

Report No:	REP11-10-01
File No:	L335
Date:	23 September 2011
Decision Required	

REPORT SUMMARY

Report to: Environment & Planning Committee
Meeting Date: 6 October 2011
Report Author: Mary Honey, Policy Planner
Subject: **Policy Review: Rural Subdivision and Land Use**

EXECUTIVE SUMMARY

The purpose of this report is to:

1. Re-acquaint the Committee with the background to and reasons for this review project; and
2. Obtain Committee approval for the scope of the review and the commencement of the work programme.

The report describes the context and background to the Policy Review: Rural Subdivision and Land Use.

In accordance with the Council's 2006 decision on the Rural Futures Community Engagement process, the scope of the review has been revised to focus on the following topics or issues:

1. Protecting and providing for productive opportunity
2. Providing for rural living opportunity
3. Providing for rural business opportunity
4. Developing a land use monitoring system to provide an information base for the above and subsequent reviews
5. A review and reorganisation of TRMP rural zone provisions to help resolve the above issues.

The report recommends that the Committee approves the scope of the review and the commencement of the work programme.

RECOMMENDATION/S

It is recommended that the Committee:

1. Receives this report; and
2. Approves the scope of the review and the commencement of the work programme.

DRAFT RESOLUTION

THAT the Environment & Planning Committee:

1. **Receives** the Policy Review: Rural Subdivision and Land Use REP11-10-01 and
2. **Approves** the scope of the review and the commencement of the work programme.

Mary Honey
Policy Planner

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1. Purpose

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1. Re-acquaint the Committee with the background to and reasons for this review project; and
2. Obtain Committee approval for the scope of the review and the commencement of the work programme.

2. Context and Background

2.1 National Context

In recent decades, Tasman District along with many other parts of New Zealand, has experienced continuing rural land fragmentation despite the existence of controls on rural subdivision and dwellings. In a nutshell:

“During the 1980s, New Zealand combined economic and trade liberalisation with a radical restructuring of the public sector and the introduction of a new environmental policy and planning regime, based upon the sustainable management of the environmental effects of land use. This New Zealand ‘experiment’ (Kelsey, 1995) has created unique planning and management challenges for agricultural landscapes, the outcomes of which are still being played out.” (Macleod and Moller, 2006).

“Planning authorities were required to focus on the *effects* of land use rather than land use itself. When combined with a strong liberal ideology within government, this led to a neglect of strategic planning (Osram 2007), and a general relaxation of controls upon rural subdivision. One consequence has been widespread fragmentation of land tenure in locations suitable for urban commuting, or in areas of high landscape quality such as the coasts and lakesides. (Environmental Defence Society, 2004; Parliamentary Commissioner for the Environment, 2004). Nationally, MAF reported that 200,000 ha of farmland was converted to small holdings between 1994 and 2002 (Ministry of Agriculture and Forestry, 2003). This land is typically managed for aesthetic and recreational purposes rather than intensive production and relies upon income sourced from urban employment. Hence the ‘subsidy’ is now private and the landscape becomes a focus of consumption rather than production.” Swaffield, S: Local landscape consequences of macro-scale policy reform: the New Zealand experiment, p104).

The situation described is evident in many locations around the country. Consequently several national institutions and local authorities are investigating the issues, monitoring trends and reviewing policy responses to rural subdivision and land use issues.

Due to the interrelated and wide scope of the issues that affect the patterns of rural land use, a literature survey of local authority initiatives indicates that local authorities initially, commence general “rural area ” review and consultation processes. Subsequent or follow up initiatives tend to separate initiatives into two streams of work, namely (i) the protection of landscape and special natural areas and (ii) rural subdivision and land use.

2.2 Legislative Context

The national legislative and policy framework requires local authorities to promote the sustainable management of natural and physical resources. Of particular relevance to this review are the RMA requirements to monitor and review policy and plan provisions and outcomes. More specifically, local authorities are required to:

- Control actual or potential effects of land use (s31);
- Monitor and report on the efficiency and effectiveness of policies, rules, or other methods in its policy statement or its plan every five years (s35(2)(b)); and
- Review provisions of RMA policy statements and plans every 10 years after becoming operative (s79).

