Table 1 – Section 32(1)(b)(i) examination – Reasonably practicable alternatives

Section 32(1)(b)(i)		Ор	tion		
examination	Pursue resource consent	Pursue private plan change	Wait for Council-led District Plan review	Do nothing	
General costs	<ul> <li>High degree of specificity of outcomes and effects required.</li> <li>Commensurate high degree of mitigation detailing = increased economic cost to applicant up front.</li> <li>Regulatory burden - any future deviation from precise approved plans requires variation = social and economic costs</li> <li>Lack of flexibility once consented to implement improved environmental mitigation solutions due to adherence to approved plans = environmental, cultural and social costs.</li> <li>Loss of part of rural land resource.</li> </ul>	<ul> <li>Further regulatory         (consenting) work required         following plan change =             economic cost to applicant.</li> <li>Reduced certainty of outcome         in comparison to a resource         consent = social, cultural,         environmental costs.</li> <li>Loss of part of rural land         resource.</li> </ul>	<ul> <li>Uncertainty of timing, lag as combined with other changes, increased likelihood of prolonged hearing requirements as it is tied up with such a large volume of work = economic and social costs.</li> <li>Economic costs increase with delay in being able to undertake detailed design and construct if zoning is delayed more than necessary.</li> <li>Loss of part of rural land resource.</li> </ul>	Opportunity cost in respect of provision of social infrastructure and housing in an appropriate location responding to local employment and industry (horticulture) growth.	
General benefits	<ul> <li>Highest certainty of outcome for all stakeholders and costs to applicant/future developers of the land.</li> </ul>	<ul> <li>Flexibility provided for future developments whilst remaining within scope of proposed zones.</li> <li>Adaptive and best-practice mitigation of effects can be implemented at the time of future development without regulatory burden of</li> </ul>	Ensures absolute integration with Council strategies and visions for development in the District.	<ul> <li>No economic costs incurred.</li> <li>Rural land resource retained as is.</li> </ul>	

		adherence to a contemporary		
		set of approved plans.		
		<ul> <li>Scope for appropriate</li> </ul>		
		consultation with		
		stakeholders as to exact final		
		outcome.		
		Reduced up-front economic		
		costs to applicant in terms of		
		mitigation implementation.		
Preference of option	Not preferred – precise control	Preferred – appropriate	Not preferred – the timing	Not preferred – the
	over exact design that comes	combination of flexibility and	uncertainties, and increased	opportunity costs that would
	with resource consent is not	certainty of general outcomes	economic and social costs to	accrue are significant in this
	appropriate in this instance.	that align with the vision and	the applicant and community	local context.
		objective of the project. Loss of	who stand to benefit, by way of	
		rural land resource is	including this application with	
		contextually small (<10ha) and	the general District Plan review	
		is appropriately justified as	are too great, considering	
		consolidation of an existing	engagement with Council to	
		village area i.e. is not ad-hoc or	date supporting the concept of	
		new sprawl consuming rural	this plan change.	
		land.		

Table 2 – Section 32(1)(b)(i) examination – Reasonably practicable geographic alternatives (supporting images below)

