



TAURANGA CITY COUNCIL

CITY PLAN SECTION 32 REPORT

Chapter 13– Open Space



Table of Contents

1. INTRODUCTION.....	3
2. PURPOSE OF THE CHAPTER	3
3. RECORD OF DEVELOPMENT OF PROVISIONS.....	4
3.1 Background Research.....	4
3.2 Consultation Outcomes	4
3.3 Council Meetings.....	6
3.4 Relevant Legislation, Strategies and Policy	8
4. ISSUES.....	11
4.1 Summary of Issues.....	11
4.2 Issue 1 – Ensuring that the City’s Open Space continues to meet the Demands of the City	11
4.2.1 Objectives.....	11
4.2.2 Policies, Methods and EREs	12
4.2.3 Monitoring Proposed Plan Provisions	13
4.3 Issue 2 - Disconnect between the Reserves Act 1997 (specifically Reserve Management Plan implementation) and the RMA.....	14
4.3.1 Objectives.....	14
4.3.2 Policies, Methods and EREs	15
4.3.3 Monitoring Proposed Plan Provisions	16
4.4 Issue 3 - The Loss of Open Space through inappropriate Reserve Development which creates Adverse Effects on the Surrounding Environment	17
4.4.1 Objectives.....	17
4.4.2 Policies, Methods and EREs	18
4.4.3 Monitoring Proposed Plan Provisions	20
4.5 Issue 4 - The Potential Loss of Public Access to areas of Open Space	21
4.5.1 Objectives.....	21
4.5.2 Policies, Methods and EREs	21
4.5.3 Monitoring Proposed Plan Provisions	22
4.6 Issue 4 - The Loss of the Natural Character, Ecological and Conservation Value of Areas within or adjoining the Open Coast, Harbour, Wetlands, Estuaries, Rivers and Streams.....	23
4.6.1 Objectives.....	23
4.6.2 Policies, Methods and EREs	23
4.6.3 Monitoring Proposed Plan Provisions	24
5. RECOMMENDED OBJECTIVES, POLICIES AND METHODS.....	29
6. NOTIFICATION AND RECOMMENDED DECISIONS	30

1. INTRODUCTION

The Council is required under section 32 of the Resource Management Act 1991 (the RMA) to carry out an evaluation of alternatives, costs and benefits, and efficiency and effectiveness of the various components of the proposed City Plan.

Section 32 of the Act requires that the evaluation must examine:

- (a) the extent to which each objective is the most appropriate way to achieve the purpose of the Act; and
- (b) whether, having regard to their efficiency and effectiveness, the policies, rules or other methods are the most appropriate for achieving the objectives.

An evaluation must also take into account:

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

This report fulfils the obligations of the Council under s32 of the RMA. The following is a section 32 analysis in regard to Chapter 13 – Open Space Zones. It should be read together with the text of the proposed City Plan itself.

2. PURPOSE OF THE CHAPTER

Chapter 13 – Open Space Zones is concerned with the integrated management of resources in so far as they relate to Open Space Zones used for recreation activities, amenity, conservation (including ecological) heritage and landscape purposes by either the local or citywide community, whether or not the land is publicly owned and/or classified under the Reserves Act 1977.

Tauranga has a wide range of open spaces that are required to meet the needs of the community. These open spaces, while providing for a wide range of recreational activities also provide significant amenity to the City or provide protection of cultural and heritage features.

The different types of open space include:

- Open spaces primarily used for passive recreation e.g. playing and walking;
- Open space primarily used for active recreation e.g. organised sport and events;
- Open space where the primary function is the conservation of natural, ecological, heritage and landscapes features;
- Open space primarily used for specific activities such as campgrounds and uses and developments associated with marina and water access recreational activities.

The different ways that open space can be used needs to be recognised in the City Plan approach to open space. This can be achieved through the use of three City Plan Zones applied to land used for open space purposes reflecting the type of activities that the open space area provides for. The Zones are:

- Passive Open Space Zone;
- Active Open Space Zone;
- Conservation Zone.

Council has a number of Reserve Management Plans to provide for and ensure the use, enjoyment maintenance, protection and preservation of Reserves classified under the Reserves Act 1977. Management Plans are developed using a special consultative process and guide development on Reserves. The Open Space Chapter recognises and provides for these Reserve Management Plans, and the guiding nature of development anticipated on Reserves.

3. RECORD OF DEVELOPMENT OF PROVISIONS

3.1 Background Research

The background research that underpins the Open Space Chapter includes:

- Reserve Management Plan Development;
- Best Practice Guide for Neighbourhood Reserves Development;
- Best Practice Guide for Open Space;
- Open Space Strategy;
- Sport and Active Living Strategy;
- Vegetation Strategy;
- Urban Design Strategy;
- Integrated Transport Strategy;
- Levels of Service Policy.

These lead Strategies and policies all provide guidance on community expectations with respect to the development of Open Space, and the individual roles each open space areas plays within the wider network.

These key documents are discussed in Section 3.2.

3.2 Consultation Outcomes

TCC has undergone significant community consultation over the last 8 years. This work began with the development of the Neighbourhood Reserves Management Plan (2002) which considered the management, use and development of all neighbourhood reserves with Tauranga City. Community consultation was undertaken with all surrounding landowners and key stakeholders to neighbourhood reserves including a survey undertaken with residents of Tauranga.

Neighbourhood Reserves Management Plan

In 2002, Council adopted the Neighbourhood Reserves Management Plan which covers all small reserves located within urban areas. To develop this policy, key consultation was undertaken with the entire Tauranga community. As part of this Plan, Council adopted the Best Practice Guide to Neighbourhood Reserves. This document provides key advice to developers and Council on the key qualities of Open Space in neighbourhood reserves and how to achieve a usable neighbourhood reserve.

Active Reserves Management Plan

During 2004/05 TCC developed the Active Reserves Management Plan which covered all active reserves (sports fields) within Tauranga City. This key document covers matters such as management, development and use of the reserves over a ten year period. Community consultation was undertaken with all active reserves users, leaseholders, neighbours and key stakeholders.

Harbour Reserves Management Plan

The Harbour Reserves Management Plan was developed during 2006/07 and covers all reserve land owned or administered by TCC that borders onto the Tauranga Harbour. In short this management plan mainly covers esplanade reserves which are zoned conservation in the Tauranga District Plan.

Best Practice Guide for Open Space

The Best Practice Guide for Open Space was adopted in 2007. This guide, like the Best Practice Guide for Neighbourhood Reserves, provides direction on the key qualities of Open Space within Tauranga.

