

APPENDIX 2 – SECTION 32AA EVALUATION

SECTION 32AA EVALUATION

- 1.1.1 Section 32 of the Act requires the Council to carry out an evaluation of the plan change to examine the extent to which relevant objectives are the most appropriate way to achieve the purpose of the Act, and whether, having regard to their efficiency and effectiveness, the related policies, rules, or other methods are the most appropriate for achieving the objectives.
- 1.1.2 The notified proposal was accompanied by Section 32 evaluation of the notified PC5B provisions. Where I am recommending changes in response to submissions and further submissions, I have undertaken a further evaluation pursuant to section 32AA within this report commensurate with the scale and significance of the proposed change compared to the notified proposal
- 1.1.3 As required by Section 32AA of the Resource Management Act, this report evaluates further changes to District Plan amendments proposed in the notified Plan Change 4 document since the s32 evaluation was undertaken. This evaluation should be read in conjunction with Plan Change 4 document, Section 32 evaluation and Section 42A submissions report. Refer to these documents for detailed analysis of submissions and other options considered.
- 1.1.4 Changes to proposed amendments since the original section 42A and s32 evaluation are assessed in Table 1 below. In evaluating the effects of the changes in accordance with 32AA, the following questions have been considered. Do the changes recommended:
- make a significant difference to the conclusions of the s32 evaluation?
 - have significant effects on their own or in combination with the other amendments?
 - address the identified problems?
- 1.1.5 Further evaluation under s32AA shows the changes to the proposed amendments do not affect the conclusions of the s32 evaluation.
- 1.1.6 I conclude from my evaluation of the notified Section 32 report and the further evaluation undertaken pursuant to Section 32AA below that the proposed amended objective is the most appropriate way to achieve the higher order directions and consequently the purpose of the RMA. I also conclude that the proposed policy is the most appropriate for achieving the objectives of the district plan and the rules for implementing the policies.

Table 1 – Evaluation of recommended changes

Changes to PC 4 proposed amendments	
1. Objective 14.2.9 Visitor Accommodation in Residential Zones	
a.	Visitors and other persons requiring short-term lodging have a broad choice of types and locations that meet their needs where that use is compatible with: i. — this is compatible with the function and level of amenity intended for the zone; and

<ul style="list-style-type: none"> ii. <u>the use of any residential unit is still predominantly a residential activity, and the residential character of the site is retained</u> <ul style="list-style-type: none"> i. <u>residential activity being the predominant activity on sites and the residential character being maintained, with minimal disturbance to neighbours, and.</u> b. Visitor accommodation is only established in residential zones (except for the Residential Visitor Accommodation Zone and Accommodation and Community Facilities Overlay) where it is of a scale and character that is consistent with meeting objectives for: <ul style="list-style-type: none"> i. <u>a sufficient supply of housing, including affordable housing, with a choice of locations including an increase in the number of households within the Four Avenues;</u> ii. <u>a revitalised Central City with a wide diversity and concentration of activities that enhance its role as the primary focus of the City and region;</u> iii. <u>enabling the revitalising of commercial centres;</u> iv. <u>protecting strategic infrastructure from incompatible activities and avoiding reverse sensitivity effects on them.;</u> and v. <u>high quality residential neighbourhoods with a high level of amenity.</u> c. <u>Visitor accommodation in the Residential Visitor Accommodation Zone and Accommodation and Community Facilities Overlay can establish, operate, intensify and/or redevelop in a way that is compatible with the character and amenity of adjoining residential, rural or open space zones; and does not expand the activity outside of the existing zone or overlay area into other non-commercial zones.</u>
<p>1. <u>Appropriateness in achieving the purpose of the Act and the strategic direction of the Plan</u></p> <ul style="list-style-type: none"> a. The amendments in clause a. still recognise the role that visitor accommodation and other forms of short-term accommodation play in providing lodging options for shorter term stays and gives effect to the range of economic related objectives in chapter 3 identified in the section 32 report (3.3.1(a)(i), 3.3.5). It is proposed to retain the requirement to be compatible with high quality residential neighbourhoods to give effect to objective 3.3.7 Urban growth, form and design. b. The proposed changes mean the objective no longer emphasises the need to consider impacts on the role of the Central City as the primary focus for the city and region and to support the rebuilding and revitalisation of commercial centres as addressed in Objective 3.3.8 Revitalising the Central City. This reflects that the economic evidence shows short term accommodation locating in residential areas is likely to have some cumulative effects on commercial centres depending on whether it is wholly distributed or concentrated around the City Centre, but it does not have significant implications for the supply of housing¹. The cumulative effects on a revitalised Central City or other commercial centres (para 4.4.8, pg 29) (other than trade competition effects on formal visitor accommodation providers which must be ignored in this analysis) from short term accommodation have in my view not been demonstrated by the economic evidence in a way that is practical to respond to and manage through the District Plan so I do not see a strong basis for elevating this as a key outcome through this objective. c. It is more appropriate in achieving the purpose of the Act, to remove the requirement in the objective that visitor accommodation only be established in residential zones (with the exception of dedicated

