


**SECTION 32
COMMERCIAL CHAPTER**

CONTENTS

1.0	STRATEGIC CONTEXT	3
2.0	RESOURCE MANAGEMENT ISSUES	12
3.0	GENERAL POLICY DIRECTION OPTIONS AND RECOMMENDATIONS	27
4.1	EVALUATION OF PROPOSED OBJECTIVE 1	30
4.2	EVALUATION OF PROPOSED OBJECTIVE 2	37
5.0	EVALUATION OF PROPOSED POLICIES, RULES AND METHODS	39
6.0	SUMMARY OF CONSULTATION	102
7.0	BIBLIOGRAPHY	113
8.0	APPENDICES	118



1. STRATEGIC CONTEXT

1.1 PURPOSE AND SCOPE OF THE COMMERCIAL CHAPTER

1. The purpose of the Commercial chapter is as follows, having regard to the issues that Christchurch faces in a post-earthquake environment:
 - a. To provide clarity on the function of different centres including District Centres and Neighbourhood Centres, their place in a wider network of centres and the appropriate scale and form of development commensurate with their function.
 - b. To support a consolidated urban pattern to the city's development, recognising the role of centres as focal points for commercial and community activity, with more intensive residential development around larger centres to sustain and support the growth of centres.
 - c. To recognise that some commercial activity beyond centres is appropriate, where it is ancillary, limited in scale and doesn't undermine the viability and vitality of centres, or where it is of a format that is unsuited to a traditional centre location.
 - d. To ensure the recovery of suburban centres that suffered damage in the earthquakes of 2010 and 2011.
 - e. To achieve a high quality urban environment in commercial centres that contributes to their vitality and amenity and is a focus of commercial and community investment.
2. These purposes are not dissimilar to those of the operative District Plans (Christchurch City Plan and Banks Peninsula District Plan (BPDP)). However, in reviewing those provisions, a number of changes were identified that would assist with Canterbury's recovery. In particular there is a need to:
 - a. give greater emphasis to a centre's intended function, and managing activities and the scale/form of development to align with this.
 - b. provide greater certainty on the activities and the scale/form of development anticipated in different centres and parts of centres.
 - c. update existing provisions to recognise a new statutory planning framework, including the Recovery Strategy for Greater Christchurch, the Christchurch Central Recovery Plan (CCRP), the Land Use Recovery Plan (LURP), and Chapter 6 of the Regional Policy Statement (CRPS). This includes the need to identify the extent of Key Activity Centres (KACs) and identify Neighbourhood Centres.
3. The first phase of the review provides a policy framework on the distribution of commercial activities across the city and covers commercial zones and the activities provided for in those zones. Parts of the District Plan that have not been reviewed and are instead to be considered in Phase 2 include the following matters:
 - a. rezoning of New Brighton commercial centre (subject to a master plan, which will inform and be informed by the District Plan Review (DPR)).
 - b. the implementation of suburban centre master plans for Edgware, Ferry Road and Main Road.

- c. The preparation of Outline Development Plans for each Key Activity Centre to plan the location of new community infrastructure, including public transport interchange, library and other uses.
- d. The development of provisions in the General City Rules chapter for taking Financial Contributions to fund improvements to community infrastructure (including public transport and community facilities).

1.2 PROPOSED DISTRICT PLAN: OVERVIEW AND SYNOPSIS

1. The Strategic Directions chapter provides the following policy direction for commercial activity in Christchurch to:
 - a. promote the utilisation and redevelopment of existing urban land
 - b. ensure new development is integrated with, and within, existing urban areas, transport networks and other infrastructure
 - c. improve people's connectivity and accessibility to employment, transport, services and community facilities
 - d. provide additional land for urban activities within planned new urban areas that meet anticipated demand and enable the efficient and affordable provision and use of new and existing infrastructure
 - e. limit the adverse effects of activities on the efficient and effective functioning, maintenance and upgrading of infrastructure, including reverse sensitivity effects
 - f. prevent sensitive activities establishing near lawfully established activities that generate noise, odour and other adverse effects.

2. The Commercial chapter gives effect to these strategic directions with two objectives that seek to:
 - a. manage the distribution of commercial activity by intensification within existing centres, and to support their recovery
 - b. achieve high quality urban design outcomes for centres and development at a scale and form appropriate to the role of a centre.

3. The methods by which the objectives are supported include policies on the following, together with zoning and rules:
 - a. the role of centres and the extent and development of KACs
 - b. a comprehensive approach to the future development of KACs at Belfast and North Halswell
 - c. managing activities in District and Neighbourhood Centres
 - d. providing for new Local Centres in greenfield areas
 - e. the design, scale and form of development
 - f. the maintenance and enhancement of the built form and character of commercial centres that have undergone a master planning process.

4. Appendix 2 sets out the linkages between all provisions in the chapter.

5. Proposed framework – A hierarchy of centres
 - a. The chapter introduces a hierarchy in providing certainty on the role of centres and their place relative to other centres. In doing so, it recognises the different characteristics of centres including their size (floor space), the scale of built form in

each centre, the range of activities, their catchment and accessibility by a range of modes of transport.

- b. Establishing a hierarchy also provides certainty regarding the anticipated role of each centre, which will guide decisions on investment and the development of community infrastructure, e.g. public transport improvements.
- c. The adoption of a hierarchy reflects higher order directions in the LURP, including Chapter 6 of the Regional Policy Statement, and the CCRP. These documents emphasise the role of the Central City as the “*principal focus for a diversity of business, accommodation, community and cultural activities*” (Objective 12.2 of the City Plan as inserted by the CCRP) while also reinforcing the role of Key Activity Centres (KACs) (Policy 6.3.6, Chapter 6 of the Regional Policy Statement). This is reflected in Policy 6.3.1, which seeks to ensure that adverse effects on the “*function and viability of, or public investment in the Central City and Key Activity Centres*” are avoided (Policy 6.3.1, Chapter 6 of Regional Policy Statement).
- d. Notwithstanding the support to be given to the Central City and KACs, the Council is to “support and maintain the existing network of centres below as the focal points for commercial, community and service activities during the recovery period, including the Central City, KACs and Neighbourhood Centres”
- e. *Key Activity Centres*
- f. KACs are defined in the Regional Policy Statement as the “*focal points for employment, community activities and the transport network and which are suitable for more intensive mixed-use development*”. Action 45 of the LURP requires the Council to define the extent of KACs, which are identified as Papanui, Shirley, Linwood, New Brighton, Belfast, Riccarton, Halswell, Spreydon and Hornby.
- g. The Council has reviewed the KACs including their size (floor space), land uses, constraints and opportunities, and determined that Spreydon (Barrington) is not performing the same function as other KACs and will serve a more localised role in the future. It is on this basis that Spreydon is not ‘grouped’ with other KACs for the purpose of the hierarchy.
- h. *Proposed hierarchy*
- i. The hierarchy of centres is therefore as follows:
 - i. Central City
 - ii. District Centres
 - iii. Neighbourhood Centres
 - iv. Local Centres.
- j. The Council has reviewed the state of each commercial centre across Christchurch, having regard to observations, floor space data (undertaken in 2013), land uses including the presence of anchor stores (supermarket and/or department store) and other indicators. Based on this work, centres have been assigned to a tier in the hierarchy.
- k. *District centres*

- l. District Centres comprise the KACs of Papanui, Shirley, Linwood, Belfast, Riccarton and Hornby, reflecting their sub-regional function serving large parts of Christchurch and surrounding areas. These centres are the largest in terms of floor space with a large range of activities, including a number of anchor tenants. North Halswell is also identified as a District centre, which is yet to develop and is anticipated to be of a function similar to other KACs.
- m. District Centres are on arterial routes and benefit from the highest level of accessibility by public transport outside of the Central City, reflecting their role as public transport hubs now and in the future.
- n. The extent of the area covered by each District Centre is determined by zoning. Each centre is defined by a number of different commercial zones (see below under 'zoning' for an explanation).
- o. *Neighbourhood Centres*
- p. Policy direction in Chapter 6 of the Canterbury Regional Policy Statement (CPRS) requires the Council to identify Neighbourhood Centres, describing the "service role they play to local communities and as a location for appropriate business development". The Council has therefore defined Neighbourhood Centres, which include the likes of Church Corner, Bishopdale, Sydenham and as described above, Spreydon.

Neighbourhood Centres generally serve four or five suburbs and have up to 10,000m² of retail floor space as well as other activities. They are dispersed through suburban areas and are generally located on major roads (including radial routes from the Central City to the edge). Supermarkets and in some instances, department stores, provide an anchor to the centre, supported by a large number and range of outlets including retail, community and entertainment uses.

- q. In some instances, Neighbourhood Centres attract visitors from further afield, reflecting uses, specialty offers or unique characteristics, e.g. setting. This includes Merivale and Sumner, which have a catchment greater than other Neighbourhood Centres.
- r. Like District Centres, Neighbourhood Centres are defined by a number of different commercial zones (see below under zoning, for an explanation).
- s. *Local Centres*
- t. The tier of Local Centres include local parades of shops serving the immediately surrounding residential area. They generally comprise up to 10 shops, which are primarily retail uses, and provide for residents in walking or cycling distance.
- u. *Large Format Centres*
- v. While not listed in the hierarchy above, Large Format Centres such as Tower Junction are made up of stores with a large footprint (greater than 450m²) including trade suppliers, e.g. Bunnings. They have large areas of car parking and are generally less accessible by public transport than District Centres. Large Format Centres have established in areas previously zoned industrial, which are now zoned Business Retail

Park, introduced by a variation to the City Plan.

- w. As they provide for primarily large format stores, rather than smaller scale retail activity, and a limited range of other uses, they sit apart from the other types of centres in the hierarchy. The proposed District Plan, reflecting policy direction, recognises these centres and seeks to maintain them but not provide for growth that would adversely impact on District and Neighbourhood Centres.

6. Zoning

- a. The zoning of commercial areas in the proposed District Plan reflects the activities and scale of development anticipated in different areas of a Commercial Centre. The zones and standards for each zone recognise that activities of different scales, intensity and amenity need to be managed differently depending on their context.

- b. The proposed commercial zones in the Commercial chapter comprise:

i. Commercial Core Zone

This zone is generally the area of a centre dominated by a mall or supermarket, which is reflected in the proposed rules that enable a larger scale of development, i.e. greater height of buildings. The Commercial Core Zone can be found in all District and Neighbourhood Centres.

ii. Commercial Fringe Zone

This zone adjoins the Commercial Core Zone and has an interface (boundary) with adjoining residential zones. It provides for a smaller scale of development and finer grain retailing (smaller shop sizes) reflecting the historic use and character of these areas. Given the proximity to residential areas the rules limit the scale of development, namely with a reduced height limit. The Commercial Fringe Zone can be found in all District Centres and most Neighbourhood Centres.

iii. Commercial Local Zone

This zone comprises small standalone groups of shops, generally single storey, that serve the immediate residential area.

iv. Commercial Retail Park Zone

The Retail Park Zone is made of those areas that provide for larger format (greater than 450m²) as well as trade suppliers, e.g. Bunnings, and yard-based retailing, e.g. car sales yards. It provides for a larger scale of development reflecting the types of activities in these locations, and rules limit the range of activities.

- v. The proposed zones largely reflect the existing zones in the City Plan as outlined below:

- A. Commercial Core Zone – areas zoned Business 2 in the City Plan
B. Commercial Fringe Zone – areas zoned Business 1 in the City Plan that adjoin a Business 2 Zone
C. Commercial Local Zone – areas zoned Business 1 in the City Plan that are stand-alone, i.e. they don't adjoin a Business 2 Zone

D. Commercial Retail Park Zone – areas zoned Business Retail Park.

vi. The proposed zoning is not a significant change from the existing zoning structure in the City Plan.

7. Relationship between the hierarchy and zoning

a. The Commercial chapter is structured according to the zones, with rules specific to each zone. However, the hierarchy (District, Neighbourhood, Local) is reflected in the policies and rules in a number of ways as described below:

i. Policies

Support is given to District Centres and the Neighbourhood Centre of Spreydon ahead of all other centres outside the Central City. Therefore, a development in a Neighbourhood Centre (other than Spreydon) that could compromise the function of a District Centre is not supported.

ii. Rules

A. Caps on floor space
 Rules for the Commercial Core and Commercial Fringe Zones include maximum limits on the floor space of each tenancy for retail, office and other activities. This maximum limit of 500m² in Neighbourhood Centres, is to encourage larger developments to the Central City and District Centres.

B. Height
 The Commercial Core and Commercial Fringe Zones can be found in both District and Neighbourhood Centres. However, the scale of development appropriate in a District Centre such as Riccarton or Hornby is different to what may be appropriate in a Neighbourhood Centre such as Merivale or Edgeware. On this basis, the height rules for the Commercial Core and Commercial Fringe Zones differ between District and Neighbourhood Centres.

b. To summarise the relationship between the hierarchy and zoning, the hierarchy distinguishes between the different functions of centres, while the zoning reflects the scale and form of development anticipated in different parts of the same centre.

1.3 RESEARCH

1. The Council has commissioned technical advice and assistance from various internal and external experts and utilised this, along with internal workshops and community feedback, to assist with setting the Plan framework for the proposed Commercial chapter provisions. This advice includes the following:

Title	Author
Technical Analysis – Post-earthquake:	
<i>Proposed Christchurch City District Plan Commercial and Industrial Chapters Economic Analysis, Christchurch City Council, November 2013. The report provides an evaluation of future retail growth and capacity (supply), as well as assessment of the capacity to accommodate future demand for office floor space</i> Refer to Appendix 9.3 of Industrial Section 32 report.	Property Economics Limited
<i>Workshop - Multi-disciplinary workshop with Council Officers</i>	Christchurch City

Christchurch City Council staff	Council staff
<i>Memo dated 10 October 2013 re. review of provisions for B1 and B2 zones including building height, bulk/ scale, corner sites, building setback and car parking location (Appendix 8.6)</i>	David Compton-Moen, Sinclair Knight Mertz
<i>Memo dated 21 October 2013 re. Criteria and identification of Key Pedestrian Frontages 21 October 2013 (Appendix 8.6)</i>	David Compton-Moen, Sinclair Knight Mertz
<i>Evaluation of effects of bonus height on corner sites 2014 (Appendix 8.7)</i>	Christchurch City Council
<i>Evaluation of interface between Commercial Core/Fringe zones and residential zones, March 2014 – Example in Appendix 8.8.</i>	Christchurch City Council
Effectiveness of the City Plan	
<i>Evaluating the Effectiveness and Efficiency Of The Christchurch City District Plan, 28 January 2011</i>	Response Planning Consultants Limited
<i>Evaluating the Effectiveness and Efficiency Of The Banks Peninsula District Plan, 28 January 2011</i>	Response Planning Consultants Limited

Refer to Bibliography (Section 7.0) for a complete list.

- In addition to the above reports and advice, the Council has compiled, reviewed and developed a collection of material on commercial issues (refer to Bibliography). This information has been used to inform the DPR and this s 32 report.

1.4 CONSULTATION

- During the pre-notification stage of the DPR, a number of consultation meetings were held as summarised in the Introduction to the s 32 report for the proposed District Plan. Consultation undertaken and feedback specific to the Commercial chapter is summarised below.
- General stakeholders or public
Two sessions with stakeholders (industry, landowners, investors and other interested parties) were held on 22 and 29 August 2013, to provide an overview about the direction of the proposed Commercial chapter. Key messages from the stakeholder sessions relevant to the Commercial chapter included the desire to:
 - encourage a dispersal of employment/business/commercial activity across the City
 - provide for a variety of activities at a small scale
 - provide certainty on the role of centres
 - provide for small business in affordable locations.
- Subsequent events were held with the community over February and March 2014 on the draft Commercial chapter. Feedback has raised a number of issues including:
 - how the intensification of centres provided for by the rules will look, particularly building height, car parking and the interface between Commercial Centres and surrounding residential activity.
 - providing for commercial activities established under the Order in Council for Temporary Accommodation, allowing them to remain in their premises beyond April 2016.

- c. support for a new KAC at Halswell, subject to appropriate design, scale, amenity and stormwater management.
- d. the appropriateness of urban design controls on development within centres.

4. Strategic Partners

Meetings have also been held with staff from the Canterbury Earthquake Recovery Authority, Environment Canterbury and Mahaanui Kurataiao Limited in preparation of the draft chapter, to outline the direction of the chapter and also to invite their feedback. Matters raised in the context of these discussions included:

- a. catchment size not being an appropriate criteria for determining a centre's role in itself, given catchments change over time.
- b. any increase in permitted height in Commercial Centres should be predicated on achieving a wider set of outcomes as part of the development, e.g. provision of public open space / community facilities.
- c. how KACs are identified and mapped.
- d. managing office and retail activity to avoid undermining the centres-based approach for commercial activities, including across territorial local authority boundaries.
- e. the distribution, scale and function of Commercial Centres and land supply needs to be informed by a robust understanding of the District's economy.
- f. the rebuilding and enabling of community and social facilities needs consideration in commercial zones.
- g. enabling emergency services and providing direction for the rebuilding of their facilities.

5. Collaborative Advisory Group and Christchurch Joint Officials Group

A Collaborative Agency Group comprising representatives of the Canterbury Regional Council, Selwyn District Council, Waimakariri District Council, Canterbury Earthquake Recovery Authority, NZ Transport Agency, Ngai Tahu and the Ministry for Environment (in an advisory role), and the Canterbury Joint Officials Group (CJOG), representing officials from various government departments, provided feedback through late 2013 and early 2014, including:

- a. the need to consider requiring consent for large scale development in commercial centres to support improvements to, or the provision of, public space, community facilities and public transport infrastructure.
- b. the need for planning of the interface between Lyttelton town centre and the harbour, having regard to the operational and growth plans of the Port.
- c. the definition of KACs and the need for visual illustration of the boundaries.
- d. the need to consider providing for commercial activities outside centres beyond the expiry of the March 2011 Order in Council to recognise that the rebuild in the Central City and some suburban centres will be over a longer period
- e. the need for policy support to the comprehensive development of brownfield sites
- f. Positive support sought for redevelopment and the rejuvenation of damaged areas
- g. Clarity sought on whether a change of activity would trigger resource consent requirements where the existing rules are not complied with
- h. The need to provide for temporary activities to support recovery and rebuilding e.g. location of offices at ground floor

- i. Thresholds for office/ retailing to stage development in greenfield commercial areas having unintended consequences
 - j. The need for the relationship between the centres hierarchy and zoning to be made clearer
 - k. Provision for temporary activities and events being extended to other zones outside Lyttelton
 - l. The need to reduce the complexity of urban design provisions
 - m. Requirements for compliance with ODPs being unnecessary ahead of subdivision and which should be addressed in the subdivision chapter
 - n. Requiring consent for all activities to assess their urban design leading to perverse outcomes. Allowing for some activities as permitted would provide more certainty and better encourage rebuilding.
6. Runanga Focus Working Group
- Ngai Tahu and the Runanga representing the Christchurch City Rohe have also provided input by way of a Runanga Focus Working Group that has provided comments on the Commercial chapter. This has included the following feedback regarding:
- a. importance of indigenous species in landscaped areas
 - b. creation of water bodies being allowed in locations close to the flight paths
 - c. protection of springs and other waahi tapu me waahi taonga, particularly in the planning of new greenfield areas identified for commercial activity
 - d. maintaining separation between stormwater facilities and waterways
 - o. avoiding the discharge of wastewater or stormwater to waterways.

2.0 RESOURCE MANAGEMENT ISSUES

2.1 STRATEGIC PLANNING DOCUMENTS

1. Those strategic matters and provisions specifically given effect or had regard to in this chapter are summarised in the table below and set out in full in Appendix 1. These documents broadly identify the resource management issues for the district and provide the higher level policy direction to resolve these issues.
2. The Strategic Directions chapter also contains higher order objectives and policies to reflect the outcomes sought in a number of strategic planning documents. An assessment of these objectives and policies is contained within the s 32 Strategic Directions report. Those objectives and policies within the Strategic Directions chapter relied on in this chapter are discussed in s 5 (Evaluation of Objectives) below.

Document	Relevant provisions	Relevant directions given effect/taken account of in the Commercial chapter
a. Canterbury Regional Policy Statement (CPRS)	Chapter 5 Objective 5.2.1	i. Ensure that development is consolidated and well designed in and around existing urban areas, and commercial activity is appropriately located to service the community
	Chapter 6 Objective 6.2.6	ii. Recognition of the primary role of the Central City iii. Support for and maintaining a network of KACs and Neighbourhood Centres as focal points for community, commercial and other activities and investment iv. Direct new commercial development to centres v. Provide for a range of other business activities in appropriate locations while avoiding adverse effects on the function and viability of, or public investment in, centres
2. Canterbury Earthquake Recovery Strategy		a. The Recovery Strategy lists six components of recovery each with associated goals. Those goals given effect in the Commercial chapter are listed below: i. Plan for a well-functioning Christchurch Central City, thriving suburban centres, flourishing rural towns and a productive rural sector ii. Renew the region's brand and reputation as a safe, desirable and attractive place to live, study, visit and invest iii. Ensure a range of employment options to attract and retain a high-calibre, appropriately skilled workforce iv. Enable a business-friendly environment that

		<ul style="list-style-type: none"> v. retains and attracts business v. Rebuild infrastructure and buildings in a resilient, cost-effective and energy-efficient manner vi. Zone sufficient land for recovery needs within settlement patterns consistent with an urban form that provides for the future development of greater Christchurch.
3. The Land Use Recovery Plan (LURP)		<ul style="list-style-type: none"> a. LURP actions related specifically to commercial activity direct the DPR to enable: <ul style="list-style-type: none"> i. Community facilities within KACs and Neighbourhood Centres ii. Improved access to buildings and public spaces/places through opportunities for rebuilding iii. Clarity and certainty about urban design requirements while addressing standards that could negatively impact on recovery iv. Zoning that defines the extent of KACs v. Planning provisions for KACs and Neighbourhood Centres that have undergone a suburban centre master plan process; vi. Mixed-use development within KACs.
4. Christchurch Central Recovery Plan (CCRP)		<ul style="list-style-type: none"> a. The CCRP describes a spatial framework for the recovery and rebuild of central Christchurch. It describes the form in which the Central City can be rebuilt as a whole, and defines the locations of 'anchor' projects, which will stimulate further development. b. Of particular relevance, the objectives and policies related to commercial activities broadly seek the development of vibrant urban areas where a diverse and compatible mix of activities can co-exist in support of the Central City Business Zone and other areas within the Central City.
5. Iwi Management Plan (IMP)		<ul style="list-style-type: none"> a. Supporting economic development for Iwi. b. Ngai Tahu participation in urban and township planning and development. c. Protection of water quality including controls over stormwater management. d. Support for activities that improve water use and efficiency.
6. Canterbury Earthquake (Resource Management Act Permitted		<ul style="list-style-type: none"> a. Following the February 2011 earthquake, the Canterbury Earthquake (Resource Management Act Permitted Activities) Order 2011 (OIC) was gazetted (March 2011). It enables the Council to permit temporary accommodation for displaced businesses that otherwise would not comply with the City Plan.