Other Reserves Management Plan

Numerous other reserve management plans have also been developed over the last years, including the Coronation Park Reserve Management Plan, Otumoetai Pa Historic Reserve Management Plan and the Historic Reserves Management Plan.

In August of 2008 general consultation of issues associated with Chapter 13 – Open Space Zones and options to address these issues was undertaken. The following feedback was received:

- The Jetboating New Zealand (Northern District's Branch) requests that the status quo be retained on the Kaituna River;
- The Department of Conservation (DoC) supports Council working with Western Bay of Plenty District Council to establish an integrated method of controlling the effects of activities on the surface of waterbodies. The protection of this, and the Kaituna River, is important, especially with the potential for the spread of invasive organisms such as didymo through commercial and recreational users;
- Reserves should be zoned for their purpose;
- Support was provided for the need to allow for development on reserve land;
- DoC understands the concerns of Council with regard to constraints on reserve development. It may be appropriate for some developments to be controlled through permitted or controlled activity criteria, providing important values and features of the reserves are not compromised by this development. This may involve required setbacks from indigenous vegetation, no modification of any dune structures and limits on bulk and footprint;
- DoC state that as reserve management plans are prepared through a process that is less rigorous than the resource consent process, not having right of appeal, the actions recommended have not been given the same level of investigation and may not take all required matters into account. Because of this, the option of making all developments identified in Reserve Management Plans permitted activities is not appropriate, as the required level of assessment of environmental effects is not high;
- The movement of fast water-craft such as jet boats creates wave lap that can lead to erosion of stream banks. Council needs to satisfy itself that any activity on the surface of the Kaituna River and Wairoa Rivers does not contribute to erosion;
- One commenter identified that carparking within reserves was unnecessary and took up valuable open space.

In April of 2009 a community feedback exercise was undertaken on draft content for the City Plan. As a result of this process the following feedback was received:

- Need to consider rezoning of certain reserves where specific activities are currently occurring but not provided for by the existing zone;
- Specific request by the Papamoa Beach Holiday Park to consider further activities as being permitted (built cabins);

- Support for the removal of the requirement to fence reserves;
- Questions over whether the permissibility of reserves infrastructure should be reduced.

3.3 Council Meetings

Elected Members discussed the development of the Open Space Chapter on the following dates. The outcomes of each discussion are also listed.

Meeting: Strategy and Policy Committee - 8th July 2008

Issues Discussed:

- Reserves – Zoning of Reserve Land: Acquired reserve land that is not zoned for its intended purpose;
- Flexibility of Rule Requirements - Existing District Plan requirements for Reserves are not flexible to enable the implementation of TCC's levels of service for playgrounds and other associated structures;
- Reserves – Reserve Management Plans: Implementation of Reserve Management Plans;
- Waterbodies - Sustainable Management of Water Bodies.

Meeting Outcomes:

- Investigate options to zone acquired land as soon as it is vested with TCC (ie. create a new rule in the District Plan);
- Develop new Reserve Zoned permitted activity criteria to provide for enabling developments on reserve land. The permitted activity criteria could be the same, or similar to that in the Residential Zone for structures;
- Undertake a review of all current Reserve Management Plans, identifying where non-compliances with the District Plan occur, and consider more appropriate levels of assessment;
- Work with WBOPDC to identify methods to sustainably manage activities on the surface of water bodies.

Meeting: Strategy and Policy Committee – 17th November 2008

Issues Discussed:

- Enabling large sports facilities to be developed;
- Signage within reserves;
- Fencing of reserves when play equipment is installed;
- Buildings within reserves;
- Car parking within reserves.

Meeting Outcomes:

- 1500m² of GFA. Amend the status quo from being 1000m² GFA to 1000m² 'dripline' of the building (or similar increased threshold). This would enable buildings to be constructed of a size that allows for the sportsville model to be implemented (i.e. differing clubs being located in one building). This options should only be allowed on reserves defined as Premier' or 'Community sports and events' within the Active Reserves Management Plan (which would also need to be specifically defined in the reviewed District Plan – potentially as major reserves), being:

- Blake Park;
- Smiths Farm;
- Gordon Spratt;
- Waipuna Park;
- Parau Farms;

- Greerton Park;
- Tauranga/Wharepai Domain.

The final location/size of any proposed facility would be subject to meeting the existing Reserve Management Plan concept plan. For those reserves not identified above, the status quo would remain. The height limit of 15m would remain on all facilities;

- Continue with the status quo of having no requirements in the City Plan, however undertake a project to review the Signs Policy prior to the notification of the District Plan in August, however develop a higher threshold within the City Plan to catch proposed large signage which may have adverse effects on the wider environment (i.e. billboards);
- Remove the current provision and have fencing as an outcome of the work which is negotiated between Council and the associated party through the Fencing Act;
- Status Quo (subject to outcomes of Traffic Design Group Review – as part of Chapter 4 General Rules (Transportation). Consent will still be required for activities that require more than 25 carparks.

Meeting: Strategy and Policy Committee – 10th March 2009

Issues Discussed:

- Presentation of the Draft Open Space Zones Chapter for community feedback which was endorsed for that process.

Meeting: Strategy and Policy Committee – 24^h June 2009

Issues Discussed:

- Zoning of the Papamoa Domain;
- Papamoa Holiday Park – Rule requirements applying to the Papamoa Holiday Park;
- Permissibility of activities within Open Space zones;
- Permissibility of Surf Life Saving Facilities;
- Setbacks from the Conservation zone;
- Mauao Camping Ground.

Meeting Outcomes:

- Elected Members concluded to make no changes to the Draft Plan other than to:
 - Define and permit surf life saving activities to occur within the Conservation zone, but no facilities (i.e. buildings). This would extend to the activity itself and ancillary minor structures, and make Surf Life Saving Buildings (including Clubs) a Discretionary Activity; and
 - Apply the provisions that provide for the continuation of the Holiday Park provided that this does not provide for greater flexibility than provided for in the adopted Reserve Management Plan.

3.4 Relevant Legislation, Strategies and Policy

Resource Management Act 1991

The RMA does not provide for the need for Open Space; however it is an overall function of the Council and an appropriate means to maintain the amenity of the City. Many of the City's Open Spaces are located in or around the Harbour, Open Coast, rivers, wetlands and streams. These areas have either been set aside during the early development of the City, or have been vested or purchased or otherwise acquired by the Council for the benefit of the City. Many of these areas are high in Natural Character, have Significant Vegetation located within them, or are Outstanding Natural Features and Landscapes. These aforementioned areas are managed through other Chapters of the City Plan, however there is a need to ensure consistency between this Chapter and those other relevant Chapters. Therefore, the following RMA legislation is appropriate in the context of managing subdivision, use and development within Open Space Areas.