¹ Property Economics “Economic Cost Benefit Assessment Plan Change 4” for Christchurch City Council, August 2021, para 4.4.7, pg 28

overlays and areas zoned for this activity) where it is of a scale and character that doesn't interfere with objectives for sufficient and affordable housing, or an increase in the number of households within the four avenues. The current evidence indicates that short-term accommodation is not having an impact on the sufficiency and affordability of housing, or housing in the four avenues.

- d. In removing these matters from the objective which only register as cumulative adverse effects, the objective will better achieve Objective 3.3.2 by reducing transaction costs. Narrowing the focus of the objective to the most pertinent issues will better enable the benefits of the activity to provide for peoples economic and social wellbeing. Looking forward to implementing this objective, these changes will make applying for and making decisions on home sharing accommodation in residential areas more focussed and therefore more efficient.
- e. Comparing the recommended changes to the objective with the objectives of the Operative Plan for guest accommodation before PC4, it is noted that the changes are likely to be more effective in achieving the objectives of the plan and the purpose of the Act. The Operative Plan provisions fail to address a clear gap between traditional types of formal accommodation which fell within the provisions for guest accommodation (policy 14.2.6.7), Airbnb type accommodation and farm stays and bed and breakfasts which were excluded from the definition for guest accommodation and the provisions for non-residential activities (objective 14.2.6).
- f. Comparing the objective with a more permissive and enabling wording that emphasises the benefits of home sharing and its similarity to residential development will not better achieve the purpose Act as it would fail to balance these matters with the need to provide for peoples well-being while avoiding, remedying or mitigating adverse effects on the various residential environments addressed in Chapter 14. My recommendation is better in that implementing a more simple and positive framing through objectives policies and rules will not address predictable adverse effects on the quality of residential environments and amenity, coherence and residential character explored in the section 32.

2. Amending 14.2.9.1 by removing the test that the activity be avoided where having regard to cumulative effects it is inconsistent with the centre-based framework for commercial activities.

Policy 14.2.9.1

14.2.9.1 Policy – Visitor Accommodation in a Residential Unit

- a. Permit visitor accommodation in a residential unit where:
 - i. at least one permanent resident of the site is in residence for the duration of the stay;
 - ii. the number of visitors, including additional guests not spending the night, is comparable to use by a residential household; and
 - iii. disturbance to neighbours is minimal.
- b. Manage visitor accommodation in a residential unit where a permanent resident(s) is not in residence to minimise while ensuring adverse effects on the residential character, coherence and amenity of the site and its immediate surroundings are minimised including through:
 - i. restrictions on controlling the scale, duration and frequency and extent of use to ensure that the residential unit is still predominantly used for a residential activity; and

- ii. ~~management of operations to minimise disturbance of~~ minimising the risk of disturbing neighbours, including providing contact and site management information to guests and neighbours.
- c. Avoid visitor accommodation in a residential unit at a scale ~~duration and/or frequency~~ or extent ~~that cannot be managed in a way that minimises adverse effects on commercial centres or the~~ is inconsistent with:
- i. retaining predominantly residential character, coherence and amenity of the site and its immediate surroundings; or
 - ii. minimising the risk of disturbing neighbours; or
 - iii. protecting strategic infrastructure from reverse sensitivity effects.
 - ~~ii. having regard to the cumulative effects of visitor accommodation and other non-residential activities offered in the same commercial centre catchment, would be inconsistent with the centre-based framework for commercial activities in Objective 15.2.2; or~~
 - ~~iii. that would be likely to give rise to reverse sensitivity effects on strategic infrastructure.~~

The previous section 32 evaluation examined a range of other reasonably practicable options for achieving the objectives including a more permissive and enabling approach consistent with managing hosted and unhosted visitor accommodation as a residential activity and I agree with and support that analysis other than as described below.

