

BEFORE THE PALMERSTON NORTH CITY COUNCIL

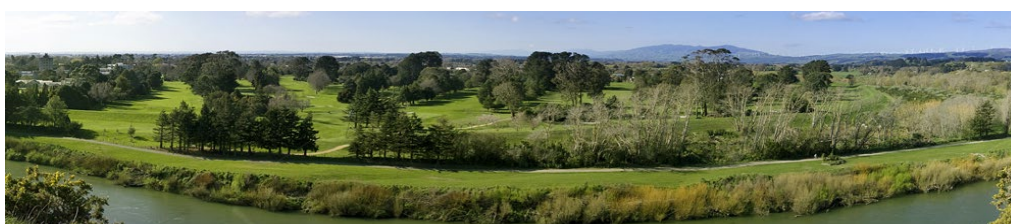
In The Matter Of

Resource Management Act
1991 and a Plan Change under
Schedule 1

And In The Matter Of

Plan Change 23 to the
Palmerston North District Plan

STATEMENT OF EVIDENCE OF HAMISH WESNEY, RMA PLANNER



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1. My full name is **Hamish Philip Joseph Wesney**. I present this evidence as an expert in resource management planning. I am an Associate Partner/Senior Planner at Boffa Miskell Limited. I have a Bachelor of Resource and Environmental Planning with 1st class honours from Massey University. I am a full member of the New Zealand Planning Institute.

2. I have 17 years' experience as a planner working for both a local authority and a consultancy. For the first four years I was employed as a planner with the Horowhenua District Council, undertaking a variety of planning tasks, including processing numerous land use and subdivision resource consent applications and alterations and outline plans for designations. For the past 13 years, I have been a consulting planner based in Wellington, and have been involved in advising a wide range of clients, including local authorities, corporate entities, central government and individuals on various projects. In particular, I have been involved in reviewing and preparing a number of district plans and plan changes. These plans include the Wairarapa Combined District Plan, Horowhenua District Plan, Hutt City District Plan, Manawatu District Plan, South Taranaki District Plan and New Plymouth District Plan. A common issue I have been involved with in these plans is addressing reverse sensitivity which can arise from a wide range of land uses. For example, residential/lifestyle development near airports, major infrastructure, industrial sites and community facilities.

3. I am an occasional recreational golfer, therefore I am aware and understand the features and play at golf courses and the potential hazards, such as wayward or misdirected golf balls.

4. I have read the Code of Conduct for Expert Witnesses issued as part of the Environment Court Practice Note. I agree to comply with the Code of Conduct. I am satisfied that matters addressed in this Statement of Evidence are within my expertise. I am not aware of any material facts that have been omitted or might alter or detract from the opinions expressed in this Statement of Evidence.

5. The key documents that I have referred to in preparing my evidence include:
- (a) Proposed Plan Change 23 (and the accompanying section 32 report and appendices);
 - (b) The Operative Palmerston North District Plan; and
 - (c) The Horizons One Plan, incorporating Regional Policy Statement (“RPS”).

SCOPE OF EVIDENCE

6. I have been engaged by the Manawatu Golf Club (“MGC”) to prepare and present planning evidence on Proposed District Plan Change 23 (“PC 23”). I understand that the MGC’s submission on PC 23 relates to the relationship between the former Hokowhitu campus site, being the subject of PC 23 and the Manawatu Golf Course.
7. This evidence addresses matters raised in the submission of the MGC. The specific amendments to PC 23 that I am suggesting, based on the evidence I provided below, are tracked in Appendix 1. Any references to the numbering of provisions in this evidence relates to the numbering as per the notified version of the Proposed Plan, although I do footnote any changes recommended in the section 42A report.
8. The scope of my evidence addresses:
- (a) Context of the former Hokowhitu campus and Manawatu Golf Course, including planning context.
 - (b) Operational characteristics and constraints of the Golf Course.
 - (c) Reverse sensitivity effects between the Golf Course and institutional activities and residential development and activities.

- (d) Management of reverse sensitivity effects.
9. I have relied on advice from Mr Collett, MGC's General Manager in relation to the operational activities at the golf course, and advice from Mr Cushnahan on golf course design and safety aspects. This advice has assisted in assessing the benefits and costs of the Proposed Plan Change and alternative methods, including plan provisions.