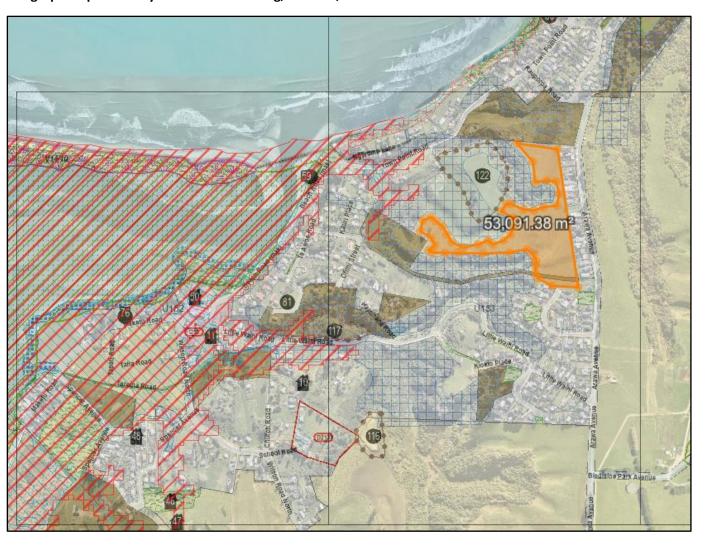
Section			Option	Option			
32(1)(b)(i) examination	Maketu	Pukehina	Paengaroa	Other Pongakawa	PPC Site		
General costs	<ul> <li>Further distanced from Pongakawa horticultural employment demand and SH2. Similar to Te Puke and Rangiuru Business Park.         Comparatively higher VKT.</li> <li>Places residents in known tsunami risk zone.</li> <li>Coastal – higher chance of generating cultural/archaeological adverse effects.</li> <li>Known geotechnical instability issues to deal with.</li> <li>Largest vacant contiguous area of residential-zoned land = 5.3ha. Cannot deliver the same scale, yield and community services.</li> </ul>	<ul> <li>Further distanced from Pongakawa horticultural employment demand and SH2, Te Puke, Rangiuru Business Park and SH2. Comparatively much higher VKT.</li> <li>Places residents in known tsunami risk zone.</li> <li>Coastal – higher chance of generating cultural/archaeological adverse effects.</li> <li>Existing residential-zoned land subject to coastal erosion risks.</li> <li>No sizeable vacant residential-zoned land available for development within Pukehina.</li> </ul>	<ul> <li>No sizeable vacant residential-zoned land available for development within Paengaroa.</li> <li>Residential development beyond current residential zone, towards Rangiuru, as generally envisioned by UFTI between 2050-2070, will have to consume established orchards on LUC Class 2 and 3 land. Developed productive orchard land lost.</li> <li>Greater job losses. Adverse social and economic costs.</li> <li>Greater reverse sensitivity – working orchards in all directions.</li> </ul>	<ul> <li>Anywhere else north and south of SH2 – completely greenfield/sporadic development, not connected to existing urban village. Poor settlement pattern.</li> <li>Greater reverse sensitivity effects – existing village creates existing reverse sensitivity.</li> <li>South of SH2 – further reverse sensitivity effects – closer to railway line.</li> <li>North and south of SH2 – all LUC 1 or 2. Substantially affected by floodable area hazard. Loss of undeveloped productive land to create houses in a floodable area.</li> <li>South of SH2 – potential to disrupt established orchards. Loss of developed productive land. Greater job losses, established orchards lost,</li> </ul>	<ul> <li>Part of undeveloped productive land only, lost. Working dry farm to remain.</li> <li>Loss of rural amenity to some residents of Arawa Road.</li> </ul>		

				disestablishment costs. Greater adverse social and economic costs.	
General benefits	<ul> <li>No loss of productive land.</li> <li>Coastal amenity delivered to future residents.</li> <li>Integrated within existing Maketu urban area</li> </ul>	None as no material yield available.	<ul> <li>Closer to Te Puke, Rangiuru Business Park, Tauranga.</li> <li>Consolidates around existing Paengaroa village.</li> <li>Development not subject to hazards.</li> </ul>	No benefit regarding productive land.	<ul> <li>No impact to developed productive (horticultural) land.</li> <li>Residential development outside of known tsunami risk zone.</li> <li>Less reverse sensitivity.</li> <li>Consolidates around existing residential village – not sporadic/isolated greenfield pattern of growth.</li> <li>Delivers enhanced amenity and infrastructure to existing urban area of Pongakawa.</li> <li>Combined with location near SH2, and with existing village, delivers critical mass in appropriate location to enhance feasibility of commercial shop.</li> <li>Access not directly from SH2, however very close – important transport link, safely and conveniently accessible.</li> </ul>
Preference of option	Not preferred – further isolated than PPC site, higher degree of hazards and constraints to deal	Not preferred – further isolated than PPC site, higher degree of hazards and constraints to deal with, no yield delivered.	Not preferred – requires mass removal of established orchards on productive land. PPC proposal is less severe in impact to productive land use.	Not preferred – greater hazard profile/reverse sensitivity risks at other locations, or more severe impact to productive uses.	Preferred – greatest weight of benefits against costs.