Benefits

- Economic:
 - a. The proposed changes remove the requirement to consider impacts of unhosted visitor accommodation in residential units on nearby commercial centres and the Central City, which are in part intended to maintain demand for commercially-zoned land in commercial centres and curtail wider effects to maintain and enhance the Central City and other centres as community and commercial focal points (objective 3.3.7(a)). However, the economic evidence indicates that using controls on the location of home sharing accommodation is not justified and that PC4 (including the notified policies) is unlikely to control the location of short-term accommodation on residential properties effectively and so is unlikely to realise significant economic agglomeration benefits from forcing the activity into centres, which the Operative Plan also purported to do, in its provisions addressing the location of guest accommodation.
 - b. The recommended changes could make it somewhat easier to consent visitor accommodation businesses in residential areas (although it remains a fully discretionary activity over defined thresholds which will still allow cumulative adverse effects to be considered) by reducing the number of separate issues to be addressed and facilitating a focus on minimising disturbance to neighbours, maintaining the predominance of residential activity and character and the amenity of surrounding sites. Applications to consent these businesses would be less costly to prepare and assess (depending on how much information Council require to address the matters signalled in the policies as important) because they would not have to establish that they are having minimal impact on commercial centres and the centre-based framework for commercial activities which would better achieve Objective 3.3.2 by reducing transaction costs.

- Social Cultural and Environmental

- c. The changes to the policies are still framed to ensure the social benefits of home sharing accommodation are realised. This form of accommodation provides a valued alternative to conventional formal short term accommodation offerings and can make travel more economic, can better suit the preferences of large families, groups with children and the elderly. The changes should also protect the social and environmental benefits of high-quality residential environments, and a range of factors that contribute to residential amenity.

Costs

- Economic:

- a. Potentially reduced vitality and vibrancy in commercial centres and a loss of agglomeration benefits could result from a less restrictive approach to unhosted visitor accommodation for more than 60 nights a year, however the evidence indicates it does not currently have a significant impact on commercial centres but could in some possible future scenarios. The risk of this is reduced by retaining the permitted framework for visitor accommodation in commercial zones and retention of a discretionary activity status for residential zones where such effects can be considered. It is also reduced by the requirement on the balance of the policy to minimise adverse effects on residential coherence, amenity and character in residential zones.
- b. MFE statistics indicate that very few resource consent applications are declined however there would be a portion of the current short term accommodation listings that operate between 60 nights per year and 180 that could (depending on their assessed affects) struggle to be consented following these changes compared with a more permissive and enabling framing as sought by short term accommodation providers and some other submitters. The economic evidence conservatively estimates this at a level of 10% and estimates this has a value of \$3.4m per annum in lost visitor spending. However, a more enabling framing where the similarity of this activity to residential activity is emphasised and the consideration of effects is further narrowed will fail to give effect to the relevant objectives. The reasons for this include that:
 - the section 32 analysis demonstrates that short term accommodation in residential properties has a range of potential and predictable adverse effects on the quality of residential environments and amenity, coherence and residential character over and above that of more conventional residential activities
 - a targeted approach to avoiding particular effects will still allow short term accommodation proposals to proceed.

- Social:

- c. Some additional unhosted visitor accommodation in residential units for more than 60 nights a year may be able to be granted in residential zones and create additional effects on neighbourhoods, the quality of those neighbourhoods and residential coherence but this is unlikely as the application would also need to get past the other limbs of the policy to minimise adverse effects on residential character, coherence and amenity. The proposed changes are also more beneficial than a more permissive scenario for the same reason.