Context of the former Hokowhitu campus and Manawatu Golf Course

10. The MGC submission on PC 23 sought that the plan change is either withdrawn or amended to ensure that measures are put in place to mitigate any potential reverse sensitivity effects on the MGC that may arise from the rezoning and subsequent subdivision and development of the site for residential use.
11. The proposed new objective (10) in PC 23 seeks to ensure that subdivision and development in the Hokowhitu Lagoon Residential Area "is sensitively designed to enable a safe and appropriate interface with the adjoining Manawatu Golf Club". This objective in part recognises the relationship issues between the former Hokowhitu campus site and the Manawatu Golf Course in the context of health and safety. However, it fails to directly address reverse sensitivity in that it is silent on amenity expectations and compatibility, which in my experience are the two main elements of reverse sensitivity. I also observe at this point that there are no specific policies or methods in the notified version of PC 23 to achieve this outcome.
12. Before evaluating the policies and methods for managing these issues, the context needs to be established. In his legal submissions, Mr Maassen has provided an overview of the District Plan context for this matter. The City View Objectives in the District Plan provide the "broad outcomes" sought to be achieved for the City. Section 2.2 of the Section 32 report for PC 23 notes the relevant City View Objectives. These objectives relate to such matters as planning for growth, subdivisions and buildings are designed and constructed to promote a coordinated, healthy and safe environment, and principles of

good urban design are given effect to. In addition to the City View Objectives listed in the Section 32 report, I also consider City View Objectives 13, 21 and 26 are relevant to this matter. These three additional objectives are:

13. Investment within the City is stimulated and identified priority sectors such as research, education, public administration, retail, logistics, construction, manufacturing and agriculture are well supported.

21. A broad range of recreation and leisure opportunities are provided for in the City which contribute towards an enhanced quality of life.

26. Actively provided for a wide range of education, research opportunities, and supporting services in the City.

13. Objectives 13 and 26 are relevant in terms of supporting and providing for institutional activities, and Objective 21 is relevant in providing for the recreation and leisure opportunities at the MGC.

14. The Section 32 report also refers to the existing objectives for the Residential Zone¹ and the Institutional Zone² which I concur are relevant considerations. I also consider the proposed new objectives for the Residential Zone are relevant context. One further part of the District Plan I consider relevant is the Recreation Zone, which is the zoning that applies to the MGC. I consider two Recreation Zone objectives are relevant to this matter as follows:

Objective 1: To enable the effective and efficient use and development of the open space resource within the Recreation Zone.

Objective 2: To protect the amenity values of adjacent residential areas and within the Recreation Zone.

15. It is also necessary to consider the higher level planning documents, including the Regional Policy Statement (Horizons One Plan) and the National Policy Statement on Urban Development Capacity. The One Plan only contains policy

¹ Paragraph 2.5

² Paragraph 2.3

direction on reverse sensitivity for infrastructure with no specific direction or recognition for reverse sensitivity issues in other situations. In addition, the National Policy Statement is focused on urban capacity and does not include direction on reverse sensitivity. I concur with the reporting officer that the rezoning would contribute to the housing capacity in the city and that this matter is the only aspect of the NPS relevant to this plan change.

16. Turning to the site context, these are well outlined in the Urban Design Report accompanying PC 23. The Urban Design Report recognises the presence of the golf course, noting there are expansive views over the golf course at the north-east corner of the former Hokowhitu campus, as well as trees along the eastern boundary with the golf course which screen views. In Figure 6 of the Urban Design Report it illustrates the majority of the edge of the Hokowhitu campus and MGC as “closed edge condition”, meaning it is screened by existing vegetation.
17. In addition to the context described in the Urban Design Report, I observe that a large area of the former Hokowhitu campus near the MGC is unoccupied, and is either access road (Kanuka Drive), car parking, playing fields or landscaped grounds. The existing institutional buildings on the Hokowhitu campus are either setback some distance or do not face the golf course. This context, use and development may explain why there have been minimal incompatibility issues to date between the institutional use and golf course.

Operational characteristics and constraints of the Golf Course

18. Mr Cushnahan has explained the design and operational characteristics and constraints in golf course design. He explains that golf courses are generally located where there is a surplus of land and large separation distances with non-golf uses. He also explains that for commercial viability purposes, residential use can be combined with golf courses, and in these cases, both uses are designed together from the start. He highlights the interface with adjoining uses as a major component in the design and management of a course, particularly for safety and amenity purposes, both on and off course.