<p>Activities) Order 2011 (OIC)</p>		<p>Temporary accommodation is permitted subject to meeting standards that were outlined in a public notice issued by the Council on 9 April 2011. If a proposal does not comply with the standards, then a site-specific public notice can be issued by the Council to permit the activity.</p> <p>b. The overriding requirement for both permitted and site-specific approvals is that the activity must be temporary accommodation for displaced businesses. The effect of the order is that businesses can occupy a site/premises under the Order until April 2016, after which time, the requirements of the District Plan will apply.</p>
<p>7. South West Area Plan (SWAP)</p>		<p>a. The objectives in SWAP relevant to the Commercial chapter seek to create a hierarchy and balance of Activity, Neighbourhood Centres and Local Centres across the south-west, which are within walking distance for residents, appropriate in the context of the surrounding environment and cater for a range of community and business needs (Objective 9.9). Objectives also seek the better utilisation of existing business land (Objective 9.1), opportunities for mixed-use development (Objective 9.3) and building design that facilitates conversion for different uses over time (Objective 9.5). Business areas are to be easily accessible by walking, cycling and public transport (Objective 9.6) and of a high quality so they are attractive and have strong visual and physical links with the wider area (Objective 9.10).</p>
<p>8. Belfast Area Plan (BAP)</p>		<p>a. A key issue in the Belfast area, relevant to the Commercial chapter, is ensuring that business and community services are provided to serve the existing and future residential communities in Belfast. This can reduce the distance that people may need to travel to work, or obtain goods and services.</p> <p>b. Objectives in the BAP relevant to the Commercial chapter include enabling the creation of a commercial area focussed around the Styx District Centre, while providing limited opportunities for new local centres within greenfield areas.</p>

2.2 RESOURCE MANAGEMENT ISSUE 1

RESOURCE MANAGEMENT ISSUE 1: Dispersal of retail and office activities has the potential for significant adverse effects on the vitality and amenity of commercial centres

- a. The dispersal of retail and office activities in areas outside the Central City and suburban centres was an issue prior to the earthquakes and has become more pronounced since February 2011, with significant damage to land or buildings forcing businesses to relocate.
- b. Between February 2011 and February 2012 there was an increase in the number of business locations and employees in the western suburbs, substantial in some cases. In contrast, there was a decline across almost all industries (including commercial) in the Central City (Environment Canterbury, 2013 *Land Use Recovery Plan Issues Paper*).
- c. The dispersal of retail and office activity is attributed in part to the existing and past regulatory framework, which has provided for the establishment of retail floor space (up to a limit) and offices (unrestricted) in a number of industrial zones.¹ An OIC introduced in March 2011 under the Canterbury Earthquake Recovery Act 2011 has also enabled the relocation of businesses whose land or buildings were damaged, on a temporary basis until April 2016. As at November 2013 the Council issued over 700 approvals for business and non-residential activities outside commercial centres (B1 and B2 Zones) under the OIC.
- d. Other reasons for the dispersal of retail and office floor space include:
 - i. a trend among retailers to embrace larger store formats than previously utilised, requiring larger sites than may be available in commercial centres.
 - ii. cheaper land and floor space in out-of-centre locations, particularly in industrial areas.
 - iii. large out-of-centre sites enable businesses to provide customer parking and therefore convenience for customers from their vehicle to the entrance of a store.
 - iv. changes in technology and email services and the growth in online retailing, enabling professional and other business activities to operate from home or within residential areas, and leading to growth in small businesses.
 - v. changes in consumer preferences.
- e. As a result of dispersed retail and office activity, hot spots have appeared where an agglomeration of retail and/or office activity has occurred outside centres, e.g. an agglomeration of offices adjacent to the existing Addington Commercial Centre. This has had effects on infrastructure and residential amenity including traffic and parking issues. Isolated out-of-centre retail developments have also occurred (e.g. Cassells, The Tannery in Woolston), which has led to potential reverse sensitivity issues for industrial activities (notwithstanding any issues of non-compliance with resource consents held by industrial companies).
- f. In a report for the proposed District Plan (*Proposed Christchurch City District Plan Commercial and Industrial Chapters Economic Analysis, Christchurch City Council, November 2013*) Property Economics Limited (PEL) identifies the distribution of retail employment across the City and by location. Table 3 of the PEL report shows that in 2000, 70 per cent of the City's retail employment was in the Central Business District and other

¹ In the Business 3B, 4, 4T and 8 zones offices are permitted. Across a number of industrial zones, retail activities are permitted with restrictions on the type and scale permitted.

centres. In 2012, this had fallen to 58 per cent. Over the 11-year period from 2000 to 2011, the amount of retail employment did not increase significantly. However, between 2011 and 2012, retail employment in out-of-centre locations jumped from 34 to 43 per cent, reflecting the relocation of businesses.

- g. In terms of office floor space, PEL highlighted the large proportion of consented office activity in industrial zones, reflecting the dispersal of offices to out-of-centre locations that has occurred. Also refer to the s 32 report for the Industrial chapter.
- h. If not appropriately managed, the dispersal of retail and office activity away from centres can have adverse effects on:
 - i. the function and economic viability of established centres.
 - ii. the (physical and social) amenity values of established centres.
 - iii. business certainty.
 - iv. the efficient and sustainable use of resources, including transport and community infrastructure, e.g. public transport facilities and services, the Council's investment in public space.
 - v. private investment in centres and the ability to attract businesses. With the dispersal of offices and therefore employment, there is not the employment base within a centre to the level otherwise achieved, which may influence whether retailers and other services locate in a centre or not.
- i. GENERAL DIRECTIONS
 - i. The Strategic Directions chapter has the following policy direction:
 - A. Promote the utilisation and redevelopment of existing urban land and provide additional land for urban activities within planned new urban areas to meet community needs.
 - B. Enable business development and growth primarily within a network of commercial and industrial areas.
 - C. That most activities in temporary locations and accommodation following the Christchurch earthquakes ultimately relocate into areas specifically identified for that land use, to support the longer term prosperity and sustainability of Christchurch.
 - ii. In a strategic context, LURP and Chapter 6 of the CRPS also provide policy direction for Commercial Centres:
 - A. The development and distribution of commercial activity will avoid significant adverse effects on the function and viability of these centres (Objective 6.2.5).
 - B. Avoid development that adversely affects the function and viability of, or public investment in, the Central City and KACs (Policy 6.3.1).
 - C. Support and maintain the existing network of centres as the focal points for commercial, community and service activities during the recovery period: (1) The Central City; (2) KACs; (3) Neighbourhood Centres. These centres will be high quality, support a diversity of business opportunities including appropriate mixed-use development (Objective 6.2.5).
 - D. New commercial activities are primarily directed to the Central City, KACs and Neighbourhood Centres (Objective 6.2.6).

E. Business activities are to be provided for in a manner that reinforces the role of the Central City, as the city's primary commercial centre, and that of the KACs (Policy 6.3.6).

F. Recognise that new commercial activities are primarily to be directed to the Central City, KACs and Neighbourhood Centres where these activities reflect and support the function and role of those centres (Policy 6.3.6(4)).

j. As discussed above, an OIC currently allows for suitable earthquake-affected business activities to locate temporarily in residential zones. This planning flexibility expires in April 2016. As a part of the DPR, the Council has considered the appropriateness of extending the period for businesses to remain in locations they would otherwise need resource consent. In the Strategic Directions chapter, there is policy direction to:

“recognise the critical need of some temporary recovery activities to remain beyond their authorised period in the short term because alternative locations or options are not available while taking into account: (i) the effects on the surrounding community and environment; and (ii) the implications on the recovery of the district as a whole, including the loss of housing stock and the recovery of centres for both commercial activities and their role as community focal points”.

k. PROPOSED DIRECTION IN ADDRESSING THE ISSUE

i. Having regard to the strategic policy direction, which is to primarily direct commercial activities to the Central City, KACs and Neighbourhood Centres, the policy approach in the Commercial chapter is to focus commercial activities within centres. This direction is not too dissimilar from the City Plan's Objective on the distribution of commercial activity, which states (amongst other matters)

“ensuring the function, vitality and amenity of those existing centres that provide a wide range of public and private services and facilities to the community will not be significantly affected by new retail activity”

k. SCALE AND SIGNIFICANCE

i. For the purposes of this evaluation, the policy direction of focussing commercial activity within centres is not a significant change and is not of a scale that necessitates greater evaluation than other provisions.

ii. A restrictive approach is proposed to commercial activities in industrial zones, which is dealt with in the Industrial chapter and its s 32.

2.3 RESOURCE MANAGEMENT ISSUE 2

RESOURCE MANAGEMENT ISSUE 2: Areas identified for commercial activity in greenfield areas have not developed, potentially limiting the services available to local communities

- a. A s 35 report prepared in 2011 on the Christchurch City Plan highlighted the issue of areas zoned Business 1 within larger greenfield residential areas not developing for commercial activities. Examples include Northwood and Aidanfield where areas zoned Business 1 have been developed for residential activities. The report attributes this to residential development achieving a greater financial return for developers, as well as suggesting there does not appear to be sufficient demand for these areas to be taken up for this activity, or in this location. The Report also recommends that closer consideration be given to the location of new commercial centres including their accessibility, visibility and existing land uses.
- b. In other greenfield residential areas that are undergoing development, commercial uses are planned and/or consented. Examples include Wigram and Prestons where supermarkets and smaller shops are proposed on land identified on Outline Development Plans in the City Plan for commercial activities. It can be assumed that demand exists in the areas that commercial development is proposed, which may reflect the heightened demand for sections in the surrounding area post-earthquake as residents from red-zoned areas relocate.
- c. In planning new commercial centres, there is a need to consider those factors identified in the s 35 report including accessibility, visibility and existing land use in the immediate area.
- d. **GENERAL DIRECTIONS**
 - i. In a strategic context, LURP and Chapter 6 of the CRPS also provide policy direction for Commercial Centres as follows:
 - A. Development of greenfield priority areas must provide local retail and community spaces suited to the scale of the subdivision (LURP, s 4.2.2 (Ensure quality of greenfield housing subdivisions)).
 - B. The Christchurch City Council to enable in the next review of its District Plan the following measures:
 - thresholds for commercial activities in greenfield priority areas for business where these are considered necessary to avoid reverse sensitivity effects or effects on the viability of KACs (LURP, Action 24).
- e. **PROPOSED DIRECTION IN ADDRESSING THE ISSUE**
 - i. Having regard to the statutory context, particularly LURP, the proposed direction is to provide for localised commercial activity in greenfield residential areas to serve the needs of the surrounding community.
- f. **SCALE AND SIGNIFICANCE**
 - i. It is not a significant change from the existing policy framework of the City Plan, the change being in the methods to enable development of local centres in greenfield areas. With this in mind, the scale and significance of the general policy approach is low.
 - ii. A new Commercial Centre at North Halswell, identified as a KAC in Chapter 6 of the CRPS, is significant and of a large scale given its potential impacts, both positive and negative on a large extent of the City. With this in mind, a full evaluation of the proposed North Halswell KAC is provided separately in this s 32 document.

2.4 RESOURCE MANAGEMENT ISSUE 3

RESOURCE MANAGEMENT ISSUE 3: The current policy framework does not provide clarity on the function of different centres and their place in a hierarchy of centres. This has the potential to create uncertainty, leading to unintended outcomes.

- a. The operative City Plan recognises the different roles of centres by defining District and Local Centres. District Centres are described in the Plan as having *“an important function as significant physical resources providing for the social and economic well-being of their respective communities of influence”* and as *“focal points in terms of providing important public and private services and facilities to the community.”*
- b. District Centres are divided into two groups, the first being smaller District Centres that serve a neighbourhood catchment and which include a ‘number and variety of small retail, community and service activities, and usually include a supermarket’. Examples include Woolston, Halswell and Redcliffs. A second group of District Centres are larger and comprise business activities and community facilities, serving ‘sizeable suburban residential catchments’ with over 20,000 sq m of floor space. Examples include Riccarton, Hornby, Bishopdale and Sydenham.
- c. In contrast, Local Centres, of which there are over 130, are smaller and more localised in nature, serving a small and immediate catchment. They generally comprise a strip of shops with limited community facilities.
- d. While the Plan distinguishes between the functions of these two distinct groups, there is insufficient recognition of the different roles that centres play, which is reflected in the large and diverse group of centres defined as District Centres.
- e. An issue highlighted in a s 35 Report was *“the differentiation between the functions of different business locations has been blurred. As a result, different areas are performing similar functions when this may not have been intended”*. An example given in s 35 was that *“the City Plan is less effective in maintaining the city centre’s role as the principal focus for commercial and administration businesses, and overall employment”*.
- f. Unless there is greater recognition of the distinction between different locations, there will continue to be uncertainty regarding the intended function of different centres and what is anticipated in those centres in terms of activities, the scale and form of development and the overall size of a centre relative to other centres.
- g. Chapter 6 of the CRPS requires the Council to identify KACs and Neighbourhood Centres, which in effect requires recognition of the different functions of centres currently classified as District Centres. KACs are defined as *“focal points for employment, community activities, and the transport network”* as well as providing for higher density residential development.
- h. Neighbourhood Centres are described in Chapter 6 as playing a ‘service role to local communities, and as a location for appropriate small-scale development’, but sit at a level above what are currently described as Local Centres in the operative City Plan.
- i. In terms of retail areas that have developed as Large Format Centres and are currently zoned Business Retail Park, there is not a clear direction in policy on their intended role and the types of activities for which they are specifically intended. The rules for retail parks such as Tower Junction provide for food and beverage outlets, however there is a risk in the future of food and beverage outlets agglomerating and becoming destinations in their own right but without the levels of amenity and accessibility expected of traditional centres.

Potential also exists for the development of other non-retail activities more appropriately located in centres with good access by walking, cycling and public transport. This includes commercial services, e.g. banks and professional offices, recreational activities and food and beverage outlets.

j. GENERAL DIRECTIONS

i. In a strategic context, LURP and Chapter 6 of the CRPS also provide policy direction for Commercial Centres through a centres-based approach.

ii. Avoid development that adversely affects the function and viability of, or public investment in, the Central City and KACs (Policy 6.3.1).

iii. Support and maintain the existing network of centres below as the focal points for commercial, community and service activities during the recovery period: (1) The Central City; (2) KACs; (3) Neighbourhood Centres. These centres will be high quality, support a diversity of business opportunities including appropriate mixed-use development (Objective 6.2.5).

iv. New commercial activities are primarily directed to the Central City, KACs, and Neighbourhood Centres (Objective 6.2.6).

v. Business activities are to be provided for in a manner which reinforces the role of the Central City as the city's primary Commercial Centre, and that of the KACs (Policy 6.3.6).

vi. Recognises that new commercial activities are primarily to be directed to the Central City, KACs and Neighbourhood Centres where these activities reflect and support the function and role of those centres (Policy 6.3.6(4)).

vii. In the Strategic Directions chapter of the proposed District Plan, there is also guidance that influences the policy direction in the Commercial chapter. This includes:

A. Support the role of the Central City and suburban and town centres as community focal points for housing, commercial service, community and transport activity (Objective 3.6.2).

B. Enhance the role of the Central City as the principal community focal point for Christchurch (Objective 3.6.2).

C. Maintain and enhance the function and viability of, and public investment in, the Central City, KACs (as identified in CRPS), and ensure those centres provide a high quality urban environment, as key community focal points (Policy 3.6.2.7).

D. Reinforce the role and attractiveness of the Central City as the primarily community focal point for the district (Policy 3.6.2.7).

k. PROPOSED DIRECTION IN ADDRESSING THE ISSUE

i. Having regard to the policy direction described above, the general policy approach necessitates recognition of the different roles of centres by establishing a hierarchy that reinforces the roles of these centres, particularly the Central City and KACs.

l. SCALE AND SIGNIFICANCE

i. With this context, there are not broader options to evaluate. The distinction made between the roles of centres articulates their function now and in the future, i.e. centres ranging in size, the catchment they serve, their accessibility, and the range of goods and services available. The proposed policy direction strengthens the recognition of a centre's function but in doing so, does not propose significant changes and not of a scale that will be detrimental to communities.

2.5 RESOURCE MANAGEMENT ISSUE 4

RESOURCE MANAGEMENT ISSUE 4: Inadequate controls on design could lead to poor outcomes, particularly in the rebuild of suburban centres

- a. High quality urban design is integral to a place's form, feel and function. There is a strong connection between the quality of the built environment and the economic, social and environmental success of a place, as identified by the *Value of Urban Design* (Ministry for the Environment, 2005) and more recent urban design and health research.
- b. LURP requires the proposed District Plan to address the efficiency and effectiveness of urban design provisions (Action 2), provide clarity and certainty about urban design requirements (Action 11) and through amendments to the CRPS directs the District Plan to incorporate the principles of high quality urban design through objectives, policies, rules and other methods, including design guidelines (Chapter 6 Policy 6.3.2).
- c. The operative District Plan recognises the importance of high quality urban design through objectives, policies, and methods, including urban design assessment matters, for some areas of the city, but to a limited extent for other areas of the city including Business 1 and 2 Zones. Both private plan changes and council-initiated plan changes in recent years have provided a much stronger foundation for achieving high quality urban design, such as in new residential urban growth areas encompassed by the Living G Zone, and for existing higher density residential zones, including the Living 3 and 4 Zones (Plan Change 53).
- d. However, for more than a decade there has been significant concern that the district's Local and District Centres have not, and will not of their own accord, achieve the quality of environment that is anticipated by the wider community for these areas.
- e. The matters of concern raised relate to (amongst other matters):
 - i. environmental or amenity quality of District and Neighbourhood Centres.
 - ii. layout of developments and their relationship to public space.
 - iii. lack of human scale.
 - iv. quality of the interface between public and private space.
 - v. accessibility to and within centres.
 - vi. visual and physical impacts of vehicle access and parking.
 - vii. Crime Prevention through Environmental Design (CPTED).
 - viii. quality of architectural design.
 - ix. building construction and materials.
 - x. environmentally sustainable design.
 - xi. relationships with neighbouring developments in the wider context.
- f. The key matter of concern is the relationship between public or publicly accessible space and private development, which impacts upon all of the matters noted above.
- g. These concerns have been raised through:
 - i. research, including surveys and assessments, undertaken from 2008 to 2013.
 - ii. residents and other community stakeholders, including business associations, articulated via Community Boards and City Councillors and through various forums.
 - iii. wider community, through processes such as the preparation of a suburban centre master plan.
 - iv. Council staff, particularly regulatory and urban renewal planners and urban designers

who deal with resource consents, including more recent and extensive involvement in the redevelopment of the suburban centres following the Canterbury earthquakes.

- h. The s 35 report on the effectiveness of the City Plan highlighted the issue of the 'intensity of built form resulting in poor design outcomes, particularly at the interface with residential properties'. It goes on to state:

"The City Plan is not controlling the visual appearance of large buildings resulting in the presence of large, blank walls. Landscape and design mitigation measures are not effective at managing visual effects. The built form outcomes are viewed as being poor. The current rule managing development and re-development of land is not considered to be effective because of its controlled activity status and the inability to influence or initiate meaningful design changes that would go to better integrate commercial areas with the immediate adjoining (usually living) environment."

- i. Observations made from site visits to suburban centres by David Compton-Moen (Urban Designer, Sinclair Knight Mertz) during 2013 have also highlighted a number of matters requiring attention as expressed below:

"It was observed that older B1 developments, constructed right up to the street boundary had a better relationship to the street than some new developments which are positioned behind car parking or landscaping or both. Centres such as Addington, Woolston and Ferrymead often had inconsistent building setbacks which created a sense of disunity and clutter. The location of car parking had a significant influence on the character of each commercial centre."

- j. At present there are no urban design controls for the older, established Business 1 Zones under the operative District Plan and limited urban design controls in the Business 2 Zones, with the controls related to larger developments or those within the Business 2P (parking) Zone. Where controls exist, they have been introduced to the District Plan by way of a plan change for a specific suburban centre, or in relation to an urban growth area, the latter being relatively inconsistent in approach and scope across the city.

- k. A clear pattern of redevelopment and expansion of floor space within existing sites has been emerging since the 2010/2011 earthquakes. As a result there appears to be a general sense that many of the Commercial Centre Zones are currently vulnerable to poor design outcomes due to the lack of District Plan design provisions for these zones. In addition, the ability to undertake a quality rebuild has become negligible in some areas where provisions, such as the number of car parks required, have placed a heavy burden on the extent of a site required to accommodate these provisions.

- l. Quality urban design is arguably seen as having far greater importance now than ever before as the city identity is rebuilt. In suburban areas where many of the Business 1 Zones played an important role in the legibility of the local area by way of location, visibility, the activity and built form, it is vital to ensure the building is relevant to its context. In addition, the Business 2 Zones, with pressure for expansion as a result of the loss of much of the Central City commercial area, are playing a far greater and more varied role in community life, than previously.

- m. The Council has been facing increasing pressure from the owners of the suburban malls to rebuild and intensify activity in and around these sites, primarily for additional retail activity,

while the Central City is not functioning. These malls, in essence, have begun to take on a higher order function in the interim. As such, the provision of not only private amenity and good urban design practice is important in achieving a high quality environment, particularly given the number of visitors who see and undertake activities in these centres.

- n. The Suburban Centres Programme is a master planning initiative for suburban commercial centres that experienced a high degree of earthquake damage and need public and private sector assistance to rebuild. At the time of writing, six of the nine master plans initiated by the Council have been adopted: Lyttelton; Sydenham; Linwood Village; Selwyn Street Shops; Sumner Village Centre and Edgware. The remaining master plans (Ferry Road, New Brighton Centre and Main Road) are near completion.
- o. Key principles that featured strongly in the community consultation for the master plan areas included the desire for centre redevelopment that:
 - i. is resilient and flexible.
 - ii. recognises the character of the centre.
 - iii. is of a high quality design.
 - iv. ensures buildings are built right up to the street, and car parking does not dominate the site.
 - v. protects the remaining built character that contributes positively to the centre.
- p. In conjunction with these principles, there were a number of actions and methods proposed in the master plans, including: community representation on the Urban Design Panel; recommended changes to the City Plan,² and design and character guidance, some of which is complete.
- q. The District Plan provides a mechanism to achieve actions identified in the master plans and as a part of a package, can support the achievement of visions for these centres.
- r. In addition to this, other communities centred on areas such as Beckenham took the initiative to instigate discussions on what the community would like to see in terms of design for their local shopping centre. In part this was to ensure better quality design in their rebuilds, both because opportunities arose through earthquake damage, and in response to recent developments in the centre that members of the community felt had been detrimental to the character and quality of their area. This more than suggests good design is sought by the community, which more recently has been supported by survey responses on the DPR.
- s. GENERAL DIRECTIONS
 - i. In a strategic context, LURP and Chapter 6 of the CRPS provide policy direction as follows:
 - A. Christchurch City Council to enable in the review of its District Plan the following measures
 - i. clarity and certainty about urban design requirements;
 - ii. improved access to buildings, structures and public places and spaces through opportunities during rebuilding;
 - iii. clarity and certainty about urban design requirements in KA.Cs and other business zones.

² Including the identification of areas appropriate for rezoning for a mix of activities including residential and commercial; the consolidation of zoning in some areas; provision for improved pedestrian linkages e.g. laneways; introduction of specific controls on height, lot sizes; provision for temporary activities.