Effectiveness and Efficiency

- d. Compared with the option in the notified PC4 proposal, the changes may enable some additional unhosted visitor accommodation with cumulative effects on commercial centres, as the wording does not stress the importance of cumulative effects. However, with a discretionary or non-complying activity all effects must be considered and the resulting framework is still on the whole, consistent with Policy 6.3.6 of the CRPS to primarily direct new commercial activities to the Central City, Key Activity Centres and neighbourhood centres. The main saving in potential transaction costs is that the policy focusses on other matters and this is likely to translate to less information being required on these less than minor matters and therefore shorter applications and less processing costs. This evaluation relies on the economic evidence relating to administration costs and the modelling of different options for regulations under PC4 which concludes that there is no clear economic position for or against the recommended changes.
- e. Having visitor accommodation establishing in residential areas without having a policy stressing the need to determine the extent of cumulative adverse effects on objectives for centres may not actively reflect and support the function and role of commercial centres both of which are important for economic efficiency reasons (as well as other reasons) and the market could change to a situation where these effects become more significant.
- f. In areas with high demand for unhosted visitor accommodation in residential units (e.g. suburbs near the airport, coastal suburbs and the Central City Residential Zone) there are risks of significant adverse urban form effects from overly enabling this activity in residential zones. This is particularly the case if enabling this activity creates a permitted baseline argument for other non-residential activities. However, my recommended provisions should achieve a balanced approach to this issue in acknowledgement that, it is expected to be residential in character and consistent with the Plan's objectives.
- g. Taking into account the difficulty with addressing cumulative adverse effects on centres and the City Centre from individual short term accommodation proposals, and the lack of clear support in the economic evidence for the notified provisions that purport to address effects on centres, I consider the changes I propose to the Policy would be more effective in balancing the outcomes sought in Strategic Directions Objective 3.3.7(a)(v) and Objective 15.2.2 to primarily direct new commercial activities to commercial centres. They will focus on matters of consistent and direct relevance in relation to unhosted visitor accommodation, and are therefore likely to be more efficient and effective. The notified wording compares less well as it fails to address the fact that this activity will normally be of a scale and be in locations where they will not have significant adverse distributional or urban form effects that are practical for the plan or the consent process to address.
- h. The changes recommended for the policy better implements the amended objective in that it would not raise issues which are not the focus of the outcomes sought by the objective.
- i. There are likely to be a relatively small number of proposals that have distributional or urban form effects which (although likely to be minimal) could to some extent undermine the relevant objectives, that also have minimal effects on residential coherence and amenity. I therefore consider the efficiency

of the amended version of the Policy overall is likely to be a better approach to what was assessed in the s32 report, the s32AA report and a more permissive scenario.

3. Changing the status of unhosted visitor accommodation in a residential unit for more than 180 nights a year from discretionary to a non-complying activity, making it a discretionary activity year-round where it exceeds permitted activity standards or (where applicable) controlled activity standards.

Benefits

- Economic:
 - a. Makes it more probable that consent will be granted for hosts operating a short-term accommodation business, depending on its effects on residential character within sites and amenity of neighbouring sites, to let the property out for more than 180 days a year. This can allow for better (more efficient) utilisation of housing stock as, based on the evidence, an arbitrary cut off is likely to see the market responding by filling that demand from a larger number of residential properties. It is also likely that properties being let for up to 180 days will have to be made available for a large portion of the year in order to achieve this amount of occupancy which means that properties may well sit empty as a result of this cut-off rather than convert to long term rental or a permanent residency.
 - b. The PE report in Table 5 following para 3.7.4 shows that 18% of the total of 2,452 short-term accommodation businesses in Christchurch District list for more than 180 nights. In Commercial and Mixed Use Zones around 21% of listed home share accommodation business identified by AirDNA (256 in total) are listed for over 180 nights a year, 18% of listing in residential zones (1,998 in total) and 10% of listings in rural zones (198) in total. It is reasonable to expect that a large number of these 441 listings (18% of the total across the district) should be able to obtain consent following this change (albeit in a form where their effects are avoided or minimised).
 - a. One would normally expect that non-complying activities have issues with significant adverse effects and potential for harm or direct conflict with relevant objectives. In terms of economic effects, operating home sharing accommodation for more than 180 days does not produce these adverse outcomes.
 - b. There can be cumulative economic benefits for centres and the vibrancy of the City Centre from concentrating tourism activity in these areas, however the economic evidence suggests that this activity status is not important in terms of this issue², as any benefits are likely to either be trade competition effects (which shouldn't be taken into account) or somewhat eroded by the suppression of demand for short term accommodation that results from applying this limit, which according to the economic evidence can result in reduced overall tourism spending.
- Social/Cultural:

² Although it is noted that the report attached to Phil Osborne's evidence supports this change of activity status on economic grounds.

- c. In so far as I anticipate that slightly more consents would be granted for unhosted visitor accommodation with the proposed changes than with the notified provisions, or the Operative Plan provisions, this would enable more hosts and customers to experience the social and cultural benefits of offering hosted accommodation in and around Christchurch. This outcome would be more enabling of a valued service for visitors who prefer home sharing accommodation due to several innate differences to traditional hotels and motels described in the balance of the section 32 evaluation.

