

Review of the Canterbury Regional Policy Statement: settlement and the built environment, transport and versatile soil

Purpose

The purpose of this paper is to seek direction on the approach to be used to review the settlement and built environment (Chapter 12), transport (Chapter 15) and versatile soil (part of Chapter 6) provisions of the Canterbury Regional Policy Statement (CRPS). The paper brings together the current thinking on the review of these CRPS provisions. It outlines the options and preliminary approaches to be used in the review. Prior to preparing specific wording changes, confirmation is sought on the way ahead, including the policy approach(es) to be further developed and consulted upon.

For the reasons outlined in this paper it is proposed to make a structural change to the CRPS by integrating the transport and versatile soil provisions into the settlement and built environment chapter.

Background

Environment Canterbury has begun its review of the CRPS. The review must consider all the provisions in the CRPS, decide whether to retain, amend, or delete existing provisions, or add new provisions.

Statutory context

The role of the CRPS (to achieve the purpose of the RMA) is to provide an overview of the resource management issues of the Region and the policies and methods to achieve the integrated management of the natural and physical resources of the whole Region (section 59).

The RMA prescribes Environment Canterbury a number of functions relating to the management of settlement and the built environment, transport and versatile soil. These include:

1. *the establishment, implementation, and review of objectives, policies, and methods to achieve integrated management of the natural and physical resources of the region (section 30(1)(a))*
2. *the preparation of objectives and policies in relation to the actual or potential effects of the use, development, or protection of land which are of regional significance (section 30(1)(b))*
3. *the control of the use of land for the purpose of soil conservation (section 30(1)(c)(i))*
4. *the control of the use of land for the purpose of the avoidance or mitigation of natural hazards (section 30(1)(c)(iv))*
5. *the strategic integration of infrastructure with land use through objectives, policies, and methods (section 30(1)(gb))¹.*

Existing CRPS provisions

Settlement and environment, transport and versatile soil provisions are found in Chapter 12 (Settlement and Built Environment), Chapter 15 (Transport) and Chapter 7 (Soils and Land Use) of the CRPS.

¹ This function did not exist at the time the current CRPS became operative.

Within Chapter 12 there are six key threads, being:

1. avoiding, remedying or mitigating adverse effects of settlement, including:
 - a. promoting settlement and transport patterns and built environments to achieve the efficient and effective use of resources²
 - b. discouraging the use of land for urban development and the physical expansion of settlements, and that the adverse effects of network utility use and provision are minimised, where such development would result in a loss or threat to resources³
2. not adversely affecting the efficient operation, use and development of identified key infrastructure⁴
3. the maintenance of the rural character of land in the proximity of Christchurch and Christchurch's rural-urban contrast
4. avoidance or mitigation of the actual and potential costs of natural hazards
5. enabling people and communities in rural areas
6. establishment of papakainga and marae.

Overall, Chapter 12 (Settlement and Built Environment) integrates the CRPS provisions relating to the management of the growth and development of settlements. Notwithstanding this, relevant provisions are found in most chapters of the CRPS. In particular, Chapter 15 (Transport) provides specific provisions in relation to transport and transport infrastructure, relating to:

1. protecting Canterbury's existing transport infrastructure and future options to develop this infrastructure
2. avoiding, remedying or mitigating adverse effects on the environment from transport use and provision.

The versatile soil provisions are found in Chapter 7 (Soils and Land Use). These relate to the issue of irreversible effects on land compromising versatile soil that foreclose future options that benefit from the use of that soil.

Relationship of the CRPS review with Urban Development Strategy process

Currently, the settlement and built environment provisions of the CRPS are generally not geographically based, but rather relate to specific natural and physical resources. As such, the current

² Efficient and effective use of resources (particularly energy), rate of use of non-renewable energy sources, emissions from the use of motor vehicles and building heating, energy efficient approaches to building.

³ Contamination of the drinking water, flows and levels of water bodies, natural character, natural features and landscapes, recreation values, amenity values, heritage values, significant indigenous vegetation and habitats of indigenous fauna, ancestral land water and sites, mahinga kai, wahi tapu and wahi taonga.