19. In the case of the MGC, Mr Cushnahan highlights the existing golf course is constrained by its existing boundaries, with residential (existing or proposed) and open space adjoining the golf course. He states that the MGC has limited opportunities to meet safety and amenity requirements on and off course, while maintaining the length, difficulty and quality of holes.
20. Mr Cushnahan highlights the particular safety issue associated with stray golf balls and identifies the risk of balls travelling beyond the boundary of the golf course. In relation to future development on the land subject to PC 23, holes 11, 12, 14 and 15 are identified as posing a risk to people and property on the adjoining land from stray golf balls. Mr Cushnahan states that these risks could be reduced by the golf course through re-designing the holes, such as moving tee locations. However, Mr Cushnahan also states that these design changes would be at some cost, both the direct costs of earthworks, turf and planting and degradation to the quality of the golf course to play which could lead to the lower difficulty and ranking of the course.
21. The other key characteristic of golf courses like the MGC is the vegetation which creates a park like setting. This vegetation is an integral part of the design of the golf, both from a game perspective in posing an obstacle and from an aesthetic perspective in providing amenity. In terms of reverse sensitivity issues, it is the aesthetic perspective that is the main consideration as vegetation blocks views and provides a sense of enclosure and escapism, as well as a barrier for impeding stray golf balls. Both Mr Cushnahan and Mr Collett highlight the importance of planting around the golf course boundaries to provide a visual buffer as well as to minimise stray golf balls crossing the boundary.
22. A further operational characteristic of the golf course is mowing. Mowing is a frequent and essential activity in maintaining the golf course. I understand greens, fairways and tees are mown daily, with the occasional less frequent mowing during the winter months. Areas of rough are mown between 1-2 times a week during spring, summer and autumn, and approximately once a

week during winter. The time period of mowing in any one location is for a relatively short period of time. However, the greatest potential for reverse sensitivity to arise is the time of day when mowing occurs. As is customary in most golf courses, mowing is undertaken in the early morning before play commences. This timing avoids interruptions to golf players and the safety issue of golf balls hitting greenkeepers and/or golf balls entering mowers and hitting golf players. In addition, early morning mowing is preferred as it ensures the grass is in the best condition for play that day. At the MGC, it is common practice for mowing to commence at 7.00am. During tournaments, early morning mowing is essential to prepare the course for the day's play.

23. Noise is the primary effect associated with mowing and maintenance activities that may trigger reverse sensitivity effects with future residential development on the former Hokowhitu campus.

Reverse sensitivity effects between the Golf Course and institutional and residential activities

24. There are three potential effects arising from the existing operation of the golf course which may have adverse effects on the new future residential development on the former Hokowhitu campus. These potential effects are:
 - a. Safety to people and property and loss of amenity from stray golf balls
 - b. Visual and shading effects from existing vegetation on the golf course
 - c. Noise from mowing and other maintenance activities.
25. If new residents are sensitive to these effects, there is potential for complaints to arise which in turn may restrict the operation of the golf course or diminish the quality and amenity of the golf course to mitigate these effects. This outcome would not achieve the objective for the Recreation Zone which is 'to enable the effective and efficient use and development of the open space resource within the Recreation Zone'.

26. While these effects could also adversely affect institutional activities, institutional activities are not as sensitive to these effects due to the shorter duration of occupancy, the largely internal nature of the activity during normal office hours, and the generally lower amenity expectations. Therefore, comparing residential and institutional activities, the potential for reverse sensitivity issues to arise with institutional activities is significantly lower.

Management of reverse sensitivity effects

27. Given these reverse sensitivity effects, I consider the first step is that the District Plan should clearly state the amenity expectations and outcomes for the golf course and former Hokowhitu campus interface. These expectations and outcomes should be captured in the objectives and policies for the applicable zones. These expectations and outcomes need to be expressed in terms of the characteristics or attributes of the interface, as well as people's perceptions and tolerances of potential changes and conflicts which may arise. For example, the characteristics or attributes may be the same, although people's perceptions and tolerances may differ depending on whether the adjoining use is institutional or residential.
28. As highlighted by Mr Maassen and by the reporting officer, PC 23 as notified and recommended in response to submissions contemplates and provides for both institutional and residential use. Given this range of uses, the policy framework should recognise both situations.
29. In Appendix 1 to this evidence is my suggested wording of the objectives and policies for Subdivision and Residential Zone chapters which are the subject of PC 23. The key features of my suggested wording are:
- a. Understanding and recognition of the key physical, social and economic resources and amenity of the golf course and former Hokowhitu campus interface, and of the people who regularly play, live or visit there and their social values
 - b. Dialogue between parties with interests in the interface to understand their perspectives

- c. Ongoing monitoring of change at the interface and amenity outcomes and perceptions
 - d. Integrating reverse sensitivity management measures for the interface.