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	with, incomparable yield		
	delivered.		

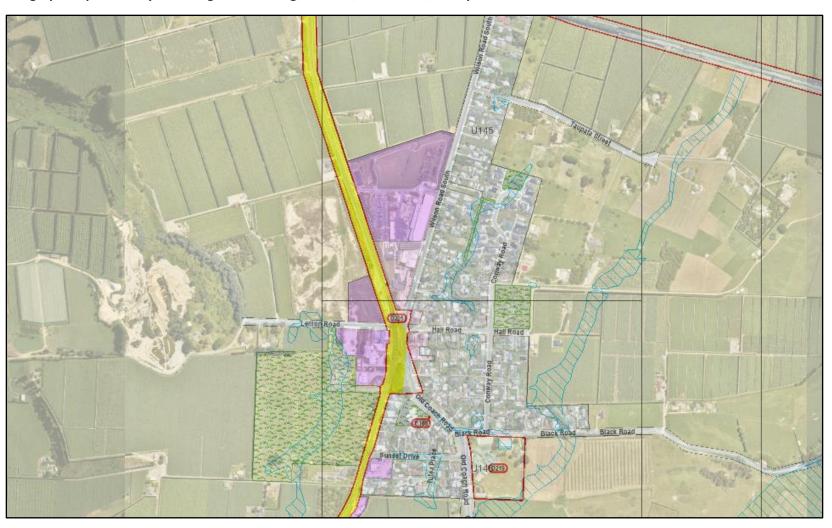
All images below sourced from either WBOPDC Eplan or BOPRC GIS (Bay Explorer).

# Geographic option analysis: Maketu – Zoning, Hazards, Constraints



Geographic option analysis: Pukehina – Zoning, Hazards, Constraints

### Geographic option analysis: Paengaroa – Zoning, Hazards, Constraints, Occupied Land

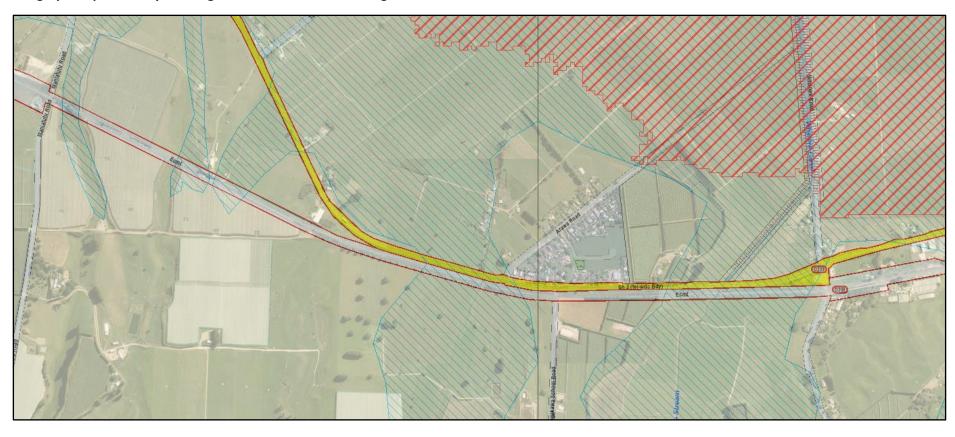


### Geographic option analysis: Paengaroa – Surrounding Land Use Classes, Orchard Establishment



Green = Class 2, Blue = Class 3, all HPL.

# Geographic option analysis: Pongakawa – Hazards and Zoning



#### Table 3 – Section 32(1)(b)(ii) examination – Efficiency and effectiveness of proposed provisions to achieve project objective

Note: The proposal does not propose to introduce any new Residential or Commercial objectives and policies, as these sufficiently support the objective of the proposal. New rules are proposed to be included in the District Plan to achieve the objective of the proposed plan change – these are specifically examined in accordance with s.32(1)(b)(ii) below.

It should be further noted that efficiency concerns the proportion of benefit to cost. Effectiveness concerns the degree to which the provisions contribute to addressing the problem or achieving the intended objective.