⁴ road infrastructure, Christchurch International Airport, Timaru Airport, Port of Lyttelton, Port of Timaru, telecommunication facilities, military establishments for defence purposes, rail networks and other network utilities.

provisions apply equally to settlements within and outside of the Greater Christchurch Urban Development Strategy (UDS) area⁵.

The UDS project is preparing a strategy to manage the predicted growth of the Greater Christchurch area. The draft strategy has been released for the purposes of public consultation. The project timeline envisages that the strategy will be finalised in April 2007. It is apparent that the CRPS will, in the first instance, be changed to provide for the UDS outcomes. It is anticipated that as a result of the UDS process a change to the CRPS will be publicly notified in the second half of 2007.

While still being subject to discussion, the preliminary indications are that the UDS initiated change will be to introduce a new chapter (Chapter 12A) into the CRPS. Chapter 12A is likely to be designed to provide further direction within the confines of the existing policies found within the CRPS, and in particular Chapter 12. This direction may include:

1. defined urban limits
2. areas identified for intensification
3. policy on the sequencing of new development, tied to the provision of infrastructure
4. minimum density of development to be achieved at different locations.

The upcoming UDS does not result in a full review of the settlement and built environment provisions in the CRPS for the greater Christchurch area. Therefore, the review must consider the application of the CRPS both with, and outside of, the UDS area. The interrelationship between the UDS change to, and the full review of, the CRPS will need to be carefully managed as the UDS change advances.

Resource management issues

Subject to the statutory requirements of the RMA, the appropriate policy approach to be used in the review of the CRPS settlement and built environment, transport and versatile soil provisions is dependent on the specific resource management issues being addressed. Within the CRPS there are seven resource management issues identified in relation to settlement and built environment, transport, and versatile soil. In addition, consultation and issue mapping indicates that a further two issues warrant inclusion within the CRPS.

The existing seven resource management issues in the CRPS, together with recommended changes, are:

1. The versatile soil issue (Chapter 7 Issue 2) is incorporated within Chapter 12, Issue 1, and deleted from Chapter 7.
2. Chapter 12, Issue 1 (adverse effects of urban and other development) is retained but amended to create a demarcation between the current issue and a new recommended issue relating to the strategic integration of infrastructure with land use (see below).
3. Chapter 12, Issue 2 (Christchurch's urban/rural contrast) is reviewed once the content of the UDS change to the CRPS is known.
4. Chapter 12, Issue 3 (communities meeting their needs) is amended to focus solely on the protection of communities from natural hazard events.
5. Chapter 12, Issue 4 (the needs of tangata whenua) is retained subject to the outcome of consultation with tangata whenua.

⁵ The UDS project is a collaborative initiative involving the Christchurch City Council (including the former Banks Peninsula District Council) Selwyn and Waimakariri District councils, Environment Canterbury, Transit New Zealand and a cross-section of local leaders drawn from community, business and government organisations.

6. Chapter 15, Issue 1 (effectiveness and efficiency of transport infrastructure) is retained but moved to form part of a new issue (strategic integration of infrastructure) in Chapter 12.
7. Chapter 15, Issue 2 (adverse effects of transport) is retained but moved to form part of Chapter 12, Issue 1.

In addition, the two new resource management issues recommended are:

1. Chapter 12, New Issue (strategic integration of infrastructure and land use) is introduced.
2. Chapter 12, New Issue (adverse effects of dispersed development outside of urban areas) is introduced.

An analysis of the relevance and significance of these nine issues is set out in Appendix 1.

Effectiveness and efficiency of the current CRPS provisions

The effectiveness and efficiency of the current policies and methods in the CRPS was evaluated in *Our changing environment: An Evaluation of the 1998 Canterbury Regional Policy Statement*⁶. Below is a summary of the findings contained within that report.