- 30. Based on the evidence of the MGC representatives, Mr Cushnahan and Mr Collett, as well as the Urban Design Report commissioned by PNCC, the specific characteristics or attributes of the interface and people's perceptions that need to be recognised in the policy framework are:
 - a. Minimise risk to the safety of people and property from stray golf balls by ensuring buildings and structures are appropriately located, designed and constructed.
 - b. Maintain and enhance a dense barrier of vegetation along the majority of the interface to preserve the park-like character of the Manawatu Golf Course, provide a sense of enclosure on the course and prevent overlooking by residential development over the golf course, and act as an obstruction to minimise stray golf balls travelling over the boundary.
 - c. Recognition and acceptance of the presence of the golf course and the expectation of regular noise and maintenance works by surrounding activities.

- 31. By clearly setting out these characteristics and perceptions would provide certainty to current and future owners and occupiers of the golf course and adjoining activities.

- 32. To manage reverse sensitivity effects and achieve the above outcomes, there are generally three broad strategies:
 - a. Plan provisions to manage effects generated by golf course
 - b. Plan provisions to manage sensitive uses adjoining the golf course
 - c. Methods outside of the District Plan

33. Attached in Appendix 2 to this evidence is a summary table with a benefits and costs evaluation of methods identified potentially appropriate to manage the reverse sensitivity effects.
34. The Recreation Zone already contains provisions which manage the effects generated by the golf course, particularly adjacent residential areas. These provisions include performance standards on lighting, hours of operation, height, size and siting of buildings, outdoor storage and noise. I note the Recreation Zone was recently reviewed as part of the Sectional District Plan Review which culminated in Proposed Plan Change 21 (PC 21). The review of the Recreation Zone concluded no changes were required to the interface provisions and they were considered to be working effectively.
35. The only reference to reverse sensitivity effects in PC 21 is associated with rezoning land at Awapuni Racecourse from Recreation/Racecourse Zone to Residential Zone. As part of this rezoning, the rules for the rezoned land include assessment of reverse sensitivity effects on the Racecourse from new residential subdivision and development. Based on the findings of this review and PC 21, I consider no changes are warranted to the Plan provisions to manage effects generated by the golf course apart from the amended noise rule recommended by Council officers.
36. The Palmerston North District Plan uses a range of Plan methods for managing sensitive uses near other activities to avoid or minimise reverse sensitivity effects. Examples include:
 - a. Structure Plans or Comprehensive Development Plans managing the location, scale and intensity of new sensitive activities to provide separation between incompatible activities, such as the Whakarongo Structure Plan.
 - b. Acoustic buffer areas or noise insulation requirements, such as around the airport, near State Highways and railway lines.
 - c. Separation distances or setbacks from zone boundaries, such as in the Airport Zone from the Recreation Zone.

- d. Resource consent required or restriction on new sensitive activities establishing close to other activities, such as residential subdivision and development in the Racecourse Residential area, and residential uses in the Industrial Zone.
 - e. Landscaping and planting to mitigate visual effects at zone interfaces, such as for the Industrial Zone with the Recreation Zone.
37. I consider each of these methods has merit for the Hokowhitu Lagoon Residential Area as they target the different potential reverse sensitivity effects identified above. Establishing and identifying a Manawatu Golf Course Management Overlay on the Structure Plan for the Hokowhitu Lagoon Residential Area would effectively identify the interface with the golf course and spatially define the area susceptible to potential effects of safety from stray golf balls, noise from mowers, and visual effects from vegetation.
38. Based on the high risk and danger areas for stray golf balls identified by Mr Cushnahan and the area potentially exposed to higher noise levels from mowers identified by Mr Lloyd on behalf of PNCC, I consider the extent of the Manawatu Golf Course Management Overlay should generally extend 50m from the course boundary. The extent of this 50m distance covers the majority of the area between the primary local street and golf course boundary shown on the Structure Plan. For ease of administration and certainty, I consider the Manawatu Golf Course Management Overlay should apply to the entire area between the primary local street and golf course boundary as shown on the amended Structure Plan in Appendix 1 of this evidence. I consider the Structure Plan should also be amended by specifically identify the golf course boundary as shown in Appendix 1.
39. The Overlay Area provides certainty on the spatial extent of the area in which consideration of these effects would be required. This Overlay Area provides the foundation for other provisions which I have assessed below.
40. Depending on the location of new residential development within the Hokowhitu Lagoon Residential Area adjacent to the golf course, it may be