- B. Christchurch City Council to enable in the next review of its District Plan the following measures, as a matter of urgency: address standards relating to urban design that could negatively impact upon recovery (LURP Action 45).
- C. With reference to the Central City, KACs and Neighbourhood Centres incorporate good urban design principles (Objective 6.2.5, Chapter 6).
- D. Business development adopts appropriate urban design qualities in order to retain business, attract investment and provide for healthy working environments (Objective 6.2.6, Chapter 6.)
- G. *“Business development ... and the establishment of public space is to give effect to the principles of good urban design below, and those of the NZ Urban Design Protocol 2005, to the extent appropriate to the context ... “(Policy 6.3.2).*
- H. Territorial authorities will (1) Include in district plans objectives, policies and rules (if any) to give effect to Policy 6.3.2 (Method to Policy 6.3.2);
- I. Territorial authorities should (2) Develop urban design guidelines to assist developers with addressing the matters set out in Policy 6.3.2. and (3) Consider the principles of good urban design as reflected in the New Zealand Urban Design Protocol (2005) in urban design processes (Method to Policy 6.3.2) .

t. Reflecting the above, the Strategic Directions chapter has the following directions:

- i. A well-designed urban environment

The chapter states:

“Attractive streetscapes, open spaces and buildings enhance the appearance and function of the city and provide opportunities for community interaction and healthy lifestyles. They also provide support for commercial and industrial activity.”

This is carried through into the following objectives and policies:

- ii. 3.6.1 – Recovery and Long-term future of the District
“The recovery and development of Christchurch as a dynamic and internationally competitive city with ... A distinctive identity and quality urban environment that is attractive to business, residents and visitors.”

- iii. 3.6.13 – Development design and quality

“Development shall give effect to the principles of good urban design below, and those of the NZ Urban Design Protocol 2005.”

u. PROPOSED DIRECTION IN ADDRESSING THE ISSUE

- i. Having regard to the policy direction in LURP, it is appropriate for the Commercial chapter to pursue an objective of a high quality environment, which can be supported through good design in the built form. The methods for achieving this are considered in this evaluation but the overall policy direction of incorporating urban design principles into the plan is consistent with higher order documents.

v. SCALE AND SIGNIFICANCE

- i. The inclusion of urban design provisions into the plan to achieve a high quality environment is a change from the status quo, with the City Plan currently having a limited number of rules concerned with design outcomes. This affects landowners and developers in commercial centres who will be subject to greater requirements through the introduction of standards and a requirement for consent to enable an urban design assessment. It impacts on their compliance costs as well as development costs.

- ii. The wider community and city's success benefits from this policy direction by having a high quality environment to visit, work, live and play. Through good design a centre can be more attractive and may attract more investment and development opportunities.
- iii. Having regard to the private costs borne by landowners or developers, the change is significant from the status quo, and is of a reasonable scale in that it affects a large number of the business community. More detailed evaluation of the proposed provisions is therefore provided in s 5.8. Also refer to relevant documents listed in the Bibliography, which highlight the issues above, options, and the benefits and costs of each.

2.6 RESOURCE MANAGEMENT ISSUE 5

RESOURCE MANAGEMENT ISSUE 5: Community groups and emergency services suffered damage to their premises and facilities and have been forced to relocate. Unless provided for, there is a risk such groups will be displaced permanently in locations that may not be accessible to the groups they serve.

- a. Community facilities owned by the Council and other organisations suffered damage in the earthquakes. This has resulted in community groups relocating on a temporary or permanent basis. Some sectors have established forums, e.g. Christian Churches, which has enabled the sharing of information and facilities to support others.
- b. There is a need to provide for the development of new facilities in appropriate locations to meet the needs of groups. Many community groups may re-establish on the same site they previously occupied while others will look to find a new site or continue sharing with other organisations. Having regard to this, the District Plan needs to be flexible to the needs of these groups.
- c. POLICY DIRECTION IN STRATEGIC DOCUMENTS
 - i. LURP recognises this issue, with Action 11 for the Christchurch City Council to enable community facilities within KACs and Neighbourhood Centres in its review of the District Plan.
 - ii. The Strategic Directions chapter has a direction that *“people have a sense of connection to and participate in their community”*. The role of the District Plan in achieving this is recognised as *“creating opportunities for community interaction, for example, through provision for open space, community facilities and walking networks and supporting the Central City and suburban centres as community focal points”*.
- d. PROPOSED DIRECTION IN ADDRESSING THE ISSUE
 - i. The policy direction of providing for community facilities in centres reflects higher order documents.
- e. SCALE AND SIGNIFICANCE
 - i. The policy direction is not a departure from the current City Plan and is unlikely to have

an adverse effect. It is therefore not considered to be significant or of a scale that justifies more in-depth evaluation than is provided in this report.

3.0 GENERAL POLICY DIRECTION OPTIONS AND RECOMMENDATIONS

1. Through the LURP, it has been directed that a new Chapter 6 be inserted into the CRPS. Objectives and policies in Chapter 6 require the Council to support and maintain the existing network of KACs and Neighbourhood Centres as focal points for community and commercial activity, and to recognise that commercial activities are to be primarily directed to centres. This policy direction is to be met through objectives, policies and rules (if any).
2. Therefore, the option of not having regulatory control and leaving it to the market is not an appropriate option.
3. The following options have therefore been evaluated in terms of their ability to provide the most efficient and effective means of managing the function, scale and form of different centres and areas within centres and distribution of retail and office activities.
4. **Option 1 – New policy framework consistent with the Land Use Recovery Plan**
 - a. An approach of providing for retailing and office activities predominantly in centres, particularly small format retail, while enabling very limited retail and office activity outside centres.
 - b. Benefits
 - i. Provides greater clarity on the distribution of retail and office activities.
 - ii. Recognition of the importance of supporting recovery of earthquake-damaged centres.
 - iii. Supports the viability, function and amenity of centres.
 - iv. Supports the public and private investment within those centres through retaining certainty on urban form and intended retail distribution.
 - v. Confidence for developers of higher density residential development where this is located near centres.
 - vi. Reduces potential for distributional effects on centres arising through out-of-centre retail, given that only certain types of retail will be permitted out-of-centre.
 - vii. The range and scale of retail services enabled out-of-centre maintains an appropriate level of function and amenity in existing centres.
 - viii. Supports the efficient use of infrastructure, including multi-modal access to centres and 'cross-shopping.'
 - ix. Improved ability to manage significant out-of-centre retailing where distributional effects alone do not suffice (through link to urban form effects, especially where new agglomerations of retail activity are not well supported by transport and nearby residential activity).
 - x. Retains certainty for industrial activity of the future use of adjoining land
 - xi. Reduces the potential for reverse sensitivity effects in industrial areas of retail and other commercial activity giving rise to complaints about existing industry
 - xii. Supports retention of amenity and character of sensitive environments (e.g. residential).
 - c. Costs
 - i. Less flexibility for retail businesses to locate in a wide variety of places throughout the city and potentially higher land costs for locating in centre.
 - ii. Is more restrictive for retail developments outside of centre in comparison with existing provisions, which enable more retail particularly in industrial zones.

5. Option 2 – Status quo (Centres plus framework)

- a. This option would result in the retention of the same suite of commercial-related objectives, policies and rules (including zones) as presently contained within the City Plan and BPDP. The existing zoning framework for commercial zones would also apply.
- b. Benefits
 - i. Provides for a distribution of retail and office activities in a range of environments.
 - ii. Supports the viability, function and amenity of centres while still enabling access elsewhere to a range of goods and services.
 - iii. Reduces potential for distributional effects on centres arising through out-of-centre retail, with restrictions on the quantum of retail floor space permitted in industrial zones and the types of retail activities permitted in the Business Retail Park and industrial zones.
 - iv. Enables a greater level of flexibility for retail developments to occur outside of centre, particularly in the industrial zones.
- c. Costs
 - i. Impact on the recovery of and future growth of the Central City, District and Neighbourhood Centres, reducing the potential to achieve their function.
 - ii. A dispersed pattern of retail and office activity in less accessible locations (as provided for by current rules) will result in reliance on motor vehicle for trips by employees and visitors. This may result in reduced access for those with limited access to private motor vehicles, and reduced pedestrian or cycle accessibility.
 - iii. Impacts upon the road network if retail activity is a strong attractor or agglomerates with other retail activity, particularly where high rates of vehicle generation result in pressure upon the network capacity.
 - iv. Does not address urban form effects including a consolidation of activity in centres, and promoting higher densities of housing around centres to support their function.
 - v. Reduces potential investment and growth in centres, impacting on the amenity and vitality of the centre.
 - vi. The investment in and utilisation of physical resources in centres, including community infrastructure, is compromised through provision for out-of-centre development.
 - vii. Social and community well-being is not provided for if services are located outside centres in areas less accessible by modes of transport other than private vehicle.
 - viii. Provision for and the location of retail and office activities in industrial zones contributes to the loss of suitable industrial land, inflates the value of industrial land (given the ability to develop higher value uses) and results in inefficient use of land and infrastructure.
 - ix. Opportunities for the agglomeration of activities in centres is reduced through provision for out-of-centre development.

6. Option 3 – Conservative Approach

- a. A 'centres-only' approach, requiring all new retail activity to locate in centres.
- b. Benefits
 - i. Supports the viability, function and amenity of centres.
 - ii. Supports the public and private investment within those centres through retaining

- certainty on urban form and intended retail distribution.
- iii. Confidence for developers of higher density residential development where this is located near centres.
 - iv. Eliminates potential for distributional effects on centres arising through out-of-centre retail development.
 - v. Supports the efficient use of infrastructure, including multi-modal access to centres and 'cross-shopping'.
 - vi. Reduces the potential for reverse sensitivity effects in industrial areas of retail and other commercial activity giving rise to complaints about existing industry.
 - vii. Retains certainty for industrial activity that there will be sufficient industrial land supply for foreseeable purposes.
 - viii. Supports retention of amenity and character of sensitive environments (e.g. residential).
- c. Costs
- i. No flexibility for retail businesses to locate anywhere other than centres, with potentially higher land costs for locating in centre.
 - ii. Some retail activities are large format and if not serving as an anchor (e.g. supermarket or department store) will potentially displace smaller format stores.
 - iii. Some retail activities require large spaces of outdoor display, which may impact on street scene (e.g. DIY retail, garden centres and car yards).
 - iv. Retail activities that do not give rise to distributional or urban form effects (e.g. dairies in residential areas, small food and beverage outlets supporting industrial workers) would only be able to locate in centres and therefore be at a greater distance from their retail catchment.
 - v. May give rise to traffic effects including congestion on the surrounding road network.

ADOPTED GENERAL POLICY DIRECTION

7. Option 1 provides for limited amounts of retail activity outside centres, supports the intensification of commercial activities in centres and reinforces centre's role as a focal point of investment and business activity. This provides for a higher level of amenity and contributes to vitality and viability of commercial centres.
8. Recognition of the role of different centres and their identification (including KACs and Neighbourhood Centres) is consistent with the LURP including Chapter 6 of the CRPS.
9. Research indicates future growth in commercial activity can be met through intensification within the Central City and a number of new centres identified in greenfield residential areas such as Prestons. This 'managed' approach is also consistent with the strategic policies in Chapter 6 of the CRPS and provides clarity, supporting investment decisions and public funding of infrastructure and community facilities.
10. By using the technique of zoning and adopting rules that set standards to manage effects, this approach is better able to manage the effects of commercial activities of differing scale, intensity and amenity on centres and their receiving environment.

4.0 EVALUATION OF OBJECTIVES

Section 32(1)(a) of the RMA requires the Council to evaluate the extent to which the objectives are the most appropriate way to achieve the purpose (s 5) of the Act.

4.1 EVALUATION OF PROPOSED OBJECTIVE 1

OBJECTIVE MOST APPROPRIATE WAY TO ACHIEVE THE PURPOSE OF THE RMA	
Objective	Summary of Evaluation
<p>Objective 1 – Option 1 Centres-based framework</p> <p>Commercial activity is primarily focussed within a network of centres (comprising the Central City, District, Neighbourhood, Local and Large Format centres) through intensification and in a way and at a rate that:</p> <p>a. supports the function of District and Neighbourhood Centres as community focal points, while giving primacy to the central city, followed by District Centres and Neighbourhood Centres identified as Key Activity Centres;</p> <p>b. is consistent with the defined role of each centre (refer to Policy 1 Table 15.1 and Appendix 15.9.1);</p> <p>c. supports a compact and sustainable urban form that provides for the integration of commercial activity with community, residential and recreational activities in locations highly accessible by a range of modes of transport;</p> <p>d. supports the recovery of centres in the short to medium term, and enhances the vitality and the amenity of centres;</p> <p>e. ensures goods, services and other facilities are readily accessible to residents, visitors</p>	<ol style="list-style-type: none"> 1. The intent of Objective 1 is to facilitate the growth of centres by ensuring commercial activity is focussed within a network of centres, consistent with strategic directions in the LURP (s 4.3.1) and Objective 6.2.5 and 6.2.6 of Chapter 6 of the CRPS. Ensuring that development is appropriate to the anticipated role of centres also aligns with direction in Policy 6.3.6(4) of Chapter 6 (“...activities reflect and support the function and role of Central City, Key Activity Centres, and Neighbourhood Centres”). 2. This option provides for limited retail activity outside centres, supports the intensification of commercial activities in centres and reinforces their role as a focal point of investment and business activity. Research indicates that future growth in commercial activity can be met through intensification within the Central City and a number of new centres identified in greenfield residential areas such as Prestons. This ‘managed’ approach is consistent with strategic policies in Chapter 6 of the CRPS. 3. The implementation of the objective will provide for a higher level of amenity in centres and contribute to their vitality and viability. The recovery of the Central City and earthquake-damaged suburban centres will be provided for, and in doing so, will support the social and economic well-being of local communities. Identification of the role and function of different centres serving different catchments, including District Centres, KACs and Neighbourhood Centres is also consistent with the LURP and Chapter 6 of the CRPS. 4. A framework for managing the function and distribution of centres provides clarity, supporting investment decisions and public funding of infrastructure and community facilities. 5. Proposed Objective 1 seeks to address the following resource management issues identified earlier, namely: <ol style="list-style-type: none"> a. Dispersal of retail and office activities has the potential

<p>and workers by a range of modes of transport;</p> <p>f. manages strategic adverse effects, including effects on the transport network and public and private infrastructure; and</p> <p>g. is integrated with the delivery of infrastructure.</p>	<p>to have significant adverse effects on the vitality and amenity of commercial centres (Issue 1).</p> <p>b. The current policy framework does not provide clarity on the function of different centres and their place in a hierarchy of centres. This has the potential to create uncertainty, leading to unintended outcomes (Issue 3).</p> <p>Option 1 (Proposed Objective 1) would (in the context of Part 2 matters):</p> <p>c. Ensure the Central City is the primary Commercial Centre of the District. This recognises the investment, infrastructure and accessibility of this location, which reflects the historic form of the city, i.e. a core servicing the surrounds. It is consistent with the Recovery Strategy, Christchurch Central Recovery Plan and LURP including new Chapter 6 of the CRPS.</p> <p>d. Support suburban centres and their role in serving the needs of communities, therefore supporting social and economic well-being for residents and businesses (Section 5).</p> <p>e. Provide certainty on the anticipated urban form of the city, including the distribution of commercial activities and a centre's place in a network, therefore providing confidence for investors, and business owners and occupiers and providing for their economic well-being (Section 5).</p> <p>f. Support the viability, function and amenity of centres by intensifying activity within them, enhancing the environment of centres, and minimising effects of dispersed commercial activity (effects on a physical resource, Section 5).</p> <p>g. Ensure activity within a centre is consistent with the role of the centre, avoiding effects of development in one centre compromising the function, vitality and success of another (Section 5(2)(c)).</p> <p>h. Recognise the importance of supporting the recovery of earthquake-damaged centres, enabling them to fulfil their role in supporting the social well-being of affected communities that rely on these centres for access to goods and services, and the economic well-being of businesses (Section 5).</p> <p>i. Provide for the efficient use of land as a resource by consolidating growth within centres that may otherwise occur in other locations and could reduce the availability of land for other activities (Section 7b).</p> <p>j. Support the physical resource of a centre, including</p>
--	--

	<p>buildings and infrastructure, promoting its use for current and future generations (Section 5).</p> <ul style="list-style-type: none"> k. Ensure accessibility by a variety of transport modes to employment, goods and services as well as enabling the use or participation in a range of community services and facilities that support both social and economic well-being of people (Section 5). l. Provide for the efficient use of infrastructure by enabling travel to obtain goods and services by sustainable modes of transport, and promote linked trips, i.e. visiting a centre for multiple purposes (Section 7b). m. Reduce reliance on the motor vehicle to travel to centres that would arise in less accessible locations. This in turn can reduce carbon emissions and contribute to maintaining the quality of the environment (Section 7f). n. Avoid a dispersal of commercial activity through residential areas, which could impact on the amenity and quality of environment in these locations, and industrial zones, which could impact on the function of these areas and result in reverse sensitivity effects. o. Require existing commercial businesses in out-of-centre locations to rely on existing use rights, which may not provide the same degree of long-term economic certainty and flexibility for businesses to expand. p. Result in potentially higher land costs for businesses to establish within centres, compared with out-of-centre locations. q. Increase demand for land within centres, which may inflate the cost of land or rent. r. Potentially lead to capacity within centres being fully utilised and pressure for the expansion of the existing centre or a new centre.
<p>Objective 1 Option 2 Status quo</p> <p>Centres plus framework</p> <p>Retention of the same suite of commercial-related objectives as presently contained within the City Plan and BPDP.</p>	<ul style="list-style-type: none"> 1. Objectives in the current City Plan seek to: <ul style="list-style-type: none"> a. Ensure the distribution of business activity provides the community with “convenient access to goods, services and opportunities for social interaction”, supporting development within centres, which provides convenient access. However, the City Plan is not as explicit as it could be in directing commercial activities to centres to ensure consistency with the LURP. b. Support social well-being by ensuring the role of centres is maintained and achieved in “satisfying the

	<p>requirements of people and communities for goods, services, and recreation” (Objective on Role of Suburban Centres).</p> <ul style="list-style-type: none"> c. Support the physical resource of a centre including buildings and infrastructure by ensuring the distribution of businesses provides “convenient access to goods, services and opportunities”. d. Avoid effects of new retail activity on the function, vitality and amenity of existing centres, which is consistent with Action 24 of the LURP and Policy 6.3.6(6) of Chapter 6. However, it does not extend to all commercial activity in referring to retail activity, i.e. excluding offices. e. Ensure the Central City is the primary commercial centre of the District. This recognises the investment, infrastructure and accessibility of this location, which reflects the historic form of the city, i.e. a core servicing the surrounds. It is consistent with the Recovery Strategy, Christchurch Central Recovery Plan and LURP, including new Chapter 6 of the CRPS. f. Support suburban centres and their role in serving the needs of communities, therefore supporting social and economic well-being for residents and businesses. g. Enable the provision of employment opportunities in locations that are ‘accessible to communities’. This supports economic well-being of individuals. h. Provide for commercial activities outside of centre, provided it doesn’t have significant adverse effects on existing centres. i. Provide for the “co-location of community services and facilities” in centres. This supports accessibility and participation by residents in a variety of community services and facilities, which supports their social well-being, and linked trips. j. Encourage the consolidation of residential activity around “selected consolidation focal points” ensuring the social and economic well-being of residents is met through proximity to services, while also supporting the economic well-being of businesses in the centre who benefit from a larger population in close proximity. k. Avoid adverse effects of commercial activity in residential areas by reference to “maintaining the
--	--

	<p>amenity of residential and other sensitive environments”.</p> <ul style="list-style-type: none"> l. Reduce reliance on motor vehicles to access goods and services by ensuring business activity is distributed in a manner that provides convenient access to goods, services and opportunities for social interaction. This in turn can reduce carbon emissions and contribute to maintaining the quality of the environment. m. Manage “the adverse effects of business activities on the environment, including maintaining or improving the safety and efficiency of the road network and related systems for all users...” n. Provide for the efficient use of infrastructure in “minimising unnecessary trip generation” and reference to maintaining and improving transport systems for all users, e.g. public transport users, pedestrians and cyclists. o. Specifically address effects of development by reference to “minimising contamination, pollution, odour, hazardous substances, noise and glare”. p. Enable approval of new developments that may have urban form effects as the focus of the objective is principally on distributional effects. q. The objectives will not address the issue of a dispersal of retail and office activities as they do not provide certainty as to where commercial activity is directed.
<p>Objective 1 Option 3 Conservative Approach A ‘centres-only’ approach, requiring all retailing and office activity to locate in centres.</p>	<ul style="list-style-type: none"> 1. Option 3 would see a distribution of commercial activity focussed in commercial centres, which avoids new retailing and office activity beyond zoned centres. It is noted this objective is consistent with LURP and Chapter 6, which direct commercial activity to the Central City, KACs and Neighbourhood Centres. However, LURP and Chapter 6 also provide for commercial activity outside centres, e.g. within greenfield priority areas. This option is therefore not entirely consistent with the LURP and Chapter 6. 2. This objective seeks to achieve the following: <ul style="list-style-type: none"> a. Provide certainty on the anticipated urban form of the city including the distribution of commercial activities, and a centre’s place in a network, therefore providing confidence for investors, business owners and occupiers. b. Supports the viability, function and amenity of

centres by consolidating activity within centres, thereby enhancing the environment and minimising effects of dispersed commercial activity on centres

- c. Recognise the importance of supporting the recovery of centres enabling them to fulfil their role in supporting the social well-being of affected communities that rely on these centres for access to goods and services, and the economic well-being of businesses.
- d. Support social well-being by ensuring the role of centres is maintained and achieved, thereby meeting the needs of the community served by that centre.
- e. Provide for the efficient use of land as a resource by consolidating growth within centres that may otherwise occur in other locations, reducing the availability of land for other activities.
- f. Support the physical resource of a centre including buildings and infrastructure, promoting its use for current and future generations.
- g. Ensure accessibility by a variety of transport modes to employment, goods and services, as well as enabling the use and participation in a range of community services and facilities, which support both social and economic well-being of people.
- h. Provide for the efficient use of infrastructure by enabling travel to obtain goods and services by sustainable modes of transport, and promote linked trips, i.e. visiting a centre for multiple purposes.
- i. Reduce reliance on motor vehicles to travel to centres that would arise in less accessible locations. This in turn can reduce carbon emissions and contribute to maintaining the quality of the environment.
- j. Avoid a dispersal of commercial activity through residential areas, which could impact on the amenity and quality of environment in these locations, and industrial zones, which could impact on the function of these areas and result in reverse sensitivity effects.
- k. Provide greater flexibility for retail developers and potentially lower set up costs (particularly for land).
- l. Require existing commercial businesses in out-of-centre locations to rely on existing use rights, which may not provide the same degree of long-term economic certainty and flexibility for businesses to

	<p>expand</p> <ul style="list-style-type: none">m. Result in potentially higher land costs for businesses to establish within centres, compared with out-of-centre locations.n. Increase demand for land within centres, which may inflate the cost of land or rent.o. May lead to capacity within centres being fully utilised and pressure for the expansion of the existing centre or a new centre.p. Not all commercial activity is required or appropriate to locate in a centre and may have adverse effects on the centre or its surroundings, e.g. yard-based retailing or trade suppliers, which may impact on the amenity of a centre.
--	---