Legislative requirements aside, monitoring is a common sense precursor to review because it tells us what is happening and whether we are on track. It tells us whether policy objectives and the anticipated environmental outcomes are being achieved.

The Tasman Regional Policy Statement (TRPS) and the Tasman Resource Management Plan (TRMP) set out Council’s policy and management approach to the rural environment. In line with the national and legislative context, the TRMP manages rural development by addressing the effects of land use or development. It provides a framework of controls and guidance on how to assess and manage the effects of potential development. The TRMP does not state what development must occur. Nor does it control the effects of existing lawful development.

The main objective of the TRMP is to balance the opportunities for soil based production with other uses of rural land, namely commercial, industrial and residential, while safeguarding the rural landscape and special cultural and natural features.

Important to this review are the TRMP Chapter 7 (Rural Environment Effects) policies on rural land management and Chapter 6.2 (Land Effects from Urban growth) policies on urban growth management, and the related subdivision and zone rule chapters.

A full description of Council's TRMP management framework is set out in section 3 of the "Tasman Rural Futures Community Discussion Paper on Rural Development Policy in the Tasman District, November 2004," (Rural Futures Discussion Paper). A copy of the paper is available on request.

2.3 Tasman Context

In line with national experience, over the last thirty years Tasman District has experienced continuing pressure for subdivision and development, particularly residential development, in rural areas including land with high productive values. This is a powerful force for change in rural areas. The main areas of change occurring are:

- Changes to the opportunities for soil based productive activity. In some rural areas which have become relatively urbanised, there is fragmentation of productive land; a decline in the extent of land available for soil-based production; and cross boundary effect issues from diverse and competing uses.
- Changes to rural character and landscape qualities, particularly in coastal locations and locations within commuting distance (about 20 kms) from urban centres, through buildings, land disturbance, vegetation removal and new plantings.
- Changes in the number and diversity of non-soil based business activities occurring in rural areas.
- Changes in the demographic profile of rural areas with increasing numbers of rural "lifestylers" reliant upon income sourced from urban employment.
- Implications for servicing through increasing demand for water and road upgrading, and increasing wastewater contamination risk, all leading to the need for higher standards of basic services.

In addition to these changes, there are ongoing changes in the nature of productive activity, such as shifts toward more intensive production and more land in dairying and horticultural activities, some of which may be seasonal and others more permanent.

2.4 Project Background

2.4.1 Rural Futures Community Engagement Process

During 2003 - 2005, in response to these changes, Council:

1. Conducted a preliminary assessment of the effectiveness of the Council's regulatory framework for managing the rural land resource (TRPS and TRMP). The assessment concluded that the TRMP may not be achieving its policy objectives efficiently, effectively, or at all.

The information is contained in the Rural Futures Discussion Paper which informed the public consultation process that followed. It is available from staff on request.

2. Embarked on a Rural Futures Community Engagement process to obtain information about:
 - The values and attitudes held by the rural community in relation to the rural Environment & rural land use activities; and
 - The outcomes the community seeks for the long term future of the District's rural environment, economy and people.

In the light of the feedback, the staff report to Council on the consultation process (EP06/03/04) recommended a 17 step approach to the review of the rural policy and plan framework to commence after the TRMP became operative. A copy of the report is available from staff on request.

2.4.2 Council Decisions on the Process

In response to the report on the feedback, Council directed a review of the TRMP rural policy issues in the following order of priority:

- Review the zoning regime and /or refine the rules relating to Rural 1 and 2 zones. This should include a review of the criteria for the assessment of productive land.
- Review the rules relating to rural residential opportunities with a focus on opportunities for second dwellings and /or workers accommodation not leading to further subdivision.
- Review the provisions for rural business opportunities.

Notably, a review of rural amenity and landscape values, specifically, was excluded.