exposed to different types and magnitude of potential effects from the golf course. For example, the risk from stray golf balls is greatest near the tees for the 12th and 15th holes. In addition, noise from mowers is likely to vary in volume, duration and frequency along the boundary. Furthermore, the visual effects and outlook from new residential development towards the golf course and its vegetation would also vary along the boundary. Depending on the circumstances of each location and the nature, scale and intensity of the proposed residential development, the reverse sensitivity effects could vary significantly. Given these circumstances, I consider restricted discretionary activity status is the most appropriate for assessing new residential development and subdivision within the Manawatu Golf Course Management Overlay. This activity status would provide for a case-by-case assessment and it would specifically consider the interface and reverse sensitivity effects. It would enable the applicant to develop a site-specific response to be developed. In addition, it would provide the opportunity for engagement with the Manawatu Golf Club to inform the assessment which would provide certainty to all parties. This engagement opportunity is in the form of identifying the MGC as an affected person for resource consent applications within the Manawatu Golf Course Management Overlay. The specific wording I suggest for these rules is contained in Appendix 1 to this evidence.

41. The notified PC 23 and recommended rules for subdivision (R 7.7.2.7) and multi-unit residential development (R10.7.3.4) within the Hokowhitu Lagoon Residential Area include a non-notification clause stating resource consent applications under these rules must not be publicly or limited notified. I acknowledge the majority of the matters of discretion in this rules relate to on-site or internal design matters, therefore public notification is not warranted. However, other matters address property interface effects and linkages between adjacent areas which could have adverse effects. I do not consider it appropriate to preclude limited notified in these circumstances, and suggested the reference to limited notification should be deleted.
42. Turning to specific reverse sensitivity effects, to further mitigate the potential risks from stray golf balls to people and property, I support the

recommendation of Mr McIndoe for PNCC to require toughened safety glass in buildings adjoining the golf course. I generally support the wording of this new standard in the s42A report, apart from that it should be a standard to a restricted discretionary activity for new residential dwellings to take into account the level of danger depending on the dwellings location and orientation in relation to the golf course. This standard would apply to the Manawatu Golf Course Management Overlay as shown in the provisions in Appendix 1 to this evidence.

43. To mitigate the potential exposure to noise from mowers at the golf course, I also support the recommendation of Mr Lloyd for PNCC to require noise insulation for buildings occupied by noise sensitive activities adjoining the golf course. The recommended standard is consistent with other noise insulation rules I am familiar with and should minimise noise disturbance for occupants. In addition, as with the glazing standard above, I consider this standard should apply to the Manawatu Golf Course Management Overlay and be a restricted discretionary activity standard for the same reasons as above.
44. To maintain and enhance the vegetation along the interface between the golf course and former Hokowhitu campus, I consider a combination of methods would be effective in implementing this policy. As outlined above, requiring resource consent for all subdivision and residential development in the Manawatu Golf Course Management Overlay would provide the opportunity to assess on a case-by-case basis the vegetation on the former Hokowhitu campus and surrounding area such as the golf course. This assessment would determine the values and condition of the vegetation and whether it should be retained, removed, trimmed or supplemented with additional planting. This assessment would also consider other relevant matters, such as the role of vegetation in providing a barrier for stray golf courses and contribution to the park-like character of the golf course, and any effects of the vegetation on privacy and outlook for new residential development. I consider this method would be the most effective in achieving the objective for the vegetation.

45. Methods outside the District Plan could also be implemented to maintain and enhance vegetation within the Manawatu Golf Course Management Overlay on the former Hokowhitu campus, as well as vegetation on the golf course itself. These methods include regular maintenance of the trees, including health/condition inspections, trimming, removal and replanting. Advice on suitable trees and plant species taking into account the characteristics and role of the vegetation in this location would also be effective. Liaison and coordination between the MGC and owners/occupiers and the former Hokowhitu campus and any subsequent owners/occupiers in future decisions on vegetation would assist with better understanding the values of the trees. This combination of methods, in my opinion, would be the most effective and efficient approach to maintaining and enhancing the vegetation at this interface.
46. The above methods target the identified effects which may give rise to reverse sensitivity issues between the golf course and new residents. As I have highlighted earlier, one of the factors which contribute to reverse sensitivity issues arising relates to people's perceptions and tolerances of certain characteristics or conditions. A key influencer of these perceptions and tolerances is awareness and understanding of the local environment and effects to expect. While future occupiers of residential buildings adjacent to the golf course may value the outlook and proximity to the golf course, they may be unaware or underestimate the nature and magnitude of effects, such as noise, stray golf balls and the values of the vegetation.
47. The provision of information to new owners and occupiers of properties within the Manawatu Golf Course Management Overlay would be the most effective method to achieve this awareness. Specific methods could include covenants or consent notices registered on the Computer Registers (Certificates of Title) for each property at the time of subdivision. I consider this form of information provision is the most effective and efficient as it would be brought to the attention of all new owners at the time of purchase, which would enable them to make an informed decision. In addition, covenants/consent notices utilise