Proposed provision	Cultural Effects	Economic Effects	Social Effects	Environmental Effects	Efficiency/Effectiveness
Adoption of existing Residential and	Costs of implementation:	Costs of implementation:	Costs of implementation:	Costs of implementation:	The benefits identified
Commercial zoning to PPC site	<ul> <li>Promotes further urban use,</li> </ul>	Opportunity cost in respect of	Change to character of the area	Urbanisation of land	considerably outweigh the
	further divergence of natural	agricultural use, delivery	<ul> <li>from semi-rural to more urban,</li> </ul>	generates a wider set and	costs, particularly when
	functioning of the land and	primary produce to market and	changes the relationship people	scale of environmental	considering changing demand
	associated ecosystems.	associated employment of	have with an area, sense of	effects. Includes new	for land use and lack of social
	<ul> <li>Associated mauri effects in-</li> </ul>	farm workers.	identity people have with the	potential pollutant pathways	infrastructure serving the
	principle.	Financial cost for planning and	area.	and emissions, increased	Pongakawa community.
		enabling infrastructure		noise and traffic	
	Benefits of implementation:	required to enable	Benefits of implementation:	environmental effects.	The adoption of these zones
	Early engagement allows for	development sought – lies with	Increased access to home	If not managed appropriately,	and the existing provisions
	influencing of zoning and	applicant.	ownership, recreation and	this wider range of adverse	within them contributes
	structure plan arrangements,		convenience and community	effects may occur to the	significantly to realising the
	setting the platform for	Benefits of implementation:	facilities (enabled within the	detriment of local ecosystems	objective of the proposal by
	optimal outcomes for tangata	Reduced economic pressure in	Commercial Zone)	and the existing environment	way of enabling the necessary
	whenua	terms of house pricing in the	Enables flexibility of housing	generally.	development integral to the
	Promoting development brings	area;	development to suit diversity of		objective being achieved .
	with it further consenting in	Reduced travel costs for local	housing demand for the	Benefits of implementation:	
	due course which is where	conveniences and recreational	residential community expected	Large scope for and	
	opportunities for	opportunities based on uses	in the area the future.	confidence of achieving	
	environmental improvement	enabled by the application of	Increased safety of operation of	environmental and ecological	
	and enhancement of mauri of	the proposed provisions to the	the road as a function of the plan	enhancement in conjunction	
	taonga, exercise of	site.	change has positive effects in	with planned development.	
	kaitiakitanga can be realised.	Reduced travel costs from	terms of perceived safety and	Proposed infrastructure	
	Enables flexibility of housing	dwellings to horticultural	social wellbeing.	improvements as part of plan	
	development, which may	conversions nearby – worker	Increased critical mass to	change will improve the	
	benefit mana whenua	accommodation is limited and	support dedicated and safe bus	management and quality of three waters through the	
	hapū/iwi members in respect of dwelling within the rohe	further away from Pongakawa.	stops to improve connectivity to other destinations for locals	area.	
	or dwelling within the rolle	<ul> <li>Integrated and holistic consideration with existing</li> </ul>	other destinations for locals	Proposed road network	
		Pongakawa infrastructure		improvements will enhance	
		ensures cost-effectiveness		safety and operation of	
		achieved in comparison to		existing traffic environment.	
		piecemeal subdivision.		The PPC consolidates around	
		Land values in proximity to		an existing urban area,	
		social, community and utility		therefore ad-hoc	
		infrastructure likely to increase.		environmental effects in a	
		Employment opportunities		fundamentally new location	
		created in commercial area.		would not occur.	
		0	N Britania	0 1 1 1 1 1	N
New Rule 12.4.24 – Pongakawa	Costs of implementation:	Costs of implementation:	None to distinguish from the same	Costs of implementation:	No costs are identified, only
Residential Structure Plan	No cultural costs identified.	None identified.	costs and benefits discussed in	None identified.	benefits, therefore the
<b>New rules</b> in this location, with title	Ponofits of implementations	Panafits of implamentations	respect to the general adoption of Residential and Commercial zoning	Panafits of implementations	provision is completely efficient.
above, and parts a c. as per below:	Benefits of implementation:  • Ensures environmental	Benefits of implementation:	provisions at the site.	Benefits of implementation:	emdent.
above, and parts a c. as per below.	benefits with flow-on cultural	Provides financially feasible method for the applicants to	אוסיוטווט מג נווב טונב.	Ensures reasonable certainty of environmental effects to	This provision contributes
Rule 12.4.24.1.a – General:	benefits secured in the	ensure the vision and		be addressed.	strongly to achieving the
a. Any subdivision or development	provisions of the Structure Plan	objective, with flow on		Ensures investment to date in	objective of the proposal, by
(including delivery of stage pre-	are realised.	objective, with now on		environmental solutions, as	making it clear future

