

Urban Issues

1. Introduction

1.0.1 This paper examines the current ‘urban issues’ that are evident in Southland which are relevant to the Regional Policy Statement (‘RPS’) and Southland District Plan review processes. It should be noted that it is not an exhaustive examination of every issue for urban areas in Southland. It has also avoided delving too deeply into issues that will be addressed through other papers in the review processes. Instead, it focuses upon the issues that, at least at a local territorial authority level have become apparent over the ‘life’ of the current RPS and Southland District Plan. Inputs from wider sector groups, and the community at large will be incorporated as the plan process, including public consultation, proceeds.

1.0.2 A useful starting point is to examine the current Regional Policy Statement. The current Regional Policy Statement in section 5.10 Built Environment states:

“The built environment comprises a number of important physical resources to the people of the region, including the homes and towns that are lived in, the places where most Southlanders work, the facilities that are needed for the efficient operation of modern society, for example utility networks, transportation systems, sewerage and water systems, energy supplies, dams and flood control structures, and recreational facilities. Without the built environment society would not be sustainable, and, for that reason, it is necessary to ensure that it is available for existing and future generations.”

1.0.3 For the purposes of the Regional Policy Statement review, the chapter of Built Environment has been superseded primarily by a move to focus on ‘urban issues’ and ‘rural issues’ as separate papers.

1.0.4 Similarly the Southland District Council has therefore inputted localised issues into both of these papers also.

1.1 Context – Global, National and Local

1.1.1 Southland consists of a number of urban settlements dispersed across the Southland Plains, generally located either around the coastline or close to water bodies, being either rivers or lakes. These settlements range in size from Invercargill at around 48, 000 people down to smaller urban centres as small as 20 dwellings. Additionally a small urban community exists in Oban, on Stewart Island.

1.1.2 A variety of definitions exist for the word urban. One that captures the scope of this paper best is:

“An urban area is an area with an increased density of human created structures in comparison to the areas surrounding it.”

1.1.3 Interestingly, Statistics New Zealand defines an urban area, at least for statistical purposes, as a settlement with a population of 1000 people or more. Certainly the scale of urban issues in Southland is not the same as in larger centres, but the nature of the issues is, and in some cases they are occurring in centres of under 1000 people in size. Additionally, a number of ‘Urban Resource Areas’ zoned in the Southland District Plan are for settlements for well under 1000 people in size – yet these settlements exhibit a density of structures and population greater than the surrounding area, urban infrastructure such as reticulated services and street furniture and other urban features such as schools (although not exclusively an urban phenomenon).

1.1.4 Before discussing the issue at a national level, it is useful to consider what is happening on a global scale. The extract below sums things up well, and in a sense gives some context to where things may head in New Zealand, and indeed Southland.

“Internationally in the field of urban planning, there has been a growing realisation that the use of ‘reactive’ planning, where a local authority’s powers are limited to the control of social and environmental externalities in an environment of market led development, is insufficient to address the goals of improved sustainability and quality of life in urban areas and other settlements. As a result, there has been a revival of traditional proactive urban planning practices, for example through: the development of master planned town centres and neighbourhoods; the integration of urban design principles into planning; detailed and more prescriptive urban plans; as well as through more strategic level planning, including the development of growth management strategies (Johnson, A 2007:32.)”

- 1.1.5 The approach to urban planning in New Zealand has largely followed the international trend outlined above, with a gradual shift from the effects based approach inherent in the Resource Management Act to an increasing recognition of importance of ‘traditional’ planning through the implementation of a range of tools across the country such as:
- growth management strategies
 - urban design strategies
 - structure plans
 - design guidelines
- 1.1.6 The issues associated with urban growth and in particular its relationship to sustainability, have become prominent in the last 10 years. An even more recent development has been the emergence of ‘Urban Design’ as a discipline. The New Zealand Urban Design Protocol is a response to this. In Southland, the Invercargill City Council (ICC) and Southland District Council (SDC) are signatories.
- 1.1.7 The New Zealand Urban Design Protocol was the previous Labour government’s vision to help achieve successful New Zealand towns and cities through quality urban design. The protocol identifies seven areas that characterise quality urban design (“The seven C’s”)
- *Context* – building on the social, cultural, economic and environmental context with an overall long term vision
 - *Character* – reflecting and enhancing the distinctive character, heritage and identity of our urban environment
 - *Choice* – ensuring diversity and choice for people.
 - *Connections* – enhancing how different networks link together for people
 - *Creativity* – encouraging innovative and imaginative solutions and activities
 - *Custodianship* – ensuring design is environmentally sustainable, safe and healthy
 - *Collaboration* – communicating and sharing knowledge across sectors, professions and with communities
- 1.1.8 In particular, urban design is seen as having a number of benefits for communities, individuals, the economy and the environment, including:
- Better public health
 - Greater social equity
 - Enhanced land values

- A more vibrant local economy
- Reduced vehicle emissions
- More sustainable use of non-renewable resources

1.1.9 In August 2008, the Ministry for the Environment under the then Labour government published “Scope of a National Policy Statement on Urban Design – Background Paper”

1.1.10 A National Policy Statement (NPS) is a high level statutory document that provides direction to local authorities on matters of national significance. An NPS on Urban Design could include objectives and policies to promote quality design in urban environments, but not rules or standards. Its scope would be restricted to matters that are relevant to the purpose of the Resource Management Act (RMA).

1.1.11 Under the RMA local authorities are required to give effect to an NPS when preparing or changing their regional policy statements and regional and district plans. When considering an application for resource consent decision makers, including the courts must also assess any relevant provisions of an NPS. Should this National policy statement on Urban Design proceed under the current National Government consideration in the formulation of regional and district plans will be required.

1.1.12 In addition to the discussion paper on a NPS for urban design, a further discussion document was released by the then Labour government Sustainable Urban Development Unit – Building Sustainable Urban Communities – A discussion document. This document explores place based approaches to sustainable urban development in New Zealand. The Sustainable Urban Development Unit at release of this document was an interagency unit hosted by the Department of Internal Affairs with support from a wide range of Government Departments including Ministry for the Environment, Department of Building and Housing and the Ministry of Transport.

1.1.13 This document outlines a possible new approach to sustainable development which aims to strengthen the ability of existing types of urban development organisations, such as local territorial authorities or their subsidiaries, and Crown entities, to achieve positive sustainable urban development outcomes in their areas. The possible new approach would introduce a new suite of enabling regulatory powers and non-regulatory tools, with a ‘place-based’ focus. It is uncertain as to whether any action will be taken as a result of this discussion document under the current National Government.

1.1.14 The document discusses:

- what local and central government could do to support sustainable urban development, as policy makers, developers, investors or capability builders
- possible improvements in coordination between national, regional and local government, and mechanisms to better integrate land use and transport planning with the provision of utilities, transport and other services
- potential ways to fund sustainable urban development
- how to assemble parcels of land in strategic locations to support sustainable urban development
- whether planning processes and development control can be streamlined to encourage sustainable urban development
- ways to improve housing supply, choice and affordability in sustainable urban development.

1.2 **The way forward?**

1.2.1 Under the previous Labour government there was an evident focus upon urban environments and the design of the spaces and buildings. As yet the recently appointed National government have not indicated their intention. However additional attention will need to be placed upon urban issues within any Regional Policy Statement or district plan review process. A shift away from the effects based approach of the RMA back towards more traditional planning techniques also brings with it the need for more forward thinking and proactive planning than has perhaps been the habit over the past 15 years. In particular there is a need to give Councils guidance as to how these issues are to be addressed regionally through, in particular, District Plans. At present the Regional Policy Statement outlines the issues, objectives and policies for the built environment. This paper examines the relevant sections of the RPS and an assessment as to their relevance in today's environment. It further reflects some of the issues that at more localised scale will require address through the Southland District Plan review process.

2.0 **Relevance of Existing Regional Policy Statement and Southland District Council District Plan Issues**

2.0.1 One of the purposes of this paper is to assess whether the existing urban issues contained in the Regional Policy Statement and Southland District Council District Plan are still relevant to the management of the urban environment, and whether the objectives, policies and rules that are currently contained in the Regional Policy Statement and District Plan address those issues appropriately.

2.0.2 A detailed analysis of each Regional Policy Statement issue and its objectives, policies and methods is included in Appendix 1. Staff at Southland District Council have provided input into this paper by way of this section, which provides a Southland District Council perspective to urban issues.

2.1 ***Existing Regional Policy Statement Provisions***

2.1.2 The existing RPS contains six issues relating to the 'Built Environment'. In summary they are that:

- Urban environments and expansion of these can have adverse effects on natural and physical resources, including; loss of productive land, loss of amenity values, inefficiencies in the roading network, reduction in water quality, loss of heritage values and archaeological sites of regional significance.
- Patterns of development can constrain future generations from meeting their needs.
- The environmental quality of the built environment should reflect the social, economic and physical needs of the people that undertake activities within it.
- The extent to which the built environment is compatible with existing activities, as health concerns, for example, noise and dust can arise.
- The cumulative adverse effects of components of the built environment can be significant, even if the individual effects appear insignificant.
- Natural hazards can have a significant adverse effect on the built environment.

2.1.3 Each of these issues have been reviewed to assess whether or not they remain relevant in Southland today. What we have found is that most of the issues are still relevant and indeed some of these have increased in importance including:

- There has been expansion of urban environments in a number of locations across Southland which have brought with them a range of issues such as the provision of infrastructure, loss of productive soil and, transportation effects;
- There is an increasing awareness of the effect land use can have upon infrastructure such as the ‘three waters’ (drinking water, wastewater, and stormwater) and transportation networks;
- There are issues to be addressed around onsite wastewater disposal in non-reticulated urban areas;
- Advances in technology offer a means to address the cumulative effects of the urban environment; in particular with respect to the effects urban environments can have upon water and air quality;
- The amenity or environmental quality of the built environment is something that is becoming increasingly important. Issues have arisen around the region with respect to the level of amenity provided by District Plans – provisions such as maximum permitted height of buildings or density of development have been questioned.

2.2 *Existing Southland District Plan Provisions*

2.2.1 Southland District’s urban areas vary significantly in population and size and are often characterised by very different geography. The three largest towns in the District provide a good indication of the geographic variation present in the District with one of these towns located on the coast, another a lakeside town bordering a National Park and the third an inland rural service town located on the Southland Plains. Riverton, Te Anau and Winton are very different townships geographically but at the same time they are currently experiencing similar urban issues mainly as a result of all three towns having recently experienced a period of sustained growth. A range of urban resource management issues related to this growth have arisen in recent years in all three townships.

2.2.2 There are also a large number of smaller urban settlements and townships located throughout the Southland District. These smaller areas like the three largest towns can also be very geographically diverse. Many of these urban areas however have not experienced significant growth and have remained static in terms of their population levels while some have experienced declines in population. Many of the urban issues relating to these settlements and townships are therefore quite different to those of the three largest urban areas. The second generation Southland District Plan therefore needs to provide for and address a range of urban issues in a range of different townships and settlements.

2.2.3 The existing District Plan was formulated in the 1990s and the Southland District has undergone a significant amount of change since this time. Direction from central government in the form of new legislation and policy on urban issues also needs to be provided for and addressed in the second generation Southland District Plan.

2.2.4 The existing District Plan in Section 1.4 ‘Urban Environment’ provides a breakdown of the population and urban areas of the Southland District. The figures used in the population estimates are based on census data from 1991 and this background information will need to be updated. General background on the District’s urban areas and their populations provides a useful approach in terms of framing the District’s urban issues.

2.2.5 The following issues are identified in the urban environment section of the existing Plan:

- The need to provide for the efficient use and development of utility networks whilst avoiding and mitigating adverse environmental effects.
- The need to protect and conserve the District's significant cultural heritage resources including buildings, objects and archaeological sites.
- The need to provide opportunity for housing in a manner that maintains and enhances the quality of the environment.
- The need to monitor development in the peri-urban areas, and take steps to counter any short-term or long-term environmental effects of that development.

2.2.6 **Utility Networks**

2.2.6.1 In terms of the first issue listed above there is still a need to provide for the efficient use and development of utility networks whilst avoiding and mitigating adverse environmental effects. The maintenance and provision of roads, water, storm and wastewater services along with other forms of urban infrastructure is still a key issue for the urban areas of the District.

2.2.7 **Heritage**

2.2.7.1 There is also still a need to protect and conserve the District's significant cultural heritage resources including buildings, objects and archaeological sites. The existing District Plan's schedule of listed buildings, objects and sites will need to be updated. Under the 2003 amendments to the RMA 1991 heritage was included in section 6 of the Act and as such is now considered as a matter of national importance. Heritage issues will be addressed further in the heritage issues and options paper.