Section 6 of the RMA outlines the matters of national importance

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance:

- (a) the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development;*
- (b) the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development;*
- (c) the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna;*
- (d) the maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers;*
- (e) the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga;*
- (f) the protection of historic heritage from inappropriate subdivision, use, and development;*

In achieving the purpose of this RMA, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to:

- (c) the maintenance and enhancement of amenity values:*
- (d) intrinsic values of ecosystems:*
- (f) maintenance and enhancement of the quality of the environment:*

Those administering the RMA must give particular weight or consideration to the matters of section 7. The matters in section 7 must be recognised as "important to the particular decision" and therefore to be considered and carefully weighed in coming to a conclusion.

The Open Space Strategy

The Open Space Strategy response to the population growth of Tauranga is to ensure existing open spaces are retained and valued, and future open space opportunities are recognised. The Open Space Strategy sets the direction to link existing open spaces with the coast, rivers, green corridors and the hills. The Strategy encourages consideration of both qualitative and quantitative open space planning to provide a good quality open space environment and the continued provision of open space to meet the needs of current and future generations.

The key principles for the Strategy are that the open space network:

- will be preserved for the benefit of the natural and built environment and for future generations to enjoy;
- will be flexible and respond to changing needs;

Key Themes of the Open Space Strategy

The Open Space Strategy focuses on five key themes, of which one of these is specific to this scoping report:

- The **protection** of open space: Ensuring the protection and preservation of the open space network for existing and future generations to enjoy.

The Open Space Strategy identifies that we will:

Action 5a.

*Ensure all public land included in the open space network is **appropriately zoned in the Tauranga District Plan**. **Review all zones** identified in the open space network to ensure they reflect the purpose of the land. Undertake a plan change where it is recommended that a new zone be applied.*

The purpose of *Action 5a* is to **enable a consistent approach to ensure that the land zone reflects the intended use and purpose of the land**. This may require reviewing existing zones to see whether they are appropriate and reflect the key objectives of the land, for example the Greenbelt zones.

The Strategy also identifies that:

Action 2c

Where resource consent is required for the development of services infrastructure and network utilities on open space areas, require full consideration of the impact on open space values.

Undertake a plan change to the District Plan to require full consideration of the impact on open space values in the “other methods” section of the District Plan for resource consent applications for network utilities.

The purpose for *Action 2c* is to **ensure that open space values are maintained and not compromised through the presence of utilities and infrastructure**.

Action 3g states that TCC will

Review and update the report on the Tauranga District Esplanade Reserves Network (Beca 1994) with a view to stating the desired esplanade reserves network.

Review District Plan requirements and undertake District Plan Change (if required).

The purpose of *Action 3g* is to provide a **comprehensive analysis of where esplanade reserve has been acquired**, where it is yet to be acquired, where more than 20m is required and where land should be secured prior to any subdivision of the land.

Comment: *It is believed that there is no longer a need to undertake this review as two key documents have been developed since the adoption of the Open Space Strategy, namely the Harbour Reserves Management Plan which sets out the key development opportunities throughout the City and the Open Space Reserve Acquisition Plan which sets out the ‘gaps’ within the open space network and identifies desired key opportunities for Council to pursue through land purchase.*

Hence the method to be adopted to pursue esplanade reserves will be via Reserve Management Plans, resource consent conditions and possible land purchase through LTCCP funding. Esplanade Reserves are also acquired through the resource consent process and section 230 of the RMA. Further work on esplanade reserve provisions has occurred through the development of Chapter 12 – Subdivision and Infrastructure.

Action 3h states that:

Review the District Plan esplanade reserve provisions for assessing esplanade reserve waivers and reductions and establish criteria that ensure Councils objectives for harbour access and preservation are not compromised. Undertake District Plan Change (if required) to include appropriate criteria.

The purpose of Action 3h is to ensure that **future requirements for esplanade reserve recognise Council's strategic objectives for harbour and coastal margins.**

SmartGrowth

The actions identified above have strong linkages to the following SmartGrowth actions:

- Initiating and supporting open space and leisure opportunities that reflect an identity with the subregion.

Tauranga Tomorrow

The Actions have strong linkages to the following **Tauranga Tomorrow** actions:

- Identify and protect an interconnected open space network.
- Ensure that multiple use of open space is encouraged and that these are active spaces overlooked by people in adjacent buildings wherever possible.

4. ISSUES

4.1 Summary of Issues

Tauranga has a variety of well established open space areas that play a vital role in the quality of life enjoyed by residents and visitors. Tauranga is fortunate to have access to large areas of coastline and harbour which is a major recreation and open space resource. Large passive reserves also provide additional amenity through planting, walkways and the formation of green corridors throughout the City. Urban spaces such as town squares and seating areas contribute to the open space network by providing places for people to gather and enjoy. This open space is significantly impacted by population growth in Tauranga with pressure on the use of land and more people wanting access to open space areas. The development and protection of the open space network and improvements to the quality of open space is therefore increasingly important.

The community has told us how important open space is through strategic documents like SmartGrowth and Tauranga Tomorrow. Smart Economy recognises the need to provide high quality open space and that this is an integral part of creating vibrant living centres. The ability to achieve a compact and balanced “live, work, play” environment as promoted by SmartGrowth could not be achieved without the provision of good quality open space such as parks and urban spaces.

Currently, through the Operative District Plan there are some minor issues/anomalies inherent within that Plan which limits Councils ability to realise its Objectives/Goals/Actions within the Open Space Strategy and Reserve Management Plans. Furthermore, key Objectives of Strategies such as the Open Space Strategy need to be incorporated in the City Plan.

4.2 Issue 1 – Ensuring that the City’s Open Space continues to meet the Demands of the City

Inadequate provision of open space in the City will result in restricted access for the City and sub-regional community to valued social, cultural and economic opportunities.

4.2.1 Objectives

This table identifies the appropriateness of the listed objectives in achieving the purpose of the RMA.

Objective Number	Objective	Appropriateness
13.2.1.1	<p><i>Objective - Open Space Role and Function</i></p> <p><i>The maintenance, enhancement and development of open space provides for a wide range of recreational, community and active living opportunities.</i></p>	<p><i>The Objective is appropriate in that there is a need to provide guidance within the City Plan as to the Role of Function of the varying types of Open Space within the City. Identifying and providing for varying roles and functions of Open Space is an appropriate means to deliver on Councils adopted Strategy, the Reserves Act and provides certainty the public on the use of Open Space throughout the City.</i></p> <p><i>The Objective is consistent with Section 5(2) of the RMA because the protection of parks, conservation reserves and esplanade reserves is consistent with managing the protection of natural and physical resources to meet the reasonable foreseeable needs of future generations, while safeguarding the life-</i></p>

		<i>supporting capacity of ecosystems. This is achieved through identifying the Role and function of each Open Space type</i>
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Objective 13.2.1.1 is addressed through Policy 13.2.1.1.1. This Policy is achieved through:

- The appropriate zoning of Open Space in the Plan Maps (Part B);
- Rule Requirements which limit activities that are not compatible, or anticipated within specific zones.