Proposed provision	Cultural Effects	Economic Effects	Social Effects	Environmental Effects	Efficiency/Effectiveness
requisites) of land zoned Residential or Commercial within the Pencarrow Estate Pongakawa Structure Plan shall be undertaken in general accordance with that structure plan as set out in Appendix 7 and in the Pencarrow Estate Pongakawa Structure Plan Stage Prerequisites below.		economic and intangible positive value being realised.		evidenced in plan change reports, can be put to use.	development of the land shall accord to the patterns and outcomes contained within the structure plan.
Rule 12.4.24.1.b – General:  b. All roofs of buildings constructed in the Pencarrow Estate Structure Plan Area bordering a Rural Zone site shall be of a finish with a reflectivity (Light Reflectance Value) of no greater than 37%, measured and determined in accordance with AS/NZ Standard 1580.	Costs of implementation:  No cultural costs identified.  Benefits of implementation:  Minimises visibility of development in vista views of the site which include sites of significance to tangata whenua	Costs of implementation:  Restriction to certain finishes of roof materials will have development cost implications.  Low reflectance of finishes absorb more sunlight thus may require more regular maintenance.  Benefits of implementation:  Ensures a degree of consistency of roofs in the area – results in a stronger character being evident across the area which is of economic value to future purchasers.	Costs of implementation:  None identified. The requirement to construct buildings in a certain way is already established by way of requirements to meet general planning and building code requirements.  Benefits of implementation:  Will contribute to the character of the area which is of value to social well-being and sense of pride in an area.  Reduces glare and increased visibility of roofs of built form in medium-long range views within the rural environment.	Costs of implementation:  Low-reflectance materials means more absorption of sunlight and more regular use of resources to keep roofs in optimal condition.  Benefits of implementation:  Minimises glare adversely impacting visual amenity as a component of the overall residential/rural amenity of nearby properties, and visual amenity within wider landscapes enjoyed by the public.  Minimise glare and potential adverse impacts to safe operation of nearby transport networks	The potential cost implications of having to use certain roof finishes, over and above all other roof design and construction costs, are likely to be proportionately very low. Similarly of low cost and environmental impact is the requirement to replace roof materials as a result of higher sunlight absorption (over and above standard maintenance requirements).  The benefits to character, and importantly mitigating adverse visual amenity and safety (glare) effects are considered to outweigh the identified costs. The provision is therefore considered to be appropriately efficient.  The provision is effective in that it contributes to the vision of appropriate development complementing and enhancing the residential community of Pongakawa.
New Rule 12.4.24.2 – Staging Details	Costs of implementation:  • Staging reduces the timing of	Costs of implementation:  • Staggers addition of supply of	Costs of implementation:  • Staged manner of construction	Costs of implementation:  • Staggers delivery of all	The opportunity cost of managing staging as proposed
New rule governing staging	benefit being delivered to the environment, delaying further	sections and dwellings to market, opportunity cost in	may result in a longer construction and associated	environmental mitigation and enhancement, inefficiency in	is not considered to outweigh the benefits of ensuring the
Rule 12.4.24.2 – Staging:  a. Subdivision or development of land within the Pencarrow Estate Pongakawa Structure Plan shall	ecological and mauri improvements.  Benefits of implementation:	terms of housing affordability as prices will likely increase between stages.	disruption period to existing residents than if everything was undertaken at once	achieving overall environmental mitigation and enhancement	development occurs in accordance with the objective of the project and in an integrated, robust manner as
occur sequentially in that Stage 1 shall be completed prior to, or at the same time, as Stages 2 and 3.	<ul> <li>Provides further time for engagement on latter stages to maximise ecological and mauri improvements.</li> </ul>	Provides financially feasible method for the applicants to ensure the vision and	Benefits of implementation:     Provides financially feasible method for the applicants to ensure the vision and objective,	Provides smaller, more manageable areas for detailed consideration at	planned. This has numerous economic and intangible benefits to the community, as well as heightened overall
b. Subdivision to create separate lots that reflect the boundaries of the Pencarrow Estate Pongakawa		objective, with flow on economic and intangible positive value being realised.	with flow on economic and intangible positive value being realised	consenting stage of environmental mitigation.	environmental mitigation which may be the end-result.