2.2.8 **Quality of Urban Environment**

2.2.8.1 The third issue identified above is still considered relevant but there may be a need to reword and reframe this issue. There is significant opportunity for the development of new residential housing that maintains and enhances the quality of the Districts urban environments. Many of the District's urban areas are under-utilised with significant scope for further residential development within existing Urban Resource Areas. Townships that have experienced higher levels of growth in recent years could possibly provide for higher density residential development than is currently provided for in the existing Plan. This could help address issues associated with urban sprawl as much of the development that has occurred in recent years has taken place on the outskirts of these towns. Changes to the existing performance standards of the District Plan to provide for and encourage higher density residential accommodation could be appropriate. The performance standards of the existing Plan may still be appropriate for those urban areas of the District that have not experienced growth or have experienced population decline.

2.2.9 **Development in Peri-Urban Areas**

2.2.9.1 Development in peri-urban areas over the lifetime of the existing District Plan has emerged as a major urban issue. This issue has most relevance to the Southland District's largest urban environments which are the townships of Te Anau, Winton and Riverton. These three towns have experienced the greatest levels of urban growth in recent years and a significant amount of residential development has occurred in the urban/rural fringe areas of these townships. The existing District Plan in Section 1.4 'Urban Environment' notes that the expansion of urban areas normally encroaches on adjoining rural or rural/residential land, and is an outcome of lifestyle demands on the market.

2.2.10 Performance Standards

2.2.10.1 Section 4.7 'Urban Resource Areas' of the existing District Plan identifies five urban issues and then lists policies, methods and rules aimed at addressing these issues. The issues are as follows:

- Non residential activities can adversely effect residential activities through generation of noise, traffic and other nuisances.
- Structures in these areas can adversely impact on adjoining properties' access to sunlight and privacy due to their bulk and location.
- Past management controls have often lead to the inefficient use of land and restricted activities where adverse effects are minimal.
- Inappropriate development can lead to unsustainable development of the physical resources contained in the District's town centres.
- The resources and amenities of the central areas of the District's towns conveys that particular town's image and this can be adversely effected by some activities.

2.2.10.2 One way in which the existing District Plan addresses the issues above is through the use of performance standards. Proposed activities must adhere to these standards in order for them to take place within a particular resource area. These standards include height, noise and yard limits among others and are designed to ensure that any activity undertaken in a certain areas does not breach minimum environmental standards. Performance standards are likely to be required for incorporation within the second generation District Plan. However over the lifetime of the existing District Plan it has become apparent that some of these standards need amending while others may no longer be relevant. A number of problems with existing performance standards have arisen during the processing of resource consent applications.

3.0 Emerging Urban Issues In Southland

3.0.1 In establishing the emerging issues for the Southland region, discussions were had with the senior planning staff from the three local territorial authorities in Southland - Gore, Invercargill City and Southland District. Emerging issues are those which have arisen over the life of the current Regional Policy Statement and also have a reflection on the currency of district plan provisions. Again, this is not an exhaustive list but rather a focus upon the more major issues, especially where there is some commonality across the three local territorial authorities.

3.0.2 The population of Southland has not grown to any large extent over the past 10 years; however there have been some areas where there has been residential expansion, which has brought with it a number of issues. It should be noted a number of 'grey' areas emerged during the process of preparing this paper, particularly the urban/rural fringe and where this fits as an issue. This is because urban sprawl is an issue for both the urban areas as potentially an unsustainable growth form, and to the rural areas through changes to the rural environment and the potential reduction of land available for agriculture and horticulture purposes.

3.1 The Urban/Rural Fringe

3.1.1 Residential densities in rural areas are an issue facing all local authorities in Southland. Increased demand for rural residential lifestyle blocks and recent intensive development in

areas such as Lochiel for example. Council staff have expressed concern that a number of 'lifestyle' subdivisions have pushed the boundaries of what 'is' and 'is not' rural. Whilst there is an acknowledged desire for 'the country life' it should be tempered with an examination of the additional costs that it brings. The consequences of living in a rural situation where car based travel is a necessity such as travelling to school or satellite towns should be given some consideration. There have been examples where this type of development has occurred in close proximity to existing urban areas but with no provision for pedestrian or cycling links to the existing urban area. These new properties effectively rely on the private motor vehicle for access in some instances via State Highways and other busy roads.

- 3.1.2 Travel Demand Management (TDM) is an approach to transportation planning that looks to reduce the demand to travel through a variety of mechanisms. It is suggested a proliferation of lifestyle blocks may not sit comfortably with TDM and perhaps more thought is needed into lifestyle blocks and how they can be better planned to address TDM. This is especially pertinent when you consider that these blocks may not be of a sufficient size to be 'self sustainable'.
- 3.1.3 Another issue is loss of production land and high quality soils. Residential subdivision on rural land adjoining some of the District's townships is likely in many instances to result in a loss of productive rural land. This process often results in existing farms being subdivided up into smaller rural/residential lifestyle blocks which are held in multiple ownership. Higher density residential subdivision also occurs on rural land located near existing urban areas with a large amount of this type of development having occurred on the outskirts of Te Anau in recent years.

3.2 Onsite Wastewater Disposal

- 3.2.1 Historic patterns of development have created problems around onsite wastewater disposal, for example in Makarewa. This is the issue of highest priority facing the Invercargill City Council - failing onsite wastewater systems in unserviced urban settlements such as Makarewa and Woodend. This is due to the nature of the soils, a high water table and cold winters. Other contributing factors are a change in lifestyles and habits.
- 3.2.2 Onsite wastewater disposal is an issue for the Invercargill City Council. Council has investigated a number of sites which has revealed a failure rate of around 90%. This has resulted in, as an extreme example, a pipeline being built to Lorneville to service the 'North Road Sewerage Reticulation Area' by the Invercargill City Council. This was seen by Council as the best solution to the problem. Invercargill City Council is not alone in this problem.
- 3.2.3 Growth on the fringes of existing townships require the extension of essential services. Roads, water and sewerage infrastructure needs to be provided to service new subdivisions and while development contributions towards these services are received from developers Councils and ratepayers over longer timeframes incur ongoing maintenance costs. The further the urban areas of a township spread the greater the ongoing costs associated with infrastructure are likely to be.
- 3.2.4 From a sustainability point of view, 'fingers' of infrastructure extending beyond the urban fringe is not an efficient use of resources and it may be that other options are looked at for other problem sites. Extensions of infrastructure bring with them the pressures for further connections, an increased density of development and pressure for other infrastructure to be provided.
- 3.2.5 One of the responses to address wastewater disposal is a proposed national environmental standard for Onsite Wastewater Systems (septic tanks) which aims to improve the management and environmental performance of septic tanks and other on-site systems used to treat domestic wastewater. This is consistent with the purpose of the Act as it will promote

sustainable management of resources and help to safeguard the life supporting capacity of water and soil.

3.2.6 In essence, the proposal is that:

“Owners of properties with on-site wastewater systems in specific locations be required to hold a current warrant of fitness that confirms their on-site system is functioning properly and is being maintained to an appropriate standard.”

3.2.7 In particular, this will have implications for property owners with existing older style systems that may not be functioning appropriately. In some communities the costs of rectifying this may be very difficult from an economic point of view.

3.3 Areas of Growth and Decline – Competing Demands

3.3.1 Southland District’s urban areas are a scattering of 30 settlements facing a variety of competing issues.

3.3.2 The three largest urban areas of the Southland District - Riverton, Te Anau and Winton and have all experienced significant levels of growth over the lifetime of the existing District Plan and Regional Policy Statement. This has resulted in an increase in population for these three towns along with an increase in the land area that these towns cover. Most of the recent development activity in these townships has occurred outside their existing Urban Resource Areas. New residential subdivisions over recent years have mainly been concentrated in rural areas of land lying outside the urban areas of these towns. Development on the outskirts of these towns has been driven by private developers and market forces with the rural/urban fringe of these townships seen as a desirable place to live. There are a number of issues associated with this type of urban development and they include the encroachment of urban areas onto high quality soils, natural hazard risks, issues associated with density of development, pressures on existing infrastructure, transportation issues and issues associated with the provision of new infrastructure.

3.3.3 Te Anau in particular has experienced a significant level of subdivision development and there are now a significant number of vacant residential sections available for new dwellings. The District Council is currently proceeding with a number of plan changes relating to the Te Anau Basin. This area has experienced considerable growth over recent years with a large amount of residential subdivision activity occurring along with increased levels of commercial and industrial development. The Council has recognised a need to manage growth in this part of the District more proactively.

3.3.4 At the time the existing Southland District Plan was formulated the level of growth and development that has occurred in the Te Anau area had not been envisaged. The impact of residential development on the Te Anau basin landscape is one major growth issue that the proposed Te Anau Plan changes will seek to manage. The District Council has taken the view that resource management issues associated with growth and development in the Te Anau basin need to be addressed with urgency and as such these plan changes are likely to take place prior to the development of the second generation Southland District Plan. These Plan changes would however eventually be incorporated into the new District Plan.

3.3.5 Other centres, such as Otautau are relatively static in terms of growth and in such places Council is encouraging ‘infill’ of the existing urban areas. There is also the potential in Otautau to attract industry through rezoning. In particular there may be the need/demand for an additional dairy plant in Western Southland. Coastal settlements such as Orepuke and Colac Bay are also in the process of ‘consolidation’.

- 3.3.6 Other areas such as Ohai and Nightcaps are in a state of decline. This gives rise to the issue of an underutilised infrastructure in these towns effectively subsidised by other ratepayers; whilst in other parts of the region expenditure is needed to extend infrastructure. From an efficiency point of view making use of existing infrastructure is a better use of resources than investing in new infrastructure (which brings with it additional maintenance costs).
- 3.3.7 Following on from the issue of communities ‘in decline’, is the need for Southland to retain a ‘critical mass’. That is, essential services require a critical mass of population for them to be provided. If this ‘mass’ does not exist or is lost through population decline, these services can be lost, and would be very difficult to ‘re-acquire’. The Southland Base Hospital is a prime example of this. If essential services are lost from Southland, and more particularly, Invercargill, there are risks that Invercargill becomes a satellite to Dunedin. In saying this there may also be a need to work closely with Dunedin given its proximity to avoid unnecessarily duplicating/competing for some functions. There is the possibility for a strategic alliance especially around transport links that are complimentary. Contributing to retaining a viable population is the need to have quality urban environments that people will choose to live in, as well as employment opportunities. These quality urban environments are generally achieved through good urban planning.
- 3.3.8 Gore is on the verge of major growth spurt, with a new dairy factory at McNab to be built within the next few years. Additionally Solid Energy has plans for the land south of the Mataura township in terms of an energy related project. These proposals will create the demand for accommodation for construction workers in the short term, and workers in the longer term. It is understood it will take 3 to 5 years for the necessary infrastructure upgrades to be undertaken to provide for a large number of new dwellings as Gore is ‘close to capacity’ in terms of its wastewater system (once the McNab plant comes ‘online’). Mataura is seen as an industrial centre and has plenty of spare infrastructure capacity.

3.4 Definition of Urban Resource Areas in the Southland District Plan

- 3.4.1 Under the existing District Plan there are a number of smaller townships within the Southland District that do not have a defined Urban Resource Area and these include Orepuki, Athol and Garston. These townships have experienced a modest amount of growth over recent years and the absence of a defined Urban Resource Area means that when new residences are proposed they often require resource consent as they sit within the Rural Resource Area or in the case of Orepuki the Coastal Resource Area. There has been concern expressed from some members of the public that this situation is an impediment to the ongoing growth and sustainability of these townships. In terms of the second generation Southland District Plan it may be appropriate to revisit some of the other small towns in the Southland District in order to assess whether the definition of an Urban Resource Area would be appropriate. There may also be a need to look at other townships in the District for example Riversdale, which does currently have an Urban Resource Area. In the case of Riversdale there may be a need to expand the existing Urban Resource Area boundary to provide for further urban expansion.
- 3.4.2 In some cases there are empty residential sections within the existing Urban Resource Areas of the Southland District as well as ‘brownfield’ sites that could be developed for residential use. There is also considerable scope for infill subdivision of existing residential properties in growth towns such as Te Anau, Riverton and Winton. The residential density of these townships could be increased to provide for increases in population while at the same time reducing the need for development on the urban/rural fringe. Residential development of properties and sites that are already fully serviced can also potentially reduce costs. The residential density of these towns could be increased through this process without the need for an increased expansion in land area. The density of these townships could be increased and still be very low when assessed. If this process occurred the density of these towns is likely to still be low when considered on a national basis.