Common to the current 'settlement and built environment' and 'transport' provisions of the CRPS is that the objectives, policies and methods are all expressed at the level of a principle -- that is, the outcomes sought for the resource in question are expressed but the means, and/or level of protection necessary, to achieve these outcomes are not specified. A range of implementation methods are identified. However, experience to date indicates that the primary implementation mechanisms are district plans⁷ and the Canterbury Regional Land Transport Strategy (and associated strategies and studies)⁸.

The effectiveness and efficiency of the current approaches in Chapters 12 and 15 is low. This is evidenced from a number of court decisions. The most blunt court decision found that the CRPS contains no meaningful direction on settlement and built environment matters. There are three primary reasons for this low effectiveness and efficiency:

1. the provisions in Chapters 12 and 15 are expressed at the level of 'principles' rather than at a level of specificity that allows clear understanding of the land use outcomes required
2. as currently pitched, the interpretation of a number of the policy provisions is subject to debate
3. the key methods are discretionary (i.e. use of the words "should" and "should consider").

Further, a series of Environment Court decisions indicates that the versatile soil provisions are also not effective or efficient.

Notwithstanding this, it must be recognised that in response to their own functions (and the CRPS), all territorial authorities within Canterbury have included within their district plans provisions (including rules) to manage the growth and development of settlements and the built environment and transport. In addition many district plans include versatile soil provisions. However, the CRPS no longer provides an overview, nor advances the achievement of integrated management, in relation to these district plans.

⁶ Environment Canterbury (2007), still in final draft form

⁷ settlement and built environment, transport and versatile soil

⁸ transport only

Policy approaches to be used in the CRPS review

Settlement and built environment and transport

There is a strong relationship between the settlement and built environment and transport provisions in the CRPS. This is not surprising given that transport and transport infrastructure are a consequence of human settlement. This is now reinforced by the 'strategic integration of infrastructure with land use' function of regional councils⁹. Consequently, at the outset it is proposed to combine the settlement and built environment and transport provisions in the CRPS.

Broadly speaking, there are three approaches¹⁰ available for the review of the settlement and built environment and transport provisions of the CRPS in order to improve effectiveness and efficiency:

1. Maintain the current level of detail in the CRPS - review the provisions within Chapters 12 and 15 to determine whether the policy direction provided remains appropriate, but maintain the current level of detail.
2. Introduce new work programme methods into the CRPS – review the provisions within Chapters 12 and 15 maintaining the current level of detail within the policies, but introduce investigation and design specific methods requiring the development of detailed responses to these policies¹¹. Such methods may include the development of structure plans, servicing plans, and the like.
3. Introduce greater level of direction in the CRPS - as part of the review of Chapters 12 and 15 for the Region, in anticipation of the UDS change examine each settlement outside of the UDS area, incorporate into the CRPS provisions to strategically manage development that are specific to that settlement. These provisions may include; geographical limits, development sequences, density, preconditions for zone changes and review requirements.

A brief analysis of the strengths and weaknesses of these three approaches is set out in Appendix 2. Overall, outside of the UDS area approach 2 is recommended. It provides a framework and direction for the resolution of the resource management issues associated with settlement within the region while allowing local solutions to be developed in appropriate time-frames.

Versatile soil

Again there is a strong relationship between the settlement and built environment and versatile soil provisions in the CRPS. This is not surprising given the focus of the current versatile soil provisions in the CRPS - foreclosure of land use options benefiting from versatile soil¹². Therefore, if the current approach to the management of versatile soils is retained in the reviewed CRPS it is proposed to incorporate this within the settlement and built environment provisions.

There are four policy options for any future CRPS relating to versatile soil, being:

1. Remove the versatile soil provisions in the CRPS - this option involves all references to versatile soil in the CRPS being deleted. Versatile soil would no longer be an issue or a resource identified in the CRPS.

⁹ section 30(1)(gb)

¹⁰ The option of removing the current settlement and built environment and transport provisions outside of the UDS area was considered and discarded. This reflects the outcomes from preliminary consultation undertaken with individual territorial authorities. It also recognises the purpose of the CRPS.