4.2 EVALUATION OF PROPOSED OBJECTIVE 2

OBJECTIVE MOST APPROPRIATE WAY TO ACHIEVE THE PURPOSE OF THE RMA	
Objective 2	Summary of Evaluation
<p>Objective 2 Option 1 Comprehensive</p> <p>An approach that comprehensively sets out expectations for form and scale of commercial development both <i>within and beyond centres</i>.</p> <p>A scale, form and design of development that is consistent with the role of a centre, and which:</p> <ul style="list-style-type: none"> a. recognises the Central City and District Centres as strategically important focal points for community and commercial investment; b. contributes to a high quality urban environment and enhances the character of the centre; c. Is integrated with the surroundings; d. minimises adverse effects on adjoining land use; and e. recognises Ngāi Tahu/manawhenua values 	<ol style="list-style-type: none"> 1. Option 1 supports the purpose of the RMA by: <ul style="list-style-type: none"> a. Ensuring the scale, form and design of development is consistent with the role of a centre and adverse effects of an inappropriate scale and form of development are minimised. b. Recognising the importance of the character of a centre and Ngai Tahu / Manawhenua values, and therefore providing for people and community cultural well-being. c. Recognising the role of the Central City and District Centres, which act as focal points for the community and therefore support the social well-being of affected communities that rely on these centres for access to goods and services. d. Ensuring integration between a centre and its surrounds, thereby minimising effects of activities and contributing to the quality of the environment. e. Making centres attractive locations for business, investment and to visit, contributing to economic and social well-being of the community, both businesses and residents. f. Sustaining the physical resource of a centre, comprising buildings and infrastructure through good design and scale that provide longevity in the built form. g. Good design in a centre contributes to its attractiveness and promotes activity in a highly accessible location by a range of modes of transport, therefore promoting people’s health and safety. h. A high quality environment provides for people’s health and safety through their enjoyment of a place and recreation within the centre i. Contributing to a high quality urban environment, which contributes to the amenity and quality of the environment (s 7). 2. However, the Objective in seeking to achieve a high quality environment may contribute to additional private costs for landowners or developers. This is balanced by the public good that a high quality environment provides for the community.
<p>Objective 2 Option 2 – Status Quo</p> <p>Amenity, design and effects of</p>	<ol style="list-style-type: none"> 1. Option 2 supports the purpose of the RMA by: <ul style="list-style-type: none"> a. Providing for a high standard of amenity, contributing to the quality and enjoyment of the environment for those

<p>suburban centres</p> <p><i>A high standard of amenity, design and layout in suburban centres, whilst minimising adverse effects resulting from their development and activities.</i></p>	<p>living or working within or visiting the area, therefore supporting the economic and social well-being of these people.</p> <ul style="list-style-type: none"> b. Minimising adverse effects (5)(2)(c), particularly in the context of a site’s surroundings.. c. Making centres attractive locations for business, investment and to visit, contributing to economic and social well-being of the community’s businesses and residents. d. Sustains the physical resource of a centre, comprising buildings and infrastructure through good design, layout, and amenity that provides longevity in the built form. e. Good design in a centre contributing to its attractiveness and promoting activity in a location accessible by a range of modes of transport, therefore promoting people’s health and safety. f. Providing a high quality environment for people’s health and safety through their enjoyment of a place and recreation within the centre. <ul style="list-style-type: none"> 2. However, the Objective is not explicit in ensuring the scale and form of development is consistent with the role of a centre, potentially impacting on the quality of the environment in the centre and other centres 3. It may also contribute to additional private costs for landowners and developers. However, this is balanced by the public good that a high quality environment provides for the community.
--	---

5.0 EVALUATION OF PROPOSED POLICIES, RULES AND METHODS

1. Section 32 (1)(b) requires an evaluation of whether the provisions are the most appropriate way to achieve the objectives by identifying other reasonable practicable options, assessing the efficiency and effectiveness of the provisions in achieving the objectives, and summarising the reasons for deciding on the provisions. The assessment must identify and assess the benefits and costs of environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions, including opportunities for economic growth and employment. The assessment must if practicable quantify the benefits and costs and assess the risk of acting or not acting if there is uncertain or insufficient information available about the subject matter.

5.1 POLICY 1 ROLE OF CENTRES AND SUPPORTING METHODS

PROVISIONS (POLICY, RULE, METHOD) <u>MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES</u>	
<p>Relevant objectives:</p> <p>Commercial chapter OBJECTIVE 1: Focus of commercial activity</p> <p>Strategic Directions chapter OBJECTIVE 3.6.1 Recovery and long-term future of the district <i>“Diverse opportunities for business to establish and prosper”</i> <i>“Long term sustainable and efficient use of resources”</i> OBJECTIVE 3.6.2 Development form and function <i>“Consolidates development for urban activities”</i> <i>“Improves people’s connectivity and accessibility to employment, transport, services and community facilities”</i> <i>“Promotes the efficient provision and use of infrastructure”</i> <i>“Supports the role of the central city and suburban and town centres as community focal points for housing, commercial, service, community and transport activity.”</i></p>	
Provision(s) most appropriate	Effectiveness and Efficiency
<p>POLICY 1 – Option 1</p> <p>Maintain and strengthen commercial centres through intensification within centres that reflects their functions and catchment sizes, and in a way that:</p> <p>a. gives primacy to and does not adversely affect the recovery of the Central City as a regional centre and the primary destination for a concentration of a wide range and scale of activities serving the district’s population including shopping, employment, offices, commerce, administration, entertainment, events, tourism and transport services;</p> <p>b. supports and enhances the role of District Centres as significant focal points of commercial and community activity, serving a wide catchment and providing for a diverse range of commercial and community activities, social interaction and recreation in a highly accessible location by a range of modes of transport;</p> <p>c. maintains the role of Neighbourhood Centres, while prioritising support for the Neighbourhood centre of Spreydon defined as Key Activity Centre, as a destination for weekly and daily shopping, local employment and community needs, with a range of</p>	<p>1. EFFECTIVENESS</p> <p>a. Option 1 of maintaining and strengthening centres through intensification is appropriate in achieving Objective 3.6.2 of the Strategic Directions chapter, particularly in improving people’s connectivity to employment, transport, services and community infrastructure.</p> <p>b. The option is appropriate in achieving Objective 3.6.2 of <i>“enhance(ing) the role of the Central City as the principal community focal point for Christchurch”</i>.</p> <p>c. The option is also appropriate as it gives effect to the LURP and Chapter 6, which promote intensification within centres.</p> <p>d. ‘Intensification’ is considered to be more appropriate than ‘consolidation’ as intensification provides for the more efficient use of land within centres and supports their recovery. ‘Consolidation’, while providing for the expansion of centres, can contribute to a diluted concentration of activity within a centre if there is capacity to accommodate development in the centre. As has been observed, significant earthquake damage in many centres has resulted in the demolition of buildings, providing capacity within commercial areas to support their growth.</p>

<p>activities that are accessible to the surrounding residential catchment by a range of modes of transport;</p> <p>d. maintains Local Centres and their role to cater primarily for the day to day convenience shopping and commercial service needs of the immediate walkable residential catchment; and</p> <p>e. maintains the large format retail function of the Commercial Retail Park Zone, located within District Centres at Hornby and Belfast or as standalone 'Large Format Centres', by providing for predominately large format retail activities (excluding supermarkets and department stores), yard based suppliers and trade suppliers and limiting the scale of office activity to an ancillary function</p> <p>Methods Activities permitted in centres:</p> <p>A limited range of activities permitted in the Commercial Local Zone, i.e. activities that are permitted in the Commercial Core and Commercial Fringe Zones of District and Neighbourhood Centres including entertainment facility and restaurant, are not permitted in the Commercial Local Zone.</p> <p>A limited range of activities permitted in the Commercial Retail Park Zone, i.e. activities that are permitted in the Commercial Core and Commercial Fringe Zones of District and Neighbourhood Centres including entertainment facility and restaurant.</p> <p><u>Rules</u> capping the maximum tenancy size of retail, office and other activities to 500m² in the Commercial Core Zone and Commercial Fringe Zone of Neighbourhood Centres to direct large scale activities to the Central City and District Centres.</p> <p><u>Rules</u> capping the maximum tenancy size of a supermarket to 1000m² and other activities to 250m² in the Commercial Local Zone to ensure a range of activities appropriate to its function.</p>	<p>e. Option 1 supports the recovery, vitality and amenity of centres (Objective 1), by defining the function of centres and their place in a hierarchy. This is particularly important given the impacts of the earthquakes on the built form of centres, spending within centres, i.e. change in population influencing the trade within centres, travel patterns of where people shop.</p> <p>f. The development of a centres classification or hierarchy is a commonly used and effective tool within other district plans to distinguish the roles and importance of types of centres. Ensuring appropriately distributed and sized centres in accordance with their catchment needs maximises commercial efficiencies thereby enabling each centre to remain vital and viable and meet the needs of the community.</p> <p>The proposed policy ensures the categories of different types of centres are well defined to:</p> <p>e. provide clear direction on how existing centres should be redeveloped and future centres developed to meet commercial and residential objectives.</p> <p>f. ensure the appropriate level of growth and opportunity for redevelopment of different centres is adequately provided for (i.e. according to their classifications) thereby providing certainty for:</p> <ul style="list-style-type: none"> - landowners, occupiers (tenants) and investors on the future use (role, function, design and growth) of different centres, supporting future growth (while being within the limits of what is appropriate in the context of the centre). - local and central government in terms of the level of investment required to maintain existing and/or develop new infrastructure and services to support the function and vitality of different centres. <p>g. provide for efficient use of resources including land and infrastructure in existing centres, thereby promoting a sustainable urban form (Objective 1 of Commercial chapter).</p> <p>h. provide clear policy direction to support the recovery and ongoing success of centres, particularly the Central City (Objective 1 of Commercial chapter).</p> <p>i. support employment opportunities in centres at</p>
--	--

<p>Rule: maximum plot ratio for the Commercial Retail Park Zone.</p> <p>Definitions Commercial centre District centre Neighbourhood centre Large format centre Local centre Ancillary office activity (in context of the Commercial Retail Park zone)</p>	<p>a level consistent with the infrastructure to serve the needs of the workforce, i.e. large scale office development within the Central City and District Centres, which is supported by a range of other services while also being the most accessible locations to a larger catchment where those workers come from.</p> <p>j. promote sustainable economic growth and business activity within centres in a manner that does not inhibit or undermine the growth of other centres.</p> <p>k. employ methods to limit the range and scale of activities in lower order centres, i.e. Neighbourhood Centres and Local Centres support the objective of giving primacy to the Central City followed by KACs. (Also refer to Policy 2).</p> <p>This approach is supported by the analysis undertaken by PEL that recommended the District Plan: <i>“enable appropriate development to occur in appropriate (centre) locations within the overarching goal of rebuilding the CBD”.</i></p> <p>Rules <i>Activities permitted in the Commercial Local zone</i> The range of activities permitted in the Commercial Local zone is restricted in the proposed plan to recognise the context of stand-alone commercial centres. Due to their size, there is generally not the separation between commercial activities and adjoining residential areas and therefore limited ability to minimise effects of commercial activity including noise, traffic and lighting. From discussions with Council’s monitoring and compliance staff, an issue identified is the sensitivity of the interface between commercial-residential environments. With this in mind, the range of activities provided for in the commercial local zone is more limited than the commercial core and commercial fringe zones.</p> <p><i>Activities permitted in the Commercial Retail Park zone</i> The proposed plan continues to recognise the existing agglomerations of large format retail activities by way of a retail park zone, reflecting Variation 86 to the City Plan. Given the need for</p>
---	---

larger sites to accommodate larger footprints, there is a need to retain capacity in existing retail park zones to meet future demand rather than opening these locations up for a wider range of activities. However, it is recognised that some activities may be appropriate to serve the needs of workers and visitors, including food and beverage outlets.

Maximum tenancy size in Neighbourhood centres

The introduction of a maximum tenancy size in neighbourhood centres gives effect to the policy direction of giving primacy to the Central City and Key Activity Centres. While the intent is to direct larger scale development to larger centres, provision is made for supermarket(s) and department store(s) to recognise the anchor role they play in neighbourhood centres. Having regard to the existing size of tenancies in neighbourhood centres (based on surveys in 2013, between 85 and 100% of tenancies in Neighbourhood centres were 500 m² or less. This includes supermarkets so it is not anticipated that a limit on tenancy size of 500m² will constrain the market to a significant degree.

2. EFFICIENCY

a. Benefits

Environmental

- i.Improvements and growth of individual centres (depending on their category) can be planned and designed more efficiently as the expectations for their form and function are clearly defined.
- ii.Promotes the use of public transport and community facilities, contributing to their viability.
- iii.Method of a maximum plot ratio in the Commercial Retail Park Zone limits the potential for intensification in a location less accessible by a range of modes of transport than other commercial centres.

Economic

- iv.A hierarchy encourages an efficient distribution of centres of various sizes according to their respective catchments, reducing the potential for catchment (expenditure) overlap, i.e. one

centre impacting on the ability for another centre to achieve its defined function, which can lead to vacancies and a reduction in the critical mass needed to support commercial and community activities in each centre.

v.Ensures best use of existing and future planned improvements to infrastructure, thereby achieving cost-effective private and public investment. Avoids under expenditure and over expenditure of ratepayer and tax payer funds and enables the prioritisation of projects.

vi.Provides greater certainty for the market in making decisions on appropriate locations for future investment.

vii.Avoids poor investment in centres where a proposal for either its growth and/or redevelopment is not appropriate for the area.

viii.Method of limiting activities in local centres, tenancy size in Neighbourhood Centres, and plot ratio in Retail Parks supports the recovery and vitality of the Central City and KACs, promoting employment and economic growth in these centres.

ix.Provides for employment within centres, which attracts other businesses, in turn supporting other activities, and efficiencies in the use of land.

Social and cultural

x. Provides for accessibility to services for persons without access by private vehicle.

xi. The community benefits from access to goods and services in highly accessible locations.

xii. The range of activities provided for is appropriate to the centre's role, limiting the potential for adverse effects of activities being inappropriately located, e.g. entertainment in a Local Centre.

3. Costs

Environmental

a. A maximum plot ratio for the Commercial Retail Park Zone limits the potential for intensification and more efficient use of land, which may create additional costs arising from the need for more

	<p>land elsewhere.</p> <p><i>Economic</i></p> <ul style="list-style-type: none"> b. Opportunities for growth and new employment in some areas, particularly Neighbourhood and Local Centres, is limited due to constraints on the anticipated size of the centre (in terms of scale), and supporting infrastructure (particularly transport). c. Methods giving primacy to the Central City and KACs may constrain the potential for a centre to grow to a level not anticipated, i.e. a centre that may be a Neighbourhood Centre at present, which seeks to grow to a scale commensurate with a District Centre. d. Additional costs for new commercial activities of a larger scale to locate in the Central City and District Centres due to higher land values and rentals. e. The creation of categories and subsequent categorisation of the different centres may deter future investment in existing underperforming centres. Reduces the ability of the free market to determine the form and function of individual centres, which could potentially better predict the growth and redevelopment opportunities. f. Greater consenting costs will be incurred when new growth and employment opportunities are sought for centres beyond their defined form and function. <p><i>Social and cultural</i></p> <ul style="list-style-type: none"> g. The community's access to goods and services in Neighbourhood or Local Centres may be more limited than what could otherwise occur, reducing opportunities for local employment and services close to where people live.
<p>Options less or not as appropriate to achieve the objectives and policies:</p>	
<p>POLICY 1 – Option 2 Status quo – current policies and rules</p> <p>To provide for varying levels of commercial activity, both within and beyond identified commercial centres and areas, to meet the wider community's social and economic needs. This is to be achieved by:</p>	<p>1. Appropriateness</p> <ul style="list-style-type: none"> a. The Operative District Plans provide a 'centre's plus' approach to the location of commercial and community activities, through the respective business zones and associated provisions (controlling and providing for growth and redevelopment). The Operative District Plan currently directs most commercial and

<p>(a) encouraging consolidation of commercial activity, particularly retailing, at existing commercial centres while ensuring the maintenance and enhancement of the function and amenity of the centre.</p> <p>(b) managing local and strategic adverse effects of commercial activity in a way that:</p> <ul style="list-style-type: none"> i. maintains the amenity of nearby living environments ii. avoids reverse sensitivity effects iii. sustains existing physical resources and ensures the continuing ability to make efficient use of, and undertake long-term planning and management for, the transport network and other public and private infrastructural resources, including parks and community facilities. iv. for retail activity, avoids adverse effects on the function and the efficient use of the on Central City and District Centres. v. for retail activity, limits adverse effects on people and communities who rely on the Central City and District Centres for their social and economic well-being and require ease of access to such centres by a variety of transport modes. vi. for retail activity, maintains the amenity values of the Central City and District Centres. 	<p>community activity into centres whilst enabling limited commercial activity outside of centres, particularly within industrial business zones. Therefore, the current provisions are deemed to be partially effective in achieving Commercial Objective 1 and Objective 3.6.2 of the Strategic Directions chapter (in supporting the role of the Central City and suburban and town centres as focal points).</p> <p>b. The current categories of centres under the City Plan and BPDP are not considered to be the most appropriate, or wholly effective as:</p> <ul style="list-style-type: none"> i. The two District Plans do not clearly establish a coherent strategy for the network of existing centres. Whilst centres are categorised within the City Plan, there are no methods to support their defined function and the policy is focussed on managing adverse effects of retail activity on the Central City and District Centres, i.e. it is focussed on effects. <p>While there is some relationship between the current business zoning and the function of centres (i.e. District Centres are zoned Business 2 and/or Business 1 while Local Centres are zoned Business 1), there is no direct correlation between the two matters.</p> <ul style="list-style-type: none"> ii. The current approach is silent on the relative role and anticipated scale of each centre, which has led to unrestrained commercial development in some suburban centres, to the detriment of the Central City viability and vitality, the amenity of surrounding residential areas and unanticipated traffic and parking impacts. iii. Research concludes that up until 2011, the current District Plan was not effective in maintaining the city centre's role as the principle focus for commercial and administration businesses and overall employment. iv. The current provisions provide for a more flexible approach. However, large scale retail activities will have an effect on the character and appearance of centres (particularly in respect to the urban grain of many of the
---	---

	<p>older Neighbourhood and Local Centres). There is also the potential for such activities to displace a number of smaller retail activities (thereby reducing the range and diversity of smaller tenancies and opportunities for smaller and start-up businesses).</p> <ul style="list-style-type: none"> v. The current provisions do not provide certainty of each centre's role and how this is managed, potentially discouraging investment. vi. The current framework does not give primacy to the Central City or KACs, which may have adverse effects on their recovery, inconsistent with the LURP.
Risk of Acting or Not Acting	
<p>There is insufficient information on the future level and potential for other factors (e.g. the intended function. However, there is sufficient performance to make decisions and establish</p>	<p>growth potential and capacity of each centre at micro level and potential for other factors (e.g. the market) to dictate whether a centre may achieve its intended function. However, there is sufficient information on the size of centres and their performance to make decisions and establish a policy direction on their function.</p>

5.2 POLICY 2 ROLE, EXTENT AND DEVELOPMENT OF KEY ACTIVITY CENTRES AND SUPPORTING METHODS

PROVISIONS (POLICY, RULE, METHOD) MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES	
<p>Relevant objectives: Commercial chapter OBJECTIVE 1 Focus of commercial activity</p> <p>Strategic Directions chapter OBJECTIVE 3.6.1 Recovery and long-term future of the district OBJECTIVE 3.6.2 Development form and function</p>	
Provision(s) most appropriate	Effectiveness and Efficiency
<p>POLICY 2 – Option 1</p> <p>a. Recognise and strengthen the role of the following District and Neighbourhood Centres as Key Activity Centres, being the Commercial Core Zone, Commercial Fringe Zone, and also the Commercial Retail Park Zone at Hornby and Belfast: Belfast, Hornby, Linwood, Papanui, Riccarton, Shirley, North Halswell (District centres), Spreydon (Neighbourhood centres)</p> <p>b. Give primacy to Key Activity Centres ahead of Neighbourhood Centres (excluding Spreydon) as the primary community focal points for those parts of the city they are located in terms of commercial, cultural, community and residential activities and as a focus for the transport network.</p> <p>Methods</p> <p><u>Rules</u> capping the maximum tenancy size of retail, office and other activities to 500m² in the Commercial Core Zone and Commercial Fringe Zone of Neighbourhood Centres to direct large scale activities to the Central City and District Centres.</p> <p><u>Rules</u> capping the maximum tenancy size of a supermarket to 1000m² and other activities to 250m² in the Commercial Local Zone to reflect its function.</p>	<p>1. EFFECTIVENESS</p> <p>a. The option supports Objective 1 by giving primacy to KACs and recognising their role as distinct from other centres. In defining their role as focal points for those parts of the City they are located in, the policy supports their recovery, vitality and amenity, consistent with Objective 1.</p> <p>b. The option is appropriate in achieving Objective 3.6.2 of the Strategic Directions chapter by “supporting the role of the Central City and suburban and town centres as community focal points”.</p> <p>2. EFFICIENCY Benefits</p> <p>a. <i>Environmental</i></p> <p>i. The policy and methods to give primacy to KACs (by limiting tenancy size in lower order centres) ensures an efficient distribution of retail activities serving the needs of communities across Christchurch.</p> <p>ii. The policy distinguishes between the different roles of centres defined as KACs, i.e. Spreydon being defined as a Neighbourhood Centres, ensuring that the extent and scale of development is appropriate to its role.</p> <p>b. <i>Economic</i></p> <p>i. By defining the spatial extent of KACs using zoning, and the activities anticipated within the KACs, decisions can be made on land use and development, public</p>

	<p>infrastructure provision and investment.</p> <ul style="list-style-type: none"> ii. The policy and methods give support to the development of and investment in KACs through recognition they are given primacy ahead of other centres. <p>c. <i>Social and cultural</i></p> <ul style="list-style-type: none"> i. Supporting KACs as community focal points enables the needs of people and communities in the surrounding area to be met. ii. Ensures access to goods and services and employment opportunities to those communities living around KACs, particularly for those without access to a private vehicle. <p>3. Costs</p> <p>a. <i>Environmental</i></p> <ul style="list-style-type: none"> i. Methods giving primacy to KACs may constrain the potential for other centres to grow to a level not anticipated, i.e. a centre that may be a Neighbourhood Centre at present, which seeks to grow to a scale commensurate with a District Centre. <p>b. <i>Economic</i></p> <ul style="list-style-type: none"> i. Investment in smaller centres, i.e. centres not defined as KACs, is not supported to the same degree as KACs, which may inhibit their growth and employment opportunities. ii. Additional costs for new commercial activities of a larger scale to locate in the Central City or District Centres due to higher land values or rentals.
<p>Options less or not as appropriate to achieve the objectives and policies:</p>	
<p>POLICY 2 – Option 2</p> <p>Introduce a new Key Activity Centre Zone</p>	<ul style="list-style-type: none"> 1. Appropriateness 2. This approach would be consistent with the objectives sought by the LURP and CRPS. 3. This option would <i>not</i> be an effective method of achieving proposed District Plan Commercial <i>Objectives 1 or 2</i>, as it would subsume a number of existing zones (e.g. Commercial Core, Fringe, Retail Park) all with different functions, within a single new zone. This could result in perverse outcomes, including the loss

	<p>of a defined core to a centre in terms of scale and activities.</p> <ol style="list-style-type: none"> 4. While the extent of KACs would be identified in accordance with the LURP and CRPS directive, other objectives and policies in these policy documents (recovery and vitality of centres) would not be achieved to the extent anticipated. 5. By defining the location and extent of a KAC by a single zone, decisions can be made on land use and development, public infrastructure provision and investment within the area. 6. Defining KACs by zoning enables an integrated approach to land use and development within KACs by identifying a common purpose and any environmental results anticipated. 7. Provides greater development opportunities, particularly for commercial activities, by enabling them across a larger area, a part of which may currently be limited in function, scale and the range of activities provided for, i.e. a Business Retail Park Zone. 8. No differentiation between the scale and form of different parts of centres, which has implications for urban design, appearance and amenity of a centre and the interface with adjoining areas. For example, some large format commercial activities may adversely affect the finer grain, pedestrian-focussed character anticipated in the core of a centre. 9. An inability to manage large format retail areas differently to other commercial zones, with potential implications for urban design, amenity, centre vitality and recovery (due to need for large sites with significant storage, servicing and car parking areas). Also potential difficulties for large format commercial operators to acquire sites (potentially higher land values). 10. Potential for oversupply of commercial floor space with implications for recovery both within (dispersed commercial activity) and outside (Central City recovery) of KACs. 11. Would not acknowledge the differences between KACs, i.e. the intended role of New Brighton and Spreydon centres is very different
--	---

	<p>from that of Riccarton or North Halswell. As a result, the specific needs of their catchment populations may not be met effectively.</p>
<p>POLICY 2 – Option 3 Introduce a Key Activity Centre overlay</p>	<p>1. Appropriateness</p> <ul style="list-style-type: none"> a. The introduction of an overlay <i>would</i> give effect to Commercial Objectives 1 and 2 of the proposed District Plan by identifying the extent of KACs and specific regulatory measures needed to support the recovery and ongoing success of centres including opportunities for improved amenity, urban design outcomes, accessibility and integration of land uses. b. This approach would also be consistent with the objectives sought by the LURP and CRPS. <ul style="list-style-type: none"> i. Enables a bespoke approach specific to each centre while identifying specific strengths, weaknesses and opportunities. ii. Illustrates the extent of the KACs, providing clarity on the area that is within the KACs and an understanding of the area that policies and rules apply to. iii. Provides clarity to residents and visitors about the anticipated outcomes for each centre. iv. Opportunities for stakeholder engagement and involvement in preparation of the overlays. v. An overlay may cause confusion and make the plan unnecessarily complex, having regard to the distinction between District and two Neighbourhood Centres as well as the zones that make up a KAC.
<p>Risk of Acting or Not Acting</p>	
<p>The potential rate of growth of KACs is unknown and will be influenced by a range of factors. Having regard to the policy direction that gives primacy to KACs ahead of other centres outside the Central City, the extent of the zoned area that determines the extent of the KAC may therefore need to be reviewed over time.</p>	

5.3 POLICY 3 COMPREHENSIVE APPROACH TO DEVELOPMENT OF THE HALSWELL AND BELFAST KEY ACTIVITY CENTRES

PROVISIONS (POLICY, RULE, METHOD) MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES

Relevant objectives:

Commercial chapter

OBJECTIVE 1 Focus of commercial activity

OBJECTIVE 2 Achieving high quality urban design outcomes

Strategic Directions chapter

OBJECTIVE 3.6.1 (Recovery and long-term future of the district)

OBJECTIVE 3.6.2 (Development form and function)

Provision(s) most appropriate

Effectiveness and Efficiency

POLICY 3 – Option 1

Require development within the Halswell and Belfast Key Activity Centres to:

- a. be planned and coordinated in accordance with an Outline Development Plan;
- b. provide for a high quality, safe commercial centre which is easily accessible by a range of transport modes and well connected to the surrounding area; and
- c. be developed in a manner aligned with roading improvements to avoid adverse effects on the safe, efficient and effective functioning of the road network.