- 3.5.4 Invercargill's current housing stock has a large proportion built prior to the 1950s and therefore is not the best insulated nor healthiest environment. Older houses are not built to obtain maximum benefit from the sun for solar heating or passive heating. There are three options for these dwellings – preserve them as some sort of heritage building, redevelop/renovate them to re-adapt them for 21st century lifestyles or demolition. A balance needs to be found in terms of how the form of these buildings contribute to urban environments against the costs of retaining them.
- 3.5.5 There is a shortage of residential land in Gore, with a lot of infill subdivision (1/4 acre sections being divided into two). There is also a demand for a more upmarket semi rural subdivision with ½ to 1 hectare lots with an expectation of full urban servicing.
- 3.5.6 There is currently no provision for 'flats' in the Gore District Plan. With the need to house potentially a large workforce the need for more intensive accommodation may be required.
- 3.5.7 The growth of the urban areas of Riverton, Te Anau and Winton is likely to have decreased the residential density of all three towns. The urban areas of these towns may have spread on a disproportionate basis when compared to their actual increases in population. Some new subdivision developments still have a substantial number of empty sections and new dwellings have not been constructed on every new property. As residential growth in these towns has largely been market driven new subdivision developments may be proposed even though existing developments still have significant capacity. The urban area covered by these towns has therefore increased substantially while the actual residential density remains static or may even decrease.

3.6 Infrastructure Limitations

3.6.1 Infrastructure is a further issue constraining growth and requiring addressing. Effects generated by structures within the urban environment can have a cumulative effect upon the environment, particularly:

3.6.2 Use of reticulated water

3.6.2.1 At present no water metering occurs in the (residential) urban areas of Southland. Interestingly, treated water is provided to all households and is available for a range of uses including watering the garden. Methods encouraging the harvesting and reuse of rainwater for non potable uses – such as watering gardens and washing cars could be a tool to reduce metered water use. Furthermore if water was 'metered' as such the incentive to do this would increase.

3.6.3 Impermeable Surfaces & Stormwater

3.6.3.1 Following on for the above, there are also no limits on impermeable surfaces in the District Plans of Southland. This makes it a permitted activity to pave entire sites – this can potentially have implications in terms of the capacity of the stormwater reticulation networks of the region. New developments are one area Councils could 'target' to ensure a proportion of sites do not have impermeable surfacing. Additionally, a shift away from traditional engineering philosophies is occurring around the country. Previous infrastructure codes looked at ensuring stormwater was captured and piped off sites as quick as possible. There has been a shift in thinking to look at means of primary treatment, such as interceptor tanks, use of vegetation and ponds to help store stormwater during peak events, to ensure the stormwater reticulation is not overwhelmed by a large burst of water. These systems look to delay the peak flows and reduce them over time.

3.6.3.2 Additionally, techniques such as grass swales (instead of conventional kerb and channelling) offer the benefit of providing some primary treatment of stormwater before it enters sumps.

When the water is running off a road surface (in particular) it has the potential to be contaminated with hydrocarbons, metals, rubber and silts. Grass swales can filter some of this out. Water quantity devices attenuate stormwater flows to remove the peak flow from a storm event and distribute it over a longer time period. This can allow smaller diameter pipes to be installed, and can reduce the overall cost of a stormwater system. Stormwater attenuation can also reduce the downstream impact of stormwater catchments.

3.6.3.3 Water quality devices endeavour to improve the quality of the discharged stormwater by removing suspended solids, oils, grease, heavy metals and a number of other environmentally damaging contaminants. Water quality devices are usually aimed at treating the “first flush” of stormwater flows, where 80% of containments enter stormwater systems. Many devices also provide both quantity and quality solutions.

3.6.4 Heating sources and energy use

3.6.4.1 A variety of incentives exist to encourage householders to move towards more energy efficient means of heating. This includes double glazing, for example, being mandatory on new homes. It is also noted a recent suggestion by the previous Labour government to limit the amount of water that could flow through a showerhead was met with staunch opposition. This is an example of people being reluctant to alter behaviours where there may be a clear environmental benefit from doing so. Certainly in areas where there are issues regarding a lack of water such ideas may have some merit.

3.7 Soil Displacement - Filling/Re-contouring in Urban Areas

3.7.1 The existing Southland District Plan does not include a rule relating to urban land filling/urban recontouring. During the lifetime of the existing Plan this has been problematic as the filling and re-contouring of land can have significant environmental effects particularly for adjoining landowners. This issue was covered for Stewart Island under the Stewart Island Plan Change but a District wide rule should be included as part of the second generation Southland District Plan.

3.8 Geomorphologic Constraints

3.8.1 Geomorphologic forces in Southland are an ongoing issue - communities need to be working with them rather than against them. As it stands almost all of Southland’s urban centres are located adjacent to the main river systems; Mataura, Oreti, Aparima, and Waiau. All of the townships can be affected (directly through flooding in townships or indirectly through road closures etc) by flooding from these river systems.

3.8.2 Additionally, with only a few exceptions, wastewater from the urban centres is discharged to these rivers, and a number of centres, Invercargill most notably, depend upon them for potable water. Thus, under current practices, the ‘carrying capacity’ of these river systems is a constraint to urban growth in Southland.

3.8.31 There has been a shift to different methods of wastewater disposal throughout Southland, with for example Lumsden’s wastewater being discharged to land rather than water through infiltration basins. Additionally SDC’s proposed biofiltro plant proposed for Wyndham/Edendale is an example of new technology that could become more common. This technology uses a type of worm living in a bed of sawdust to break down components of wastewater.

3.9 Heritage

- 3.9.1 In Southland to date the focus on heritage has largely been in an urban context, and in particular commercial buildings.
- 3.9.2 At present Winton has a heritage precinct and SDC is exploring this as an option for Riverton and perhaps Stewart Island. Nightcaps is also a location with a number of old miners cottages and heritage buildings with a particular character. There is perhaps an opportunity to create a point of difference to bring people to Nightcaps.
- 3.9.3 In terms of urban environments a potential gap in heritage protection exists in the form of character in residential neighbourhoods; for example early state housing, clusters of former workers cottages, or areas where there may be a cluster of a particular design. Thought may be needed as to how we retain these ‘clusters’, if they are of particular heritage value.

3.10 Bulk and Location Standards

- 3.10.1 All three local territorial authorities in Southland have relatively simple District Plans when it comes to bulk and location requirements. Bulk and location standards are the ‘cornerstone’ of District Plans in terms of the built forms they allow as permitted activities. Bulk and location standards essentially ‘shape’ communities on a site by site basis which then contributes to the overall urban form. The Resource Management Act plan formulation process in Southland was largely undertaken during an economic recession and efforts were made to ensure plans were of a nature that encouraged development (through essentially very ‘liberal’ rules). However these Plans have struggled to cope with a period of growth and as a result a number of issues have become apparent to the staff of these Councils.
- 3.10.2 *Invercargill City Council*
- 3.10.2.1 Invercargill City Council’s experience has been the minimum level of amenity prescribed in the District Plan has now become the standard – the majority of new dwellings are designed to the limit in terms of the plan. This has resulted in a number of developments that have pushed the limits in terms of good urban design. In other words, what has resulted in terms of a built form may be within the District Plan parameters, but may not be good urban design or result in a quality outcome. Alternatively some may argue that such a simple District Plan does not allow good urban design.
- 3.10.3 *Southland District Council*
- 3.10.3.1 Southland District Council have had issues with their height control rules in areas where there is both growth and a demand for views – principally Te Anau and Riverton. Views are traditionally viewed as ‘a privilege, not a right’ and often concerns are expressed to Council about the effects permitted developments have upon the views of existing dwellings. There may be the need to investigate refining the existing bulk and location requirements to provide an increased level of amenity protection for existing residences.
- 3.10.3.2 Further to this, SDC is looking to provide a greater level of amenity control, particularly with regards to colour schemes and lightspill in both residential and commercial situations. Whilst lightspill is something measureable which can be addressed through rules the issue of colour is something more subjective. It may be a combination of regulatory and non regulatory measures are investigated to address these issues. It may be different responses in terms of the regulatory/non regulatory ‘balance’ are used in different parts of the district.

3.10.3.3 A related issue has been the control of hazardous substances for SDC particularly large volumes of LPG being present in an urban context has made residents in some locations uncomfortable.

3.10.4 ***Gore District Council***

3.10.4.1 Gore District Council has had some minor issues with respect to outlooks being lost through infill development. This has not been of a nature or frequency to the extent that it has been identified as a potential plan change.

3.11 **Retail**

3.11.1 The provision of land for retailing is not a significant issue of concern for the Invercargill City Council at present. Council staff see recent overseas investment in the Invercargill Central Business District (“CBD”) as encouraging. With regards to heritage conservation at present there seems to be a gap in the market and the Building Act. It would seem Building Act requirements needed to refit some heritage buildings for re-use make them an uneconomic proposition. Commercial subdivision on the periphery of the Invercargill CBD may only serve to ‘widen’ this gap in the market. Invercargill’s CBD may be vulnerable to businesses relocating to larger format sites such as the Invercargill Showgrounds Development. Heritage conservation in the CBD is important in this respect.

3.11.2 Southland District and Gore District have seen some increase in commercial premises around the dairy sector. This does not appear to have given rise to any issues at this stage, however there may be a shortage of suitably zoned land for this type of activity in Winton.

3.12 **Climatic Influences and Natural Hazards**

3.12.1 Climate change, global warming and sea level rise are all issues that have the potential to impact upon urban environments that have emerged over the past 10 years. These issues are relevant to the built environment, and require consideration. These aspects are noted in a number of other discussion papers, typically natural hazards and the energy and infrastructure paper.

3.12.2 Additionally, other natural hazards such as flooding or tsunami remain as risks to be managed. Expansion of the urban areas of in towns such as Winton and Te Anau that has occurred since the existing Southland District Plan was adopted has in some cases occurred in areas that are susceptible to flooding.

3.12.3 The planning process will need to ensure future development gives rise to ‘robust’ communities. That is, communities will need to be robust enough to cope with disasters (as much as is practicable). Simple things, such as the issues around onsite water storage to reduce stormwater flows can also have the added benefit of providing a potable water source in the event of a natural disaster. The Southland District Council could give more guidance on the susceptibility to flood events in the second generation District Plan and could look to more actively discourage urban development in areas that could be subject to natural hazard events.

4.0 Options for Addressing Issues

4.1 *Response to issues from a regional perspective*

4.1.1 Urban Residential Fringe

4.1.1.1 The urban residential fringes of Southland are an area where decisions regarding the management of growth need to be made. One option is to ‘ringfence’ urban areas in order to encourage infill and urban renewal, potentially into more intensive settlements. This approach would seem to align with Southland District Council’s desire to consolidate rather than expand some of the existing urban areas of the District.

4.1.1.2 Three traditional methods used for urban containment are:

- greenbelts which are traditionally used to prohibit development in certain areas – this is a traditional ‘ringfencing’ approach
- urban service boundaries – policies that describe where infrastructure provision will occur, and where it may be expanded into the future
- urban growth boundaries are a ‘line’ between land intended for urban development and rural or other open space land

4.1.1.3 At present urban containment is achieved principally through zoning in district plans.

4.1.1.4 There may be a need to identify areas where expansion will be encouraged. It is noted that the recent ‘Sunridge’ subdivision application in south eastern Invercargill for 600 residential sections faced the issue of servicing. The water supply from Branxholme is such that expansion could not occur in this part of the city without there being disruption to water supply elsewhere in the city. At present there are no mechanisms or policies to impose financial contribution conditions in the Invercargill City Plan to recover costs from developers for additional servicing. For future growth of the region, issues around servicing will need to be addressed.

4.1.1.5 Another option could be looking at ‘village’ type developments, in rural areas, which would provide opportunities for small scale wastewater treatment plants etc to deal with some of the environmental effects of non reticulation. These villages would also provide better opportunities for ‘nodes’ to facilitate the provision of public transport into the future. In some locations these clusters are arising in a de facto manner as subdivision applications are approved – there may not be the same capacity for easy provision of public transport if there is no overall guidance to where these clusters occur. These villages may provide the rural lifestyle some people are seeking. Others may argue these opportunities already exist in existing small settlements. A tool to achieve this is a mechanism known as ‘cluster zoning’ where development is clustered on a large site which provides for the provision of open space on the majority of the site allowing more efficient servicing of the site (either reticulation or on-site). This can be combined with covenants on the ‘remainder’ of the site to preserve open space.

4.1.1.6 Identifying suitable sites for more intensive residential development in rural areas may be a way to provide for rural lifestyles into the future. This could be achieved by a structure or master planning exercise where sites suitable for such development are identified and incorporated in the relevant District Plan.

4.1.2 **Residential Development and Amenity Protection including views**

4.1.2.1 Invercargill has seen a recent consolidation and renewal around Tweed Street, between Clyde Street and Elles Road, to service the need for rental properties for students attending the Southern Institute of Technology. Other areas, previously in decline (John Street east area), which saw a number of ex Tiwai houses shifted away in the 90's, has now seen a resurgence in building activity on these empty sections. Former school sites within Invercargill (that were closed as part of the schools review) have also seen interest from developers with a number of sites having subdivision applications approved.