4.2.2 Policies, Methods and EREs

<i>Policies and Methods</i>	<i>13.2.1.1.1 Policy - Open Space Role and Function</i>
<i>Costs</i>	<i>No Cost</i>
<i>Benefits</i>	<i>Identifies areas of the City and addresses the appropriate and anticipated uses of those areas. Furthermore, it provides certainty to adjoining landowners of the anticipated uses of those Open Spaces.</i>
<i>Risk</i>	<i>By identifying Open Spaces and their role and function the community will have information about their anticipated uses and therefore there will be a lower level of risk that the community will not anticipate future developments to occur. It is however noted that the community may not realise the anticipated developments provided by the Plan, such as the scale, size and use of buildings and activities (i.e. Open Space is intended to be utilises for activities and buildings). However, generally prior to reserve development special consultative processes are undertaken with the community, therefore the risk is low.</i>
<i>Efficiency</i>	<i>Identifying the Role and Function of Open Spaces provides a clear Policy directive of the expected uses that will occur within these areas.</i>
<i>Effectiveness</i>	<i>Identifying the Role and Function of Open Spaces is an essential step in achieving the Objective. The Policy directly reinforces the Objective that each reserve type will have expected uses, and the method puts in place a regulatory framework to achieve this. The Policies and Methods are therefore considered to be effective at achieving the stated Objective.</i>
<i>Appropriateness</i>	<i>Appropriate as the Objective achieves the outcomes of Councils Strategic framework.</i>

<i>Alternative 1 – No Policy on the Role and Function of Open Space</i>	<i>The alternative ‘do nothing’ is not an appropriate response to managing the role and function of Open Space. This method would not identify where activities are anticipated throughout the City, and thus not providing certainty to adjoining neighbours of expected use and development. It also would not allow for appropriate effects assessment at the City level in considering effects of traffic movements. The approach would not be effective or efficient in that by not identifying the role and function of Open Space areas, there would be no tie back to Reserve Management Plans and existing policy development. The existing approach is also inefficient as this approach has been in existence since the development of the Operative District Plan. During this period there has been extensive evaluation of the existing rules, and given the need for resource consents for any activity regardless of its</i>
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	<i>potential effect on the environment when there is no Operative Reserve Management Plan it is clearly resulting in the inefficient administration of the District Plan and is contrary to the sustainable management of natural and physical resources in the City.</i>
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Based on the finding of the assessment of cost and benefits and the efficiency and effectiveness of the Policies and Methods, the Objective “The maintenance, enhancement and development of open space provides for a wide range of recreational, community and active living opportunities” is an appropriate way to achieve the purpose of the RMA.

4.2.3 Monitoring Proposed Plan Provisions

ERE	Indicator	Evaluation of Plan Effectiveness
<p><i>Diversity in the type and size of open spaces and recreational facilities throughout the City, to produce the following outcomes:</i></p> <ul style="list-style-type: none"> <i>• provision of a wide range of recreational opportunities in recognition of the diversity of community recreational needs at local, City and subregional levels;</i> <i>• provision and development of additional public open spaces and recreation areas where there is significant growth and development in the City;</i> <i>• open spaces and recreational facilities that are convenient and accessible to users.</i> 	<p><i>Number, type and distribution of reserves; (a) Council; (b) DoC;</i></p> <p><i>Compliance with Reserve Levels of Service Policy</i></p> <p><i>Extent and distribution of esplanade reserves</i></p> <p><i>Number and distribution of resource and building consents on, or proximate to, open space;</i></p> <p><i>Number, cause and frequency of complaints relating to open space</i></p> <p><i>Location of open space in residential areas (i.e. 500m walking distance)</i></p>	<p><i>Council records.</i></p>

4.3 Issue 2 - Disconnect between the Reserves Act 1997 (specifically Reserve Management Plan implementation) and the RMA

Council has over many years undertaken the development and review of Reserve Management Plans. There is a disconnect between the Reserves Act and the RMA in that, once a Reserve Management Plan has been developed, following the special community consultation process, there is then the requirement to, in certain circumstances, gain resource consent. There is an opportunity through the development of the City Plan to add specific Objectives that require, through the consent process, the need to consider adopted Reserve Management Plans given that these plans have been developed in accordance with the community.

4.3.1 Objectives

This table identifies the appropriateness of the listed objectives in achieving the purpose of the RMA.

Objective Number	Objective	Appropriateness
13.2.1.2	<p><i>Objective – Recognition of Reserve Management Plans</i></p> <p><i>The Objectives, Policies, Actions and relevant development/landscape concept plans of approved Reserve Management Plans are recognised and provided for.</i></p>	<p><i>Council has a number of Reserve Management Plans to provide for and ensure the use, enjoyment maintenance, protection and preservation of Reserves classified under the Reserves Act 1977. Management Plans are developed using a special consultative process and guide development on Reserves. The Open Space Chapter recognises and provides for these Reserve Management Plans, and the guiding nature of development anticipated on Reserves. It is appropriate to link the Reserves Act and RMA processes to deliver on similar outcomes given the consultative nature of each process.</i></p>

Objective 13.2.1.2 is addressed through Policy 13.2.1.2.1. This Policy is achieved through:

- The appropriate zoning of Open Space on the Plan Maps (Part B);
- Rule requirements which identify activities that are compatible, or anticipated within specific zones by utilising the Reserves Act process.