an existing system for recording property information which is efficient and cost effective.

48. Another information provision method is for the developer to prepare information packs for purchasers to inform them about the nature and quality of the subdivision, which could include information about the golf course and its effects. However, this approach would depend on the willingness of the developer and it may not be viewed or read by purchasers in the same way as a legal document such as a covenant or consent notice.

49. Lastly, PC 23 provides for the continued use and operation of institutional activities within the Hokowhitu Lagoon Residential Area. I consider this use is compatible from a reverse sensitivity perspective with the Manawatu Golf Course, and therefore no specific reverse sensitivity provisions need to apply to these activities.

Conclusion

50. Overall, I consider the above suite of provisions and methods outside the District Plan would effectively and efficiently manage the potential reverse sensitivity effects between the MGC and future sensitive activities on the former Hokowhitu campus. A combination of targeted and more general provisions would provide certainty to the Council, developer, MGC and future owners and occupiers that the reverse sensitivity effects are appropriately assessed and managed at the time of subdivision and development. I consider the suggested provisions in Appendix 1 to this evidence appropriately respond to the matters raised in the MGC submission, while also being cognisant of the wider objective of PC 23.

Dated: 30th November 2017



H Wesley

Appendix 1

Suggested Amendments to PC 23

Appendix 2

Section 32 Evaluation of Methods

Summary Section 32 Evaluation of Management Methods

Overall Framework

Approach/Options	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p><u>Manawatu Golf Course Management Overlay</u></p> <p>Identify and apply a Management Overlay along the common boundary with the Manawatu Golf Course</p> <p>Manage subdivision and development within the Overlay in an integrated manner.</p> <p>Require all subdivision and development within the Manawatu Golf Course Management Overlay require resource consent as a restricted discretionary activity, subject to compliance with standards.</p>	<p>Time, costs and uncertainty associated with the resource consent process.</p> <p>Costs for design advice for subdivisions and buildings taking into account safety risks and amenity associated with the golf course interface. Difficulties in achieving multiple and/or potentially conflicting outcomes, such as outlook, privacy, safety from stray golf balls, noise and shading.</p>	<p>High level of certainty that buildings and outdoor areas are safe to acceptable levels.</p> <p>Protects people from injury and property from damage, and achieves an acceptable level of on-site amenity.</p> <p>Flexibility in the design of subdivisions and buildings to manage the interface with the golf course.</p>	<p>Not applicable</p>
<p><u>Effectiveness and efficiency</u></p>	<p><i>Effectiveness</i></p> <p>A Management Overlay is an effective method when applying specific provisions to localised effects. The Management Overlay provides spatial certainty and clearly identifies the area subject to specific provisions. The case-by-case assessment of all subdivisions and developments through the resource consent process enables the circumstance of each proposal and site to be assessed and conditions imposed.</p>		<p><i>Efficiency</i></p> <p>The flexibility provided in the Management Overlay provisions enable land to be efficiently used. While the resource consent process has associated costs, the assessment is focused on specific effects which should minimise any inefficiency.</p>
<p><u>Overall evaluation</u></p>	<p>The provisions are reasonable, achievable, and support the objective of a safe and compatible interface with the golf course.</p>		