4.1.2.2 As previously discussed, the District Plans of Southland have taken a rather simple approach to amenity protection – in terms of the bulk and location requirements for residential developments. It may be there is a need to look at the requirements for different styles of residential developments, that are more public transport friendly, more sustainable and make a better use of the available space – rather than a continual sprawl out across the plains. There are people who choose to live in a situation with little outdoor living space and yards – perhaps these people could be better catered for in a Southland context. Certainly, more intensive developments offer opportunities to ‘concentrate’ and thus deal with effects. They also offer increased opportunities to take advantage of public transport by ‘concentrating’ people. This approach extends to heritage buildings also through re-use. This perhaps a move towards encouraging and providing for a range of housing types – ‘choice’ as per the New Zealand Urban Design Protocol.

4.1.3 **Funding and Provision of Infrastructure**

4.1.3.1 Southlands local territorial authorities all take differing approaches to the funding of infrastructure. Southland and Gore Districts have a very strong user pays ethos with financial and reserve contributions. Invercargill City is more ‘developer friendly’ with less of a user pays ethos.

4.1.3.2 With several potential industries looking to establish in Southland, particularly around the energy sector there is the need to provide appropriate infrastructure to cope with the additional demands this will bring and with this will come the issue of who will pay for it. Both the Resource Management Act and the Local Government Act provide methods for ‘contributions’ to be made to meet the costs of additional infrastructure associated with development.

4.1.3.3 Infrastructure is important, as its renewal and gradual improvement are important tools to protect and improve the urban environment. This infrastructure includes:

- Solid waste disposal facilities
- Water treatment and distribution facilities
- Roads
- Public transport
- Street lighting
- Open spaces
- Urban and civic commercial centres

- 4.1.3.4 The impacts of infrastructure as part of the urban environment on issues such as water quality were discussed above in section 3 of this paper and in Appendix 1 that looks at existing provisions within the RPS. The ‘greening’ of infrastructure is an emerging issue for the region to consider as a move away from older engineering standards such as NZS 4404: 1981 Code of Practice for Urban Land Subdivision occurs.
- 4.1.3.5 It should also be noted that there has been some investment in infrastructure to encourage development. Examples of this include improvements (new footpaths, gardens, street furniture) to the main street of a number of Southland’s towns – a process often referred to as ‘mainstreeting’. Invercargill City Council’s Plan Change 8 for Industrial rezoning at Awarua is a work in progress, but is another example of investment in infrastructure to encourage development (as was the Industrial zone on the opposite side of the highway).
- 4.1.3.6 Other examples of investment in infrastructure that add to the quality of urban environments is the network of walking trails alongside the Waihopai River and the New River Estuary adjoining Invercargill as well as the proposed Invercargill to Bluff Walkway.

4.2 *Response to issues from a Southland District Council Perspective*

4.2.1 Regulatory Approach

- 4.2.1.1 A regulatory approach to certain urban issues is considered appropriate in the second generation Southland District Plan. A number of issues relating to the urban areas of the District have arisen since the existing District Plan was formulated and adopted. The existing District Plan can be viewed as a Plan that does not adequately address a number of issues that have arisen from increased levels of development in Riverton, Te Anau and Winton in recent years. The approach of the existing District Plan which can be viewed as one in which individuals and the market were left to determine the areas appropriate for development has facilitated the growth of these three towns. The Council at the time the existing Plan was formulated wanted to encourage development and this has occurred in all three of these towns. A regulatory approach towards urban issues that have arisen in these three towns from this growth is one option available for use in the second generation District Plan.
- 4.2.1.2 While some urban areas of the District have expanded others have remained static or are declining. It is therefore important that the second generation District Plan in terms of objectives, policies and rules provides for the different circumstances of these urban areas. The existing District Plan approach to urban areas may therefore still be an appropriate approach to take towards those townships that have not experiencing growth issues. An enabling approach to these townships may help facilitate growth in these urban areas of the District.
- 4.2.1.3 Updated population statistics need to be included in the second generation District Plan. Emerging trends related to the growth or decline of the District’s urban populations in different townships and settlements will provide a useful tool for assessing the urban issues that relate to them. As noted earlier the urban resource management issues for townships that have experienced growth are very different from those that have remained static or may have experienced a decline. The second generation District Plan could build on the approach of the current Plan by providing a short summary of all the urban areas of the District which notes their size and issues specifically relevant to them. Continued expansion of the dairy industry at Edendale is an example of activity specific to this township that will influence Edendale’s urban issues in the future. The establishment of Rakiura National Park on Stewart Island is another example of a relatively recent change that may have an indirect effect on the urban areas of the Island.

4.2.2 **Urban Consolidation**

- 4.2.2.1 In terms of the issue of residential growth on the fringes of existing townships the second generation Southland District Plan could look to consolidate urban areas. Subdivision activity on the fringes/outskirts of some townships in the District during the lifetime of the current Plan has resulted in the urban area of these towns increasing significantly. In some cases the expansion of the urban areas through subdivision development has occurred while there is still significant capacity for new residences within recent developments that have already been consented. Te Anau for example had a large number of new residential developments fully formed and serviced but with significant capacity for new residential dwellings. Further urban development in the rural fringe of these towns could be discouraged and development of existing sections that have yet to be fully occupied encouraged. The Council could look at limiting patterns of urban sprawl in these towns through policies and rules aimed at urban consolidation.
- 4.2.2.2 There is also scope for increased levels of residential development within the Urban Resource Areas of the District's three largest towns. Larger residential sections in older more established parts of these towns could be subdivided to provide for additional residential dwellings. The development of regulatory controls is one option available to ensure that existing urban areas are consolidated.

4.2.3 **Provision of Utility Services**

- 4.2.3.1 The issues that arise from provision of utility services can be very different for different urban areas of the Southland District and this needs to be identified when framing this issue. The second generation District Plan could recognise that there can be difficulties retaining and providing an appropriate standard of service at a reasonable cost in those urban areas of the District that have experienced a decline in population levels. While at the other end of the scale the significant growth pressures experienced by some urban areas give rise to a very different set of issues. Increases in the urban areas of these towns can lead to increases in infrastructure maintenance costs as the land area covered by these towns expands. At the same time the existing urban areas of these townships often have sufficient infrastructure capacity that in some cases is under utilised. This has implications for the efficient use and development of utility networks. The consolidation of urban growth within defined Urban Resource Areas may be one way of addressing this issue.

4.2.4 **Loss of High Value Soils and Productive Land**

- 4.2.4.1 Rules focussed on the consolidation of urban areas may also help to address issues associated with the loss of high value soils and productive land located on the fringes of these towns.

4.2.5 **Urban Design**

- 4.2.5.1 The second generation District Plan could look to address urban design issues. One way this could be done would be through the development of urban design guidelines which are a useful non-regulatory tool. Design guidance relating to the historic commercial buildings found in the centres of townships could be an example of where this approach could be beneficial.

4.2.6 **Landscape Issues**

4.2.6.1 A regulatory approach to landscape issues could also be adopted in the second generation District Plan. Rules relating to areas adjoining existing towns that are identified as outstanding natural landscapes could be adopted. Landscape studies on the coastal areas in and around Riverton and on the Te Anau Basin have recently been conducted. The findings and recommendations of these studies could be used as a base for any regulatory approach to landscape issues associated with urban development where landscape effects could potentially be significant.

4.2.7 **District Wide Performance Standards**

4.2.7.1 The urban areas of the Southland District in many cases are subject to similar issues for example noise and other residential amenity issues and the development and use of generic district wide objectives, policies and rules such as the environmental performance standards in the existing Plan are considered appropriate. It may be appropriate to create new performance standards for the following.

4.2.7.2 ***Height***

4.2.7.2.1 There is a need for clarification in the second generation District Plan as to how the height of buildings and structures should be measured. Issues relating to the height of buildings often arise when development sites are located on sloping land. This issue was addressed under the Stewart Island Plan Change and a District wide rule based on the Stewart Island example could be included as part of the second generation Southland District Plan.

4.2.7.2.2 The height limits of certain Resource Areas of the existing Plan may also need to be examined. The Council has received feedback in this regard and it appears as though some changes to height limits would be appropriate. A slight increase to the accessory building height limit from 3.5 metres to 4 metres may be appropriate as there is some evidence that accessory buildings which exceed the 3.5 maximum only slightly are triggering this rule while the actual effects of these buildings are often no more than minor.

4.2.7.3 ***Signage***

4.2.7.3.1 One criticism of the existing District Plan is that the signage rules relating to community facilities may be overly restrictive. This could be examined further so that these facilities which provide important services to the community for example kindergartens are able to display reasonable amounts of signage without having to go through the resource consent process.

4.2.7.4 ***Noise***

4.2.7.4.1 The existing District Plan's noise limits are based on New Zealand standards NZS 6801:1991 'Measurement of Sound' and NZS6802:1991 'Assessment of Environmental Sound'. These 1991 standards have now been superseded with the most recent standards being NZS6801:2008 'Measurement of Sound' and NZS6802:2008 'Environmental Noise' these standards or their future equivalent should be incorporated into the second generation District Plan. The latest standards are understood to have rectified problems associated with the measurement and assessment of noise which arose with earlier standards.

4.2.7.5 ***Odour and Lightspill***

4.2.7.5.1 Existing Rule URB.4 can be viewed as being open to interpretation and the wording and framing of this rule will need to be addressed in the second generation District Plan. The provisions of the existing Plan relating to glare and lightspill (Rule AME.2 - Glare) also need to be re-examined.

4.2.7.6 ***Visitor Accommodation***

4.2.7.6.1 There may be a need for a more detailed rule relating to visitor accommodation facilities such as hotels, motels, backpackers and camping grounds. Some of these accommodation activities require resource consent under performance standards such as the hours of operation and a specific rule relating to these facilities would be a more appropriate way of ensuring that these facilities are provided for and meet appropriate environmental standards. There has also been some criticism of current rules as disadvantaging large commercial operators and being too enabling with respect to persons renting private dwellings as holiday accommodation.

4.2.7.7 ***Verandah Rule***

4.2.7.7.1 Existing Rule URB.6 (8) which relates to the provision of verandahs requires public notification in situations where a verandah is not proposed. This rule acknowledges that there may be circumstances relating to building design, layout and topography whereby the provision of a verandah is not appropriate. The requirement to notify resource consent applications in these circumstances should be removed and this rule amended appropriately.

4.2.8 **New Forms of Residential Accommodation**

4.2.8.1 The second generation Southland District Plan could allow for forms of development that traditionally have not been provided in the Southland District. Allowing for higher density residential development in Riverton, Te Anau and Winton is an option that could be examined further. Allowing for higher density residential accommodation could address the issues associated with urban sprawl and related increases in infrastructure costs. Riverton and Te Anau are popular destinations for holidaymakers and tourists and higher density residential accommodation could be well suited to short term and seasonal visitors. Both these towns are also popular locations for holiday homes or 'cribs' and smaller residential units may be suitable for the needs of many of these people. These types of residential accommodation have become popular in other areas of the country that are also popular holiday destinations including certain urban areas of the Lakes and Central Otago Districts. The existing District Plan under Rule URB.5 – 'Residential Activity Performance Standards' does provide for multi unit developments although to date construction of these types of residential accommodation have been very limited. The existing multi-unit rules may therefore need to be re-examined to ensure that the new Plan provides adequately for these types of accommodation.

4.2.9 **Non-regulatory Approaches**

4.2.9.1 The use of non-regulatory approaches could be utilised as part of the approach taken to urban resource management issues in the second generation District Plan. The Southland District Council currently has two non-regulatory development guideline booklets with one relating to the Riverton/Aparima Township and area (2005) and another relating to the Te Anau Ward (2003). These guidelines focus on specific characteristics of each of these communities and provide some design guidance and information on issues that are of particular concern to each township. They provide guidance to developers and other interested parties on the community values of each township and promote the unique nature of each local environment. The development and use of these design guidelines is one example of an information resource which the Council could develop to address urban issues. The use of these guidelines can complement regulatory methods and they are particularly useful as specific guidance centred on the issues and geography of specific townships can be developed as needed. Council has experienced positive feedback on these non-regulatory guidelines from several developers who have embraced their contents when designing new developments.

5.0 Concluding Remarks

- 5.0.1 There can be no doubt that worldwide, and in New Zealand, there has been a return to more traditional planning methods. This is an influence the Regional Policy Statement process needs to assess across all of the spheres it encompasses and determine if it is an appropriate approach to encourage. It certainly may have some merit in terms of urban environments to give local territorial authorities direction to use certain tools to address the issues they are facing. It also seems that in the urban areas of Southland there may be an upcoming period of growth in certain places. Given the potential for these ‘growth spurts’ the need to ensure robust planning frameworks are in place giving some direction to where growth occurs, and to some extent, what form it will take is essential. The relationship of this to a number of sectors, particularly transportation planning is also an important consideration.
- 5.0.2 Associated with this are issues around infrastructure related to the urban environment that need to be addressed. As a part of the urban environment infrastructure and network utilities are necessary for growth. As infrastructure is renewed or extended there are opportunities to utilise certain new technologies than can offer improvements over current systems. An example of this is in improvements to the quality of stormwater through primary treatment methods.
- 5.0.3 If there is to be a period of growth in Southland around certain industries, providing quality urban environments for people to work, live and play in order to attract a workforce to the region is important. The Regional Policy Statement will give local territorial authorities direction as to how to achieve this. It would seem the current Regional Policy Statement is ‘close to the mark’ in terms of the issues identified within it; however some slight adjustment may be required to reflect a return to more traditional planning methods.