4.3.2 Policies, Methods and EREs

<i>Policies and Methods</i>	<i>13.2.1.2.1 Policy - Recognition of Reserve Management Plans By ensuring that approved Reserve Management Plans Objectives, Polices, Actions and relevant development/landscape concept plans are recognised and provided for through open space management and development.</i>
<i>Costs</i>	<i>No Cost as the method of developing and utilising Reserve Management Plans is an existing Council process, with cost considered through the LTCCP process.</i>
<i>Benefits</i>	<i>Utilises the Reserves Act process as a key consultative tool to identify the community aspirations for each individual open space.</i>
<i>Risk</i>	<i>By recognising Reserve Management Plans as a key tool in guiding development there is a low risk that adverse effects may not be considered through development proposals.</i>
<i>Efficiency</i>	<i>Recognising Reserve Management Plans is an efficient means of considering development opportunities given the fact that the development of a Reserve Management Plan itself goes through a special consultative process which also considers the wider effects on the environment.</i>
<i>Effectiveness</i>	<i>Recognising Reserve Management Plans is an effective means of considering development opportunities given the fact that the development of a Reserve Management Plan itself goes through a special consultative process which also considers the wider effects on the environment.</i>
<i>Appropriateness</i>	<i>Appropriate as the Objective achieves the outcomes of Councils Strategic framework.</i>

<i>Alternative 1 – No Policy on the Recognition of Reserve Management Plans</i>	<i>The alternative is not appropriate as there is a direct link between Reserve Management Plans and City Plans, however there is a need to set an overall developable threshold of anticipated development through the proposed approach. By not recognising reserve management plans means that an entire community process is not utilised in considering development within Open Space.</i>
<i>Alternative 1 – Sole reliance on Reserve Management Plans to guide use and development</i>	<i>The alternative is not appropriate as Reserve Management Plans generally identify aspirational development. This is not always based on appropriateness when weighed against environmental effects. Placing sole reliance on reserve management plans does not provide a backstop for considering those potential effects, and therefore such an alternative is not appropriate, nor effective.</i>

Based on the finding of the assessment of cost and benefits and the efficiency and effectiveness of the Policies and Methods, the Objective “The Objectives, Polices, Actions and relevant development/landscape concept plans of approved Reserve Management Plans are recognised and provided for” is an appropriate way to achieve Councils strategic direction.

4.3.3 Monitoring Proposed Plan Provisions

ERE	Indicator	Evaluation of Plan Effectiveness
<i>All Open Spaces have adopted Reserve Management Plans</i>	<i>Number of Reserves Covered by Reserve Management Plans</i>	<i>Council records</i>

4.4 Issue 3 - The Loss of Open Space through inappropriate Reserve Development which creates Adverse Effects on the Surrounding Environment

The development of Open Space can create adverse effects on the surrounding amenity and landscape character of the environment. There is a need to recognise that certain activities on Open Space need to be appropriately designed, sited and the effects of those activities are mitigated against.

4.4.1 Objectives

This table identifies the appropriateness of the listed Objectives in achieving the purpose of the RMA.

Objective Number	Objective	Appropriateness
13.2.1.3	<i>Objective - Bulk and Scale of Buildings and Structures in the Open Space Zones Buildings and structures are of a bulk and scale that is compatible with the surrounding environment.</i>	<i>The four Objectives are appropriate in that they provide clear guidance that reserve development can create adverse effects on the surrounding environment and that if this occurs, then specific matters need to be addressed through the resource consent process. The Objectives are also consistent with the maintenance and enhancement of amenity values, and the maintenance and enhancement of the quality of the environment as required by Section 7 of the RMA.</i>
13.2.1.4	<i>Objective – Site Layout and Building Design in the Open Space Zones Development within the Open Space Zones provides for an amenity consistent with the landscape character of the surrounding area.</i>	
13.2.1.5	<i>Objective - Open Space Character The Open Space character of the City's reserves is maintained and enhanced.</i>	
13.2.1.6	<i>Objective – Adverse Effects on the Surrounding Environment Buildings, structures and activities on land zoned Open Space does not adversely affect the surrounding environments amenity, landscape character, streetscape and/or heritage values.</i>	

Objectives 13.2.1.3, 13.2.1.4, 13.2.1.5, and 13.2.1.6 are addressed through Policies 13.2.1.3.1, 13.2.1.4.1, 13.2.1.5.1, and 13.2.1.6.1. These Policies are achieved through:

- The appropriate zoning of Open Space on the Plan Maps (Part B);
- Rule requirements which identify activities which are not compatible, or anticipated within specific zones, and appropriately considering those effects through the resource consents process.
- Policy 13.2.1.3.1 is achieved through
 - Rule 13.4.1 – Building Height, which sets a maximum height of for each Open Space Zone to reflect the anticipated development;
 - Rule 13.4.2 - Building Scale, which sets a maximum gross floor area for each Open Space Zone to reflect the anticipated scale of development;
 - Rule 13.4.3 Overshadowing – which sets a building envelope that ensures a consistent height to boundary ratio for development anticipated in the Zone and that daylight and sunlight reaches all sites.
- Policy 13.2.1.4.1 and 13.2.1.5 and 13.2.1.6 are achieved through
 - Rule 15.4.4 Setbacks - which provides for a consistent setback from boundary of sites to ensure separation between sites and buildings and opportunities for landscaping;
 - Rule 13.4.5 Streetscape – which provides for a consistent setback from front boundary of sites and opportunities for landscaping.

4.4.2 Policies, Methods and EREs

<i>Policies and Methods</i>	<p><i>13.2.1.3.1 Policy - Bulk and Scale of Buildings and Structures</i></p> <p><i>13.2.1.4.1 Policy - Site Layout and Building Design</i></p> <p><i>13.2.1.5.1 Policy - Open Space Character</i></p> <p><i>13.2.1.6.1 Policy – Adverse Effects on the Surrounding Environment</i></p>
<i>Costs</i>	<p><i>Minimal cost as the methods proposed reflect the existing provisions of the Operative District Plan, and are widely accepted as managing potential adverse effects on the environment from building development.</i></p>
<i>Benefits</i>	<p><i>Provides clear guidance that activities that require resource consent must be appropriately designed, and the effects mitigated against to ensure the surrounding environment is not adversely affected by reserve development.</i></p>
<i>Risk</i>	<p><i>There is a low, to no risk associated with these Policies. Each provides specific guidance as to the requirement to consider the effects on the surrounding environment. Given that all development proposal go through a special consultative process it is anticipated that the majority of issues would have been raised and resolved through that process.</i></p>
<i>Efficiency</i>	<p><i>Providing strong regulatory guidance is an efficient means to implementing the Objective. The Polices clearly articulate the importance of maintaining amenity values which Councils are required to have particular regard to.</i></p>
<i>Effectiveness</i>	<p><i>Providing strong regulatory guidance is an efficient means to implementing the Objective. The Polices clearly articulate the importance of maintaining amenity values which Councils are required to have particular regard to.</i></p>