Require development within the Halswell Key Activity Centre to:

- d. be developed in a manner that ensures the role of District and Neighbourhood centres within the city and adjoining towns are not significantly adversely affected;
- e. provide high quality public open spaces, a strong Main Street with a concentration of finer grain retailing, and strong linkages between key anchor activities;
- f. be of a human scale that recognises the context of the landscape; and
- g. achieve a supply of both large and finer grain retail activity (approx 60/40 split) that provides for the long term needs of the population in the south west.

Require development within the Belfast Key Activity Centre to:

- h. achieve a high quality of landscaping and avoid adverse effects on the natural character, ecology and amenity values of the Styx River corridor; and
- i. discourage the development of office and retailing at the Styx Centre in excess of the

1. Effectiveness

- a. The policy is appropriate in achieving Objective 3.6.1 of the Strategic Directions chapter by ensuring “*sufficient land to meet the community’s immediate recovery and longer-term needs for ...economic development*”. It is also appropriate in achieving Objective 3.6.2, by improving accessibility to employment, transport, services and facilities for existing and future residents in the south west.
- b. The policy supports a comprehensive approach to development of the KACs at Belfast and North Halswell, which in turn provides certainty for landowners, neighbours, occupiers and investors about the location and vision (scale and form) for the KAC. This reduces the potential effects of plan changes being submitted for commercial development in other locations.
- c. The policy supports Objective 1 (Focus of Commercial activity) by ensuring goods, services and other facilities will be readily accessible to residents, visitors and workers within the south west and north by a range of modes of transport.
- d. It supports wider commercial policies relating to the distribution of commercial centres. These recognise that a vital and viable commercial centre is a key element of a strong local economy.
- e. Ensuring the development of the KAC is in line with an ODP will provide for integrated development, which does not jeopardise other future development opportunities outlined through the ODP.
- f. The preparation of the ODP for North Halswell has drawn on considerable planning

identified total retailing and office caps so as to ensure:

- i. that the central city's role as the region's primary commercial area is protected following the Canterbury earthquakes of 2010 and 2011; and
- ii. That the role of other district centres within the city and commercial centres in adjoining towns are not significantly adversely affected.

Methods

The methods to give effect to the policy: Requirement a Development Plan is produced for the North Halswell KAC. This Development Plan will address a range of identified design and location matters (all specified) to ensure that proposals for the KAC are comprehensively planned, integrated and phased appropriately. Further evaluation of these matters are covered from page 53.

Rules for the Belfast KAC include:

- i. Maximum building height
- ii. Buildings within the building restriction area and Styx River riparian setback
- iii. Visual amenity
- iv. Landscaping
- v. Rooding, access and parking
- vi. Maximum thresholds for office activities
- vii. Maximum thresholds for retailing activities
- viii. Maximum threshold for non-residential activities.

Definitions

Development Plan
Key Structuring Elements
Outline Development Plan
Public Transport Interchange

research relating to both the form and scale of future land use options for the site

- g. The policy ensures that the growth (scale and form) of the new centres at North Halswell and Belfast meets the requirements of an increasing population yet prevents adverse effects on other District Centres and the Central City. This is appropriate in achieving Objective 3.6.2 of the Strategic Directions chapter.
- h. The policy meets the aims of Objective 2 (Achieving high quality urban design outcomes) of the Commercial chapter and Objective 3.6.1 of the Strategic Directions chapter by seeking an integrated development to produce a high quality urban environment.
- i. Particular elements of the development have been highlighted within the policy (e.g. main street, finer grain retail) as these are considered to be core factors crucial to the development of a successful new centre at North Halswell.
- j. Policy direction on achieving high quality landscaping and avoiding effects on the Styx River corridor recognises the context and quality of the adjoining environment, and is consistent with Objective 2 in minimising adverse effects on adjoining land use while being integrated with the surroundings.

Rules for Belfast Key Activity Centre

The proposed rules reflect the recent decision of the Environment Court on Plan change 22 (12 November 2012), made in the context of the Christchurch Central Recovery Plan and Recovery Strategy.

There is not considered to be any evidence at the current time to indicate a need to depart from the provisions developed by parties to the appeal and decided by the Court, particularly the thresholds for office and retail activity.

2. Efficiency a. Benefits

Environmental

- i. Ensures the Halswell KAC offers the

	<p>capacity (size) and capabilities to meet the requirements of a KAC (as per the LURP).</p> <p>ii. An integrated approach to development in both Belfast and North Halswell will lead to higher quality built environment outcomes.</p> <p>iii. Improved integration of land use and transport networks has the potential to reduce car-based travel and its impacts on the environment.</p> <p><i>Economic</i></p> <p>iv. Provisions for phasing of development of the Belfast and North Halswell KACs ensure effects on the recovery of the Central City and other District Centres are minimised.</p> <p>v. A strong KAC is a key element of both the local and regional economy. The centres at Belfast and North Halswell will provide both significant employment (direct and indirect jobs) and GDP creation (see Economic Impact Assessment for North Halswell KAC).</p> <p>vi. A well-designed KAC (scale, form and offer) will offer the community and investors social and commercial advantages (high value yields on returns). (See Economic and Social Assessment for North Halswell KAC.)</p> <p>vii. Providing certainty around the location and type of centre will promote investment in the area by the business community.</p> <p><i>Social and cultural</i></p> <p>iii. The provision of KACs in North Halswell and Belfast will reduce the transport costs of accessing goods and services (time and fuel costs) for the south-west catchment and northern Christchurch populations.</p> <p>ix. The split between types of retailing provided for in the North Halswell KAC will ensure that, over the longer term, the centre meets the needs of the community and demands from the market.</p> <p>x. Opportunity to protect and restore values significant to Tangata Whenua and conserve European cultural heritage values through matters such as stormwater network design, links to Spreydon Lodge (in the case of North Halswell) and the Sty River (in the context of Belfast) etc.</p>
--	--

xi. The new centres offer the opportunity to ensure built environment elements (e.g. public transport interchanges), which are key to the social well-being of communities, are integrated.

3. Costs

Environmental

xii. Potential adverse impacts for residents as a result of living close to a new greenfield KAC include additional transport on local roads, increase in the intensity of activity close to their homes and an increase in the scale of development with consequential impacts such as noise, light and outlook.

Economic

iii. Development costs within the Halswell KAC are likely to be relatively high as a result of both the TC3 status of the land (See Economic Analysis) and the future premium values attainable by commercially zoned land within centres.

iv. Whilst initial commercial advice (Property Economics) has indicated that the impact of the new Halswell KAC on the existing Halswell commercial centre will be minimal, there may be some costs associated with a loss of trade or reduction in future investment potential as a result of the new centre being proposed in proximity to the existing Halswell centre.

kv. There are costs associated with producing the level of information required to explain and address the Development Plan matters.

vi. The capping of development limits the potential economic growth and timing of that growth in both the Belfast and North Halswell KACs, which in turn influences the level of employment. However, consent can be applied for to develop beyond these caps.

Social

vii. In the short term the community facilities in the area will be focussed on the existing Halswell centre, approximately one kilometre from the new centre. This may cause some inefficiencies for local residents.

Options less or not as appropriate to achieve the objectives and policies:

<p>POLICY 3 – Option 2 No policy framework for either the Belfast or North Halswell Key Activity Centres</p> <p><i>North Halswell KAC</i></p> <p>There are no current policies relating to development of the Halswell KAC. Limited commercially zoned land is identified at the existing Halswell Centre but proposals for any commercial development outside of this small centre would be determined via a resource consent application.</p> <p>A less directive approach than that advocated in Option 2 would be to allow development of the Halswell KAC to proceed ad hoc with limited provisions in respect to integration and quality environments.</p>	<p>1. Appropriateness</p> <ul style="list-style-type: none"> a. For the Belfast KAC, the appropriateness of the current policy is the same as the assessment of the proposed policy above, i.e. the current policy are is reflected in the proposed policy. b. For North Halswell, the status quo (absence of policy direction) would not be appropriate in achieving Objective 1 as it would fail to support the function of the centre as a community focal point (the existing centre is too constrained to meet the longer term commercial demand within the area). It is likely that commercial development would seek to spread in a linear fashion along the Halswell Road corridor creating poor outcomes in terms of walkability, cohesiveness and a sense of place. c. Whilst a more ad hoc approach (i.e. allowing development to proceed without the need for a Development Plan) would allow the market to dictate development needs in respect to land use allocation, form and pace of development, it would also likely compromise the level of integration across all aspects of the development, which would constrain the ability to achieve a sustainable long-term commercial centre. It would not be appropriate in achieving Objective 3.6.2 of the Strategic Directions chapter by not providing for the most efficient provision and use of infrastructure. d. The lack of an integrated design approach elsewhere in Christchurch has resulted in a range of amenity, transport, safety and economic effects such as traffic congestion, severance of activities and spaces, lack of land allocation for a variety of interests including community facilities, poor access for pedestrian and cyclists, poor quality interfaces with public space and overall lack of quality of the KAC.
<p>POLICY 3 – Option 3 Non-statutory master plan</p> <p>Increase control over outcomes by incorporating a Council-led master plan for each KAC into the District Plan including</p>	<p>1. Appropriateness</p> <ul style="list-style-type: none"> a. This option would support Objectives 1 and 2 of the Commercial chapter in ensuring integration within a centre, while supporting the recovery, vitality and amenity of centres.

North Halswell and Belfast	<ul style="list-style-type: none"> b. While the option would be effective, it would be onerous to include requirements in the plan, which creates a more rigid framework for development that is more appropriately dealt with through the consenting process. c. This option would result in additional costs associated with compliance with the master plan, included in the District Plan.
Risk of Acting or Not Acting	
It is considered that sufficient information exists about the proposed provisions without the need to take account of the risk of acting or not acting (RMA s 32(4)(b)).	

PROVISIONS (RULE, METHOD) MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES AND POLICIES

Relevant objective and policy:

Objective 1: Focus of commercial activity

Objective 2: Achieving high quality urban design outcomes

Policy 2.3: Comprehensive approach to development of the Halswell and Belfast Key Activity Centres

Provision(s) most appropriate

Rules for the Commercial Core Zone (North Halswell) – Option 1

- Restricted discretionary activity status for any development within the North Halswell KAC subject to approval of a Development Plan.
- Minimum and maximum building height.
- Intersection upgrade requirements.
- Floor space caps.
- Type of retail activity.

Definitions

Civic Park

Context and Site Analysis

Detailed Design Statement

Development Plan

Interface

Main

Mixed modal

Public Transport Interchange

Sense of Place

Turangawaewae

Effectiveness and Efficiency

1. Effectiveness

- a. The requirement for a Development Plan (and associated requirements) ensures that all relevant information is incorporated and available at the outset for review and response. This means greater thought can be given to how impacts will be managed and mitigated early on in the process.
- b. The Development Plan gives clarity to the vision for the new centre and to the design decisions undertaken as part of the development process.
- c. All the matters highlighted specifically within this rule are integral to ensuring that the Halswell KAC promotes a compact and sustainable urban form (as per Objective 1).
- d. There are a number of key components required to be highlighted within the Development Plan. These components (i.e open-air main street, anchor stores, public transport interchange and civic park) have been determined via discussion and research with retail specialists and urban designers, case studies and consultation. These elements are considered key factors, which will drive the development of a sustainable, desirable and safe KAC over the longer term.
- e. Detail around other elements such as the stormwater and greenspace network, location of key pedestrian frontages, location and scale of building typologies and retail types (large format retail and finer grain) are also sought, given the need to ensure the centre is planned in line with the North Halswell ODP. As the centre will develop gradually over the next 30 years, an understanding of both the bigger picture and some of the key details is important to ensure sense of continuity between stages.

2. Efficiency

Environmental

- a. Improved quality of the built environment with better outcomes in terms of visual amenity and functionality.
- b. The rules seek high quality design in the areas where it has the greatest impact in terms of the level of activity, amenity and importance such as the main street and key pedestrian frontages.
- c. The height standards for this centre are specific as it was considered the general Commercial Core Zone height rules would not be suitable in this location. Consultation feedback and appreciation of the likely scale of the centre (developer and community) indicated a desire for a reduced scale. In order to ensure that the development is at an appropriate urban scale yet also respects the surrounding environment including the landscape, the maximum height limit is 14m (four storeys) with the minimum height 8m (two storeys). The housing typologies promoted within the new residential area that will surround the KAC (new neighbourhood zone) are for a minimum 1.5 storey development to ensure the interface between commercial and residential areas is appropriate.

Economic

- d. The main street approach offers an alternative KAC retail experience to that currently available in Christchurch, which primarily is based upon mall development. The key components seek to build on the commercial successes of other mall-based centres but add value by drawing on the desire from the public and investors for an open-air yet well-designed centre.
- e. The split between types of retailing will ensure that, over the longer term, the centre meets demand from the community and retail market for both types of retailing offer.
- f. Caps on floorspace in Belfast and North Halswell ensure there are minimal impacts on other centres throughout the district. Insight Economics assessment recommends the first stage of development within the centre is up to 25,000 sq

m of retail floor space. This is to ensure the centre provides a solid business case for uses to agglomerate but without adversely affecting other centres. A large area is zoned to accommodate more retail floorspace in the longer term as well as community, entertainment and other uses to meet the future needs of residents in the south west. However, any additional floorspace over and above the threshold of 25,000 sq m is subject to an assessment to enable effects on the Central City and other centres to be considered and addressed.

- g. Detail around key infrastructure elements (public transport interchange, intersections, civic park plus stormwater and wastewater networks) means that the development requirements can be viewed more strategically to ensure linkages with long-term plan funding processes and other strategic Council decision-making processes.

Social and cultural

- h. The development will not be focussed on a mall development, which offers a retail experience primarily accessed via private vehicles. This development will offer a range of retail stores and include elements such as a civic space and public transport interchange, which should assist the accessibility of the centre and use of the area by surrounding communities.
- i. The rules note the importance of linking the KAC with the Spreydon Lodge building and associated park (a recognised heritage area), strengthening the identity and sense of place of the new centre.
- j. Intersection commencement requirements will ensure that the impacts of the KAC on the wider transport network are minimised and mitigated. In addition, intersection upgrades will ensure that the KAC is well connected and accessible to neighbouring communities.
- k. Higher quality built environment is recognised as being an important factor in people's well-being. Integration of this centre within the new residential area will provide many well-being advantages to the local community; the ability to socialise locally, walk to shops and services, access the city centre via public transport, provide a 'heart' for the Halswell area, offer a focus for

	<p>community markets and events in a civic square.</p> <p>3. Costs</p> <p><i>Economic</i></p> <ul style="list-style-type: none"> a. Overall, a greater requirement for detail necessitates additional consenting costs. Some developers may resist this level of spend at an early stage within their programme. b. Some of the key components identified within the Development Plan would not necessarily be included within a developer-led approach to the design of the KAC, eg. a public transport interchange and civic park. Some developers may consider these onerous requirements. c. The concept favours single ownership and limits the opportunities for developers not allocated within the initial stages of the development to realise their development potential. d. It requires a significant amount of investment in public space provision. e. It reduces the level of flexibility with regard to the allocation of activities, potentially increasing development risk.
<p>Options less or not as appropriate to achieve the objectives and policies:</p>	
<p>Option 2 (Status quo)</p> <p>There is no rule specific to the Halswell KAC within the current District Plan.</p>	<p>1. Appropriateness</p> <p>There has been a change in policy direction relating to the focus for commercial development in the Halswell area. The LURP identified the location of the Halswell KAC on land currently zoned Rural 2. Retaining the current rural zoning of the land would not be an appropriate course of action. Given the need to rezone the land and address the need for a comprehensively planned, integrated KAC over the longer term, the status quo option would not be an appropriate method to achieve the objectives and policies of both the Commercial chapter and wider framework documents.</p>
<p>Option 3 More directive/less directive rules</p> <p>Both a more directive rule (development of a Council master plan for the KAC) and a less</p>	<p>2. Appropriateness</p> <p>As identified in the effectiveness and efficiency assessment for Option 2, it is considered that the option promoted gave the best balance between certainty and flexibility.</p>

<p>directive rule (lesser detail required within the Development Plan and fewer rule provisions) were considered.</p>	<p>A more directive rule would be too prescriptive which, over the longer term, would be inflexible and result in multiple consenting issues in order to address amendments. A less directive rule may have resulted in a weaker, less integrated centre (failure to include key components) and risked wider impacts on surrounding centres (no caps on scale). Both options were considered inappropriate.</p>
<p>Risk of Acting or Not Acting</p>	
<p>It is considered that sufficient information exists</p>	<p>about the proposed provisions without the need to take account of the risk of acting or not acting (RMA s 32(4)(b)).</p>

5.4 POLICY 4 ACTIVITIES IN DISTRICT AND NEIGHBOURHOOD CENTRES AND SUPPORTING METHODS

PROVISIONS (POLICY, RULE, METHOD) MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES	
<p>Relevant objectives: Commercial chapter OBJECTIVE 1 Focus of commercial activity</p> <p>Strategic Directions chapter OBJECTIVE 3.6.1 Recovery and long- term future of the district OBJECTIVE 3.6.2 Development form and function</p>	
Provision(s) most appropriate	Effectiveness and Efficiency
<p>POLICY 4 – Option 1 Activities inside centres</p> <p>a. Enable a wide range of activities in District and Neighbourhood Centres including commercial, transport, residential, guest accommodation, entertainment, cultural and community activities, while providing for retailing as the primary activity.</p> <p>b. Support the vitality of centres by facilitating the use of ground floor level for activities that encourage high levels of pedestrian and street activity and convenience to shoppers and visitors, while providing for a mix of activities with offices and residential activity above ground floor level.</p> <p>Methods</p> <p>- Permitted list of activities provided for in the Commercial Core and Commercial Fringe Zones of District and Neighbourhood Centres.</p> <p>- Activity specific standards for offices and guest accommodation, requiring that it be above ground level.</p> <p>Definitions</p> <p>Ancillary office activity. Commercial services Department store Drive-through services Emergency Services Facilities Guest Accommodation Health care facility Office Parking building</p>	<p>1. Effectiveness</p> <p>a. The proposed policy and methods provide for commercial and community activities within District and Neighbourhood Centres, which support the recovery of centres, as well as their vitality and amenity (Objective 1 of the Commercial chapter) and Objective 3.6.1 of the Strategic Directions chapter.</p> <p>b. Provides certainty for landowners, occupiers and investors on the future use of land and the role of commercial areas, reducing the risk of potential effects on existing activities of unforeseen changes to land use in the surrounding area.</p> <p>c. The inclusion of some commercial activities (yard based retailing, service stations, drive-through services) and community facilities (emergency facilities) as restricted discretionary activities reduces the effectiveness of the policy and methods in supporting the recovery of centres, i.e. requiring consent. This aspect is likely to reduce commercial investment and may limit earthquake recovery. However, in requiring consent, any effects these activities may have on the vitality and amenity of centres and their integration can be assessed and minimised. The risk of permitting these activities is that they have an adverse effect on the built form and character of a centre.</p> <p>d. With an Activity based format, there is a need to ensure the activities are clear in their meaning. Definitions are therefore required for a number of activities listed in Activity tables.</p>

Parking Lot
Public artwork
Public Transport facility
Restaurant
Retail activity
Retailing
Second-hand goods outlet
Supermarket

2. Efficiency

a. Benefits

Economic

- i. Commercial areas are used for primarily commercial activities and complementary activities, supporting these areas as commercial focal points, which will contribute to economic growth.
- ii. Sufficient commercial zoned land ensures capacity to meet future demand for commercial activities.