Vegetation Management

Approach/Options	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p>Vegetation Management – Regulatory Approach</p> <p>Rule requiring protection of vegetation along golf course interface</p>	<p>Limited flexibility for developer/property owners to trim or remove vegetation which may be hazardous or block outlook or cause significant shading.</p> <p>Economic implications for developer/property owners, such as potential loss of opportunities to maximise outlook over the golf course.</p> <p>Potential impacts on property values and development potential with tighter rules for protection.</p> <p>Costs for developer/property owners in obtaining resource consents and associated time/costs/uncertainty.</p>	<p>Valued vegetation is identified, protected and maintained for present and future generations.</p> <p>Developer/property owners adjacent to the vegetation are aware of its significance and values and the rules that would apply for their protection.</p> <p>Certainty on the vegetation which are protected.</p>	<p>Not applicable.</p>
<p>Effectiveness and efficiency</p>	<p>Effectiveness</p> <p>Rules on vegetation management can be effective in protecting the vegetation. However, they can be ineffective in considering other or broader objectives, such as enabling development. In addition, depending on the detail on the rules, they may be inflexible and unduly restrict appropriate vegetation removal or trimming. In addition, the rules only protect existing vegetation and do not recognise or provide for the renewal or enhance of vegetation.</p>	<p>Efficiency</p> <p>As the vegetation rules are known prior to development, it is efficient to incorporate the vegetation requirements into the initial design of the subdivision. The overall benefits of costs of vegetation rules are considered to outweigh the benefits.</p>	
<p>Overall evaluation</p>	<p>The majority of the trees and vegetation at the interface between the subject site and the golf course are located on the golf course property. Therefore, applying a vegetation management/protection rule to the PC 23 site would have limited effect.</p>		

Approach/Options	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p>Vegetation Management – Non-Regulatory Approach</p> <p>Non-regulatory methods such as agreements between the developer and golf club, advice and financial assistance, planting and maintenance of vegetation.</p>	<p>No regulatory control places the onus on the developer/property owner and golf club to protect vegetation. Risk that developer/property owners are not supportive of protecting the vegetation and associated loss of vegetation values.</p> <p>If non-regulatory methods are not effective, loss of park-like character on golf course. Potential injury to people and damage to property from tray golf balls with loss of vegetation.</p> <p>Additional costs for developer and golf club in removing and replanting trees and other vegetation.</p>	<p>Flexibility in finding mutually acceptable outcome between the developer/property owners and golf club in maintaining a vegetation buffer along the interface.</p> <p>Increased understanding of the roles and importance of the vegetation.</p> <p>Potentially increased economic opportunities associated with development and flexibility for landowners as they are not subject to regulatory restrictions for protection.</p>	<p>Not applicable.</p>
<p>Effectiveness and efficiency</p>	<p>Effectiveness</p> <p>Non-regulatory methods could be effective based on a positive and constructive working relationship between the developer/property owners and the golf club. Conversely, these methods would be ineffective if the relationship was not constructive.</p>	<p>Efficiency</p> <p>Non-regulatory methods can be efficient where vegetation management is part of the wider design and maintenance of the golf course and adjoining properties. However, these methods could be inefficient where the processes or level of input required (i.e. costs) exceeds the benefits.</p>	

Overall evaluation	As the majority of the trees and vegetation at the interface between the subject site and the golf course are located on the golf course property, non-regulatory methods would be more appropriate in these circumstances. Non-regulatory methods provide the flexibility to achieve the objectives of a safe and compatible interface, while also maintaining the character and use of the golf course.
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Noise Management

Approach/Options	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
Noise Management – Regulatory Approach Rule requiring noise insulation for new residential buildings	Higher construction costs to meet proposed noise insulation standards. Higher costs if mechanical ventilation required. Compliance costs with acoustic specialist required to determine and certify compliance with noise insulation standard.	Enhanced indoor acoustic amenity for occupants of new residential buildings.	Not applicable.
Effectiveness and efficiency	Effectiveness Noise insulation standards are effective in applying targeted requirements to achieve a reasonable level of noise reduction in new residential buildings. This approach would minimise the potential for reverse sensitivity effects to arise in relation to noise, and provide a suitable indoor noise environment for occupants of the new residential buildings.	Efficiency As the requirements are known prior to development, it is efficient to incorporate the noise insulation requirements into the initial design of the building. The overall benefits of noise insulation are considered to outweigh the costs.	
Overall evaluation	The provisions are reasonable, achievable, and support the objective of a safe and compatible interface with the golf course. It ensures a suitable level of indoor amenity for residential uses and protects the golf course from reverse sensitivity effects in relation to noise.		