¹¹ It may be argued that to a large degree the district plans currently provide this.

¹² This relationship is further reinforced by the introduction of a definition of soil conservation within the section 2 of the RMA. This definition is to exclude the current approach in relation to versatile soil from regional councils soil conservation function.

2. Provide policy in the CRPS to have regard to the value of versatile soil for rural production when considering how to control the use of land - this option involves identifying the management of versatile soil as an issue of significance for Canterbury. The provisions would identify that the resource has value for production and should be managed as such. These provisions would provide generic support for any provisions addressing versatile soil retained in district plans.
3. Focus on the physical destruction of versatile soil in the CRPS - this option involves focusing any provisions on the physical destruction and permanent loss of versatile soil. These provisions would recognise that the value of the versatile soil is only lost when buildings and/or hard-standing areas remove or cover the soil. Other examples of the physical destruction of versatile soil include significant earthworks, quarrying and mining activities.
4. Retain current focus in the CRPS on not foreclosing land use options benefiting from versatile soil but amend provisions to address the criticisms of the courts - this option involves retaining the current focus within the CRPS on not foreclosing future land use options that benefit from versatile soil. However, the provisions would be rewritten to remove the uncertainty inherent with its current drafting and to reflect the current definition of soil conservation in the Resource Management Act 1991. The likely outcome would be provisions that are more definite. Consequently, the provisions are likely to be strengthened providing greater direction, removing some of the balances between versatile soil and other values.

A brief analysis of the strengths and weaknesses of these four approaches is set out in Appendix 2. Overall approach 2 is recommended. It provides support for the current district plan provisions. This provides flexibility for local approaches to the management of this resource. In recognition of the threat to the productive potential of versatile soil, it is further recommended that versatile soil is incorporated in Chapter 12 (Settlement and Built Environment).

Concluding comments

Given the findings in relation to the effectiveness and efficiency¹³, the feedback on Environment Canterbury's scoping report¹⁴, and the consultation responses to date¹⁵, it is recommended that the review proceeds as follows:

1. Retain, but combine, the settlement and built environment and transport provisions.
2. Review the specificity of the current settlement and built environment and transport provisions in order to provide greater certainty and direction.
3. Where appropriate in the current settlement and built environment and transport provisions, include greater guidance and direction in the implementation methods.

¹³ Environment Canterbury (2007) *Our changing environment: An Evaluation of the 1998 Canterbury Regional Policy Statement*. Still in draft form

¹⁴ Environment Canterbury (2006) *Canterbury Regional Policy Statement Scoping Report: Report on the issues and approach for review of the Canterbury Regional Policy Statement*

¹⁵ This paper builds on the paper¹⁵ prepared for, and discussed at, the territorial authorities and Environment Canterbury officers meeting at Rolleston on 20 November 2006. Overall, the feedback on the paper at the 20 November 2006 meeting was:

- of the review of the settlement and built environment provisions should be integrated with the wider CRPS review
- a greater level of specificity is desirable within the policies of the settlement and built environment chapter, particularly in relation to infrastructure, transport, landscape and above adversity
- replicating the possible approach to be used in the UDS change is not warranted outside of the UDS area

4. Remove those provisions demonstrated to be ineffective and that do not assist in the resolution of resource management issues within the CRPS.
5. Broaden the settlement and built environment provisions to focus adverse effects of dispersed development outside of urban areas that are of significance within the region.
6. Include consideration of versatile soil as part of Chapter 12, (Settlement and Built Environment), and delete it from Chapter 7 (Soils and Land Use).