Social

- iii. Provides certainty for the community and landowners and occupiers and investors of land in the surrounding area and within the zone on expected types of development allowed.

b. Costs

Economic

- i. Policy approach restricts certain activities in these areas, which are currently permitted, bringing with it additional costs for yard based retailing, service stations, drive-through services and emergency facilities to locate in centres due to consent compliance costs.
- ii. Activities-based approach runs the risk that activities may have been omitted by oversight, which will lead to consent compliance costs.
- iii. Potential over-regulation of the type of retail activity permitted within various zones, which may affect market conditions.
- iv. Limiting offices and guest accommodation to upper levels constrains the ability for business that may seek ground floor premises. This imposes additional consenting and compliance costs and may reduce growth and employment opportunities in the centre if business

	decides to go elsewhere.
Options less or not as appropriate to achieve the objectives and policies:	
<p>POLICY 4 – Option 2</p> <p>Status quo <i>To provide for a wide range of activities within suburban centres.</i></p> <p>Methods All activities permitted subject to standards.</p>	<p>1. Appropriateness</p> <ol style="list-style-type: none"> a. The proposed policy and methods support the recovery of centres, as well as their vitality and amenity (Objective 1 of Commercial chapter and Objective 3.6.2 (Strategic directions chapter). b. This option encourages all types of retail investment in centres, promoting centres as focal points for growth and investment. c. There is no risk that activities may be omitted by oversight. d. Permits a greater range of retail investment and associated economic recovery. e. Enables a range of business, and therefore provides for increased employment opportunities in centres. f. Reduced compliance costs because all commercial activities are permitted (other than those restricted through other more specific policies). g. Adverse effects may arise on the surrounding environment and activities due to lack of assessment, e.g. yard based retailing, service stations and drive-through services on the amenity of a centre. This in turn may hinder a centre’s attractiveness, investment and growth potential. h. Inefficient use of land for uses that are not necessarily appropriate in centres, e.g. yard-based retail activity, which reduces opportunities for other uses. This in turn may foreclose employment opportunities.
Risk of Acting or Not Acting	
Future changes in shopping and travel patterns	may see a change in the use of space within centres, which the plan is not flexible to respond to, i.e. resource consent may be required unnecessarily.

5.5 POLICY 5 NEW LOCAL CENTRES IN GREENFIELD AREAS AND SUPPORTING METHODS

PROVISIONS (POLICY, RULE, METHOD) MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES

Relevant objectives:

Commercial chapter

OBJECTIVE 1 Focus of commercial activity

Objective 2 Achieving high quality urban design outcomes

Strategic Directions chapter

OBJECTIVE 3.6.1 Recovery and long-term future of the district

OBJECTIVE 3.6.2 Development form and function

Provision(s) most appropriate

Effectiveness and Efficiency

POLICY 5 – Option 1

1. EFFECTIVENESS

New Local Centres in greenfield areas

In new greenfield residential areas, land identified through zoning and/or on an Outline Development Plan for new Local Centre shall be developed and used for primarily commercial activity to serve the needs of existing and future residents by walking and cycling, while not impacting on the character, coherence or amenity of the adjoining residential area.

The proposed policy is appropriate in achieving Objective 1 as it provides for commercial activity within new greenfield areas to support the day-to-day needs of new communities in these areas. The policy would also support the form and design outcomes for commercial centres sought by Objective 2, which seeks to accommodate development consistent with a centre’s role while minimising the adverse effects on the surrounding area.

It is also appropriate in achieving Objective 3.6.2 of the Strategic Directions chapter by “improving people’s connectivity and accessibility to services and community facilities”.

a. EFFICIENCY

i. Benefits

Social and cultural

- A. Enables new communities to meet their needs locally for commercial and community activities and facilities, of a range and scale appropriate to the size and role of the centre thereby:
- B. improving access by foot and cycle, reducing reliance on the private car and reducing fuel use and carbon emissions.
- C. providing local employment opportunities.
- D. providing opportunities for social interaction and provision of a community focal point.

ii. Costs

Economic

- A. Precludes the use of land for other (non-commercial uses) without recourse via a consenting or plan change process.

Options less or not as appropriate to achieve the objectives and policies:

POLICY 5 – Option 2

Market-led approach: No commercial zoning in greenfield priority areas

1. Appropriateness

- a. Option 2 would effectively leave it to the developers of new neighbourhoods to determine the need for and extent of any commercial activities and which would need to be achieved by plan change or resource consent.
- b. Without a plan change or resource consent, there could be no commercial activity provided for within residential greenfield areas, which would be to the detriment of residents who would otherwise benefit from local provision for day-to-day shopping, community and commercial services. This was a key issue identified in both the South West and Belfast Area Plans.
- c. Experience³ has shown that even in the case of commercially zoned land within new subdivisions there is the risk that such land will not be developed for commercial purposes. This particular issue was highlighted within the 2011 s 35 Report⁴.
- d. For the above reasons, this option is not considered appropriate in achieving the LURP.

While the option provides greater flexibility to respond to changes in the layout of greenfield residential areas and it allows the market to determine the demand for commercial activities and the appropriate use of land, there are costs associated with such an approach including

- a. Risk of communities being unable to meet their economic and social needs (particularly their day-to-day shopping needs) locally, resulting in:
- b. increased need to travel and placing reliance on private cars, which is a disadvantage to those who are less mobile and non-car owners.
- c. lost opportunities for community interaction and focal points.
- d. Costs (time, financial, administrative, uncertainty) of providing commercial activities via plan change or resource consent.

Risk of Acting or Not Acting

It is considered that sufficient information exists about the proposed provisions without the need to take account of the risk of acting or not acting (RMA s32(4)(b)).

³ Aidanfield and Northwood Subdivisions – B1 land use for residential purposes.

⁴ Response Planning (2011) “Evaluating the Effectiveness and Efficiency of the Christchurch City Plan”

5.6 POLICY 6 BANKS PENINSULA COMMERCIAL CENTRES AND SUPPORTING METHODS

PROVISIONS (POLICY, RULE, METHOD) MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES

Relevant objectives:

Commercial chapter

OBJECTIVE 1 Focus of commercial activity
Objective 2 Achieving high quality urban design outcomes

Strategic Directions chapter

OBJECTIVE 3.6.1 Recovery and long-term future of the district

OBJECTIVE 3.6.2 Development form and function

Provision(s) most appropriate –

Effectiveness and Efficiency

POLICY 6 – Option 1

Specific policy for commercial areas in Banks Peninsula

Recognise and protect the special character and role of the commercial areas in Banks Peninsula, including Lyttelton and Akaroa, which provide a range of activities and services meeting the needs of their respective communities as well as visitors to the townships and the wider area of Banks Peninsula.

Methods

- (a) Applicable zone rules :
- i. Noise sensitive activities within the Port Influence Overlay area
 - ii. Temporary activities
 - iii. Building height
 - iv. Sunlight and outlook for neighbours
 - v. Site coverage thresholds
 - vi. Street scene rules
 - vii. Setbacks
 - viii. Screening of outdoor storage, refuse disposal areas and car parks
 - ix. light.
- (b) Centre-specific provisions such as:
- i. design guidelines for Lyttelton and Akaroa
 - ii. ground floor residential activity in Akaroa.

1. The proposed policy is appropriate in achieving the objectives by:

- a. enabling the recovery of Banks Peninsula (BP) centres to a level that reflects the function of centres and by consolidating commercial activity in the existing centres.
- b. recognising the centres are unique in that they serve isolated communities and provide for a wider variety of commercial and community activities and functions within them, consistent with Objective 3.6.1 of the Strategic Directions chapter (which seeks “*a distinctive identity and quality urban environment*”).
- c. giving effect to Objective 2 by recognising the special character of these centres, which is heavily influenced by their heritage, built form, landscape characteristics, and relative isolation of communities.

2. Efficiency

a. Benefits

Environmental

- i. Provides for a range of retail, commercial and residential activities, and community facilities and services to ensure the vitality, attractiveness and character of the Banks Peninsula commercial centres are restored and enhanced.
- ii. Provides for cohesive well-designed commercial street frontages.
- iii. Amenity values at the interface of the commercial and residential zones are maintained.
- iv. Reverse sensitivity effects are managed in the Port Influence Overlay area.

Economic

- v. Provisions are largely carried over providing for efficiency in Plan administration.

Social and cultural

- vi. Recognises the unique characteristics of commercial

<p>Definitions Banks Peninsula Lane way Temporary buildings and activities Port activities</p>	<p>areas on Banks Peninsula.</p> <p>vii. Ensures that the special character of both Akaroa and Lyttelton town centres are preserved or restored through the implementation of urban design guidelines.</p> <p>viii. The Lyttelton design guidelines are updated to recognise changes in a post-earthquake environment, critically important to the rebuilding the historic town centre.</p> <p>3. Costs</p> <p><i>Environmental</i></p> <p>a. More restricted building design choice in the centres where historic character of the area is sought to be preserved (Lyttelton and Akaroa).</p> <p><i>Economic</i></p> <p>b. Consents required for development in the centres where design guidelines apply (Lyttelton and Akaroa), increasing compliance costs for development.</p>
<p>Options less or not as appropriate to achieve the objectives and policies:</p>	
<p>POLICY 6 - Option 2</p> <p>Apply generic commercial provisions (applicable to the city) to the commercial areas of Banks Peninsula</p>	<p>1. Appropriateness</p> <p>a. Facilitates a greater ability to merge provisions for BDP and the Christchurch City Plan into one District Plan.</p> <p>b. Supports Objective 1 by providing for integration of commercial and community activities and providing for vitality and amenity within the commercial areas of Banks Peninsula.</p> <p>c. Gives effect to Objective 2 by managing any adverse effects of these activities within the centre and on the surrounding environment.</p> <p>d. While addressing generic urban design issues for commercial centres, this option would not reflect the unique characteristics of the historic built form and street amenity of Lyttelton and Akaroa, not necessarily enhancing the character of those centres.</p> <p>e. Is consistent with the centre’s classification in ensuring the form and scale of commercial development is consistent with the centre’s function.</p> <p>f. Does not address the locational characteristics (hills, coastal and port environments) and the need to protect the historic urban form of Lyttelton and Akaroa, therefore not being appropriate in achieving Objective 3.6.1 of the Strategic Directions chapter (which seeks a “distinctive identity and quality urban environment”).</p>

	<ul style="list-style-type: none"> g. Does not recognise the unique function of the Banks Peninsula commercial centres as serving an isolated, often remote community and having to accommodate a wider range of activities in a relatively small centre. h. Standard Commercial Local Zone provisions related to design do not address the unique characteristics of the historic development pattern in Banks Peninsula centres. i. Maintenance of amenity values at the commercial and residential zones interface would require area specific provisions given topography. j. Commercial Local Zone height restriction of eight metres would be more restrictive for Lyttelton (currently 12m). k. Reverse sensitivity effects in the Port Influence Overlay area would not be managed effectively without providing area and activity specific provisions.
Risk of Acting or Not Acting	
It is considered that sufficient information exists about the proposed provisions without the need to take account of the risk of acting or not acting (RMA s32(4)(b)).	

POLICY 7 SCALE AND FORM OF DEVELOPMENT AND SUPPORTING METHODS

The method of providing an additional storey in the Commercial Fringe Zone of commercial centres is considered to be a significant change and is evaluated in more depth under 5.7.2.

PROVISIONS (POLICY, RULE, METHOD) <u>MOST APPROPRIATE WAY</u> TO ACHIEVE THE OBJECTIVES	
<p>Relevant objectives: Commercial chapter OBJECTIVE 1 Focus of commercial activity Objective 2 Achieving high quality urban design outcomes</p> <p>Strategic Directions chapter OBJECTIVE 3.6.2 Development form and function</p>	
PROVISIONS (POLICY, RULE, METHOD) <u>MOST APPROPRIATE WAY</u> TO ACHIEVE THE OBJECTIVES	
<p>Relevant objective: OBJECTIVE 2: Achieving high quality urban design outcomes</p>	
Provision(s) most appropriate	Effectiveness and Efficiency
<p>POLICY 7 – Option 1 Scale and form of development</p> <p>a. Provide for development of a significant scale and form in the core of District and Neighbourhood centres, and of a lesser scale and form on the fringe of centres.</p> <p>b. The scale and form of development in centres will:</p> <p>i. reflect the context, character and the anticipated scale of the Zone;</p> <p>ii. increase prominence of buildings on street corners;</p> <p>iii. for Local Centres, maintain a low rise built form to respect and integrate with their suburban residential context;</p> <p>iv. for Key Activity Centres and Large Format Centres, enable larger floor plates while maintaining a high level of amenity in the Centre; and</p> <p>v. minimise adverse effects on the surrounding environment, particularly at the interface with residential areas and other more</p>	<p>1. EFFECTIVENESS</p> <p>a. Various technical reports on urban design, together with supporting site analysis, modelling and stakeholder surveys, has shown that a large number of developments have not met desirable urban design principles in terms of character, human scale, legibility and connectivity, in addition to more specific physical aspects such as street entrances, glazing, verandas and fencing. These aspects of building and site design are commonly addressed through built form standards and an assessment of urban design as part of a resource consent application.</p> <p>b. The proposed policy and methods are appropriate in achieving Objectives 1 and 2 by:</p> <p>i. ensuring the scale and form of development is consistent with the role of a centre (Objective 2).</p> <p>ii. minimising adverse effects on the surroundings and ensuring integration between land uses (Objective 2).</p> <p>iii. contributing to a quality environment (Objective 3.6.1 of the Strategic Directions chapter) and character of the area including adjoining uses (Objective 2).</p> <p>iv. supporting the recovery of centres while ensuring development is consistent with the defined role of a centre in the hierarchy (identified by Policy 1.1) by enabling larger scale commercial (and other activity) in higher order centres.</p>

sensitive zones.

Rules

- Height (Refer to page 70 for more detailed evaluation of provision for an additional storey on corner sites).
- Plot ratio (in the Commercial Retail Park Zone).
- Setback from road boundaries and sensitive areas.
- Sunlight and outlook at the boundary with a sensitive area.
- Landscaping and trees.

Methods

Rules capping the maximum tenancy size of retail, office and other activities to 500m² in the Commercial Core Zone and Commercial Fringe Zone of Neighbourhood Centres to direct large scale activities to the Central City and District Centres.

Rules capping the maximum tenancy size of a supermarket to 1000m² and other activities to 250m² in the Commercial Local Zone to reflect its function.

Rules limiting the maximum tenancy size for retail activities in the Commercial Retail Park Zone to 450m².

- c. Points ii. and iv. above are supported by the zoning and scale and form of development provided for in the standards for different parts of a centre, i.e. core and fringe. This is the same approach as adopted in the operative District Plan where the B1 (fringe) and B2 (core) zones enable different scales and forms of built form in different parts of a centre depending on their function and location. The s35 Response Planning Report (Jan 2011) confirmed that the City Plan is largely effective in controlling land use activities to achieve the type of land uses desired and therefore as an effective regulatory tool. This provision is proposed to be retained.
- d. The policy direction enabling greater building height on corner sites is an incentive employed elsewhere in New Zealand to help articulate improved urban design outcomes (particularly visual interest, legibility and flexibility of spaces for future uses). It therefore responds to a criticism identified within the Response Planning Report about poor built form outcomes and the need to better manage visual effects.
- e. Methods giving effect to Policy 7 include maximum limits on tenancy size in Neighbourhood and Local Centres (also giving effect to Policy 2 to give primacy to KACs). The basis for this is three-fold. It ensures the scale of development is appropriate to the function of a centre, gives primacy to the Central City and KACs, as discussed earlier, while also avoiding impacts of development in one centre on another's ability to achieve its function (i.e. reducing the overlap of catchments, which could otherwise lead to investment inefficiencies).

In giving effect to Policy 7, the limits on floor space promote an appropriate grain and scale of development having regard to a centre's existing or desired character and scale.

Rules

Height: The proposed rules on the height of buildings reflect the different functions of centres i.e. a larger scale of development is provided for in larger centres. The provisions for the Commercial Core zone of District centres largely reflect that of the Operative District Plan for the B2 zone, which prescribes a height limit of 20 metres for the centres of Riccarton, Hornby, Linwood and Papanui.

The District centres of Belfast and Shirley currently have height limits of 16 metres in the City Plan and it is proposed that all District centres have a height limit of 20 metres, with the exception of parts of the Belfast KAC and the North Halswell KAC (See below). In extending the height limit from 16 m to 20m at Belfast (part) and Shirley, consideration has been given to the potential effects on

adjoining areas. At Belfast, the land zoned Commercial Core is bordered by the railway line, SH1, and the Supacentre, an existing Retail Park zone. Given the separation from adjoining areas, and special height provisions approved by the Environment Court to protect the interface with the Styx river, a height limit of 20m is appropriate at Belfast (in those areas that have a height limit of 16 metres in the City Plan).

In the case of Shirley, the Commercial Core zone directly adjoins a residential zone. Modelling of different scenarios has therefore been undertaken to ascertain the contrast in scale between the two zones as well as other zones (refer to Appendix 8.8 for examples of modelling undertaken at boundary of the Commercial Core zone in Shirley). Given the change in height provided for (20 metres proposed in the Commercial Core zone, with 9 m in the adjoining residential zone), it is considered appropriate that a reduced height limit of 12 metres applies within 30 metres of a residential zone to avoid the loss of outlook and amenity. A height limit of 12 metres has been determined appropriate as it is closely aligned with the proposed height limit for the Residential Medium Density zone of 11m, which adjoins Key Activity Centres and several large neighbourhood centres.

The height limit in the Commercial Fringe zone of District centres is also proposed to increase, from 8m to 12m. This is to avoid a significant drop in scale between different parts of a commercial centre while recognising the need for a reduced scale at the interface with residential areas (the fringe generally being between a Commercial Core zone and residential zone). Height limits in adjoining residential zones are either 9 m (Residential suburban) or 11m (Residential Medium Density) and a greater height limit in the commercial zone is considered suitable to ensure the legibility of a centre is maintained and to recognise that they are focal points to the community around them.

An increase in the height limits provides an opportunity for greater intensification within Key Activity Centres, a key direction in Chapter 6 of the RPS (Policy 6.3.1).

In Neighbourhood centres, a height limit of 12 metres in the Commercial Core zone reflects the current City Plan (Business 2 zone). There have not been any issues identified other than the inability to achieve the height limits due to controls on plot ratio. In the Commercial Fringe zone of Neighbourhood centres (currently Business 1 in the City Plan), the height limit is proposed to increase from 8 metres to 10 metres. This acknowledges the relationship between height and a minimum floor to ceiling requirement at ground floor, the latter being introduced through the proposed chapter (Refer to analysis under Policy 8).

With a minimum floor to ceiling height proposed of 3.5 metres, a 8 metre height limit in the Commercial Fringe zone could lead to

adverse outcomes with 2 upper floors condensed in a space that is only 4.5 metres high. Realistically, the minimum floor to ceiling height would result in buildings of 2 storeys rather than 3, the latter being provided for by the height limit of 8 metres (without a minimum floor to ceiling height).

To recognise the need for development to be economically viable (Refer to peer review by Property Economics (Appendix 8.5) for specific reference to this provision), while allowing development up to 3 storeys as is intended by the current rule, a height limit of 10 metres is proposed. In relation to an adjoining residential zone, which has a height limit between 9 and 11 metres, 10 metres is not considered inappropriate.

Plot ratio

In conjunction with providing for greater height, there has been a need to consider the appropriate intensity of development on a site. As highlighted in a paper prepared by David Compton-Moen of Sinclair Knight Mertz for the purpose of the proposed chapter, developments in commercial centres have simply not reached the heights provided for. This can be attributed in part to plot ratio limits of 1.0 and 1.5 in the current City Plan.

To promote the more efficient use of land and to provide for intensification within centres, the removal of plot ratio controls is considered appropriate. The outcome arising from this change are more intensive use of sites within a centres. The effects of development on adjoining areas are addressed through other rules including setbacks, recession planes and height. Limits on plot ratio is therefore not considered appropriate. Also refer to memo from David Compton-Moen (Sinclair Knight Mertz) dated 10th October 2013 regarding removal of plot ratio provisions.

2. EFFICIENCY

a. Benefits

Environmental

- i. Retains character of a centre and has regard to its context, therefore promoting a high quality environment.
- ii. Minimises adverse effects of development on surrounding land uses including loss of outlook.
- iii. Encourages activities of an appropriate type and scale to the centre.
- iv. Bonus heights can provide stronger corner definition to create a local landmark and improved and visual legibility.
- v. Supports the nature and scale of activities appropriate to the centre hierarchy and context, strengthening the centres and surrounding neighbourhoods.
- vi. Plot ratio controls in the Commercial Retail Park Zone

	<p>provide for a lower density environment between buildings of a larger bulk and height, while not impacting on the Central City and KACs</p> <p><i>Social and cultural</i></p> <ul style="list-style-type: none"> vii. Improves people’s experiences of, and association with the centres for those visiting or residing near them. viii. Minimises potential for large scale activities to displace a number of smaller scale activities, resulting in a smaller range of commercial activities available to meet people’s needs. <p><i>Economic</i></p> <ul style="list-style-type: none"> ix. Economic benefits accruing from bonus height incentive or additional floor space. x. Bonus heights support efficiencies in the delivery of infrastructure through the potential increase in growth and activity in centres. <p>b. Costs</p> <p><i>Environmental</i></p> <ul style="list-style-type: none"> i. Constrains building form and scale to specific areas. ii. Limits on plot ratio in the Commercial Retail Park Zone inhibit the potential for intensification and the efficient use of land. <p><i>Economic</i></p> <ul style="list-style-type: none"> iii. Consenting costs due to non-compliance. iv. Potential increased costs in respect of additional height (although height bonus is an incentive therefore only optional).
<p>Options less or not as appropriate to achieve the objectives and policies:</p>	
<p>POLICY 7 – Option 2 Status Quo – Retain existing provisions</p> <p><i>To provide for a distribution of suburban centres which is able to satisfy the needs of people and communities, while managing the adverse effects of different types, sizes and locations of centres.</i></p> <p><i>To control the adverse effects of development and activity within suburban centres, particularly upon surrounding living areas.</i></p>	<p>1. Appropriateness</p> <ul style="list-style-type: none"> a. This option retains existing District Plan provisions that apply to suburban centres. Reliance would be placed on the existing objective and policy framework and rules together with other existing mechanisms outside of the District Plan to address the issues. b. While the zoning of areas as Business 1 and Business 2 ensures that scale and form of different parts of a centre are appropriate to their context and contribute to a high quality environment (Objective 2), the current policy framework is not the most appropriate in ensuring the scale and form of development is consistent with the role of a centre and therefore, enhancing the centre. c. The current framework also does not recognise the Central

<p><i>To ensure effective buffers with adjoining living areas.</i></p> <p><i>To ensure that any development of suburban centres respects the amenity values of adjoining and surrounding living areas, while still providing opportunities to meet the business needs of the community.</i></p>	<p>City and District Centres (KACs) as strategically important in the scale of development provided for.</p>
<p>POLICY 7 – Option 3 Non-regulatory methods</p>	<p>1. Appropriateness</p> <p>a. This option would involve using a combination of current and new non-regulatory methods such as the provision of education and advice and development of urban design guidelines (as identified through the LURP). This option also involves continued provision of advice from council officers and the Urban Design Panel.</p> <p>b. Non-regulatory methods, whilst shown to be beneficial in conjunction with regulatory methods, would not give effect to Objective 2. These guidelines would be voluntary (i.e. they would not have statutory weight) and would sit outside of the District Plan, i.e. would be prepared under the Local Government Act rather than the RMA.</p> <p>c. While providing flexibility, less compliance costs and enabling urban design outcomes to be articulated, it would create highly uncertain and inconsistent outcomes, including less attractive and enjoyable centres. There could also be potential impacts on adjoining land uses and the wider community.</p>
<p>Risk of Acting or Not Acting</p>	
<p>It is considered that sufficient information exists about the proposed provisions without the need to take account of the risk of acting or not acting (RMA s 32(4)(b)).</p>	

5.7.1 RULE ALLOWING FOR AN ADDITIONAL STOREY ON CORNER SITES (LEGIBILITY)

PROVISIONS (RULE, METHOD) <u>MOST APPROPRIATE WAY</u> TO ACHIEVE THE OBJECTIVES AND POLICIES	
<p>Relevant objective and policy: Objective 2 Achieving high quality urban design outcomes Policy 2.1 Scale and form of development Policy 2.2 Design of new development</p>	
Provision(s) most appropriate	Effectiveness and Efficiency
Option 1 – Bonus height rule	1. Effectiveness

Corner sites within Commercial Fringe Zones in District and Neighbourhood Centres would be permitted to build to an additional 4m height (one storey) up to a maximum of 25m from each corner.