<i>Appropriateness</i>	<i>Appropriate as the Objective achieves the outcomes of Councils Strategic framework and clearly articulate the importance of maintaining amenity values which Councils are required to have particular regard to.</i>
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<i>Alternative 1 – No Policies relating to anticipated character and amenity</i>	<i>The alternative ‘do nothing’ relies on continuing with the current Operative District Plan Approach. Current policies are generic in nature and do not specifically state the anticipated character and amenity of the Open Space Zones for decision makers. Current rules apply generic standards to the zone in relation to height, streetscape, setbacks and overshadowing.</i>
<i>Costs</i>	<i>Policies are generic and do not set clear direction for decision makers as to the anticipated character and amenity of the zone. Lack of control could lead to loss of large areas of open space on site, and loss of recreational area on site.</i>
<i>Benefits</i>	<i>No change to current provisions for Council, and provides certainty to existing adjoining landowners to areas of Open Space..</i>
<i>Risk</i>	<i>Low – there is no uncertainty in relation to the information the provisions are based on.</i>
<i>Efficiency</i>	<i>Not efficient – the costs outweigh the benefits of this approach</i>
<i>Effectiveness</i>	<i>The Policy is not effective in achieving the Objective as it does not identify for decision makers the character and amenity anticipated in the zone.</i>
<i>Appropriateness</i>	<i>The approach is considered to be too generic to achieve the Objective particularly in relation to section 7 matters of the RMA.</i>

Based on the finding of the assessment of cost and benefits and the efficiency and effectiveness of the Policies and Methods, the Objectives:

- Buildings and structures are of a bulk and scale that is compatible with the surrounding environment.
- Development within the Open Space Zones provides for an amenity consistent with the landscape character of the surrounding area.
- The Open Space character of the City’s reserves is maintained and enhanced.
- Buildings, structures and activities on land zoned Open Space does not adversely affect the surrounding environments amenity, landscape character, streetscape and/or heritage values.

are appropriate ways to achieve the purpose of the RMA.

4.4.3 Monitoring Proposed Plan Provisions

ERE	Indicator	Evaluation of Plan Effectiveness
<p><i>That adverse effects of recreation activities, buildings or structures on people and the environment are avoided or mitigated.</i></p>	<p><i>Number and distribution of resource and building consents on open space in proximity to suburban residential areas.</i></p> <p><i>Number, cause and frequency of complaints relating to open space</i></p>	<p><i>Council records</i></p>
<p><i>The protection of amenity values of suburban residential areas which adjoin the City's Open Space Zones.</i></p>	<p><i>Number and distribution of resource and building consents on or proximate to, open space;</i></p> <p><i>Number, cause and frequency of complaints relating to open space</i></p>	<p><i>Council records</i></p>

4.5 Issue 4 - The Potential Loss of Public Access to areas of Open Space

Issue Statement

Public Access to the Coastal Marine Area, Lakes and Rivers is a Matter of National Importance under Section 6 of the RMA. It however is also a Matter of National Importance to protect the natural character of the coastal environment, and Outstanding Natural Features and Landscapes and under Section 6, particular regard shall also be had to the maintenance and enhancement of amenity values. The two matters compete against each other, and there needs to be appropriate Objectives and Policies placed within the Plan that provides guidance on when these two matters compete and how they should be managed, in this instance, the Objective is inserted into the Plan to reflect the importance of public access to these areas.

4.5.1 Objectives

This table identifies the appropriateness of the listed objectives in achieving the purpose of the RMA.

Objective Number	Objective	Appropriateness
13.2.1.7	<i>Objective – Public Access Public access, for the recreational needs of the City, to and along the coastal environment, wetlands, rivers and streams is provided.</i>	<i>The maintenance and enhancement of public access to and along the coastal marine areas, lakes and rivers is a Matter of National Importance. The Objective directly provides for this outcome and is therefore considered appropriate to achieve the purpose of the RMA.</i>

Objective 13.2.1.7 is addressed through Policy 13.2.1.7.1. This Policy is achieved through:

- The appropriate zoning of Open Space within the City Planning Maps (Part C);
- Rule Requirements which identify where public access is anticipated and permitted.

4.5.2 Policies, Methods and EREs

<i>Policies and Methods</i>	<i>13.2.1.7.1 Policy – Public Access By maintaining and enhancing public access to and along the coastal environment, wetlands, rivers and streams, provided that the adverse effects on the natural character values of those areas is remedied or mitigated.</i>
<i>Costs</i>	<i>Potential cost of damage to areas of natural character by allowing public access within those Environments.</i>
<i>Benefits</i>	<i>Identifies that access to and along the coastal environment, rivers and streams is important to the community, while making sure that the natural character values of the area are not adversely affected. Furthermore, it provides guidance to all landowners that adjoin areas of open space that public access is expected.</i>
<i>Risk</i>	<i>Reduces the risk that areas with natural character values will be adversely affected by development as the Policy provides further guidance that access is expected provided that the adverse affects are mitigated against.</i>

<i>Efficiency</i>	<i>The Policy and methods provide a clear Policy directive that Public Access will be provided for, provided that that access is appropriately located to not compromise the natural character values of the area.</i>
<i>Effectiveness</i>	<i>Stating that Public Access is to be provided for directly reinforces, through Policy, the requirement of the RMA to maintain and enhance public access to and along the coastal marine area, lakes and rivers.</i>
<i>Appropriateness</i>	<i>The Policy and Method is appropriate to achieve the Objective and meet the statutory requirements to maintain and enhance maintain and enhance public access to and along the coastal marine area, lakes and rivers under section 6 of the RMA.</i>

<i>Alternative 1 – No Policy on Public Access to and along the harbour, coast, wetlands, estuaries, rivers and streams</i>	<i>The alternative ‘do nothing’ does not meet the requirements of the RMA, particularly Section 6. It further would not provide guidance that Public Access to these areas is a Matter of National Importance, and needs to be balanced against the preservation of the City’s natural character. It is not effective nor efficient in that the matter is not addressed as it does not provide guidance that Public Access is a Matter of National Importance and that, provided appropriate conditions are placed to avoid the adverse effects of access, that Public Access must be weighed against the other requirements of Section 6.</i>
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Based on the finding of the assessment of cost and benefits and the efficiency and effectiveness of the Policies and Methods, the Objective “Public access, for the recreational needs of the City, to and along the harbour, coast, wetlands, estuaries, rivers and streams is maintained and enhanced” is an appropriate way to achieve the purpose of the RMA.

4.5.3 Monitoring Proposed Plan Provisions

ERE	Indicator	Evaluation of Plan Effectiveness
<i>The conservation and preservation of open spaces with conservation and amenity values.</i>	<i>Number and distribution of resource and building consents on land zoned conservation.</i>	<i>Council records</i>

4.6 Issue 4 - The Loss of the Natural Character, Ecological and Conservation Value of Areas within or adjoining the Open Coast, Harbour, Wetlands, Estuaries, Rivers and Streams.

4.6.1 Objectives

This table identifies the appropriateness of the listed objectives in achieving the purpose of the RMA.