Appendix 1: Review of resource management issues

Existing issues:

Issue	Relevance	Significance	Recommendation
<p><u>Chpt 7, Issue 2:</u> Land use activities which reduce the availability of land which can be identified as comprising versatile soils, thereby foreclosing future land use options that benefit from being located on such soils.</p>	<p>Relevance is subject to question. There are a number of decisions of the Environment Court that go to the heart of this matter. The foreclosure of rural productive land use options is in the most persuasive versatile soil issue. A number of district plans recognise a form of this issue.</p>	<p>Remains significant. However, it is clear that at a regional level the management of the versatile soil resource cannot easily and effectively be raised above one of a number of competing considerations when considering development proposals.</p>	<p>Amend this issue and include within Chpt 12, Issue 1.</p>
<p><u>Chpt 12, Issue 1</u> Adverse effects of urban development, physical expansion of settlements and the use and provision of network utilities on the environment.</p>	<p>Remains relevant. This is a common issue addressed in all district plans. Currently the issue is confined by the definition of "urban development" in the CRPS. Experience and consultation indicates that the issue is of equal relevance for smaller, more isolated and/or human occupation (for example, small lot subdivision within a sensitive rural environment).</p>	<p>Remains significant. Urbanisation and human occupation proposals are a common cause of resource management conflict within the Region.</p>	<p>Retain the issue. Create a demarcation between this issue and a new issue for Chpt 12 (strategic integration of infrastructure).</p>
<p><u>Chpt 12, Issue 2</u> Loss of rural character of land on the outskirts of Christchurch.</p>	<p>Relevance unclear. The issue is primarily derived from the landscape and amenity qualities of what is commonly known as the 'green belt' associated with Christchurch.</p>	<p>Significance unclear.</p>	<p>Review once UDS change is known</p>
<p><u>Chpt 12, Issue 3</u> Land uses or land use patterns which constrain future populations and communities in urban areas and settlements from meeting their needs.</p>	<p>Remains partly relevant. There are two components to this issue. The first relates to the protection of communities from natural hazards. This matter is still highly relevant. The second relates to the well-being of rural communities. The relevance of this, in resource management terms, is less clear.</p>	<p>Remains partly significant. The protection of communities from natural hazards is of importance. While the well-being of rural communities is also of importance, it is unclear how the CRPS can assist in its resolution.</p>	<p>Retain the natural hazards, and delete of the well-being of rural communities, component of the issue.</p>

<p><u>Chpt 12, Issue 4:</u> The need for Tangata Whenua to be able to exercise their cultural relationships in respect of settlement in urban and rural areas.</p>	<p>Remains relevant.</p>	<p>Remains significant.</p>	<p>Retain the issue, but review following consultation with tangata whenua.</p>
<p><u>Chpt 15, Issue 1:</u> The use, development or protection of land and associated natural and physical resources can cause adverse effects on the ability of the transport infrastructure to efficiently and effectively present and future regional, inter-regional and national transport needs.</p> <p>For example:</p> <ul style="list-style-type: none"> (i) resource development resulting in transport demands which exceed the capacity of existing infrastructures or are incompatible with present uses, for example, forestry. (ii) land use which impedes the development of transport infrastructure, for example, by foreclosing opportunities for the future expansion of airports or sea ports or impeding the upgrading of the road network. (iii) aquatic development near airports which may compromise operational safety, for example, due to the risk of bird strike. (iv) retail developments on arterial routes which impair their efficiency and safety by creating traffic conflicts. (v) buildings or trees on the flight paths at airports. (vi) developments which impede access to seaports for larger vehicles. 	<p>Remains relevant. The issue is primarily a result of conflict between different forms of human occupation (including urban development) with often competing, and mutually exclusive, requirements.</p>	<p>Remains significant. This issue is a common cause of resource management conflict within the Region.</p>	<p>Retain the issue, but combine into a new issue in Chpt 12 (strategic integration of infrastructure).</p>