Approach/Options	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
Noise Management – Non-Regulatory Approach Use of education and publicity to encourage developers'/property owners to voluntarily insulate their buildings or incorporate other measures to reduce noise.	Lower costs to developers'/property owners as noise insulation is voluntary. Cost to Council, developer and/or golf club to produce educational material to encourage land owners to protect themselves from higher noise levels. Costs to developers'/property owners to seek professional advice on level of noise they might be exposed to and the methods that could be used to ensure suitable indoor noise levels. Potentially high costs to golf club in seeking to reduce noise if complaints received about noise. These costs could be in the form of purchasing new (quieter) equipment. If quieter equipment did not address noise concerns, the golf club may need to restrict maintenance activities or change the golf course design, which could incur significant costs.	No monetary costs to developers'/property owners for noise insulation.	Not applicable.
Effectiveness and efficiency	Effectiveness To be effective, education and publicity methods must be targeted at the right time and be repeated. While this method may initially be effective for the first stage of development when educational material is prepared, over time, the effectiveness of this method is likely to diminish.	Efficiency The efficiency of this approach is considered to be low as education/publicity may have limited benefits and the amenity costs to people in residential buildings may be very high. The potential costs to the golf club is also considered to outweigh the benefits.	

	<p>This method would also not be effective in protecting the amenity, particularly indoor amenity of people who live near the golf course.</p> <p>The ineffectiveness of this method may subsequently adversely affect the operation of the golf course if there is no significant voluntary adoption of noise insulation in residential buildings.</p>	
<p><u>Overall evaluation</u></p>	<p>This approach could not adequately achieve the objectives of PC 23 of a safe and compatible interface because education/publicity may have limited effectiveness. It would not be effective in ensuring a compatible level of indoor amenity, and could result in noise complaints which could in turn inhibit the operation of the golf course.</p>	

Covenants and Consent Notices

Approach/Options	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p><u>Covenants and Consent Notices</u></p> <p>Impose covenants and/or consent notices on new allotments to alert property owners to effects from golf course</p>	<p>Costs to developer in preparing and registering covenants or consent notices.</p> <p>Some property owners may not fully understand or be fully made aware about the presence or contents of a covenant/consent notice at time of property purchase.</p>	<p>Registration on Certificate of Title is enduring and alerts all future property purchasers to the presence and potential effects from living next to a golf course.</p> <p>Enables allotments to be created for residential activities near the golf course, while acknowledging and accepting the effects from the golf course.</p> <p>Provides options for the developer/property owner how they use and develop land for residential purposes – e.g. standalone dwellings or multi-unit development.</p>	Not applicable.
<u>Effectiveness and efficiency</u>	<p><i>Effectiveness</i></p> <p>Effective in informing property owners (or prospective owners) about the effects that could arise living next to a golf course. Registering on all allotments adjacent to the golf course would be effective. The wording of the covenant/consent notice can be tailored to the specific circumstances of the golf course and residential development.</p>	<p><i>Efficiency</i></p> <p>Utilising the existing Computer Register (Certificate of Title system) is an efficient mechanism for alert purchasers and owners of property adjacent to the golf course.</p>	
<u>Overall evaluation</u>	Covenants and consent notices are a reasonable and effective method to achieve the objective of a safe and compatible interface with the golf course. They ensure future property owners are aware of and understand the effects and environment of living next door to a golf course, which would contribute to protecting the golf course from reverse sensitivity effects.		

Re-Design of Golf Course

Approach/Options	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p><u>Re-Design of Golf Course</u></p> <p>For example, re-positioning the location of the 15th tee, or moving the alignment of the fairway on the 12th hole to provide a wider area for planting/vegetation buffer.</p>	<p>Monetary costs to the golf club to construct new tee/fairway and planting.</p> <p>Potential reduction in the difficulty and/or length of each hole, reducing the overall ranking of the golf course. In turn, could impact on the appeal or suitability of the golf course for tournaments.</p> <p>Reduced visual appeal and attractiveness of the golf course with compromise hole designs or planted/vegetated areas.</p>	<p>Potentials reduces off-site effects of golf course activities, such as stray golf balls and noise.</p>	Not applicable.
<u>Effectiveness and efficiency</u>	<p><i>Effectiveness</i></p> <p>Partially effective in internalising the effects of the golf course. However, all effects cannot be internalised due to limited land area within this part of the golf course.</p>	<p><i>Efficiency</i></p> <p>Less efficient use of the golf course land as larger vegetation buffer which is not used for play. The costs to the golf club outweigh the benefits.</p>	
<u>Overall evaluation</u>	Due to the location and proximity of the course to the boundary and the nature of golf club activities, it is not reasonable in these circumstances to expect the golf club to be able to internalise all its effects. This method may be appropriate and have limited effectiveness in some circumstances (e.g. moving one tee location), overall, a re-design of the golf course or specific holes would not be appropriate in achieving the objective of efficient and efficient use and development of recreation land, and providing a safe and compatible interface with the Hokowhitu Lagoon Residential Area.		