Proposed provision	Cultural Effects	Economic Effects	Social Effects	Environmental Effects	Efficiency/Effectiveness
Structure Plan area (in its entirety or of individual stages), including prior to the delivery of any stage pre-requisites, is a Controlled Activity.:  Council shall exercise control over the following:  i) The new lot(s) to be established shall be generally consistent with the boundaries of the structure plan area or individual stages  ii) Provision of legal and physical access to all proposed lots.  New Rule 12.4.24.3 – Pencarrow Estate Pongakawa Structure Plan – Stage Pre-Requisites (see proposed track changes for complete pre-		Ability to extract the plan change site from the farm, via specific rule provisions, enables for ease of transfer to land developers to commence development.		Staging will result in improvements in mitigation and enhancement as legislation and planning requirements respond and change as forecast.	The provision ensures closer management of development and mitigation of resulting effects, contributing meaningfully to the objective of an overall improved environment within the residential area of Pongakawa.
requisites)  Amended Residential Rule 13.4.1(a)  - Height of buildings/structures  Add below existing rule:  Except that:  (i) The maximum height shall be  6m in the Pencarrow Estate  Residential Height Restriction  Area and retain a one-storey  character  New Rule 13.4.1(c)(v) - Yards  New rule:  Dwellings and garages on land  adjoining the Pencarrow Estate  Residential Rear Yard Boundary shall be setback 5m from the specified boundary as shown in that Structure Plan. Accessory buildings are permitted within this yard setback provided they have a maximum height of 2m and a gross floor area not exceeding 10m².  Provided that:	Costs of implementation:  No cultural costs identified.  Benefits of implementation:  Ensures buffer space and landscaping mitigation requirements are met, which has flow-on effects for wildlife corridor provision and habitat provision to provide for the mauri of natural taonga in the area.	Costs of implementation:  Restricts buildable area, therefore does theoretically restrict economic potential of future development.  Benefits of implementation: Appropriate retention of character appropriate to setting delivered, which will be reflected in pricing of future development.	Costs of implementation:  None identified  Benefits of implementation:  Ensures a reasonable separation distance based on separation distances common to adjoining properties in the area, therefore respecting sense of space that people of the area value.  Similarly ensures single-storey character of built form common to the setting that is valued by existing residents is retained.	Costs of implementation:  None identified.  Benefits of implementation:  Buffer space for landscaped and vegetated areas, providing a wildlife corridor/habitat opportunities.  Preserves reasonable levels of neighbouring amenity and respects local character insofar as space about buildings near existing boundaries is concerned.	Benefits considerably exceed costs, and ensure efficiency of the provision particularly in terms of ensuring character-compatible development and appropriately preserving quality of amenity for neighbours.  These objectives contribute considerably to achieving the project objective in a socially and environmentally acceptable manner.