The key themes from the community feedback together with the Council decisions on the process are set out in the "Update on the Rural Futures Community Engagement Process," attached as Appendix 1. The update was distributed to stakeholders and the interested public during 2006.

Notwithstanding the Council decision, early in 2009, due to urban planning priorities, the project was removed from the priority 1 list of policy projects and project work has not substantially commenced.

There are continuing and competing pressures on the rural land resource including on highly productive land. This is particularly evident in locations suitable for urban commuting, such as the Waimea Plains and in areas of high landscape quality such as the coasts, lakesides and land with views. Accordingly, it is recommended that the project be re-scoped and the next phase of project work commence.

3. Present Situation/Matters to be Considered

3.1 Scope of the Review

Careful scoping of the review is essential due to the very wide spectrum of interrelated issues arising from the patterns of rural subdivision and land use.

The recently established staff project team, which includes members from consents (subdivision and land use) and compliance, have re-considered the key issues and topics for review. The preliminary summary of Significant Issues for Review is attached as Appendix 2.

Table 1 below summaries the topics considered most important by: (i) the 2004 Rural Futures community engagement process; (ii) the 2006 Council decision on the process and (iii) the 2011 project team’s initial scoping.

Table 1: Summary of Topics by Project Stakeholders

	Priority Topics	2005 Rural Futures Consultation Feedback	2006 Council Decisions on Rural Futures	2011 Policy Review Project Team
1.	Protecting and Providing for Productive Opportunity	√	√	√
2.	Providing for Rural Living opportunity	√	√	√
3.	Providing for Rural Business opportunity	√	√	√
4.	Developing a land use monitoring system to provide an information base for the above and subsequent reviews	√		√
5.	TRMP rural zone provisions: review and reorganisation			√
6.	Protecting or Enhancing Rural Character, Amenity and Landscapes (sensitive and special natural and cultural environments and features, margins of water bodies)	√	X	X

The project team supports the Council decision that this review should limit its focus to rural subdivision and land use and recommends the project name reflects this focus.

The project team’s preliminary scoping of Significant Issues for Review, attached as Appendix 2, includes the issues specifically mentioned in the Council 2006 Council decision of the Rural Futures process.

Protecting and enhancing rural landscape, character and the amenity of rural areas is a significant topic on its own and should be excluded from this review other than so far as is consequentially necessary. Possibly, the topic could be the focus of a separate review following the completion of the Golden Bay Landscape Project.

This approach is similar to that adopted by several other councils. Due to the broad spectrum of issues that affect rural areas, councils tend to separate work streams addressing land use and subdivision from those addressing landscape.

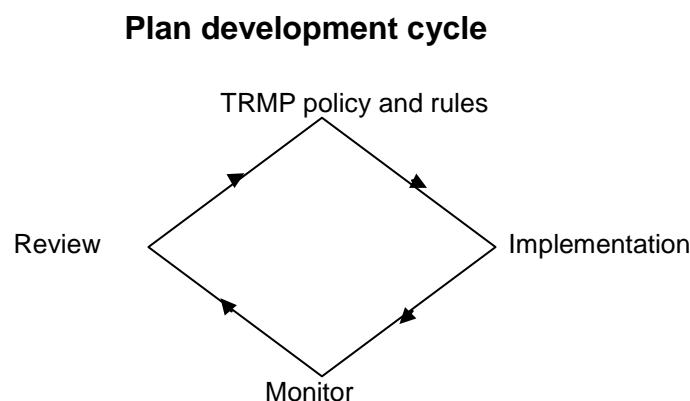
In line with the project focus, it is recommended that the project is renamed the Policy Review: Rural Subdivision and Land Use and that it include the topics 1, 2, 3, 4 and 5 above.

3.2 Land Use Monitoring System (LUMS)

Council undertakes project based investigation and assessment of rural subdivision and land use patterns from time to time, such as the preliminary assessments for the Rural Futures project. However, currently, the “feedback” loop between the development and implementation of the TRMP rural land use management framework that should inform this review is not in place. A land use monitoring system needs to be set up, populated with appropriate data sets and assessed to inform this and further reviews.