6.0 Questions for Discussion

- 6.0.1 Below are a number of questions to stimulate comment. The first set relate to the review of the RPS, whilst the second set relate to the Southland District Plan Review. There is also a degree of ‘cross – over’ between the questions and the RPS questions could be of significance for the SDC plan review process and vice versa. It is also noted that what is an issue for SDC in the context of their District Plan review may be an issue for ICC or GDC in the context of the RPS review – comments to this effect are welcomed.

6.1 Regional Policy Statement Review

1. What role should Environment Southland as the regional council have with respect to issues of urban form and settlement location? What are your views about Environment Southland becoming a signatory to the New Zealand Urban Design Protocol? Will this in your view assist in ensuring the urban environments of Southland are quality environments?
2. Are the Seven C’s, outlined in The New Zealand Urban Design Protocol (section 1.1 of this paper) with respect to characterising quality urban design, demonstrated in current urban centres throughout Southland. If not, should they and how?
3. Is there a need for District Plans to provide a range of performance standards for different types of residential development? Additionally should Councils be providing for ‘serviced’ rural residential development?

4. Are there character neighbourhoods in Southland that need heritage protection, or at least some recognition?
5. What existing amenity values should be protected in District Plans and what amenity values should be provided for into the future?
6. Should the RPS promote planning mechanisms such as cluster zoning in rural areas to facilitate 'lifestyle' development in a more controlled manner?
7. Should the RPS give direction to Councils to investigate different sets of rules for different communities to address competing demands and pressures? i.e. are the same set of rules appropriate in a settlement where rapid growth is occurring, against a settlement that may be in decline?

6.2 Southland District Plan Review

1. Should the Southland District Council take a more proactive approach to the issue of limiting urban sprawl and look to consolidate growth within existing urban areas?
2. Where there is significant scope for residential development in existing consented subdivisions (for example Te Anau) should the Southland District Council look to formulate policy that encourages the construction of new dwellings in these areas rather approving new subdivisions and adding more capacity?
3. How should demand for rural lifestyle properties of the fringes of the Southland District's existing urban areas be managed?
4. Has the use of non-regulatory guidelines been a useful approach in terms of addressing urban growth issues that have arisen in Riverton and Te Anau in recent years?
5. Should the Southland District Council examine options for the protection of high value soils and productive land on the rural/urban fringe from urban development?

Appendix 1: Analysis of Existing Regional Policy Statement Issues

1.1 The RPS currently lists six resource management issues for the built environment and each of these are cross referenced with a number of objectives, policies and methods. This section discusses each of these in turn. It is noted that the cross referencing has given rise to a number of situations where in particular a method is referred to, and is relevant to each resource management issue. In order to avoid unnecessary repetition below is a table which indicates whether each objective/policy and methods is currently cross referenced in the built environment section (blue cross), and whether it is still relevant (red cross). Additionally the table indicates where objectives/policies/methods were cross referenced and are no longer relevant (red dash). Essentially, this provides a ‘snapshot’ of the relevance or otherwise of the cross referencing. The methods relating to all issues are included at the end of this appendix.

1.2

	Issue 1	Issue 2	Issue 3	Issue 4	Issue 5	Issue 6							
Objective													
9.1	X	X											
10.1	X	X	X	X	X	X	X	X	X	X			
10.2	X	X	X	X	X	X	X	X	X	X	X	X	X
10.3	X	X											
10.4	X	X			X	X							
10.5	X	X							X	X			
11.2													
15.2											X	X	
Policy													
5.5	X	X											
8.1	X	X											
10.1	X	X	X	X			X	-	X	X			
10.2	X	X			X	X	X	X	X	X			
10.3	X	X					X	X	X	X			
10.4	X	-									X	X	
10.5	X	X			X	X							
10.6	X	X			X	X							
10.7	X	X	X	X			X	X	X	X			
15.1											X	X	
15.2											X	X	
15.3											X	X	
15.5											X	X	
15.8											X	-	
15.11											X	X	
15.12											X	X	
15.15											X	X	

	Issue 1	Issue 2	Issue 3	Issue 4	Issue 5	Issue 6						
Method												
10.1	X	X	X	X	X	X	X	X	X	X	X	X
10.2	X	X	X	X	X	X	X	X	X	X		
10.3	X	X	X	X	X	X	X	X	X	X		
10.4	X	X	X	X	X	X	X	X	X	X		
10.5	X	X	X	X	X	X	X	X	X	X	X	X
10.6	X	X	X	X	X	X	X	X	X	X		
10.7	X	X	X	X	X	X	X	X	X	X		
10.8	X	X	X	X	X	X	X	X	X	X		
10.9	X	X	X	X	X	X						

1.3 Resource Management Issue 1

“Resource Management Issue 1

The built environment, including urban and settlement expansion, can have adverse effects on natural and physical resources, including:

- *loss of productive land*
- *loss of amenity values*
- *inefficiencies in the roading network*
- *reduction in water quality*
- *loss of heritage values and archaeological sites of regional significance”*

1.3.1 Objective 9.1

To protect outstanding natural features and landscapes of the Region.

Explanation

A number of natural features and landscapes of an outstanding quality are present in the Region. These resources are of prime importance because they contribute to a considerable degree to the character and amenities of the Region, and are prized by takata whenua, residents of the Region and visitors, and as such are worthy of protection. Many of these landscapes are on public land, but a number are not. It is important that these outstanding natural features and landscapes are protected from the adverse effects of inappropriate use and development.

1.3.1.1 Comment:

This objective relates to issue 1, despite not being mentioned in issue 1. A number of built environments exist in proximity to, or ‘upon’ areas of outstanding natural features and landscapes. The need for their protection has not changed. Additionally, views of outstanding natural features and landscapes is also something to consider in this context, that is, activities outside of these areas can impact views of these features, sometimes in an adverse way.

1.3.2 **Objective 10.1**

To achieve the sustainable management of the built environment in such a way that the needs of future generations are met.

Explanation

The built environment is a physical resource of the Region and, as with all resources, the Act requires that it be managed in a sustainable manner. The settlements and towns that comprise parts of the built environment, and the infrastructure that services them, can be used and developed in a number of ways. In some cases this can give rise to inefficiencies.

1.3.2.1 Comment:

This relates to issue 1. The issue mentions a number of effects the built environment can have resulting in the 'loss' of resources or values. Protecting these resources and values for future generations is core to the notion of sustainable management. The issue and the objective both mention inefficiencies which can arise when infrastructure is underutilised or constructed in an ad-hoc manner.

1.3.3 **Objective 10.2**

To maintain and enhance the environmental quality of the Region's built environment.

Explanation

The quality of life for Southlanders comes not only from those things that people can provide for themselves and their families, but also as a result of the built environment in which they live. That environment must provide for their economic and social needs, but not give rise to conditions that could affect public safety and health. The generated effects of the built environment, including solid and liquid waste disposal, will also require management.

1.3.3.1 Comment:

This relates to issue 1, and is still relevant. The regions built environment, consists of a number of variables that contribute to its quality. These include in particular amenity values, which are mentioned in issue 1. Amenity values are a combination of a number of factors and can be influenced by, for example urban design.

1.3.4 **Objective 10.3**

To protect heritage values and archaeological sites of regional significance.

Explanation

Those sites of importance could relate to the period when Maori were the only inhabitants of Southland, the time since European settlement, or features of the modern day. In urban areas slow rates of redevelopment have meant that many buildings and other structures of the past still survive, and the extensive areas of undeveloped wilderness in Fiordland and Stewart Island have also enabled much of the past to be preserved.

1.3.4.1 Comment:

This relates to issue 1 and is still relevant. Urban environments are perhaps the most 'disturbed' areas of development, however that does not mean redevelopment will not uncover items of historical interest or significance. Further to this, there may be the need to assess what are items of regional significance that are not currently protected. Examples of this could be early examples of state housing in Southland, areas of urban environments that are relatively unmodified in terms of the housing stock where that housing stock is especially representative of a particular eras or style (for example Tiwai Housing, Miners Cottages in

Ohai/Nightcaps). In urban areas, especially Invercargill, the heritage focus has been on commercial buildings.

1.3.5 **Objective 10.4**

To recognise and support the desire of Maori to maintain and enhance their relationship with their ancestral lands.

Explanation

There are various means by which Maori may wish to maintain their relationship with their ancestral lands. This could include the construction of community facilities or papakianga housing. It is considered appropriate, taking into account the provisions of the Act, to support Maori in undertaking such developments.

1.3.5.1 Comment:

This objective relates to Issue 1 and is still relevant. As mentioned in the issue, settlement expansion can result in the loss of heritage values and archaeological sites of regional significance.

1.3.6 **Objective 10.5**

To minimise the adverse effects of the built environment on natural and physical resources.

Explanation

In developing and using the built environment adverse effects can arise. These effects can be visual, or can impact directly upon aspects of natural and physical resources. It will not be possible to totally avoid these adverse effects but action can be taken to minimise them.

1.3.6.1 Comment:

This objective relates to issue 1 and the adverse effects mentioned in issue 1. It should be noted that the adverse effects of the built environment are not all mentioned in issue 1. This may need expanding to reflect the issues that have emerged and are discussed later in this paper.

1.3.7 **Objective 11.2**

To minimise the adverse effects on the region's transportation infrastructures, so that these physical resources are managed in such a way that they are able to meet the needs of future generations.

Explanation

While it is commonly recognised that transportation infrastructures can adversely impact on natural and physical resources, it should be also recognised that transportation infrastructures are defined under the Act as a physical resource themselves, and therefore, the activities that utilise those infrastructures can adversely impact on them. It should also be noted that because of the activities that occur in respect of transportation infrastructures, they are vital in enabling the people of the Region to provide for their wellbeing. As such, these physical resources need to be sustainably managed.

1.3.7.1 Comment: Issue 1 specifically discusses inefficiencies in the roading network resulting from urban expansion. The built environment, or expansion of it, can impact upon transportation infrastructures. In particular, patterns of development can impact upon the sustainability of the transportation network. For these reasons this objective is still relevant to Issue 1.

1.3.8 **Policy 5.5**

In preparing, implementing and administrating Regional and District Plans and in considering resource consents, local authorities shall assess the effects of land use and development on ground water and surface water

quality, including both point and non-point source discharges, and provide for any adverse effects to be avoided, remedied or mitigated.

Explanation

Regional and district planning is concerned with the integrated management of resources and managing effects of the use, development and protection of land and associated resources. In carrying out their responsibilities, Councils shall have specific regard to water quality related matters.

In certain situations it may be necessary for Regional Plans to consider land management in order to address water quality problems when other statutory or non-statutory procedures, including codes of practice information, education and consultation with rural landcare groups, would not be effective. Any accords, agreements or controls will be specified in a Regional Plan or Plans, and be consistent with the statutory roles of other agencies. Matters that could be considered within a Regional Plan relate to the clearance of land, riparian management, management of channel clearance activities, the cumulative effects of adjoining intensive activities, and the creation of additional wetlands. Land users will be encouraged to address identified problems through landcare groups or codes of practice.

1.3.8.1 Comment:

This policy is still very relevant to issue 1. Urban environments can have a variety of effects on surface and ground water quality. In some instances these effects are ‘instantaneous’ and in other occasions can be a cumulative effect that arises slowly over time. The issue only currently mentions groundwater quality; there may also be the need to ‘widen’ the scope of this to include ‘quantity’ – growth in some locations could potentially utilise available water.

1.3.9 **Policy 8.1**

Maintain and enhance Southland’s soil resource by avoiding, remedying or mitigating the adverse effects of activities.

Explanation

While being ecosystems in their own right, soils are an integral part of other ecosystems and the future wellbeing of Southland is dependent upon its natural soil resources. The soil resource of the Southland Region, especially the most versatile soils, needs to be managed in such a way that the aspirations of future generations will be able to be met.

1.3.9.1 Comment:

If anything, this policy has become increasingly relevant to issue 1. Expansion of the urban environment can result in the loss of productive land. Sprawl of urban development onto these soils needs to be controlled to ensure they are protected for future generations, as essentially the built environment relies (or may rely) upon these soils to ‘feed’ that built environment

1.3.10 **Policy 10.1**

Encourage development and use of the built environment that provides for the efficient use of existing facilities and infrastructure while simultaneously avoiding the development of unnecessary additional infrastructure.

Explanation

Sustainability of the built environment requires efficient use of existing support facilities. It is in the long-term interest of the community to ensure that any new facilities and infrastructure that may be developed are necessary and desirable. Infilling, more intensive development, and utilising areas already serviced, prior to extending urban areas, aids the efficiency of network utilities and investment, and in some cases can assist in retaining areas with highly versatile soils.