- a. A key principle of good urban design is legibility⁵, which in the context of commercial centres means that people should be able to easily understand and navigate through a centre, enhancing usage, enjoyment and pride in local places. Techniques to achieve legibility usually focus on strengthening local identity and achieving an appropriate visual character.
- b. In context of a very flat city such as Christchurch where many of the previous significant marker buildings were lost as a result of the earthquakes, creating opportunities to increase the legibility of the city, including as a means of way-finding, is important to residents and visitors.
- c. Changes in height and greater articulation of the building form increases the variety in the urban fabric creating more understandable centres and better public spaces, as well as strengthening a centre's character.
- d. Providing opportunities for greater height on corner sites in some parts of some commercial centres (Commercial Fringe Zones of District and Neighbourhood Centres) can therefore be seen as an effective means of achieving the high quality urban design outcomes sought by proposed Objective 2 and proposed Policies 2.1 and 2.2.
- e. Refer to Appendix 8.7 for further analysis on provisions for an additional storey on corner sites in the Commercial Fringe zone.

2. Efficiency

a. Benefits

Environmental

- i. Helps to improve legibility including way-finding.
- ii. Strengthens local character and identity.
- iii. Limited increase in potential for effects associated with additional height including shading, privacy, scale issues, but these matters would be considered as part of an overall urban design assessment of development proposals on corner sites.
- iv. Potential for unintended consequences resulting from bonus height incentive being taken up in central blocks rather than the 'book-ends' of a centre or in centres that have multiple corner sites where the bonus height provision would apply. However modelling has been undertaken and concludes the potential for negative

	<p>effects would be minor.</p> <p><i>Economic</i></p> <p>v. Additional floor space provides for growth.</p> <p>b. Costs</p> <p><i>Economic</i></p> <p>i. As an optional incentive, the costs are considered low.</p>
Options less or not appropriate to achieve the objectives and policies:	
<p>Option 2 – Status quo</p> <p>No bonus height allowance and no urban design assessment rule.</p>	<p>1. Appropriateness</p> <p>a. The status quo approach would fail to utilise opportunities to improve the legibility, character and identity of commercial centres and as such would be less appropriate as a method to achieve the improved urban design outcomes sought by the objectives and policies.</p>
<p>Option 3 – Reliance on urban design assessment rules</p> <p>No bonus height allowance but retention of new urban design assessment rules.</p>	<p>1. Appropriateness</p> <p>a. There will be opportunities to improve the legibility, character and identity of commercial centres by other proposed methods such as through the urban design assessment required for developments over 250 sq m. This will enable the Council to consider matters such as corner articulation through increased building heights and other methods such as the use of a variety of materials to add vertical emphasis.</p> <p>b. However, it is considered more appropriate (in the context of achieving the high urban design quality outcomes sought by the Objective 1 and Policies 2.1 and 2.2) to be very explicit about the Council’s aspirations for the special treatment of corner sites in prominent locations by use of a separate rule. This will enable developers to be aware of the Council’s aspirations and the additional development potential that may be available to them at the start of the development or redevelopment process.</p>
Risk of Acting or Not Acting	
It is considered that sufficient information exists about the proposed provisions without the need to take account of the risk of acting or not acting (RMA s 32(4)(b)).	

5.8 POLICY 8 DESIGN OF NEW DEVELOPMENT AND SUPPORTING METHODS

The methods of:

- a. identifying Key Pedestrian Frontages along which built form standards apply, additional to other frontages, and
- b. requiring an assessment of any development over 500 m², or with a road frontage, defined as a Key Pedestrian Frontage, of more than 20 metres, or corner sites with a key pedestrian frontage

are considered to be a significant change and are evaluated in more depth under 5.8.2 and 5.8.3.

PROVISIONS (POLICY, RULE, METHOD) MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES	
<p>Relevant objectives:</p> <p>Commercial chapter</p> <p>Objective 2 Achieving high quality urban design outcomes</p> <p>Strategic Directions chapter</p> <p>OBJECTIVE 3.6.2 Development form and function</p>	
Provision(s) most appropriate	Effectiveness and Efficiency
<p>POLICY 8 – Option 1</p> <p>Require new development to be well designed and laid out by:</p> <ol style="list-style-type: none"> i. encouraging pedestrian activity and amenity along street frontages and in adjoining public spaces and enabling interaction between public and private space; ii. being of visual interest and a human scale while contributing to the character and coherence of a centre; iii. integrating with adjacent sites and buildings around it; iv. facilitating movement within a site and with the surrounding area for people of all mobilities and ages, by a range of modes of transport through welldefined, convenient and safe routes; v. enabling visitors to a centre to orientate themselves and find their way with strong visual and physical connections with the surrounding area; vi. promoting a safe environment for people and reflecting principles of Crime Prevention 	<p>1. Effectiveness</p> <ol style="list-style-type: none"> a. Response Planning’s s35 report⁶ was critical about the effectiveness of the City Plan in addressing a number of urban design issues, particularly visual appearance (refer to issues section). b. Council staff have also identified issues emerging in terms of waste storage associated with commercial premises. This includes insufficient space on sites resulting in bins being stored in legal road space, which can lead to a low level of amenity. c. The proposed policy sets out a set of urban design principles to guide the preparation and assessment of new development. It is positive and directive and the principles range over a number of design matters. These principles are not intended to stifle creativity but to help ensure that key aspects (principles) are incorporated within the layout and built form of suburban centres and outlying towns and that development fits in with or enhances centre character, safety, attractiveness and amenity. The new policy is supported by amended and new rules and assessment matters. d. The new Urban Design Policy and supporting suite of rules are a combination of existing District Plan Provisions, new and amended rules proposed through Plan Change (PC) 56 and further amendments / additions resulting from further research and consideration of public submissions made to PC56. The aim of the provisions being to improve urban design outcomes, implementation and compliance and

through Environmental Design;
 vii. providing for adaptive reuse of buildings and sites;
 viii. incorporating principles of environmentally sustainable design including energy efficiency, water conservation and the reuse of stormwater; and
 ix. promoting or maintaining views to prominent physical features.

b. Ensure the design of development makes a positive contribution to the streetscape and character of its surroundings, while having regard to the functional requirements of activities, particularly large format retail activities.

c. In addition to the above require residential development to be well-designed and laid out by ensuring:

i. a high quality healthy living environment through:

A. the provision of sufficient and conveniently located internal and outdoor living spaces;

B. the provision of adequate and convenient space for storage;

C. good accessibility within a development and with adjoining areas; and

D. minimising disturbance from noise and activity in a centre (and the potential for reverse sensitivity issues to arise).

ii. a high level of amenity as viewed from the street and other public spaces through the location and layout of buildings and landscaping and screening.

Methods

Rules on:

- Activity standards including

reduce the prevalence of non-notified approved resource consents. The provisions also aim to address the City Plan 'effectiveness' issues address by Response Planning (2011).

e. The proposed policy would support Objective 2 by acknowledging the importance of good design in developing and supporting a high quality urban environment. This is reflected in clause (b) of the proposed policy that seeks to ensure development makes a positive contribution.

f. Also refer to memo from David Compton-Moen (Sinclair Knight Mertz) dated 10th October 2013 regarding provisions for minimum floor to ceiling heights and standards to achieve higher quality design outcomes.

2. Efficiency

a. Benefits

The policy:

Environmental

ii. Improves the quality of the street interface, street edge continuity, activity, internal visibility (providing the economic advantage of displaying goods and services to potential customers), wayfinding and legibility supporting the economic viability of the centre by capturing pedestrian passing trade and revitalising street activity.

iii. Increases the quality of public and private space, supporting the social, economic and environmental success of the commercial centres and district more widely.

iv. Recognises the strengths and weakness of each centre and provides opportunities to build on or overcome these through the delivery of design outcomes.

v. Provides a means to strengthen the character and identity of commercial centres, on local and district levels.

vi. Supports the recovery of centres and their growth by achieving a high level of amenity that makes them attractive to business, investment and visitors

vii. Non-notified restricted discretionary consent status for the new building and redevelopment rule – provides for good urban design outcomes (consent can be declined) with certainty for applicants regarding notification.

viii. Greater use of passive energy / resources such as natural ventilation and access to sunlight (minimum floor to

<p>triggers for urban design assessment (any building over 500 m²).</p> <ul style="list-style-type: none"> • Street scene rules. Uses including offices and guest accommodation above ground floor only. • Minimum floor-to-ceiling heights. • Maximum building setback from road boundaries or street scene. • Outdoor storage areas. • Waste storage areas. • Landscaping and trees. <p>Definitions</p> <p>Articulation Context and Site Analysis Detailed Design Statement Human scale Interface Key Pedestrian Frontage Legibility Publicly accessible space Sense of Place Setback</p>	<p>ceiling heights).</p> <ul style="list-style-type: none"> ix. Compliance with Proposed CRPS requirement to determine thresholds when urban design provisions apply for development. x. Consistency with other centres including the Central city with regards to the application of floor to floor height provisions– thereby ensuring that development controls are not more onerous in the Central City (which may otherwise affect its Recovery). <p><i>Economic</i></p> <ul style="list-style-type: none"> xi. Adaptability for future uses and needs, and reducing future redevelopment costs (minimum floor to ceiling heights). xii. Removes unnecessary / ineffective regulation (plot ratio) and provides potential for better urban design outcomes. <p><i>Social and cultural</i></p> <ul style="list-style-type: none"> xiii. Good quality design outcomes can reduce property crime and increase personal safety within centres. xiv. Provide a means of achieving highly integrated communities. xv. Support other matters such as the delivery of high quality transport networks, safe and accessible communities and support social infrastructure through the provision of high quality public space. <p>3. Costs</p> <p><i>Environmental</i></p> <ul style="list-style-type: none"> xvi. Consenting costs, financial and time. xvii. Direct build costs associated with meeting minimum requirements, including waste storage, screening of outdoor storage areas and landscaping. <p>Having regard to the range of benefits and costs outlined above and informed by separate economic analysis undertaken for Plan change 56 to the Operative City Plan, it is considered that the preferred option is not overly onerous nor would it place unnecessary impediments on development.</p> <p>The urban design provisions seek to place some additional control over the detailed location and design of new development, of importance in Christchurch’s post-earthquake recovery environment.</p> <p>Refer to sections 5.8.1 and 5.8.2 (page 86 onwards for further evaluation of methods).</p>
---	--

Options less or not as appropriate to achieve the objectives and policies:	
<p>Option 2 – Status quo</p> <p>No change to the existing District Plan provisions that apply to (suburban) centres. Reliance would be placed on the existing policy framework and rules together with other existing non-regulatory mechanisms outside of the District Plan to address issues.</p>	<p>1. Appropriateness</p> <p>a. While this option provides certainty for applicants by continuing with the present approach, it would fail to respond to opportunities to improve the urban design quality of new built form in a time of rapid change, and would not be appropriate in the context of the proposed policy direction of the District Plan or the directions of the CPRS or the LURP, which all seek improved urban design outcomes for the District’s commercial centres.</p>
<p>Option 3 – Reliance on policy with Built Form Standards (other rules) to give effect to policy</p> <p>Reliance on new built form standards (e.g. height, setbacks, street scene, landscaping, minimum floor-to-ceiling height, outdoor storage and waste storage areas, recession planes and landscaping and trees).</p>	<p>1. Appropriateness</p> <p>a. A range of built form standards are proposed to provide a minimum standard, which must be achieved for activities identified as being permitted in the commercial zones.</p> <p>b. Following criticism that the current District Plan provisions are failing to consistently realise high quality urban design, the current built form standards have been improved (particularly with regard to the street scene rules). However it is considered that, on their own, these do not go far enough, being prescriptive in nature and incapable of enabling site-specific responses suited to their context.</p> <p>c. Overall, this option is not seen as the most appropriate method for achieving the high urban design quality outcomes anticipated by Objectives 2 and Policies 2.1 and 2.2.</p>
<p>Option 4 – Non-regulatory Methods</p>	<p>1. Appropriateness</p> <p>a. Non-regulatory methods such as design guides and advice are useful tools to assist with achieving urban design objectives. However, the ‘take-up’ of urban design advice is voluntary and urban design guidelines are not usually prepared under an RMA process and have no statutory weight in the District Plan. Such methods are not therefore considered to be the most appropriate method of achieving the proposed objectives and policies.</p>
Risk of Acting or Not Acting	
<p>It is considered that sufficient information exists about the proposed provision without the need to take account of the risk of acting or not acting (RMA s32(4)(b)).</p>	

5.8.1 RULE REQUIRING URBAN DESIGN ASSESSMENT

PROVISIONS (RULE, METHOD) <u>MOST APPROPRIATE WAY</u> TO ACHIEVE THE OBJECTIVES AND POLICIES	
<p>Relevant objective and policy: Objective 2 – Achieving high quality urban design outcomes Policy 2.1 – Scale and form of development Policy 2–2 - Design of new development</p>	
Provision(s) most appropriate	Effectiveness and Efficiency
<p>Option 1 – Urban Design Assessment Rule</p> <p>New rule requiring all buildings and redevelopment greater than 500 m² to be subject to a qualitative urban design assessment (Restricted Discretionary Activity Status). In addition, any building with a road frontage, defined as a Key Pedestrian Frontage, of more than 20 metres and/or corner sites on a Key Pedestrian Frontage, shall also be subject to an urban design assessment.</p> <p>For development in the suburban centres of Sydenham, Sumner and Lyttelton, which have been subject to a Master Plan and form part of Phase 1 to the District Plan Review, a lower threshold for an urban design assessment is proposed, being any development on a Key Pedestrian Frontage or greater than 250m².</p>	<p>1. Effectiveness</p> <p>a. The proposed rule seeks to address the direction of higher order policy documents including the LURP (Actions 2 and 11) and the CRPS (Policy 6.3.2), which requires that the Council addresses the efficiency and effectiveness of District Plan provisions on urban design, provide clarity and certainty about urban design requirements and to incorporate the principles of high quality urban design through objectives, policies, rules and other methods.</p> <p>b. The Council has undertaken a significant amount of work in recent years to inform changes to the District Plan aimed at improving the urban design of built form (Refer to Bibliography in Section 7.0). This culminated in the notification of PC 56 in May 2013, which proposed, among other things, a requirement for all buildings and development of 100 sq m or greater to be subject to a qualitative urban design assessment, as a Restricted Discretionary Activity. Submissions on PC56 were subsequently received and analysed by staff and further assessment undertaken to inform the new (proposed) urban design assessment threshold. A key issue raised through submissions and in subsequent discussions with stakeholders has been that the provisions do not recognise functional requirements of business activity (acknowledged in Policy 8), will stifle development and not provide certainty.</p> <p>c. In establishing an appropriate threshold, there has therefore been a need to consider the key issues that the provisions are seeking to address. As highlighted in the Section 35 report prepared for Council, a significant issue has been the visual appearance of large buildings, which can lead to adverse outcomes on amenity and the environment of centres.</p> <p><i>The City Plan is not controlling the visual appearance of large buildings resulting in the presence of large, blank walls. Landscape and design mitigation measures are not effective at managing visual effects. The built form outcomes are viewed</i></p>

as being poor.

- d. Having regard to the issues identified in the Council’s Section 35 report and previous work (refer to Bibliography in Section 7.0), the effects of larger buildings are a key issue that requires further assessment.
- e. The use of permitted activity standards has been considered as a means of achieving better design in larger developments. However, standards requiring build up to the road frontage, glazing and a verandah do not address issues that have been identified with large development. From review of other Council’s plans, there are very few examples of standards for commercial zones that deal with continuous building walls over a certain distance or other aspects of design not already addressed in the draft. Rather than standards, a number of District Plans including Auckland have a trigger for the assessment of new buildings to enable a broader assessment of urban design.
- f. A floorspace threshold is considered more appropriate rather than the use of standards, which are limited in their ability to address the issue. A threshold would provide a line above which development requires resource consent to enable an assessment.
- g. A consideration in determining a threshold is its effect i.e. the number of buildings captured. The current City Plan does not have similar triggers for an assessment of urban design in commercial zones so the effectiveness of existing provisions cannot be tested. Therefore, using the data available, an assessment has been made of existing buildings in the Commercial Core and Fringe zones likely to be captured under various scenarios as set out in the table below. Under the 100 sq m threshold proposed by PC56, a high proportion of buildings in the Commercial Core and Fringe (City Plan B1 and B2) Zones would require resource consent (84 per cent). In comparison a threshold of 500 sq m would capture around 30 per cent of all new buildings and redevelopment.

2. Table A: Proportion of Ground Floor Building Areas by Zone

Source: Rating Valuation Data, CCC Transport and Research Unit

Buildings greater than or equal to	Commercial Core Zone (no.)	Commercial Fringe Zone (no.)	Total both Zones
100 sq m	95 (83%)	103 (85%)	198 (84%)
200 sq m	65 (57%)	68 (56%)	133 (57%)
250 sq m	58 (51%)	59 (49%)	117 (50%)

300 sq m	51 (45%)	54 (45%)	105 (45%)
400 sq m	42 (37%)	42 (35%)	84 (36%)
500 sq m	36 (32%)	39 (32%)	75 (32%)
Total Number Buildings in Zone	114	121	235

- a. In addition to data on building size, Council’s data on retail unit sizes in commercial centres shows that the majority of tenancies are less than 500m² (80 – 100%) – refer to end of Property Economics Report (Appendix 9.3 of Industrial Section 32). On the assumption that retail units are developed on an individual basis (notwithstanding the fact that many developments comprise a group of shops), a threshold of 500 m² would only capture a small proportion of existing retail units (while acknowledging the survey data is based on net floor area).
- b. Having regard to the focus in the short to medium term on the recovery of commercial centres and the need to encourage activity in the locations that commercial development is sought, a lower threshold of 500m² is considered more appropriate. To set the bar higher would potentially act as a disincentive for business to locate in commercial centres, particularly when there are other opportunities elsewhere.
- c. A threshold of 500 sq m also recognises the need to achieve the right balance between enabling development in centres and introducing rules that trigger the need for resource consent.
- d. In addition to larger developments, sites with a long road frontage are generally large sites, enabling development to be laid out in a manner that does not necessarily fit or relate to its surroundings e.g. car parking dominating a site frontage and buildings not having any relationship to the street. While the size of a development may not be significant, the frontage a site has can make it highly visible and therefore prominent in the context of a commercial centre. It is therefore appropriate that sites with a road frontage of at least 20 metres in length and that are defined as a Key Pedestrian Frontage are subject to a qualitative assessment to achieve better outcomes.
- e. Also for consideration in the development of commercial centres, is the importance of corner sites. Corner sites can be prominent as the junction of two thoroughfares and buildings on corners will therefore be more prominent than other buildings. If designed well, a building on a corner can act as a landmark to a centre’s legibility. With this in mind, corner sites

on key pedestrian frontages are also considered appropriate for assessment.

- f. It is considered that setting a minimum threshold for when development proposals will be subject to urban design assessment is the most appropriate means of achieving Objective 2 and Policies 2.1 and 2.2, as it will enable the site-specific assessment of new proposals having regard to a wide range of urban design assessment matters that traditional bulk and location standards (prescriptive rules) cannot address. This will enable high quality site-specific urban design outcomes to be achieved in new development whilst making allowance for smaller scale development to proceed without the need for consent – a compromise aimed at removing regulatory constraints for small businesses and focussing on those proposals which have the most significant visual and amenity implications (and opportunities) for centres.
- g. This mechanism is commonly used elsewhere. Many local authorities in New Zealand and abroad adopt a 100 per cent capture approach for new development, that is, *all* new development requires consent where urban design matters may be considered, in recognition of the important and longstanding implications of urban design for the wider community. Many of Christchurch’s new greenfield residential areas that have been subject to a plan change in recent years, have had a 100 sq m threshold applied for assessing the urban design merits of new commercial development.

Sumner, Sydenham, Lyttleton and Akaroa

- h. The suburban centres of Sumner, Sydenham and Lyttleton have been subject to Suburban Centre Master Plans and for which specific provisions have been developed as part of phase 1. There has been a desire from the community in these centres for specific outcomes to be achieved, which are reflected in the Master Plans/ Design Guidelines. In the case of Akaroa, specific guidelines that form part of the Banks Peninsula District Plan are proposed to be carried forward into the Commercial chapter. The outcomes sought in these centres reflect in part the character of the existing/ historic built form.
- i. While standards apply to all development below 500 m² (Build up to the road frontage, glazing and verandah/ weather protection), there is a need to have regard to the specific design guidance coming through in the Master Plan

and/or any guidelines (including Akaroa), which cannot be achieved solely by standards, necessitating a broader assessment of urban design.

- j. A threshold of 500m² could be applied as is proposed for other suburban centres. However, the finer grain of shops, particularly in Sydenham, Lyttelton and Akaroa would mean that few if any buildings would be subject to an assessment. In such circumstances, the guidelines would not be effective without some statutory assessment.
- k. In order to achieve the outcomes sought, it is appropriate that all development on a Key Pedestrian Frontage or over 250 m² outside a Key Pedestrian Frontage is subject to an urban design assessment.
- l. The inclusion of a lower threshold (any development on a Key Pedestrian frontage, or otherwise over 250m²) has been proposed for Sydenham, Sumner and Lyttelton is accompanied by specific standards developed for these centres as part of phase 1. In Phase 2, similar thresholds could be appropriate in conjunction with specific standards for other centres subject to Suburban centre Master Plans incl. Edgware, Ferry Road, Main Road and New Brighton.

3. Efficiency

a. Benefits

Environmental

- m. Improved urban design outcomes for developments requiring resource consent.
- n. Improved ability to recognise opportunities, constraints and features of individual sites, and their context and achieve appropriate and improved design responses.
- o. Clear signal and direction provided to developers, adjoining landowners and community that achieving good quality urban design is important and will be an integral component of design preparation and assessment.
- p. Assists with the implementation of master plans.

Economic

- q. Urban design assessment matters providing greater certainty for developers and property owners.
- r. Rules specifying that any application shall not be notified and written approvals not required provides a high level of certainty for applicants that the consent process will proceed without lengthy delays and without significant

costs typically associated with submissions and a hearing.

- s. Supports small businesses by removing the need for resource consent.
- t. Provides certainty for investment
- u. A threshold of 500m² does not impede development as may be perceived with a lower threshold

Social

- v. Greater opportunity to incorporate Crime Prevention through Environmental Design (CPTED) principles into developments and improved public/private realm interface as well as pedestrian/cyclist connectivity to and through sites.
- w. Improves the enjoyment of centres for visitors and consequential economic spin-off effects for business owners.
- x. More efficient or direct use of advice from the urban design panel into consent application assessments (as opposed to voluntary advice when consents are not required).