Although the Council has been collecting much of the information required for this review in various forms for the past 10 to 15 years, much of the data is not in readily accessible or usable form. Once the land use monitoring system is developed and populated with appropriate data sets, it is anticipated that sufficient information will be available to support this and further reviews.

Developing the land use monitoring step of the TRMP plan development cycle before embarking on “major changes” or significantly new policy approaches may assist Council to develop a more effective management framework, more efficiently.



Due to the national context described in section 2 above, the project team anticipates obtaining assistance for the development of such system from national research under way by institutions such as Landcare.

3.3 Identified TRMP technical difficulties and inconsistencies

Notwithstanding the need for a Council Land Use Monitoring System, the consultation feedback coupled with the lessons of operational experience over the past 15 years show that the existing TRMP management framework can be significantly improved to achieve existing policy objectives more effectively and efficiently by fixing up a host of identified technical difficulties and inconsistencies that do require investigation and assessment but do not need to await the results of further or on-going monitoring.

The result of these difficulties and 'inconsistencies' is that overall the TRMP policy and rule framework lacks coherence and over time some key policy objectives such as objective 7.1.2, ("Avoid the loss of potential for all land of existing and potential productive value to meet the needs of future generations, particularly land of high productive value") and outcomes are being compromised. These improvements include:

1. Technical "fix ups", such as a Rural 1 and 2 zone boundary update to include new soil classification information.
2. Ensuring coherence between policy and rules. This includes: (i) for subdivision, the re-instatement of "non-complying" activity status below and "discretionary" above the 12 ha threshold activity rule for Rural 1; and (ii) the inclusion of a policy framework for the rural - residential zone rules; and (iii) aligning the activity status of habitable buildings and subdivision in rural zones.
3. Reorganising the content of the regulatory framework. The zone rules (specifically Rural 1 and 2) are repetitive. The zone framework could be simplified by reducing text without substantively changing zone content. This would accentuate the differences and similarities in the management of rural land as well as reducing bulk and improving the readability of the TRMP.

It is worth noting that technical difficulties and inconsistencies represent the bulk of the items listed on the project teams recently developed list of Significant Issues for Review (Appendix 2).

4. Financial/Budgetary Considerations

- 4.1 At this stage, the budgetary implication is the staff time required to undertake the project. This is included in the time budgets for the current financial year and 2012/13 as Year 1 under the draft 2012 - 2022 LTP.

5. Process Options

5.1 Proceed with a re-scoped rural policy review with a focus on rural subdivision and land use.

5.2 Status Quo - Do nothing

6. Pros and Cons of Options

6.1 Benefits and Opportunities

Option 5.1, that is, proceeding with a re-scoped review with a focus on rural subdivision and land use, enables Council to:

- Develop a land use monitoring system that will provide information about rural land use for this and other reviews by monitoring land use and tracking changes over time.
- Comply with its statutory obligations to monitor, report on and review the effectiveness the TRPS and TRMP management framework for rural areas.
- From an appropriate information base, develop a more effective management framework for rural land use, more efficiently.
- Follow through on the feedback received from the extensive Rural Futures Community Engagement process.

Option 5.2, that is, doing nothing, enables staff time to be allocated to other priorities.

6.2 Costs and Risks

For Option 5.1, that is, proceeding with a re-scoped review with a focus on rural subdivision and land use, the primary cost is staff time.

For Option 5.2, that is, doing nothing, the primary risks are the continuing:

- Lack of information about rural land use which will continue to hamper the development of appropriate management responses to the issues.
- Fragmentation and urbanisation of rural land particularly in locations suitable for urban commuting and in areas of high landscape quality such as the coasts, lakesides and land with views.
- Compromise of TRMP policy objectives relating to the rural land resource.

7. Evaluation of Options

7.1 Overall, the benefits and costs of option 5.1 outweigh those of option 5.2. It is recommended that Council proceed with a re-scoped rural policy review with a focus on rural subdivision and land use.