1.3.10.1 Comment: This policy is relevant and relates to Issue 1. Infrastructure in Southland is an important issue. Some parts of the region are in decline at present and have underutilised infrastructure. Other parts are having infrastructure installed as part of growth (e.g. Te Anau) or to improve environmental quality (Edendale Sewerage Scheme). Other centres, such as Invercargill, have significant infrastructure replacement forecast – Branxholme to Waikiwi Water pipeline. Coupled with this is the need to ensure that these assets are managed in an appropriate manner to ensure they provide for the needs of the residents of Southland. The ‘whole of life’ approach with respect to infrastructure needs to be taken into account. Underinvestment in maintenance of infrastructure, whilst having short term financial benefits, can have increased long term financial consequences for local authorities and network utility operators. Additionally patterns of growth can lead to unsustainable extensions of infrastructure.

1.3.11 ***Policy 10.2***

Require that network utilities associated with the built environment be undertaken in such a manner as to avoid wherever practicable, remedy or mitigate effects on the quality of natural and physical resources.

Explanation

It is recognised that network utilities provide for the social and economic wellbeing of the community. Under the Act territorial authority is required to have regard to extent to which network utilities will be provided for within their Plans, and the effect of those activities on the environment. In particular, regard shall be had to the effects (especially water quality) of sewage disposal and the discharge of stormwater.

1.3.11.1 Comment:

This policy is relevant and relates to issue 1. Whilst the issues of network utilities and their effects on water have been identified, other issues exist such as the visual impact of these utilities (for example power pylons or wind farms) as well as the effects generated by the utilities (noise from the state highway).

1.3.12 ***Policy 10.3***

Encourage the use of corridors for network utilities where practicable, where this will result in mitigation of environmental effects.

Explanation

This will contain the geographic effects on amenity values of such amenities to a defined and limited area.

1.3.12.1 Comment:

This relates to issue 1 and is still relevant. Patterns of development can make it difficult to create ‘corridors’ for network utilities. Conversely, extensions to network utilities as a result of growth can result in adverse effects.

1.3.13 ***Policy 10.4***

Recognise and minimise the risks of natural hazards on the built environment.

Explanation

Risks can be incurred through development in hazard prone areas, and this must be avoided or minimised to decrease risk beyond acceptable levels. This policy seeks to integrate development policies with those for natural hazards management, and draws attention to the potential risks of natural hazards to all development and use of areas subject to such risks. Those risks can include direct effects when the natural hazard occurs, and also longer term impacts, such as the risk to individual and community health.

1.3.13.1 Comment: This policy does not directly relevant to issue 1 and is better addressed under issue 6.

1.3.14 ***Policy 10.5***

Protect buildings, structures, places, features or areas that have heritage, cultural or traditional value.

Explanation

The Act provides for, and recognises, the roles of statutory agencies with an interest in cultural and heritage matters. This includes the preparation of databases. Plans prepared under the Act, should identify the processes that will enable those non-statutory bodies to have involvement in such matters, and the approach that will be adopted in providing for the protection of heritage sites, whether they are identified in resource management documents or newly discovered. The degree of protection afforded should relate to their significance.

1.3.14.1 Comment:

Historic Heritage has been elevated to a matter of national importance so if anything has become more important with respect to issue 1 and in particular the expansion of the built environment can result in the loss of heritage values. The Regional Policy Statement will need to recognise and provide for it as an issue. The debate that perhaps needs to be had in light of the policy 10.5 above is the degree of value. All buildings, structures, places, features or areas have some sort of heritage, cultural or traditional value. It is the degree and significance of that value that gives rise to the need for some form of protection.

1.3.15 ***Policy 10.6***

Protect sites and resources of cultural, natural and spiritual significant to Maori and consult the takata whenua when making statutory decisions on issues impacting upon such matters.

Explanation

When resource management documents are being prepared there is a statutory requirement that the authorities preparing the documents consult with the takata whenua. Within Southland there are also a number of specific sites which are of cultural and spiritual significant to the takata whenua. These will be generally be indentified within "Te Whakatau Kaupapa O Murihiku" and in preparing management Plans and assessing resource consents regard should be had to that document. Where development proposals requiring resource consents impact upon such sites then consultation with the takata whenua is required. In the first instance the proponent should undertake that consultation. Resource management planning should also encourage the takata whenua to utilise their land, for example, papakianga housing, and should as far as possible, remove impediments to this use, to provide, among other things, opportunities for the strengthening of Maori culture and traditions.

1.3.15.1 Comment:

This policy relates to issue to issue 1 and in particular how the expnaiosn of the urban environment can have an effect upon site of significance. It should be noted, and no doubt will be discussed in the Tangata Whenua issues paper – but Te Whakatau Kaupapa O Muruhiku has been superseded by Te Tangi A Tauira - The Cry of the People.

1.3.16 ***Policy 10.7***

Recognise that changes to one component of the built environment can have adverse effects on other components of the built environment.

Explanation

Linkages between components of the built environment result in impacts upon related components if changes occur. For example, ribbon development can result in greater risks to road traffic, and increasing costs in services such as water and sewerage.

1.3.16.1 Comment:

This policy is still relevant and relates to issues 1. This policy recognises the need for sustainable urban design to ensure growth is not done in an unsustainable form or pattern which is also mentioned in issue 1.

1.4 Resource Management Issue 2

“Resource Management Issue 2

Patterns of development can constrain future generations from meeting their needs.”

1.4.1 **Objective 10.1**

To achieve the sustainable management of the built environment in such a way that the needs of future generations are met.

Explanation

The built environment is a physical resource of the Region and, as with all resources, the Act requires that it be managed in a sustainable manner. The settlements and towns that comprise parts of the built environment, and the infrastructure that services them, can be used and developed in a number of ways. In some cases this can give rise to inefficiencies.

1.4.1.1 Comment:

This clearly relates to issue 2. The patterns of development of the built environment can have a direct effect upon the sustainable management of the built environment. Unsustainable patterns of urban development in the present will have a direct effect on the ability of future generations to sustainably manage resources.

1.4.2 **Objective 10.2**

To maintain and enhance the environmental quality of the Region’s built environment.

Explanation

The quality of life for Southlanders comes not only from those things that people can provide for themselves and their families, but also as a result of the built environment in which they live. That environment must provide for their economic and social needs, but not give rise to conditions that could affect public safety and health. The generated effects of the built environment, including solid and liquid waste disposal, will also require management.

1.4.2.1 Comment:

This relates to issue 2, and is still relevant. The regions urban environments have patterns of development. These patterns contribute to the environmental quality of the built environment. As discussed in the introduction an increased focus on urban design and a return to traditional planning techniques, makes the ‘relationship’ of this issue and policy important in terms of the RPS.

1.4.3 **Policy 10.1**

Encourage development and use of the built environment that provides for the efficient use of existing facilities and infrastructure while simultaneously avoiding the development of unnecessary additional infrastructure.

Explanation

Sustainability of the built environment requires efficient use of existing support facilities. It is in the long-term interest of the community to ensure that any new facilities and infrastructure that may be developed are necessary and desirable. Infilling, more intensive development, and utilising areas already serviced, prior to extending urban areas, aids the efficiency of network utilities and investment, and in some cases can assist in retaining areas with highly versatile soils.

1.4.3.1 Comment:

This policy is relevant and relates to Issue 2. Infrastructure in Southland is an important issue. Some parts of the region are in decline at present and have underutilised infrastructure. Other parts are having infrastructure installed as part of growth (eg Te Anau) or to improve environmental quality (Edendale Sewerage Scheme). Other centres, such as Invercargill, have significant infrastructure replacement forecast – Branxholme to Waikiwi Water pipeline. Patterns of urban development are intrinsically linked with patterns of infrastructure. As discussed above, if infrastructure is developed in an unsustainable manner, for example ‘long fingers’ of pipes extending beyond urban limits these can make sustainable management difficult in the future through having less parties contributing to their upkeep as well as potentially encouraging urban sprawl.

1.4.4 ***Policy 10.7***

Recognise that changes to one component of the built environment can have adverse effects on other components of the built environment.

Explanation

Linkages between components of the built environment result in impacts upon related components if changes occur. For example, ribbon development can result in greater risks to road traffic, and increasing costs in services such as water and sewerage.

1.4.4.1 Comment:

This policy is still relevant to issue 2. This policy recognises the need for sustainable urban design to ensure growth is not done in unsustainable form or pattern and that changes in land use within urban environments can bring with them both positive and adverse environmental effects.

1.5 **Resource Management Issue 3**

“Resource Management Issue 3

The environmental quality of the built environment should reflect the social, economic and physical needs of the people that undertake activities within it.”

1.5.1 ***Objective 10.1***

To achieve the sustainable management of the built environment in such a way that the needs of future generations are met.

Explanation

The built environment is a physical resource of the Region and, as with all resources, the Act requires that it be managed in a sustainable manner. The settlements and towns that comprise parts of the built environment, and the infrastructure that services them, can be used and developed in a number of ways. In some cases this can give rise to inefficiencies.

1.5.1.1 Comment:

This objective clearly relates to issue 3. The environmental quality of the urban environment is an outcome of the degree to which the urban environment is sustainably managed; in other words if the urban environment is sustainably managed it will meet the social, economic and physical needs of the population.

1.5.2 **Objective 10.2**

To maintain and enhance the environmental quality of the Region's built environment.

Explanation

The quality of life for Southlanders comes not only from those things that people can provide for themselves and their families, but also as a result of the built environment in which they live. That environment must provide for their economic and social needs, but not give rise to conditions that could affect public safety and health. The generated effects of the built environment, including solid and liquid waste disposal, will also require management.

1.5.2.1 Comment:

This relates to issue 3 and in fact both the issue and the objective almost 'say' the same thing.

1.5.3 **Objective 10.4**

To recognise and support the desire of Maori to maintain and enhance their relationship with their ancestral lands.

Explanation

There are various means by which Maori may wish to maintain their relationship with their ancestral lands. This could include the construction of community facilities or papakianga housing. It is considered appropriate, taking into account the provisions of the Act, to support Maori in undertaking such developments.

1.5.3.1 Comment:

This objective does not relate to Issue 3 (in its current form). It is suggested 'cultural' is added to 'social, economic and physical needs' in the issue. Community facilities (such as a Marae or Papakainaga housing) are a means to meeting the cultural needs of people within urban environments. It is noted that these facilities may not be located within urban environments but serve the cultural needs of those who live there.

1.5.4 **Policy 10.2**

Require that network utilities associated with the built environment be undertaken in such a manner as to avoid wherever practicable, remedy or mitigate effects on the quality of natural and physical resources.

Explanation

It is recognised that network utilities provide for the social and economic wellbeing of the community. Under the Act territorial authority is required to have regard to extent to which network utilities will be provided for within their Plans, and the effect of those activities on the environment. In particular, regard shall be had to the effects (especially water quality) of sewage disposal and the discharge of stormwater.

1.5.4.1 Comment: This policy is relevant to issues 3. Network utilities especially structures associated with them have the potential to detract for the environmental quality of the built environment. This should be tempered with the fact they are essential components of the urban environment and should be recognised as such.

1.5.5 **Policy 10.5**

Protect buildings, structures, places, features or areas that have heritage, cultural or traditional value.

Explanation

The Act provides for, and recognises, the roles of statutory agencies with an interest in cultural and heritage matters. This includes the preparation of databases. Plans prepared under the Act, should identify the processes that will enable those non-statutory bodies to have involvement in such matters, and the approach that will be adopted in providing for the protection of heritage sites, whether they are identified in resource management documents or newly discovered. The degree of protection afforded should relate to their significance.

1.5.5.1 Comment:

Historic Heritage contributes to the environmental quality of the built environment and thus this policy is relevant to issue 3.

1.5.6 **Policy 10.6**

Protect sites and resources of cultural, natural and spiritual significant to Maori and consult the takata whenua when making statutory decisions on issues impacting upon such matters.

Explanation

When resource management documents are being prepared there is a statutory requirement that the authorities preparing the documents to consult with the takata whenua. Within Southland there are also a number of specific sites which are of cultural and spiritual significant to the takata whenua. These will be generally be indentified within "Te Whakatau Kaupapa O Murihiku" and in preparing management Plans and assessing resource consents regard should be had to that document. Where development proposals requiring resource consents impact upon such sites then consultation with the takata whenua is required. In the first instance the proponent should undertake that consultation. Resource management planning should also encourage the takata whenua to utilise their land, for example, papakianga housing, and should as far as possible, remove impediments to this use, to provide, among other things, opportunities for the strengthening of Maori culture and traditions.

1.5.6.1 Comment:

This relates to issues 3 – the protection of sites of significance contributes to the (cultural) quality of the built environment. As mentioned above it is suggested the word cultural is inserted into issue 3.

1.6 **Resource Management Issue 4**

"Resource Management Issue 4

The extent to which the built environment is compatible with existing activities, as health concerns, for example, noise and dust can arise."