Costs

- Environmental:
 - a. The changes do potentially enable hosted visitor accommodation in residential units to take place for longer periods of the year which could cause amenity effects but because of the balance of the provisions, these effects would be managed. There is no good evidence that a change of activity status of unhosted visitor accommodation for more than 180 nights a year from discretionary to non-complying will better protect the environment than carefully managing the activity year-round through a discretionary consent as it is simply a change of activity status. If however, a non-complying activity status was implemented as a hard and fast restriction, this could lead to properties being left empty which can create its own adverse effects on the environment including inefficient use of land and impacts on amenity.
- Social:
 - b. Having to have more residential sites undertaking short term accommodation to meet demand as a result of a change of activity status at 180 nights being implemented as a hard and fast restriction (as proposed by Phil Osborne's evidence) could, in a situation where the market is undersupplied with housing or capacity for housing, impact on the affordability of housing and rental accommodation in particular³. The converse of this situation could however also be realised if properties that would have been used for long term rental accommodation for half of the year with this rule in place are no longer required to change use from short term accommodation after 180 nights to permanent residence or long term rental and instead are simply required to better manage their likely effects .
 - c. If the rental yields from short term accommodation in Christchurch were to completely outstrip those that can be derived from long term accommodation in future, the supply and availability of long-term rental accommodation could be adversely affected similar to the situation documented in the literature review evidence of cities overseas in high demand by tourists discussed in the section 32 and economic evidence. If this situation were to occur, removing this rule could lead to adverse social effects depending on how the provisions are implemented but at the present time, the economic evidence suggests that the rules in PC4 as notified do not have any significant costs implications for house and rental prices due to the very small proportion of the housing stock being used for short term accommodation.

Efficiency and Effectiveness

³ Noting that the economic evidence anticipates that the market will respond with more housing to meet demand in this situation.

- a. My proposed changes to the limits on nights would be more effective at balancing the objectives sought by the Plan and s7(b) and s7(c) of the RMA to enable the efficient use of the housing stock in Christchurch while maintaining amenity values in residential areas. The changes would still require developments to address Objective 14.2.4 which promotes high quality residential environments with a high level of amenity and are consistent with the recommended policies.
- b. The proposed changes to the limits on nights allow greater flexibility which would be more efficient but they are potentially no easier for applicants and plan administrators to understand and administer as quantitative standards are easy to administer. An assessment still has to be made as to whether the character is predominantly residential and whether amenity and coherence is retained based on a range of factors beyond (but not necessarily excluding) how many nights it is let for.

4. Remove the standards in the plan that prevent guests holding functions where the number of additional attendees exceed the number of paying guests staying overnight.

Benefits

- Economic:
 - a. Reduced consenting costs where there are potentially fewer matters to consider in some situations. Applicants will never-the-less still have to show how they are minimising the risk of disturbing neighbours in some complex urban environments. Where noise spill effects are difficult to manage, and there are sensitive activities close to the site and/or where overlooking and parking are significant problems, restrictions on events and functions implemented through conditions of consent, may well be necessary.
 - b. Being able to use properties where short-term accommodation is taking place for events and functions (within the noise controls and any related district plan standards that apply) could make short-term accommodation businesses more desirable to customers and therefore more profitable.
- Social:
 - c. One of the social benefits of home sharing accommodation is that it allows people to host friends and family in a relaxed residential setting which will be more enabled with this change.

Costs

- Economic:
 - a. If a residential environment were to be degraded in terms of its amenity values by repetitive partying occurring at one or more short-term accommodation businesses, this could have adverse effects on the property values on surrounding sites and the economic value of high quality urban environments.
- Social:
 - b. Uninterrupted sleep is important for peoples' physical and emotional well-being and the quiet enjoyment of residential and rural environments is a key benefit of a well-functioning resource management framework for urban and rural areas.

- c. The notified standards on functions and events in unhosted visitor accommodation means that are not a controlled activity or a permitted activity unless they operate on the basis that guests do not hold functions or events attended by guests not paying to stay the night. This is intended to prevent or reduce the incidence of frequent or large parties from occurring.
- d. This constraint is not without justification based on the feedback and other evidence which is well documented in the section 32 report, however it is an unusually intrusive restriction in my assessment. People use short term accommodation to visit family and friends and often-times to host them in an environment that can be carefully designed to accommodate such events on a modest scale and in a way that minimises their effects (through for example, careful attention to screening, planting, the placement of speakers and lighting, outdoor furniture, changes in level and other matters). In my view, being able to this should normally be a reasonable expectation for people and doesn't necessarily mean the environment is more likely to be degraded.