<p><u>Chpt 15, Issue 2</u></p> <p>Adverse effects on the environment are caused by the provision of transport infrastructure and the use of transport. These effects include:</p> <ol style="list-style-type: none"> (1) air pollution. (2) noise and vibration. (3) contaminated run-off from roads discharging into water or onto or into land. (4) loss of public amenity including effects on visual amenity, natural character and areas of significant indigenous vegetation and significant habitats of indigenous fauna. (5) effects on ancestral lands, sites and other taonga of value to Tangata Whenua. (6) spread of noxious weeds from road verges. (7) loss of land to roads and to the parking of vehicles. (8) effects on sites, buildings, places or areas of heritage value. 	<p>Remains relevant. This issue is already incorporated within Chpt 12, Issue 1.</p>	<p>Remains significant. However, the current CRPS lacks clear linkages between the issue and the resulting objectives, policies and methods.</p>	<p>Retain the issue, but combine into Chpt 12, Issue 1. Rework the resulting objectives, policies and methods to improve linkages.</p>
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New issues:

Issue	Relevance	Significance	Recommendation
<p><u>Chpt 12:</u> The adverse effects on strategic infrastructure resulting from poor integration with land use.</p>	<p>Highly relevant. In part the relevance is derived from section 30(1)(gb). The CRPS already contains provisions relating to this matter. These relate to the adverse effects of settlement on infrastructure such as airports and ports. Further, it is common for district plans to also have provisions relating to this issue.</p>	<p>Highly significant. This issue is a common cause of resource management conflict within the Region.</p>	<p>Create a new issue, and move current related provisions in the CRPS to this issue.</p>
<p>Adverse effects of dispersed development outside of urban areas</p>	<p>Highly relevant. Experience and consultation indicated that natural and physical resources are being adversely affected that by smaller, isolated and spasmodic development.</p>	<p>Highly significant. This issue is a common cause of resource management conflict within the Region.</p>	<p>Create a new issue, primarily focussed on: servicing (e.g. onsite sewage disposal), regional identity (e.g. landscape) matters and reverse sensitivity effects.</p>

Appendix 2: Analysis of policy approaches: settlement and built environment and transport

Option 1: Maintain the current level of detail in the CRPS

	For	Against
Purpose of the RMA		<ul style="list-style-type: none"> • Shown to be ineffective and inefficient
Issue resolution	<ul style="list-style-type: none"> • Retains flexibility for local solutions 	<ul style="list-style-type: none"> • Shown to be ineffective and inefficient
Integrated management		<ul style="list-style-type: none"> • Shown to be ineffective and inefficient
Carrying out functions	<ul style="list-style-type: none"> • Can achieve Environment Canterbury's functions 	
Consultation views		<ul style="list-style-type: none"> • Provides insufficient certainty of the outcome required
OVERVIEW	This approach is ineffective and inefficient.	

Option 2: Introduce new work programme methods into the CRPS

	For	Against
Purpose of the RMA	<ul style="list-style-type: none"> • Provides a clearer framework for decision making through regional and district plans • Allows local decision making in response to specific circumstances 	<ul style="list-style-type: none"> • Creates uncertainty until such time as the necessary work is undertaken and district plan changes made
Issue resolution	<ul style="list-style-type: none"> • Provides a process to advance the resolution of issues 	<ul style="list-style-type: none"> • Relies upon future work, principally by the territorial authorities
Integrated management	<ul style="list-style-type: none"> • Ensures process to achieve integrated management 	<ul style="list-style-type: none"> • May result in different solutions across the region
Carrying out functions	<ul style="list-style-type: none"> • Can achieve Environment Canterbury's functions 	
Consultation views	<ul style="list-style-type: none"> • Reinforces linkages between different natural and physical resources 	<ul style="list-style-type: none"> • Provides insufficient certainty of the outcome required
OVERVIEW	This approach may be effective and efficient, but relies upon future work undertaken by Environment Canterbury and territorial authorities.	