Objective Number	Objective	Appropriateness
13.2.2.1	<p><i>Objective – Maintaining and Enhancing Conservation Values</i></p> <p><i>The natural character, ecological and conservation values of the City’s conservation zoned land is maintained and enhanced.</i></p>	<p><i>The Tauranga Harbour, open coast and river margins within Tauranga City all have important natural character values. The preservation of the natural character of these areas is a matter of national importance under section 6(a) of the RMA. The Objective directly provides for this outcome and is therefore is considered to be appropriate to achieve the purpose of the Act.</i></p>

Objective 13.2.2.1 is addressed through Policy 13.2.2.1.1. This Policy is achieved through:

- The appropriate zoning of Open Space on the City Plan Maps (Part B);
- Rule Requirements which maintain and enhance Conservation Values.

4.6.2 Policies, Methods and EREs

<i>Policies and Methods</i>	<i>13.2.2.1.1 Policy – Maintenance and Enhancement of Conservation Values</i>
<i>Costs</i>	<i>Potential cost of damage to areas of Natural Character, Ecological or Conservation Values by not providing a mechanism for these areas to be identified and therefore allowing inappropriate subdivision, use and development to occur.</i>
<i>Benefits</i>	<i>Provides the mechanism to identify areas of Natural Character, Ecological or Conservation Values so the community has knowledge about their importance.</i>
<i>Risk</i>	<i>Ensures there is limited risk of areas of Natural Character, Ecological or Conservation value are adversely affected by development.</i>
<i>Efficiency</i>	<i>Providing the mechanism to maintain and enhance areas with Natural Character, Ecological or Conservation Values and providing clear policy direction that these areas will be maintained and enhanced is an efficient approach to addressing the issue as it is cost effective way of providing the community with the information on these areas.</i>
<i>Effectiveness</i>	<i>The Policy is effective at achieving the stated Objective. Providing the mechanism for maintaining and enhancing areas with Natural Character, Ecological or Conservation Values is an essential first step toward achieving the Objective. The Policy provides a clear directive that these areas are to be maintained and enhanced.</i>

<i>Appropriateness</i>	<i>Appropriate as the Policy achieves both the Matters of National Importance and the purpose of the RMA. It also gives effect to the requirements of Regional Policy Statement.</i>
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<i>Alternative 1 – No Policy on the maintenance and enhancement of Conservation Values</i>	<i>The Policy is not appropriate as a key requirement of the RMA is to maintain and enhance amenity values. Furthermore, the majority of land zoned conservation is located along the margins of the harbour, or along the Open Coast and there is a need to consider the most appropriate method to protect those values in accordance with Section 6. By not having a Policy on this matter is neither efficient, nor effective and could result in potential degradation of those values that are inherent in those areas.</i>
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Based on the finding of the assessment of cost and benefits and the efficiency and effectiveness of the Policies and Methods, the Objective “The natural character, ecological and conservation values of the City’s conservation zoned land is maintained and enhanced” is an appropriate way to achieve the purpose of the RMA.

4.6.3 Monitoring Proposed Plan Provisions

ERE	Indicator	Evaluation of Plan Effectiveness
<i>The values of land zoned Conservation are maintained and enhanced.</i>	<i>Refer s.32 for Chapter 5 – Natural Environment and Chapter 6 – Natural Features and Landscapes</i>	<i>Refer s.32 for Chapter 5 – Natural Environment and Chapter 6 – Natural Features and Landscapes</i>

Rezoning of Land to Open Space

As part of the Review of the District Plan, and notification of the Proposed City Plan, it is intended to undertake the rezoning of a number of parcels of land that have, over the life of the previous District Plan been acquired by Council through:

- Vesting of land for Reserve through the Subdivision/development process;
- Land purchase as part of Councils Strategic Land Acquisition Plans;
- Land purchase through other means (such as from Civil Defence Emergency Purposes – May 2007 Floods).

Most of these parcels of land have been vested in Council as part of recent subdivision, and because of this they can only be used Open Space purposes, or in certain circumstances stormwater purposes and need to be zoned accordingly. These parcels of land are currently zoned rural, rural residential suburban and commercial.

The purpose, therefore, to rezone of these parcels of land to the appropriate Open Space zone which best reflects the property's current land use, anticipated land use, topography and characteristics.

Rezoning of Land – Conservation

Preserving areas as open space by rezoning them to Conservation can be regarded as necessary in ensuring that Council is meeting the obligations imposed by the RMA where these reserve sites have natural character, ecological and/or conservation value.

Applying a zone to the areas which is conservation focussed is "expedient" or "desirable", as the restrictive provisions of the zone will assist the protection of the natural character, ecological and conservation values associated with the areas. Many of the areas have been acquired by Council under the provisions for the taking of esplanade reserves at subdivision, under the RMA, or are historic reserves. Council must administer these esplanade reserves in terms of Section 229 of the RMA, and for Historic Reserves, manage them in accordance with the Reserves Act 1977 and the Historic Reserves Management Plan. For esplanade reserves, Section 229 indicates that esplanade reserves will contribute to the protection of conservation values, enable public access to the adjacent water body, or enable public recreational use of the adjacent water body that is compatible with conservation values. The Conservation zone provisions are designed to enable public access to these areas, including esplanade reserves, while encouraging the conservation of the natural state and/or features of the land and coastal environment, rivers and streams.

In addition to statutory obligations, Council as landowner must respond to the expectations of the community where land is held for community purposes. The Open Space Strategy is the Council's key strategic document for managing open space and sets out the future directions in a way which reflects the community needs. Residents placed a high value on the importance of Open Space, it's the protection and enhancement, along with the provision of attractive parks and open spaces that meet the needs of the community. The use of Conservation zoning provides a transparent mechanism by which the community can ensure that its expectations of the protection of these areas are recognised and provided for while enabling the expected activities to be able to occur.

Rezoning of Land – Passive Open Space

Provision of land zoned as Passive Open Space helps Council to promote sustainable management which requires that people and communities can provide for their social and cultural wellbeing and their health, while avoiding, mitigating, or remedying any adverse effects on the environment. The zone is intended to help facilitate the maintenance of amenity values, in particular the visual amenity of neighbourhoods. The Open Space

Strategy is the Council's key strategic document for managing open space and sets out the future directions in a way which reflects the community needs. Residents placed a high value on the importance of Open Space, its the protection and enhancement along with the provision of attractive parks and open spaces that meet the needs of the community. Therefore, managing open space by zoning it with an appropriate open space zone is seen as achieving Section 7(c), which is the maintenance and enhancement of amenity values.