Proposed provision	Cultural Effects	Economic Effects	Social Effects	Environmental Effects	Efficiency/Effectiveness
A building/structure may be located within the Pencarrow Estate Residential Rear Yard exceeding the permitted height or maximum gross floor area standards, or sited up to the specified boundary as shown on that Structure Plan, where the written approval of the owner(s) of the immediately adjoining property/properties is obtained.					
Amended Rule 13.3.2(a) and 13.4.2(a) – Net land area requirements per dwelling/Minimum lot size, Pencarrow Estate Pongakawa Structure Plan  Amend table in this standard as per bold text below (inserted as new rows):  Pencarrow Estate Pongakawa Structure Plan (Density A): 350m² Maximum average 400m²  Pencarrow Estate Pongakawa Structure Plan (Density B): 500m²	Costs of implementation:  No cultural costs identified.  Benefits of implementation:  Allows for greater yield, greater development contributions, some of which will be put into environmental enhancement, reserves and social infrastructure, benefitting the mauri of improved taonga as well as tangata whenua residing in the area generally.  Diversity of housing stock which may benefit mana whenua hapū/iwi members in respect of dwelling within the rohe.	Costs of implementation:  Greater infrastructure costs owing to the greater yield anticipated (in comparison to standard 800m² minimum lot size that would otherwise apply).  Benefits of implementation: Greater yield potential and associated economic gains to the applicant and WBOPDC in terms of rates. Greater yield potential delivers a larger critical population mass in the community to demand community and commercial services which otherwise would not warrant investment in the area. This has flow-on positive economic effects in terms of reduced travel requirements for employment and to obtain community and commercial services. Economic value added in terms of proximity and convenience to social infrastructure, shops, and community convisors	Costs of implementation:  Greater density of development, increased sense of 'urban' neighbourhood. Further affects the relationship of existing residents with the rural character of the area.  Benefits of implementation: The smaller minimum lot sizes optimises the density of development that will bring community and commercial services to the village, of great benefit and convenience to social well-being. Provision for comparatively higher density is expected to deliver more affordable lots and dwellings, so as to ensure people working in the growing horticultural industry in the area can also live in the area, and thus have reduced commute/travel times and greater time for social and recreational activities to improve social-wellbeing.	Costs of implementation:  No environmental costs identified.  Benefits of implementation:  Allows for greater yield, greater development contributions, some of which will be put into environmental enhancement, reserves and social infrastructure, benefitting a wide range of environmental and ecological receptors.  Provides housing close to places of employment, reduces need to travel for employment, which reduces greenhouse gas emissions and associated adverse environmental effects.	All benefits are considered to clearly outweigh the costs, meaning this is a highly efficient provision.  This provision is highly effective in that is provides the basis of expected yield which in turn optimises the chances of successful delivery of the vision and objective of the project.
Amended Rule 19.4.1 (viii)	Costs of implementation:  None	and community services.  Costs of implementation:  Particular costs to developer of	Costs of implementation:  None	Costs of implementation:  None	The benefits are considered to outweigh the costs, meaning
Add below existing rule:  Except that:	Benefits of implementation:  Improved safety of reserve and	future commercial building for greater degree of glazing.  • Additional weathertight area of	Benefits of implementation:  Higher quality future commercial	Benefits of implementation:  Improved urban design	this is an efficient provision.  The provision is effective in
Within the Pencarrow Estate Pongakawa Structure Plan area, a continuous retail frontage shall be provided to Arawa Road and any adjacent structure plan road, as well as the façade facing the proposed playground area as shown on	surveillance, observation of health of natural resources (planted area and overland flowpath), benefits mauri of those taonga.	<ul> <li>Additional weathertight area of building to address.</li> <li>More window space reduces functional storage space within commercial building i.e. wall-based storage.</li> <li>Benefits of implementation:</li> </ul>	space, optimal to café or similar where social capital and cohesion is realised.  • Improved CPTED and safety outcomes regarding visibility of the reserve, improved social amenity.	outcome and interface with playground reserve and multiple streetscapes.  Reduced adverse safety effects/risks to future users of reserve.	achieving the purpose of the plan change where it concerns enhancing existing social infrastrucuture servicing the Pongakawa community. The provision ensures appropriate safety and quality of this reserve.

Proposed provision	Cultural Effects	Economic Effects	Social Effects	Environmental Effects	Efficiency/Effectiveness
Proposed provision Structure Plan. The continuous retail frontage is not required to be constructed to the road boundary	Cultural Effects	Increased visual interest, improved overall design quality of the future building.     Improved functionality of building with its surroundings – engages with high amenity (north-west facing) playground reserve space. Likely more attractive to prospective tenants.     Possible overall economic value	Social Effects	Environmental Effects	Efficiency/Effectiveness
		benefits.			