Effectiveness and Efficiency

- e. Overall, removing this permitted activity and controlled activity standard would be equally as effective as the notified version of the rule at achieving Objective 14.2.4 high quality residential neighbourhoods with a high level of amenity, in most situations and there are other ways to address this issue than applying this unusual level of restriction to an expected and largely complimentary activity. Paying guests generally have an incentive to maintain good relations with their hosts or the company they are using, and owners usually have an incentive to maintain good relations with their neighbours as this is very important to both parties getting and maintaining positive reviews. I note the conclusions in the section 32 analysis and its reservations about relying wholly on self-regulation by unaccountable parties with no rights of appeal or statutory basis for arbitration and enforcement, but these self-regulation forces are not wholly irrelevant in this instance.
- f. The proposed changes would not prevent the imposition of conditions of consent that prevented events and functions for people not staying the night, if it was appropriate to do so where that short term accommodation business is operating for more than the permitted and controlled activity thresholds in terms of the number of nights they are being let for in a year. An applicant might also offer such a condition to mitigate against concerns that their proposal was likely to have adverse effects on amenity. If the situation transpires where (as PC4 proposes) unhosted visitor accommodation businesses have either a controlled activity or a discretionary activity consent and (contrary to the outcomes sought by PC4) partying activity and related noise problems and nuisance behaviour is becoming problematic, conditions of consent can be reviewed under section 128 of the RMA (if there is a condition providing for it and following an appropriate process) and conditions addressing adverse effects could be applied and enforced. This ability would be more limited in a controlled activity situation given the limited matters of control proposed for PC4, which don't specifically control noise disturbance to neighbours⁴.

⁴ It is noted that under section 16 of the RMA the duty to avoid unreasonable noise applies to controlled and permitted activities however depending on the situation Council compliance units may

g. Removing this standard in rural areas is more effective and efficient in that events and functions are less likely to impact on adjoining neighbours. Consistent with the character assessment for Banks Peninsula Zones (Akaroa, Duvauchelle, Wainui) and Residential Small Settlement Zones (Barry's Bay, Cooptown, French Farm, Kukupa, Le Bons Bay, Little Karoa, Little River, Okains Bay, Pigion Bay, Robinsons Bay, Takamatua, Tikao Bay and Wainui) in **Appendix 5** of the original Section 42A report, the density of dwellings in the Large Lot zone is more similar to rural than residential zones and it would be more efficient and effective to apply the rural provisions in those zones. Settlements around the Akaroa Harbour Basin and the Eastern Bays have a high proportion of holiday homes which creates a different residential character to suburban neighbourhoods and has a heavy reliance on the visitor economy which also warrant greater flexibility in terms of standards to achieve the relevant objectives efficiently and effectively. Consistent with that assessment, settlements around Lyttleton Harbour through to Diamond Harbour and Purau and Birlings Flat are considered more suburban and should have the same standards as other residential zones.

5. Add a further permitted activity standard in rural zones (Rural Banks Peninsula, Rural Urban Fringe, Rural Port Hills, Rural Waimakariri and Rural Templeton Zones) requiring guests to be provided with information about wayfinding, hazards, inaccessible areas, and rural activities in the area.

Guests must be provided with information about wayfinding, hazards, inaccessible areas, stock, and rural activities in the area.

Benefits

- Economic:
 - a. Increased certainty and potentially reduced costs for resource consent applicants for a small outlay of in drafting, printing and distributing the information.

Costs

- Economic:
 - a. Could reduce some of the economic costs of farmers being bothered by complaints about rural activities and stock being affected by visitors being in the wrong place or doing the wrong thing, that can arise with unhosted visitor accommodation.

Effectiveness and Efficiency

- b. Most rural unhosted visitor accommodations businesses are likely to provide this type of information as a matter of course and this requirement formalises this expectation. It may not always be effective, but on balance it is likely to be beneficial and is not onerous.

6. Minor corrections

not be inclined take enforcement action against parties under section 16 where there is a resource consent in place or the activity is permitted by the Plan.

Changes to the rules addressing “hosted visitor accommodation in a residential unit” and “unhosted visitor accommodation in a residential unit” to shorten the terminology in the rules and retain it in full in the definitions and policies.

- a. These are primarily administrative changes to improve the clarity of proposal (e.g. avoiding double negatives). They are more consistent with achieving Strategic Directions Objective 3.3.2 to use clear and concise language so that the District Plan is easy to understand and use. They do not have a notable impact on the assessment of the effectiveness and efficiency of the preferred option in the s32 report.