used in industrial construction. The current TRMP rules for building coverage in the Light Industrial Zone are very generous. Some possible options for building coverage are:

Options	Costs	Benefits	Effectiveness/Efficiency
Ind Option 5: Status quo (up to 90 per cent maximum coverage permitted)	Cost of potential flood damage to buildings on site and on adjoining properties	Avoids the cost of a plan change	May appear effective and efficient in the short term until flooding occurs and damages buildings and plant
Ind Option 6: Reduce site coverage so maximum site coverage is 60 percent in areas of low flood hazard.	Some costs associated with loss of development opportunities Note: To be balanced against less flood damage to buildings and plant	If flood flowpaths are unimpeded by buildings there is less likelihood of flood damage. Economic benefits can occur if focus on avoiding flooding effects so production is not disrupted.	Likely to be more effective and efficient than the status quo rule which is impractical and risky Consistent with Brightwater Tourist Service Zone which adjoins and has quite similar flood hazard risk
Ind Option 7: Reduce site coverage so maximum site coverage is 15 percent in areas of medium to high hazard	Some costs associated with loss of development opportunities	The adverse effects of buildings on flood pathways in areas of medium to high hazard are likely to be avoided	15 percent coverage is the existing limit on Brightwater Engineering's flood prone rear land. It is efficient that land with similar risk should be treated equally.
Risks of Not Acting/ Acting	N/A – sufficient information is available		

3.2.3 Commercial Zone Rationalisation

In 2004 a residential subdivision in Charlotte Lane was approved on land zoned Commercial. It is very unlikely that the four relatively new dwellings erected on that land are ever going to be used for commercial purposes. The zoning could be left unchanged (Option 1) or altered to reflect the residential development (Option 2). Also a small area of land zoned Commercial on the intersection of Starveall St and Ellis Street has been purchased by Council as an open space reserve. It is intended that the land be developed further as an amenity area. It could be retained as Commercial Zone (option 3) or rezoned as Open Space (option 4).

Options	Costs	Benefits	Effectiveness/ Efficiency
Com Option 1: Status quo (Retain Commercial Zone)	Residential owners face unnecessary costs for resource consents in Commercial Zone. Staff time processing resource consents.	Avoids the cost of a plan change.	Inefficient
Com Option 2: (Rezone Commercial to Residential)	The cost of a plan change. Commercial opportunities foregone.	Provides more surety that residential amenity will be maintained.	Efficient in that it reflects likely current and future use.
Com Option 3: (Retain Commercial on village green)	Loss of land with amenity value to the community.	Avoids the cost/reduces scope of a plan change.	Not very effective in ensuring the land remains as open space.
Com Option 4: (Delete Commercial	Commercial opportunities foregone.	Enables the full potential of the site to become an	Efficient in that it

on village green and rezone as Open Space)		attractive amenity area to be realised.	reflects the intent that the land is retained for amenity purposes
Risks of Not Acting/ Acting	N/A – sufficient information is available		

3.3 Overall Appropriateness

The overall appropriateness of the Plan Change to achieve the purpose of the Act is an important consideration. The purpose of the Act is to promote the sustainable management of natural and physical resources, including the district's settlements.

While there is no change to the relevant TRMP objectives in Chapters 6 and 13, there has been some alteration to the policies and rules for Brightwater to enable better management of flood hazard risk and future urban development. Overall, the proposed Plan Change is considered appropriate to promote the sustainable management of natural and physical resources at Brightwater and to be an appropriate package for achieving the objectives in the TRMP in an effective and efficient manner.