8. Significance

8.1 This is not a significant decision according to the Council's Significance Policy at this stage. Project outcomes are likely to have an impact on rural land use in the District's rural areas in the future.

9. Recommendations

9.1 It is recommended that the Committee:

1. Receives this report; and
2. Approves the scope of the review and the commencement of the work programme.

10. Timeline/Next Steps

10.1 Process Steps

Table 2 refers.

Table 2

Process Steps		Time frame											
		2011	2012 Quarters				2013 Quarters				2014	On-going	
1.	Investigation and assessment of: 1.1 Land use issues and trends 1.2 TRMP technical difficulties and inconsistencies	x	x	x									
2.	Design, development, population & assessment of land use monitoring data base		x	x	x	x							
3.	3.1 Development of issues and options report with preferred options identified				x	x	x	x					
	3.2 Possible consultation with stakeholders and public on key options								x	x			
4.	Development of rural subdivision and land use draft plan change/s											x	
5.	Consultation with stakeholders and public on draft plan change/s											x	
6.	Regular monitoring, assessment and reporting on land use trends and plan effectiveness that may lead to further plan changes												x

11. Draft Resolution

THAT the Environment & Planning Committee receives the Policy Review: Rural Subdivision and Land Use Report REP11-10-01 and; approves the scope of the review and commencement of the work programme.

Mary Honey
Policy Planner

Appendices:

- Appendix 1: Update on the Rural Futures Community Engagement Process
- Appendix 2: Rural Subdivision and Land Use: Project Team Preliminary Scoping of Significant Issues for Review

Update on the Rural Futures Community Engagement Process

Background

During the latter part of 2004 and much of 2005, Council carried out the Rural Futures Community Engagement process for the purpose of obtaining up-to-date information from the community on:

- the values and attitudes held by the rural community in relation to the rural environment and rural land use activities;
- the outcomes the community seeks for the long term future for each part of the District's rural environment, its economy and its communities of people.

Community Feedback

Community responses to the engagement process were received from three sources:

- Four public workshops and seven focus groups held during the period November 2004 to February 2005.
- 543 responses to the Rural Development Summary Flyer Questionnaire.
- 37 written submissions to the Discussion Paper.

The different sources of feedback complement one another and together help build a comprehensive picture of community views.

Key Themes

The key themes from the community feedback are:

1. Rural Policy Planning Framework

- Reduce the uncertainty and speculation caused by inconsistent decision-making and enforcement, particularly regarding land use and subdivision.
- Improve, consistently implement and enforce a rural policy planning framework that manages the pressure for development in rural areas in a sustainable way. The framework must:
 - include a long term strategic vision and direction that is linked with an overall settlement strategy for the District;
 - take account of international and national trends in rural intensification;
 - make fuller use of the available planning tools to achieve TRMP objectives such as increasing control over or prohibiting the subdivision of land with special productive or environmental values;
 - take account of cumulative and cross boundary effects.

2. Providing for Productive Opportunities

- Stop the fragmentation of land and the erosion of the productive capacity of land through subdivision and its cumulative effects.
- Productive land should not be the primary resource or method for relieving population pressure and managing the demand for housing and lifestyle living.

1

- Protect the productive capacity of productive land now and for future generations. A minority of responses, including one written submission, limits this to protecting the right to farm rather than the identification and protection of productive land.
- Review the framework for the management of scarce resources, particularly water.

3. Providing for Rural Residential Opportunities

- Discourage dispersed housing scattered over rural areas. It is unsustainable from environmental, economic and social perspectives.
- Consolidate and densify towns and existing urban settlements.
- Provide rural residential housing in clusters or villages with on-site or community-based services rather than reticulated services.
- Provide for worker and family accommodation in ways that do not enable subdivision opportunities.

4. Providing for Rural Business Opportunities

- Refine and enforce the existing policy planning framework.