Option 3: Introduce greater level of direction in the CRPS

	For	Against
Purpose of the RMA	<ul style="list-style-type: none"> Provides regional direction on the achievement of the purpose of the Act 	<ul style="list-style-type: none"> Reduces flexibility for local solutions
Issue resolution	<ul style="list-style-type: none"> Provides certainty on how issues will be resolved 	<ul style="list-style-type: none"> Relies upon work being done in front of the CRPS review
Integrated management	<ul style="list-style-type: none"> Ensures common solutions across the Canterbury Region 	
Carrying out functions	<ul style="list-style-type: none"> Can achieve Environment Canterbury's functions 	<ul style="list-style-type: none"> Can be seen to going beyond an 'overview'
Consultation views	<ul style="list-style-type: none"> Provides a greater level of certainty 	<ul style="list-style-type: none"> Potential compliance costs for territorial authorities (giving effect to the direction in district plan) Seen as one size fits all solution
OVERVIEW	This approach may be effective and efficient at the scale of the Canterbury Region, but produce less than optimum local outcomes.	

Appendix 2: Analysis of policy approaches: versatile soil

Option 1: Remove the versatile soil provisions from the CRPS

	For	Against
Purpose of the RMA	<ul style="list-style-type: none"> • Can be achieved 	
Issue resolution		<ul style="list-style-type: none"> • Fails to recognise the most significant loss of productive capacity of versatile soil
Integrated management		<ul style="list-style-type: none"> • Provides no recognition of importance of versatile soil at a regional level
Carrying out functions	<ul style="list-style-type: none"> • Appropriate if no resource management issue for the region 	
Consultation views	<ul style="list-style-type: none"> • Reflects court decisions 	<ul style="list-style-type: none"> • Removes support for current district plan provisions
OVERVIEW	This approach is appropriate if a view is formed that there is no issue for the CRPS to address	

Option 2: Provide policy in the CRPS to have regard to the value of versatile soil for rural production when considering how to control the use of land

	For	Against
Purpose of the RMA	<ul style="list-style-type: none"> • Provides recognition of importance of versatile soil 	
Issue resolution	<ul style="list-style-type: none"> • Allows issue to be resolved a local level' 	<ul style="list-style-type: none"> • Relies upon district plans to resolve issue
Integrated management	<ul style="list-style-type: none"> • Ensures that versatile soil a consistent 'factor' in decision making 	<ul style="list-style-type: none"> • May result in different solutions across the region
Carrying out functions	<ul style="list-style-type: none"> • Can achieve Environment Canterbury's functions 	
Consultation views	<ul style="list-style-type: none"> • Provides support to current district plans 	<ul style="list-style-type: none"> • Provides insufficient certainty of the outcome required
OVERVIEW	This approach may be effective and efficient support current district plan provisions	

Option 3: Focus on the physical destruction of versatile soil in the CRPS

	For	Against
Purpose of the RMA		<ul style="list-style-type: none"> Loss unlikely to be of a scale and extent that warrants intervention
Issue resolution		<ul style="list-style-type: none"> Fails to recognise the most significant loss of productive capacity of versatile soil
Integrated management		<ul style="list-style-type: none"> Fails to recognise the most significant loss of productive capacity of versatile soil
Carrying out functions	<ul style="list-style-type: none"> Reflects new definition of 'soil conservation' 	
Consultation views		<ul style="list-style-type: none"> Does not address perceived issue Removes support for some current district plan provisions
OVERVIEW	This approach is unlikely to be necessary to address a regional resource management issue	

Option 4: Retain current focus in the CRPS on foreclosing land use options benefiting from versatile soil but amend provisions to address the criticisms of the courts

	For	Against
Purpose of the RMA		<ul style="list-style-type: none"> Concerns expressed by the courts (in Canterbury context) are wider than wording of current provisions.
Issue resolution	<ul style="list-style-type: none"> Provides direction of issue and appropriate response 	<ul style="list-style-type: none"> Difficulty in substantiating what the issue is
Integrated management	<ul style="list-style-type: none"> Ensures common solutions across the Canterbury Region 	
Carrying out functions	<ul style="list-style-type: none"> Can achieve Environment Canterbury's functions if 'issue' established 	
Consultation views		<ul style="list-style-type: none"> Significant justification required if this approach is to be successful No an issue for growth of city and towns
OVERVIEW	This approach may be effective and efficient if the issue can be substantiated - the level of justification required is high	