1.6.1 **Objective 10.1**

To achieve the sustainable management of the built environment in such a way that the needs of future generations are met.

Explanation

The built environment is a physical resource of the Region and, as with all resources, the Act requires that it be managed in a sustainable manner. The settlements and towns that comprise parts of the built environment, and

the infrastructure that services them, can be used and developed in a number of ways. In some cases this can give rise to inefficiencies.

1.6.1 Comment:

This objective relates to issue 4. The needs of future generations can be compromised by the presence of activities with a high degree of adverse effects (such industrial activities or network utilities) being located in close proximity to sensitive land uses. In some instances the issue of reverse sensitivity can arise.

1.6.2 **Objective 10.2**

To maintain and enhance the environmental quality of the Region's built environment.

Explanation

The quality of life for Southlanders comes not only from those things that people can provide for themselves and their families, but also as a result of the built environment in which they live. That environment must provide for their economic and social needs, but not give rise to conditions that could affect public safety and health. The generated effects of the built environment, including solid and liquid waste disposal, will also require management.

1.6.2.1 Comment:

This relates to issue 4 and is relevant. The environmental quality of urban environments can be decreased through the presence of activities with a high degree of adverse effects. Traditional planning techniques, such as zoning, are a means of separating sensitive activities from those with a higher degree of adverse effects.

1.6.3 **Policy 10.1**

Encourage development and use of the built environment that provides for the efficient use of existing facilities and infrastructure while simultaneously avoiding the development of unnecessary additional infrastructure.

Explanation

Sustainability of the built environment requires efficient use of existing support facilities. It is in the long-term interest of the community to ensure that any new facilities and infrastructure that may be developed are necessary and desirable. Infilling, more intensive development, and utilising areas already serviced, prior to extending urban areas, aids the efficiency of network utilities and investment, and in some cases can assist in retaining areas with highly versatile soils.

1.6.3.1 Comment:

This policy relates to issue 4. The development of infrastructure with potential adverse effects, such as new highways or wastewater disposal facilities should be undertaken in manner that is compatible (as much as is practicable) with existing activities. Notices or Requirement and the acquisition of land under the Public Works Act can deal with this to a certain extent by acquiring the land needed for the infrastructure and potentially to create a 'buffer' to mitigate against adverse effects.

1.6.4 **Policy 10.2**

Require that network utilities associated with the built environment be undertaken in such a manner as to avoid wherever practicable, remedy or mitigate effects on the quality of natural and physical resources.

Explanation

It is recognised that network utilities provide for the social and economic wellbeing of the community. Under the Act territorial authority is required to have regard to extent to which network utilities will be provided for

within their Plans, and the effect of those activities on the environment. In particular, regard shall be had to the effects (especially water quality) of sewage disposal and the discharge of stormwater.

1.6.4.1 Comment:

This policy is relevant and relates to issue 4. Network utilities have the potential to create a number of adverse effects, for example the visual effects of these utilities (for example power pylons or windfarms) as well as the effects generated by the utilities (noise from the state highway) can have direct impacts upon existing activities in urban environments. This needs to be balanced with the effects of not providing these network utilities.

1.6.5 **Policy 10.3**

Encourage the use of corridors for network utilities where practicable, where this will result in mitigation of environmental effects.

Explanation

This will contain the geographic effects on amenity values of such amenities to a defined and limited area.

1.6.5.1 Comment: This relates to issue 4 and is still relevant. Corridors of network utilities are methods to concentrate adverse effects thus affecting a small area of surrounding environment.

1.6.6 **Policy 10.7**

Recognise that changes to one component of the built environment can have adverse effects on other components of the built environment.

Explanation

Linkages between components of the built environment result in impacts upon related components if changes occur. For example, ribbon development can result in greater risks to road traffic, and increasing costs in services such as water and sewerage.

1.6.6.1 Comment:

This policy is still relevant to issue 4. Changes to the urban environment, through expansion or redevelopment can result in sensitive activities being newly located in a place where they are exposed to higher degrees of adverse effects from existing lawful activities.

1.7 **Resource Management Issue 5**

“Resource Management Issue 5

The cumulative adverse effects of components of the built environment can be significant, even if the individual effects appear insignificant.”

1.7.1 **Objective 10.1**

To achieve the sustainable management of the built environment in such a way that the needs of future generations are met.

Explanation

The built environment is a physical resource of the Region and, as with all resources, the Act requires that it be managed in a sustainable manner. The settlements and towns that comprise parts of the built environment, and the infrastructure that services them, can be used and developed in a number of ways. In some cases this can give rise to inefficiencies.

1.7.1.1 Comment:

This objective relates to Issue 5. The urban environment needs to be sustainably managed in a way to meet the needs of future generations. As such the management of urban environments should be done in a manner that acknowledges and manages cumulative adverse effects, particularly in terms of resource use and discharges. Cumulative effects should also be given consideration during periods of growth, especially growth in new locations or in new ‘forms’.

1.7.2 **Objective 10.2**

To maintain and enhance the environmental quality of the Region’s built environment.

Explanation

The quality of life for Southlanders comes not only from those things that people can provide for themselves and their families, but also as a result of the built environment in which they live. That environment must provide for their economic and social needs, but not give rise to conditions that could affect public safety and health. The generated effects of the built environment, including solid and liquid waste disposal, will also require management.

1.7.2.1 Comment:

This objective is relevant to issue 5 – cumulative effects have the potential to detract from the quality of the urban environment and hence need to be identified and managed appropriately to ensure the environmental quality is maintained and enhanced.

1.7.3 **Objective 10.5**

To minimise the adverse effects of the built environment on natural and physical resources.

Explanation

In developing and using the built environment adverse effects can arise. These effects can be visual, or can impact directly upon aspects of natural and physical resources. It will not be possible to totally avoid these adverse effects but action can be taken to minimise them.

1.7.3.1 Comment:

This objective clearly relates to issue 5. Cumulative adverse effects of the urban environment can impact upon natural and physical resources.

1.7.4 **Policy 10.1**

Encourage development and use of the built environment that provides for the efficient use of existing facilities and infrastructure while simultaneously avoiding the development of unnecessary additional infrastructure.

Explanation

Sustainability of the built environment requires efficient use of existing support facilities. It is in the long-term interest of the community to ensure that any new facilities and infrastructure that may be developed are necessary and desirable. Infilling, more intensive development, and utilising areas already serviced, prior to extending urban areas, aids the efficiency of network utilities and investment, and in some cases can assist in retaining areas with highly versatile soils.

1.7.4.1 Comment:

This policy relates to issue 5 as the development of unnecessary infrastructure, such as duplication or extension, can give rise to cumulative adverse effects. It can also result in the loss of some efficiency which in itself is an adverse effect.

1.7.5 **Policy 10.2**

Require that network utilities associated with the built environment be undertaken in such a manner as to avoid wherever practicable, remedy or mitigate effects on the quality of natural and physical resources.

Explanation

It is recognised that network utilities provide for the social and economic wellbeing of the community. Under the Act territorial authority is required to have regard to extent to which network utilities will be provided for within their Plans, and the effect of those activities on the environment. In particular, regard shall be had to the effects (especially water quality) of sewage disposal and the discharge of stormwater.

1.7.5.1 Comment: This policy is relevant to issue 5. Again, network utilities can have cumulative adverse effects on the environment

1.7.6 **Policy 10.3**

Encourage the use of corridors for network utilities where practicable, where this will result in mitigation of environmental effects.

Explanation

This will contain the geographic effects on amenity values of such amenities to a defined and limited area.

1.7.6.1 Comment:

This relates and is relevant to issue 5. Corridors of network utilities are a means of avoiding cumulative effects through co-location.

1.7.7 **Policy 10.7**

Recognise that changes to one component of the built environment can have adverse effects on other components of the built environment.

Explanation

Linkages between components of the built environment result in impacts upon related components if changes occur. For example, ribbon development can result in greater risks to road traffic, and increasing costs in services such as water and sewerage.

1.7.7.1 Comment:

This policy is still relevant to issue 5. Cumulative effects generated by one particular area of the urban environment are an effect that can impact upon other parts of the urban environment. An example of this could be traffic generated by a new subdivision could have 'downstream' effects upon transportation infrastructure.

1.8 **Resource Management Issue 6**

"Resource Management Issue 6

Natural hazards can have a significant adverse effect on the built environment."

1.8.1 **Objective 10.2**

To maintain and enhance the environmental quality of the Region's built environment.

Explanation

The quality of life for Southlanders comes not only from those things that people can provide for themselves and their families, but also as a result of the built environment in which they live. That environment must provide for their economic and social needs, but not give rise to conditions that could affect public safety and health. The generated effects of the built environment, including solid and liquid waste disposal, will also require management.

1.8.1.1 Comment:

This objective relates to issue 6 and is relevant. The ‘management’ of natural hazards in relation to the urban environments needs to be undertaken to ensure, as far as practicable the long term quality of those built environments. It should also be recognised that Invercargill is a good example of where the management of these natural hazards (through flood protection schemes) actually contributes to the quality of the urban environment by providing spaces for recreation.

1.8.2 ***Objective 15.2***

To reduce the social and economic costs that result from the occurrence, avoidance, mitigation and remedying of natural hazards.

Explanation

The occurrence of natural hazards can result in considerable financial and social, direct and indirect costs, to the community, both at an individual and collective level. The occurrence of the specific event may be only the beginning. Direct costs arise from the inundation itself, and indirect costs arise from materials, sewage, hazardous substances and other material mixing with or being carried away by floodwaters, building of protection works, devaluation of property, prevention of outbreaks of disease, maintenance of protection works and concern over the adequacy of any works built.

1.8.2.1 Comment: This relates to issue 6 and is still relevant. Quite simply, development in areas subject to natural hazards will increase the potential costs of any event and the resultant ‘clean up’ and thus should be discouraged.

1.8.3 ***Policy 10.4***

Recognise and minimise the risks of natural hazards on the built environment.

Explanation

Risks can be incurred through development in hazard prone areas, and this must be avoided or minimised to decrease risk beyond acceptable levels. This policy seeks to integrate development policies with those for natural hazards management, and draws attention to the potential risks of natural hazards to all development and use of areas subject to such risks. Those risks can include direct effects when the natural hazard occurs, and also longer term impacts, such as the risk to individual and community health.

1.8.3.1 Comment:

This relates to Issue 6 and is still relevant. Natural Hazards are an ongoing issue and never totally avoidable. Through recognising and minimising the risks of natural hazards on the built environment significant adverse effects can be avoided.

1.8.4 ***Policy 15.1***

In managing natural hazards, the following implementation priorities are to be adopted:

Priority 1 – Avoid exposure to natural hazards where practicable.

Priority 2 – Reduce the effects of hazards, but managing activities in areas subject to, or likely to be affected by, those hazards.

Priority 3 – Undertake physical works to divert the hazard, or to stop it from impacting upon people.

Priority 4 – Implement flood warning systems, insurance measures, and adopt civil defence procedures.

Explanation

Unless activities are compatible with the natural hazard environment within which they are located, it is preferable to avoid exposure to natural hazards, as experience has shown that, where subsequent mitigation and remedial works are required, a significant cost is incurred to achieve a lasting solution. A long-term solution can seldom be achieved by works alone. They need to be supplemented by backup systems which reduce the cost and suffering in the event of the physical works being insufficient.

1.8.4.1 Comment:

This policy directly relates to issue 6. Natural hazards can have a significant adverse effect on urban environments. Through adopting the priorities listed above the significant adverse effects of natural hazards can be, as much as is possible, avoided.

1.8.5 ***Policy 15.2***

Prepare and update hazard registers for inclusion in District Plans and the Regional Coastal Plan to show –

- a land subject to the effects of actual or potential coastal erosion*
- b areas of land instability*
- c areas prone to the effects of actual or potential coastal erosion*
- d areas prone to the actual or potential effects of sea level rise*
- e information that identifies areas most vulnerable to the effects of earthquakes*
- f areas prone to other identifiable actual or potential hazards considered to be significant, for example, wind, snow and tsunami, and prepare information to explain the hazard registers.*

Explanation

The Regional Council will prepare and maintain a register of hazards of regional significance, and of hazards in the coastal marine area, while each territorial local authority will prepare and maintain a register of hazards of local significance. As a matter of priority information on natural hazards of both regional and local significance should be contained within district plans. Inclusion at the district plan level will remove the need for the Regional Council to duplicate the same information in regional plans.

The purpose of hazard registers is to “flag” areas where specific natural hazards are worthy of more particular consideration. With respect to inundation a hazard register will generally show areas which represent the historic or geomorphic floodplains. The nature of the hazard in any one area can be quite complex. To make a hazard register more meaningful, it needs to be supported by information which explains the hazard that is “flagged” on the register. This information may be required for project information memoranda and land information memoranda, documents provided for by the Building Act 1991 and the Local Government Official Information and Meetings Amendment (No. 2) Act 1991. In addition it may be required as background information for the consideration of resource consents and the types of activities permitted as of right.