5. Protecting and Enhancing Rural Character, Amenity and Landscape Values

- The productive rural landscape is intrinsic to rural character and part of what makes our district special.
- Identify, define and protect our rural character and special natural areas for social, cultural, economic and environmental reasons.
- Develop the TRMP rules relating to the protection and enhancement of areas that have rural character, landscape or amenity value, especially, but not only, the coastal environment.

Council Decisions

During January 2006, Council considered the community feedback and management issues raised by the Rural Futures engagement process.

On 8 March 2006, the Resource Management Policy Committee of Council directed a review of the TRMP rural policy issues in the following order of priority:

- Review the zoning regime and/or refine the rules relating to Rural 1 and 2 zones. This should include a review of the criteria for the assessment of productive land.
- Review the rules relating to rural-residential opportunities with a focus on opportunities for second dwellings and/or workers' accommodation not leading to further subdivision.
- Review the provisions for rural business opportunities.

The review will commence after the TRMP rural land use provisions and maps attain operative status.

More Information

Copies of the full report to Council on the Rural Futures Programme which describes the issues informed by community feedback are available from Mary Honey, phone: 03 5438397, email: mary.honey@tdc.govt.nz.

**Rural Subdivision and Land Use:
2011 Project Team Preliminary Scoping of Significant Issues for Review**

1. Protecting and Providing for Productive Opportunity	
Zone Boundaries	<ul style="list-style-type: none"> Rural 1 and 2 zone boundaries need reviewing based on updated soil classifications.
Lot size	<ul style="list-style-type: none"> Other than for the controlled subdivision threshold (12 ha and 50 ha) the rule framework doesn't differentiate between large and small size lots and many principles /rules are not appropriate to all lot sizes. For e.g. Rural 1 800 sqm vs 20 ha lots. Rationale for Rural 1, 2 and 3 threshold lot sizes needs review.
Lot Location	<ul style="list-style-type: none"> Account for the distinction between rural locations (i) shallow or front of house rural; (ii) deep or remote and / or unfragmented rural. Identify possible locations for subdivision and development of activities that are not soil based production activities more precisely.
Policy and Rule coherence	<ul style="list-style-type: none"> Rural 1 subdivision should be "non-complying" below and "discretionary" above the 12 ha threshold. Policies for land with lesser productive values (Rural 2 zone) are needed. Boundary Adjustments represent about 40% of subdivisions. Some definition / standards are required which enable refusal in inappropriate cases, or subsequent further subdivision should be discouraged through a non-complying activity status. Definitions: <ul style="list-style-type: none"> "High productive value" definition is problematic because if one feature is lacking, it fails. The definition could be rephrased to include "one or more of the following features". "Rural character" definition should not refer to "productive" activities. Permitted location of frost protection devices requires more careful definition.
Discretionary Assessment Criteria and Weightings	<ul style="list-style-type: none"> Assessment criteria for productive land need review. There are too many assessment criteria and one off sets another with no particular weighting or priority for very different circumstances.

	<ul style="list-style-type: none"> • For land with “productive or potentially productive areas” a few key assessment criteria relevant to that issue must be selected, as rarely is there a parcel of “productive land.” There are “productive areas” within a parcel. • The Rural 3 rules are not strong enough and the weighting of rural character, amenity and productivity to 100% is compromising productive and potentially productive land.
<p>Managing Dwellings, Second and Further Dwellings and Habitable Buildings in Rural 1 and 2 zones</p>	<ul style="list-style-type: none"> • Align the activity status of dwellings with that of subdivision in rural zones. • Introduce rules that ensure that second dwellings and workers accommodation do not lead to subdivision i.e. if there are two dwellings, subdivision status trips to non-complying. • Consider restricting second dwellings in Rural 1 and 2 zones as these are not residential zones and their use /potential rationale for subdivision cannot be managed effectively?? • Clarify whether an adjoining housekeeping unit is a first or second dwelling. • Limit the bulk and size of dwellings and curtilage in Rural 1 and 2 zones (i) to encourage dwellers with “land-based production intentions”; and (ii) for visual amenity purposes (per Rural 3). • Define /Identify ridgelines more carefully. • Reliance on covenants to prevent subdivision does not always work. In the past covenants were not required and covenant compliance is not monitored. • The amenity argument fails as dwellings and greenhouses are exempt from site coverage rules - review required. • There is no limit on the number of sleepouts provided they meet permitted standards (less than 36 sqm in size and closer than 20 m to the primary dwelling - review required.
<p>Workers Accommodation</p>	<ul style="list-style-type: none"> • The definition needs review as: <ul style="list-style-type: none"> - it enables the renting of the accommodation to any person who happens to work, not necessarily on the site or engaged in soil based production work - needs to cater for farm managers.
<p>Temporary and Replacement dwellings</p>	<ul style="list-style-type: none"> • There is no distinction between temporary (up to 3 months) and replacement dwellings and replacement dwelling monitoring / follow up is inadequate. • A definition of a “decommissioned” dwelling is required. Is removal of a kitchen facility enough or must a dwelling be dismantled / removed completely?