Rezoning of Land – Active Open Space/Active Open Space (major)

Provision of land zoned as Active Open Space and Active Open Space (major) helps Council to promote sustainable management which requires that people and communities can provide for their social and cultural wellbeing and their health, while avoiding, mitigating, or remedying any adverse effects on the environment. The zone is intended to help facilitate the maintenance of amenity values, in particular provide for large open spaces for organised and informal sporting activities. The Open Space Strategy is the Council's key strategic document for managing open space and sets out the future directions in a way which reflects the community needs. Residents placed a high value on the importance of Open Space, it's the protection and enhancement, along with the provision of attractive parks and open spaces that meet the needs of the community. Therefore managing open space by zoning it with an appropriate open space zone is seen as achieving Section 7(c), which is the maintenance and enhancement of amenity values.

Rezoning of Land to Open Space

<i>Summary of costs</i>	<i>No Cost</i>
<i>Summary of benefits</i>	<i>The benefits include the provision for the protection, maintenance and enhancement of the land as Open Space which contributes to the wider Open Space network of the City. By Rezoning it also gives land a zoning that is consistent with its intended use/purpose and provides certainty to the community that the land will be used as Open Space for the intended purpose.</i> <i>The rezoning further provides for protection against inappropriate development and assists with the provisions for differing recreation needs throughout the City. The Conservation zone further protects cultural and natural heritage resources and provides certainty in the availability of land to accommodate community buildings.</i>
<i>Risk</i>	<i>The risk of not acting is that the current zoning may hinder the use of the land for its intended purpose as Open Space and place the land at risk of inappropriate development. The integrity of the City Plan is therefore compromised if the zoning does not reflect the use of the land, and there is not certainty for surrounding landowners that the land will be used for the public open space purposes for which it was acquired.</i>
<i>Efficiency</i>	<i>The change is efficient in that it provides the appropriate zone to what its intended use is, or provides the appropriate zone for what is currently occurring on sites.</i>
<i>Effectiveness</i>	<i>The change is effective in that it provides the appropriate zone to what its intended use is, or provides the appropriate zone for what is currently occurring on sites.</i>
<i>Appropriateness</i>	<i>It is considered that the zone changes is the most appropriate way to achieve the relevant Objectives of the City Plan, and the relevant Objectives and Policies.</i>

<i>Alternative 1 – Do nothing</i>	<i>The Alternative ‘do nothing’ does not reflect the current role and function of the land as Open Space. It would not protect the land from inappropriate subdivision and development nor would it provide the community with the certainty that the land will be used as public open space</i>
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Evaluation of Rules

The Open Space Chapter sets up a permissive regulatory framework to enable development on reserves where that reserve is managed by an adopted Reserve Management Plan. The purpose of this is to enable a flexibility of approach in providing recreational activities and assets throughout the City while ensuring the adverse effects on the environment are mitigated against.

The Plan recognises that all areas of the City zoned Open Space are recreational areas, however, in certain circumstances, it is less appropriate to place large structures within those areas (such as the conservation zone), unless there is a functional need to place that activity there (such as a surf club – which would be required to go through the consenting process). On many conservation zoned areas, a Plan Area is also present. The presence of the Plan Area does not prohibit activities from occurring (unless stated as prohibited), rather expects that if an activity is proposed that an appropriate assessment is undertaken to ensure that the adverse effects on the environment are avoided, remedied or mitigated. Through this process appropriate testing of the need for the activity to be located in these areas should also occur.

The zoning of each reserve dictates the scale, use and intensity of activities permitted (in terms of size and bulk of buildings) while the regulatory framework provides for a number of activities to occur (minor public recreational facilities and activities) provided reinstatement is undertaken.

<i>Summary of costs</i>	<i>Potential Degradation of Open Space in certain areas which may have natural character areas through certain development occurring such as walkways, however this cost is considered to be low given that Council is in almost all cases the landowner and establishes a framework of reserve management plans to guide development.</i>
<i>Summary of benefits</i>	<i>Provides for the protection, maintenance and enhancement of the land as Open Space and contributes to the wider Open Space network of the City</i>
<i>Risk</i>	<i>The risk is low in that rules permit the activities existing and anticipated.</i>
<i>Efficiency</i>	<i>Rules that permit the activities existing and anticipated (with appropriate restrictions) is a particularly efficient way to manage the effects on open space.</i>
<i>Effectiveness</i>	<i>Identifying the varying types of Open Space and providing specific rules for each type is an effective means of managing the adverse effects on that Open Space.</i>
<i>Appropriateness</i>	<i>Appropriate in that it maintains and enhances amenity values and enables Council to implement its Reserve Management Plans</i>

5. RECOMMENDED OBJECTIVES, POLICIES AND METHODS

The Objectives, Policies and Rules seek to regulate the development of land in Open Space areas to provide for works which would have negligible adverse effects on the environment as Permitted Activities, or are generally expected developments within those environments. Open Space areas generally consist of land which is publicly owned. The approach taken in the City Plan has been to integrate Reserve Management Plans to direct activity in the Open Space Zones. Although Reserve Management Plans were seen as the most suitable tool for managing park development (activity programmes, recreational facilities and design issues), there is a need to provide an appropriate back stop to ensure adverse environmental effects are assessed, where appropriate.

The Objectives, Policies and Rules regulates by way of newly defined generic activities, that are controlled by rules based on their potential effects on amenity and environmental values, and will achieve the sustainable management of the City's resources and the purpose of the Act.

It is considered that the above evaluation fulfils Council's requirements with regard to section 32 of the Act, and that the analysis of alternatives benefits and costs has been carefully undertaken and summarised accordingly.

The recommended plan content to:

- Provide for the role and function of Open Space;
- Recognise Reserve Management Plans;
- Manage the effects of activities located within Reserves;
- Provide for Public Access; and
- Maintain and enhance the Conservation Values of areas of Open Space;

clearly covers and outlines the key issues with respect to Open Space provision, development, maintenance and enhancement.

Council has a clear responsibility under Section 6, and 7 of the RMA to:

- Protect Significant Indigenous Vegetation and Significant Habitats of Indigenous Fauna;
- Maintain and Enhance Amenity Values;
- Have particular regard to the intrinsic values of ecosystems;
- Have particular regard to the maintenance and enhancement of the quality of the environment.

This responsibility, coupled with the Councils adopted Strategic direction provides for a strong focus to deliver on.

The principal alternatives considered are to implement management provisions or to 'do nothing'. The assessment is that a 'do nothing' alternative will not enable Council to deliver its strategic objectives or to meet community expectations.

6. NOTIFICATION AND RECOMMENDED DECISIONS

This section to be completed following hearings.