1.8.5.1 Comment:

This policy is relevant with respect to issue 6. By identifying where natural hazards are likely to occur enables a framework of land use rules to be written for District Plans that can enable significant adverse effects to be avoided.

1.8.6 **Policy 15.3**

Promote an understanding of natural hazards and an awareness of areas that could be affected, and encourage people and communities to avoid wherever practicable, or remedy or mitigate the effects of natural hazards.

Explanation

In the effects of natural hazards are to be minimised, then people need to become aware of the activities they undertake which can influence and aggravate natural hazards, and the areas that are, or could be, affected by natural hazards. This will enable informed decisions to be made prior to purchasing or using areas affected by natural hazards, and encourage adjustments to land management which could assist in reducing the effects of natural hazards. People and communities are able to make a major contribution, as resource users and landowners, and as a group, both influencing hazards and affected by them. Each group must play its part. Where it is neither practical nor necessary to avoid or mitigate the adverse effects of natural hazards by regulation, people should be encouraged to take action themselves, for example, taking out insurance where available and prepare contingency plans.

- 1.8.6.1 Comment: This policy is relevant to issue 6 as the promotion of an understanding of natural hazards can help avoid significant adverse effects. Additionally, a number of the methods in this section relate to education and awareness.

1.8.7 **Policy 15.5**

Take into account the effects of particular activities both of, and on, natural hazards when preparing District Plans and Regional Plans, considering resource consents and building permits, and manage those activities which may increase the probability of the wider community being adversely by natural hazards.

Explanation

The management of activities within areas partially protected from natural hazards should reflect the degree of residual risk, and take into account the potential costs and benefits to the users of that area and the wider community in the future. Hazard protection schemes do not provide absolute security to people or property within the areas served by the schemes. The design of schemes provides for protection from a certain level of risk based on past experience. Given the nature of natural hazards, there can be no guarantee that the scale of hazard for which any scheme may be designed will not be exceeded, or that the hazard will not have a different effects and different impacts from past occurrences.

The avoidance, mitigation or remedying of natural hazards can be addressed at three stages of land use planning process – plan formulation, resource consent approvals (including subdivision) and building consent applications. Broadly, each stage of the process allows for a more detailed assessment of site characteristics. By addressing natural hazards early in the land use planning process a greater amount of certainty is introduced into the process on how natural hazards will be dealt with. While the “ideal” is to use one’s property as one may wish, the reality is that a number of activities that are undertaken can have impacts off-site and there is a need to manage these in order to protect the community and other assets.

- 1.8.7.1 Comment:

This policy relates to issues 6. Natural hazards, and in particular flooding have been addressed through the construction of flood protection schemes. It is important to recognise that these have a design limit. The RPS can signal this issue to enable the effects of natural hazards to be recognised through the various RMA processes.

1.8.8 **Policy 15.8**

Avoid inundation hazard to other property from activities that are undertaken within riverbeds, floodways and floodplains.

Explanation

Activities such as the erection of structures, tree planting, and the stockpiling and removal of gravel can have positive and negative effects on ecosystems and the physical behaviour of rivers, particularly in floodways. Roads, bridges, railway embankments, ditch cleanings, landfills, etc, where constructed substantially across the natural flow of floodwaters on a floodplain, can significantly alter flood levels upstream of the obstruction. In some situations, fences and/or dense shelterbelts can have a similar effect. This effect has not always been recognised in the past and a mechanism is required to ensure that it is considered. Management of the use of land adjacent to community drains and watercourses is necessary to provide access for maintenance for channel efficiency.

1.8.8.1 Comment:

This policy is not relevant to issue 6. Issue 6 discusses natural hazards having an effect upon urban environments. This policy discusses activities that can increase the risks of natural hazards.

1.8.9 ***Policy 15.11***

Where subdivision takes place on land which is subject to actual or potential inundation, the consent authority shall give consideration to –

- a impose conditions to mitigate or remedy the adverse effects of actual or potential inundation; and/or*
- b restrict the activities that take place on the land; and/or*
- c require the undertaking of flood alleviation works.*

Explanation

While subdivision does not necessarily result in building consent, subdivision of flood-prone can lead to an increased risk from natural hazards. Risk is a compound measure of probability and the value of assets likely to be flooded in the event of that probability becoming a reality. As land is more densely subdivided, more people and property will become vulnerable to a natural hazard, and the risk will increase. The wisdom of permitting flood-prone areas to be as closely subdivided as other areas must be questioned, almost inevitably subdivision will lead to a situation where the potential for “disaster” is considerably increased.

In rural situations, property should contain high ground onto which stock can be moved in a flood. Floodplain land is not the most suitable for lifestyle blocks. Not only is there no high ground onto which stock can be moved, but also the new owner usually works elsewhere and may well not be able to return to his block during a flood. Furthermore, such development considerably increases the value of assets within the floodplain and places unnecessary demands on civil defence workers during a flood event. In townships, apart from the direct effect of intensifying development, subdivision can greatly reduce the area of permeable surfaces, causing substantial increases in the volume of stormwater runoff, which may pond behind stopbanks until river levels go down, or require pumping. Both the effect of flooding on the subdivision itself, and the potential effect of the subdivision on flooding further downstream, need to be considered. Some of the adverse effects of subdivision can be mitigated by conditions of approval, such as requirements for earthworks or minimum floor levels.

1.8.9.1 Comment:

This policy relates to issue 6 and is still relevant. Natural hazards are a ‘constant’ issue and one that should be addressed at time of subdivision. As discussed elsewhere, subdivision and expansion of residential areas also has the effect of increasing the amount of impermeable surfaces, which can give rise to issues regarding stormwater disposal.

1.8.10 ***Policy 15.12***

Seek the inclusion of design features in buildings in flood-prone areas which minimise the potential for future losses from flood damage to the building or its contents.

Explanation

There are many existing lots in floodplain areas that could be built on, where the potential for inundation has not previously been considered in any detail. Depending on the nature of the proposed building, and the situation of the risk, options to mitigate include refusal of consent, floor level requirements, building material requirements, or the provision of advice. Minimum floor levels are a proven and accepted means of reducing flood losses in some situation. They are not practical for some types of buildings, such as garages, and therefore, can not be used to mitigate all losses. In these cases, other options, like landfill, may need to be considered. In other cases it may be preferable to recommend a floor level and let the owner decide whether to apply the level or not. If the owner chooses not to, a mechanism to warn future owners is required. Buildings within floodplains must still comply with the requirements for access by people with disabilities in the Building Act 1991 and the Building Regulations 1992.

1.8.10.1 Comment:

This policy is relevant to issue 6. Design features are a method of reducing the degree of adverse effects upon the urban environment in a flood event.

1.8.11 ***Policy 15.15***

Implement financial measures which lessen the economic impacts arising from the effects of hazards on community-owner infrastructural assets.

Explanation

“Disaster” events, or large flood events, inevitably cause damage to public assets such as roads, bridges, pumping stations, pipelines, etc. The cost of repairs, usually not budgeted for, can represent a significant financial burden on top of other pressures that arise out of a flood event. The Government’s disaster policy has moved to transfer the costs of disasters from national to local government and as a consequence it is necessary for local authorities to investigate means by which the cost of disasters can be smoothed or transferred, either by way of the establishment of reserves, membership of a disaster damage pool or insurance.

1.8.11.1 Comment:

This policy relates to issue 6 as it provides a method to help limit the financial consequences of natural hazards in the event of a natural disaster.

1.9 **Methods**

1.9.1 ***Method 10.1***

Information, education and public awareness

Provision of advice and education will raise awareness within the community of heritage values and archaeological sites, and practicable means for their enhancement.

1.9.1.1 Comment:

The provision of information in the form of advice in information is one method to achieve sustainable management. This is still relevant to all issues (1-6) as non statutory methods can be used across the spectrum of resource management issues. These methods are often the last step before some form of regulation is required to be imposed through rules in plans. The use of such methods needs to be audited through state of the environment reporting to ensure it is achieving its intended purpose.

1.9.2 **Method 10.2**

Promotion

Environmental effects can be minimised by the promotion of appropriate techniques and practices associated with the built environment, for example, promotion of waste minimisation and on-site treatment of the contaminants to be discharged from industrial and trade premises.

1.9.2.1 Comment: As per method 10.1 above, promotion is a relevant to all issues (1-6) in the current RPS.

1.9.3 **Method 10.3**

Advocating

Advocate to relevant agencies the use of other legislation, such as the Conservation Act 1986, Reserves Act 1977, Queen Elizabeth II National Trust Act 1977 and Historic Places Act 1993, for the purpose of protecting buildings, structures, places, features or areas with significant heritage values, and archaeological sites, where the use of such legislation appears more appropriate than resource management processes.

1.9.3.1 Comment:

This method is relevant to issue one as it is a further tool that can be used to ensure expansion or redevelopment of urban environments does not impact upon buildings, structures, places, features or areas with significant heritage values.

1.9.4 **Method 10.4**

Investigations and Research

There will on occasion need to be investigations and research carried out into specific effects of the development and use of the built environment, for example, stormwater effects or expansion or urban areas onto highly versatile soils.

1.9.4.1 Comment:

Investigation and research are still a relevant method and relate to all issues (1-6). This is because investigations and research can be used to obtain 'indicators' which are used to determine the state of the regions environment. This can measure the success or otherwise of plan provisions, which can determine the extent to which the Objectives and Policies of the Regional Policy Statement are being met. There is little point in implementing plans without some form of ongoing monitoring – this can in simple terms determine if Section 5 of the RMA is being met. Further to this, investigation and research can also identify trends or unforeseen effects that may require addressing through plan changes.

1.9.5 **Method 10.5**

Prepare, implement and administer Regional and District Plans

In preparing Regional and District Plan, regard is required to be given to the integrated management of the effects of the use, development and protection of land and associated resources. Particular areas which require attention include:

- *Consultation with the takata whenua and their participation in decision-making*
- *Research and monitoring into the identification of heritage values and archaeological sites*
- *Provision for protecting buildings, structures, places, features or areas with significant heritage values, and archaeological sites of significance*

- *Sustainability of the built environment*
- *Provision of network utilities*

Heritage values can be protected within Regional and District Plans and there is no need to prepare a specific Regional Plan on heritage issues. Only in exceptional circumstances would a need arise for action on heritage issues to be taken at the regional level.

1.9.5.1 Comment:

The issues (1-6) identified in the RPS are still relevant to the formulation of Regional and District Plans. If these issues are changed/altered/expanded as part of the RPS review process, the provisions of the Regional Policy Statement will have to be given effect to by Regional and District Plans.

1.9.6 **Method 10.6**

Resource Consents and Public Works

In the preparation and consideration of resource consents and public works that concern the built environment, effects on natural and physical resources, and on heritage values shall be considered. The works and services (infrastructure) provided by local authorities, such as stormwater, sewerage and water reticulation, shape the future direction of urban development within the Region. Territorial local authorities will therefore, need to avoid the development of urban forms and land use patterns which unnecessarily encourage the extension of facilities, and the development of infrastructure that encourages dispersed development. In developing infrastructure regard must also be given to the environmental effects, and to heritage and Maori values.

1.9.6.1 Comment:

This method is relevant to all issues (1-6) as all of these may arise from time to time through the resource consent process, depending upon the ‘issues in contention’ in the application. It is noted that the Part 8 (Designations and Heritage Protection Orders) process differs somewhat from the processes in Part 6 (Resource Consents) of the Act. In particular, the designation process provides for a 2 stage process, whereby land can be designated without the specifics of a particular project settled upon. Once a site is designated, the Outline Plan process then requires the requiring authority to provide an Outline Plan to Council for approval. The Outline Plan stage of the process does not provide for public participation. Therefore there is no opportunity once approval is given to revisit issues (as may be done through a review of conditions for resource consent). Designation of network utilities, for example new highway corridors, can shape the future direction of urban development.

1.9.7 **Method 10.7**

Economic Instruments

Economic instruments could be used for the purpose of maintaining amenity values, heritage values and archaeological sites of regional significance, for example, rate relief on protected land or requirements for financial contributions on resource consents. Economic instruments can also be used to direct or discourage development in certain areas by way of differential rating or levies.

1.9.7.1 Comment:

Economic instruments are still a relevant method and relate to, or can be used to ‘influence’ all of the issues (1-6) in the existing RPS be it through, as mentioned, rates relief on protected land.

1.9.8 **Method 10.8**

Consultation

Consultation can be used to ensure the views of interest groups and the public are taken into account in preparing documents and prior to making decisions on non-statutory matters.

1.9.8.1 Comment:

Consultation is a relevant matter to all issues (1-6) and is a ‘cornerstone’ to resource management act processes.

1.9.9 **Method 10.9**

Heritage Orders

Establish criteria to assess circumstances when Council will use the Heritage Order provisions to protect heritage features.

1.9.10 Comment:

This method is relevant to Issue 1. Heritage orders may be needed in some situations where development threatens a Heritage site.

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