2. Providing for Rural Living Opportunity: Zones, Dwellings, Accommodations, Buildings	
Rural Residential Development	<ul style="list-style-type: none"> • Acknowledge historical ribbon residential development and character in rural zones possibly with a rural / residential closed zoning. • Generally the network service infrastructure is expensive to construct and results in an inefficient usage of services. • Generally, to maintain a rural residential environment, lot sizes of about 2 ha should be maintained. In some locations (Haycock Road, Teapot and Pigeon Valleys) lots sizes are 5,000 sqm and un-serviced. • Current information indicates that the existing Rural Residential zones are taken up. Policy choices: (i) No more; (ii) Enable re-subdivision; (iii) Create further spot zones (iv) Create low density residential zones on the urban peripheries.
3. Providing for Rural Business opportunity: Accommodations, Other	
Home Occupations in Rural Areas	<ul style="list-style-type: none"> • More directive policy is required on location and activity type. • The current rule thresholds are pushed to the limit. The rules require amendment to: <ul style="list-style-type: none"> - Define the limit of the gross space (indoor and outdoor) used for home occupation purposes not just the indoor floor area - Include boundary setbacks for outdoor activity - Include a motor vehicle movement per day standard (Drummond /3 Brothers corner truck park) with a possible exclusion if related to land based productive activity.
Other business uses	<ul style="list-style-type: none"> • A definition of a working quarry is needed.
Public greenspace in rural areas	<ul style="list-style-type: none"> • There needs to be some method of enabling park /reserve development other than through subdivision as Council “trades off” rural subdivision principles for the acquisition of green space.
Developing a land use monitoring system to provide an information base for this and subsequent reviews	
Data Collection Issues	<ul style="list-style-type: none"> • Currently, it is hard to collect with any precision as there is too much free text in the NCS system. Drop down boxes with a predetermined text area are need to achieve consistency within the system. • It is difficult to track what gives rise to subdivision and the effects of subdivision on land uses over time (e.g. second dwelling and boundary adjustment consents followed by further subdivision applications based on subdivided parcels and the accompanying changes in land use).

TRMP General and Format	
TRMP rural zone provisions: review and reorganisation	<ul style="list-style-type: none"> • The zone rules are repetitive other than for threshold size. The framework could be simplified by reducing the number of zones without substantively changing content. This would accentuate differences and similarities in the management of rural land; reduce word bulk and increase readability. • Setback rules relating to shelterbelts, dwellings and building from zone and lot boundaries are inconsistent and need a tidy up. • Shelterbelts require definition.
Natural Hazards and Sensitive Environments	<ul style="list-style-type: none"> • Generally, subdivision of rural land in hazardous and sensitive environments (coastal) requires higher levels of management, i.e. discretionary or non-complying activity status. • A matter reference to natural hazards is required for subdivision and building development.
Activities that are not soil based production activities in rural zones	<ul style="list-style-type: none"> • Identify possible locations for activities that are not soil based productive activities (rural living, home occupations and non-soil based business) in Rural 1 and 2 zones to avoid their general proliferation throughout these zones.