4. Costs

Environmental

- y. Risk of those developments not triggering an urban design assessment being of a poor quality.

Economic

- z. Costs to the Council of processing and assessing additional resource consents.
- aa. Potential for less certainty given that qualitative rules may be open to a level of subjectivity and misinterpretation.
- bb. Increased costs for applicants in the design process due to the potential need to seek specialist advice.
- cc. Potential costs for developers in the construction cost to incorporate urban design aspects into the development.
- dd. Additional consenting costs for some developments, however as many suburban centre developments require resource consent already (e.g. parking and traffic generation matters) it is expected to be a small increase.
- ee. Costs (uncertainty of outcome) for landowners and developers as restricted discretionary status could mean the Council declines an application that does not meet good urban design practice.

	<p>ff. Costs to the Council to support comprehensive design outcomes for suburban centres with improvements to public spaces and amenities.</p>
<p>Options less or not appropriate to achieve the objectives and Policies:</p>	
<p>Option–2 -Status quo</p> <p>No change to the existing District Plan provisions that apply to (suburban) centres. Reliance would be placed on the existing policy framework and rules together with other existing non-regulatory mechanisms outside of the District Plan to address issues.</p>	<p>1. Appropriateness</p> <p>a. While this option provides certainty for applicants by continuing with the present approach, it would fail to respond to opportunities to improve the urban design quality of new built form in a time of rapid change or address the issues associated with existing buildings, and would not be appropriate in the context of the proposed policy direction of the District Plan or the directions of the CPRS or the LURP, which all seek improved urban design outcomes for the district’s commercial centres.</p>
<p>Option 3 – Reliance on Built Form Standards (other rules)</p> <p>Reliance on new built form standards (e.g. height, setbacks, street scene, landscaping, minimum floor-to-ceiling height, outdoor storage and waste storage areas, recession planes and landscaping and trees).</p>	<p>1. Appropriateness</p> <p>a. A range of built form standards are proposed to provide a minimum standard, which must be achieved for activities identified as being permitted in the commercial zones.</p> <p>b. Following criticism that the current District Plan provisions are failing to consistently realise high quality urban design, the current built form standards have been improved (particularly with regard to the street scene rules). However it is considered that, on their own, these do not go far enough, being prescriptive in nature and incapable of enabling site-specific responses suited to their context. The intention is that these minimum built form standards would apply to smaller scale permitted activities (i.e. up to 500 sq m) and as a starting point for negotiating good urban design for development over 500 sq m.</p> <p>c. Overall, this option is therefore not seen as the most appropriate method for achieving the high urban design quality outcomes anticipated by Objectives 2 and Policies 2.1 and 2.2.</p>
<p>Option 4 – Non-regulatory Methods</p>	<p>1. Appropriateness</p> <p>a. Non-regulatory methods such as design guides and advice are useful tools to assist with achieving urban design objectives. However, the ‘take-up’ of urban design advice is voluntary and urban design guidelines are not usually prepared under an RMA process and have no statutory weight in the District Plan. Such methods are not therefore considered to be the most appropriate method of achieving the proposed objectives and policies.</p>

Risk of Acting or Not Acting

It is considered that sufficient information exists about the proposed rule without the need to take account of the risk of acting or not acting (RMA s32(4)(b)).

5.8.2 DEFINITION OF KEY PEDESTRIAN FRONTAGES AND STANDARDS THAT APPLY TO DEVELOPMENT UNDER THE THRESHOLDS IN THE COMMERCIAL CORE AND FRINGE ZONES

PROVISIONS (RULE, METHOD) MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES AND POLICIES
Relevant objective and policy:

Objective–2 Achieving high quality urban design outcomes

Policy 2.1 Scale and form of development

Policy 2.2 Design of new development

Provision(s) most appropriate
Effectiveness and Efficiency

Option 1 – New Street Scene Rule

1. Effectiveness

- a. The proposed rule seeks to improve the vitality and viability of the city’s commercial centres, particularly those parts that are highly visible and well-used by pedestrians, in recognition of their important role as community focal points. It does this by identifying specific Key Activity Frontages (KPFs) and applying standards (e.g. build up to the road boundary, requirements for glazing, weather protection and pedestrian access) to the boundaries of a site defined as a Key Pedestrian Frontage.
- b. The identification of KAFs recognises that these frontages are an important aspect of a commercial centre and through achieving the outcomes sought, these frontages can contribute to a legible, well-defined urban form. Refer to Memo from David Compton-Moen, Sinclair Knight-Mertz dated 21 October 2013 in Appendix 8.6.
- c. A significant amount of work has been undertaken by the Council staff in recent years on street scene provisions. This culminated in the notification of PC56 in May 2013, which proposed the introduction of, among other things, requirements for new development in commercial centres to be built up to the road boundary and for increased glazing and weather protection to be provided in developments with road frontages. Submissions on these provisions were subsequently received and analysed by staff and have informed the proposed new street scene rule.
- d. Requirements for buildings located within KAFs are more onerous than for those outside (and within the Commercial Core

zone). Consequently, there is greater flexibility in the proposed rule for frontages within the Commercial Core zone, not identified as KPFs. This is to address the concerns of submitters (i.e. that not all road frontages require extensive glazing or weather protection) by enabling buildings to be set back from frontages not defined as KPFs in the Commercial Core zone (Below the UD thresholds). It is still considered important that a good standard of urban design and amenity is provided for new development in non-KPF locations, so the proposed new rules also set minimum requirements for buildings in these locations to be set back and landscaped.

e. In addition to KPFs, rules require build up to the road frontage, glazing and a verandah/ weather protection on all sites in the Commercial Fringe zone. The Commercial Fringe zone provides a gateway to a centre in many instances and creating an enclosed environment can provide a sense of arrival into a centre, while also encouraging pedestrian activity. The scale of development in the Commercial Fringe zone is of a finer grain (unit size and the scale of buildings), and in some cases, has a character, achieved through build up to the road frontage and a strong relationship between the street and private space.

f. Where buildings are built up to the street boundary they provide a clearly defined edge to the street environment (public space) and the development (private space). This positioning, by its nature, forces a relationship between the building and the street, for the two elements to interact. When this interaction results in an active edge with an attractive streetscape, it positively contributes to street definition and enclosure enhancing pedestrian amenity. It results in buildings being accessible by providing convenient and direct access between the street and building for people of all ages and abilities. Studies have shown that the urban design of an area has a significant impact on how an area is used by people and that good street design often results in economic benefits for retailers. Also refer to Memo dated 10 October 2013 from David Compton-Moen on his review of provisions for B1 and B2 zones (Appendix 8.6).

g. *“Continuous building lines along a block edge are more successful at providing good enclosure to a street or square and generating ‘active frontage’, with frequent doors and windows animating the public realm. In centres, a direct frontage to pavement relationship assists commercial viability and street vitality.”*

i. Urban Design Compendium, English Partnerships (2000)

- h. Unfortunately, with design emphasis often placed on private car users and their needs, the relationship between buildings and the street can be dissolved resulting in developments that are poorly positioned for pedestrian access.
- i. In light of the above, the proposed identification of key pedestrian frontages and the associated inclusion of new street scene rules aimed at increasing the extent of 'active frontages' in the most visible and well-used parts of our commercial centres is considered the most appropriate method of achieving Objective 2 and Policies 2.1 and 2.2. The objectives and policies seek to recognise and provide for centres as important focal points for community and commercial investment and to achieve well-designed and laid out centres that are attractive, safe and accessible to pedestrians and that support commercial activity. It is considered this option provides the best balance of enabling better urban design quality of the city's commercial environments without being overly restrictive for commercial business interests.

2. Efficiency

a. Benefits

Environmental

- i. Helps to create legible, well-defined urban form (avoiding gaps in frontage).
- ii. Improves accessibility—clear, direct access to buildings.
- iii. Improved amenity of centres can contribute to their attractiveness and economic viability and success.

Economic

- iv. Economic benefits to businesses resulting from increased visibility and access by customers.
- v. Helps to appropriately direct public and private investment (e.g. public transport, streetscape improvements, retail activities seeking high visibility and high pedestrian counts).

Social and cultural

- vi. Improved safety (more 'eyes on the street', encourages more activity on the street rather than in car parks or other areas).
- vii. Greater sense of cohesion and continuity (reducing travel distances for pedestrians and consequently walking time and effort).
- viii. Provides greater certainty to the Council and less costs

	<p>to address potential interpretation issues.</p> <p>b. Costs</p> <p><i>Environmental</i></p> <ul style="list-style-type: none"> i. May result in less appropriate solutions than could be achieved with qualitative assessment. ii. Compliance with a set of rules of ‘representative elements’ is a less flexible and responsive approach (compared to qualitative assessment methods). It has the potential to restrict design creativity, innovation and to support expression of character and identity. <p><i>Economic</i></p> <ul style="list-style-type: none"> iii. Economic cost of including new elements: verandas and glazing requirements could range from \$10,000 to \$50,000 for a 10m–50m frontage length. Additional glazing could result in an additional \$9000 to \$45,000 (based on three scenarios tested to inform preparation of PC56 - http://resources.ccc.govt.nz/files/TheCouncil/policiesreportsstrategies/districtplanning/cityplan/proposedplanchanges/PC56_App9.PDF) iv. There may be additional consents required for non-compliance with the new rules and the additional information, assessment and consenting process costs will need to be met by the developer.
--	--

Options less or not appropriate to achieve the objectives and policies:

<p>Option 2 – Status quo</p> <p>No changes to the existing District Plan provisions. Rather reliance would be placed on the existing objective and policy framework and rules together with other existing mechanisms outside of the City Plan to address the issues.</p>	<p>1. Appropriateness</p> <ul style="list-style-type: none"> a. While this option provides certainty for applicants through continuing with the current approach, it would create continued risk of poor quality outcomes for the built form of (suburban) commercial centres. The existing City Plan provisions are known to have limited impact in addressing the urban design issues identified and this option would not respond to those issues, nor would it provide any guidance for the preparation and assessment of development proposals in a time when urban design matters are considered to be particularly important given the impact of the earthquakes on Christchurch’s built form. b. Moreover, maintaining the status quo in the context of tighter urban design controls in the Central City, may also provide a disincentive for businesses to locate in the Central City, hindering its recovery.
--	---

<p>Option 3 – Reliance on new urban design assessment rules</p> <p>This option involves relying on the proposed new urban design assessment rules, including the following, being a restricted discretionary activity, with the Council’s discretion limited to matters of urban design:</p> <p>1. All new development in commercial centres</p> <ul style="list-style-type: none"> - greater than 500 sq m - with a frontage of more than 20 m on a Key Pedestrian Frontage - a corner site on a Key Pedestrian Frontage 	<p>2. Appropriateness</p> <p>a. It is considered the proposed new urban design rules will help realise much improved urban design outcomes for our commercial centres even without any further regulatory intervention. This option is however not considered the most appropriate as developments of less than 500 sq m would not trigger an assessment, which equates to as much as 70 per cent of all buildings in the Commercial Core and Fringe Zones. In addition there are benefits to providing clear direction for developers and business owners or occupiers about the type of urban design outcomes (as a minimum) that the Council is seeking for the community. Without the minimum urban design (built form) standards proposed by Option 1, the high quality urban design outcomes sought by Objective 2 and Policies 2.1 and 2.2 will not be widely realised.</p>
<p>Option 4 – Non-regulatory Methods</p> <p>Provision of suburban centre design guidelines, education and advice, including continued advice from the urban design panel. Implementation of guidance and assistance through the Council’s Suburban Centres Programme.</p>	<p>1. Appropriateness</p> <p>a. Non-regulatory methods such as design guides and advice are useful tools to assist with achieving urban design objectives. However, the ‘take-up’ of urban design advice is voluntary and urban design guidelines are not usually prepared under an RMA process and have no statutory weight in the District Plan. Such methods are not therefore considered to be the most appropriate method of achieving the proposed objectives and policies.</p>
<p>Risk of Acting or Not Acting</p>	
<p>It is considered that sufficient information exists about the proposed rule without the need to take account of the risk of acting or not acting (RMA s32(4)(b)).</p>	

5.9 POLICY 9 SUBURBAN CENTRE MASTER PLANS AND SUPPORTING METHODS

PROVISIONS (POLICY, RULE, METHOD) MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES	
<p>Relevant objectives: Commercial chapter OBJECTIVE 1 FOCUS OF COMMERCIAL ACTIVITY OBJECTIVE 2 (Urban design of development)</p> <p>Strategic Directions chapter OBJECTIVE 3.6.1 (Recovery and long-term future of the district) OBJECTIVE 3.6.2 (Development form and function)</p>	
Provision(s) most appropriate	Effectiveness and Efficiency
<p>POLICY 9 – Option 1 Suburban centre master plans Give effect to the actions in suburban centre master plans that necessitate regulatory methods to ensure the built form and activities in the following centres support their recovery, long term growth and a high level of amenity:</p> <p>a. Lyttelton; b. Sydenham; c. Linwood Village; d. Selwyn Street shops; e. Sumner; f. Edgeware; g. Ferry Road h. Main Road; and i. New Brighton.</p> <p>New zones and rules: (a) Suburban centre master plan overlays for Lyttelton, Sydenham and Sumner) Centre specific provisions such as:</p> <p><i>Lyttelton</i></p> <ul style="list-style-type: none"> • Design guidelines for Lyttelton. • Special provision for recession plane to avoid shading onto London Street. 	<p>1. Effectiveness The proposed policy:</p> <p>a. gives effect to Objective 1, which seeks the recovery of centres, by facilitating the implementation of the suburban centre master plans and encouraging the return of commercial activity to the suburban centres.</p> <p>b. gives effect to Objective 2 by acknowledging the different character and roles of centres subject to master plans. While zone specific rules managing the form and scale apply, the unique characteristics of the master plan centres are recognised in specific provisions. In this respect, it is also appropriate in achieving Objective 3.6.1, which seeks a high quality environment with a distinctive identity.</p> <p>c. gives effect to the CRPS, Chapter 6, Policies 6.2.5, 6.2.6 and 6.3.6 seeking to provide for diverse commercial business opportunities within high quality Neighbourhood Centres thus aiding their recovery while recognising the unique outcomes sought for various centres and the importance of appropriate urban design.</p> <p>d. is consistent with the objectives and supporting actions (Action 24) identified in the LURP for business areas.</p> <p>2. Efficiency</p> <p>a. Benefits</p> <p><i>Environmental</i></p> <p>i. Potential for unique commercial development along pedestrian access ways.</p> <p>ii. Supports the rebuilding and revitalisation of damaged centres through enabling the implementation of the suburban centre master plans.</p> <p>iii. Provides for cohesive well designed commercial street frontages.</p> <p>iv. Ensures that the special character of centres such as</p>

<ul style="list-style-type: none"> • Provision for temporary activities on London Street. <p><i>Sydenham</i></p> <ul style="list-style-type: none"> • No car parking or vehicle access along the primary active frontages in Sydenham. • Special setback along Colombo Street in Sydenham. • Provision for mixed-use development on site at southern end of centre. <p><i>Sumner</i></p> <ul style="list-style-type: none"> • Special height limit for 14 – 16 Wakefield street <p>Definition</p> <p>Master plan Temporary buildings and activities</p>	<p>Sydenham or Lyttelton is preserved or restored through the implementation of design guidelines.</p> <ul style="list-style-type: none"> v. Provides for a mix of activities within and, in the case of Sumner, outside of the commercial zones to ensure the vitality, attractiveness and character of the centres is restored and enhanced. vi. By providing for locally accessible facilities, encourages pedestrian activity and minimised effects on the road network. <p><i>Economic</i></p> <ul style="list-style-type: none"> vii. Provides local employment opportunities. viii. Provides certainty for landowners, occupiers and investors on the future use of land and opportunities in the commercial areas subject to master plans <p><i>Social and cultural</i></p> <ul style="list-style-type: none"> v. Enables implementation of ideas and preferences of the local community and business owners adopted in the Lyttelton Master Plan. vi. Additional commercial zoning in Sumner and provision for limited commercial activity within the adjacent residential zone compensates for the loss of commercially used land, now red zoned. This provides for an attractive centre to serve the needs of the local community and visitors to the area. <p>3. Costs</p> <p><i>Environmental</i></p> <ul style="list-style-type: none"> a. More restricted building design choice in the centres where historic character of the area is sought to be preserved (Lyttelton and Sydenham). b. The requirement for development to be built up to road frontages limits the choice of areas available for car parking.
<p>Options less or not as appropriate to achieve the objectives and policies:</p>	
<p>POLICY 9 – Option 2 Status quo – Retain existing rules and focus on non-statutory methods</p>	<p>1. Appropriateness</p> <ul style="list-style-type: none"> a. While some of the actions of suburban centre master plans can be implemented outside of the District Plan framework, the effectiveness of provisions outside the District Plan would be limited. b. The current provisions also do not recognise the distinctive character or form of some centres and is therefore not the most appropriate in achieving Objective 3.6.1 of the Strategic Directions chapter. There is also not sufficient recognition of the quality of the environment, which may lead to adverse effects. This does not support achieving Objective 2, which

	seeks to enhance the character of centres and ensure the scale and form of development is appropriate to the role of a centre.
Risk of Acting or Not Acting	
It is considered that sufficient information exists about the proposed provisions without the need to take account of the risk of acting or not acting (RMA s32(4)(b)).	

5.10 POLICY 10 RECOGNITION OF NGAI TAHU / MANAWHENUA VALUES AND SUPPORTING METHODS

PROVISIONS (POLICY, RULE, METHOD) MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES	
Relevant objectives: Commercial chapter OBJECTIVE 1 FOCUS OF COMMERCIAL ACTIVITY OBJECTIVE 2 (Urban design of development) Strategic Directions chapter OBJECTIVE 3.6.1 (Recovery and long-term future of the district) OBJECTIVE 3.6.3 (Tangata whenua)	
Provision(s) most appropriate	Effectiveness and Efficiency
POLICY 10 – Option 1 To encourage the use of indigenous species, appropriate to the local environment, in landscaping and tree planting to recognise the cultural values of Ngāi Tahu/manawhenua	1. Effectiveness The proposed policy: <ol style="list-style-type: none"> a. gives effect to Objective 2 by recognising Ngai Tahu / Manawhenua values in development in commercial centres. In doing so, it also enhances the character of a centre (Objective 2). b. is appropriate in achieving Objective 3.6.3 (Tangata whenua) of the Strategic Directions chapter by recognising the relationship of Ngai Tahu with the district’s resources and enhancing those resources. c. gives effect to the Maahanui Iwi Management Plan. 2. Efficiency <ol style="list-style-type: none"> a. Benefits <p><i>Environmental</i></p> <ol style="list-style-type: none"> i. Promotes the use of indigenous species, which provides for biodiversity, amenity and intrinsic values. <p><i>Economic</i></p> <ol style="list-style-type: none"> ii. The long-term maintenance costs of indigenous species may outweigh the initial costs of purchase and establishment.

	<p><i>Social and cultural</i></p> <p>iii. Recognises Ngai Tahu’s relationship with natural and physical resources.</p> <p>b. Costs</p> <p><i>Economic</i></p> <p>i. The use of indigenous species in landscaping and tree planting imposes additional costs on developers in the short term.</p>
Options less or not as appropriate to achieve the objectives and policies:	
POLICY 10 – Option 2 Status quo – No specific reference to cultural values in objectives and policies for commercial areas	<p>1. Appropriateness</p> <p>a. The status quo would have regard to Ngai Tahu / Manawhenua values in the planning process, which would not give effect to Objectivl(e) or the Maahanui Iwi Management Plan. This would not be appropriate having regard to the purpose and principles in Part II of the RMA including “providing for cultural well-being”. It would also not be appropriate in the context of the Strategic Directions chapter by not recognising the cultural and spiritual relationship of Ngai Tahu with natural and physical resources.</p>
Risk of Acting or Not Acting	
It is considered that sufficient information exists about the proposed provisions without the need to take account of the risk of acting or not acting (RMA s32(4)(b)).	

METHOD – ZONE CHANGES

A number of changes to zoning are proposed. The most significant of those changes is removal of the Business 2P (Business Parking) zone, replacing it with a Commercial Fringe / Residential Medium Density / Residential Suburban zoning. An evaluation of this change is provided below.

EXISTING BUSINESS 2P (BUSINESS PARKING ZONES)

Provision(s) most appropriate	Effectiveness and Efficiency
<p>Option 1 – Rezone to Commercial Fringe / Residential Medium Density / Residential Suburban / Residential</p> <p>To reflect outcomes sought for the area, should parking not be required.</p>	<p>1. Effectiveness</p> <p>a. The proposed method would enable redevelopment of car parking areas serving commercial areas for commercial or residential activities. This would support a more compact urban form by providing an opportunity for intensification, consistent with Objective 1.</p> <p>b. While it could result in the development of existing car parking areas, any reduction in car parking will potentially lead to a loss of existing use rights (by consent or provided for by a previous plan) and will trigger the need for an Integrated Transport Assessment. This will enable</p>

	<p>assessment of the effects on the transport network of fewer car parks, therefore enabling effects to be managed appropriately, reflected in Objective 1.</p> <p>c. With regard to the scale, form and design of any development provided for, this will be subject to an urban design assessment if zoned commercial. In addition, controls on sunlight can minimise potential adverse effects.</p> <p>2. Efficiency</p> <p>a. Benefits</p> <p><i>Environmental</i></p> <ul style="list-style-type: none"> i. Promotes the efficient use of land. ii. Expansion of commercial activity closer to the boundary of residential properties may have an adverse effect without adequate controls. iii. Impacts on the existing outlook from adjoining properties. <p><i>Economic</i></p> <ul style="list-style-type: none"> iv. Supports economic growth and employment where the proposed zoning is commercial and more capacity is provided for expansion of a centre. v. Rezoning to residential provides for an increase in population in close proximity to a commercial centre, contributing to greater spend within the centre and potentially business growth and employment. <p>b. Costs</p> <p><i>Environmental</i></p> <ul style="list-style-type: none"> vi. If existing use rights are retained despite the loss of car parking, a reduction in car parking could lead to unforeseen effects on the transport network.
<p>Options less or not as appropriate to achieve the objectives and policies:</p>	
<p>Option 2 Status quo Retain the Business 2P Zone to recognise the role of the areas for car parking.</p> <p><u>Rules</u></p> <p>Car parking as a permitted activity.</p> <p>Assessment of proposals to enable consideration of effects including privacy, glare, building design and colour, landscaping, outdoor</p>	<p>1. Appropriateness</p> <ul style="list-style-type: none"> a. The existing B2P Zone provides for ground level car parking, and other permitted activities provided for by the underlying zoning of Living 2 or Business 2. Specific rules also enable the effects at the interface with adjoining residential areas to be managed. b. This option enables effects on the surrounding environment to be minimised, consistent with Objective 2. It also ensures access to goods and services by vehicles and other modes of transport, consistent with Objective 1.

activity and advertising.	c. In providing for development the existing zoning does not preclude a compact urban form and intensification (Objective 1). However, only ground level car parking is permitted, which does not provide for the most efficient use of land.
Risk of Acting or Not Acting	
It is considered that sufficient information exists about the proposed provisions without the need to take account of the risk of acting or not acting (RMA s32(4)(b)).	

6.0 SUMMARY OF CONSULTATION

6.1. SUMMARY OF PUBLIC FEEDBACK ON THE INDUSTRIAL CHAPTER AS REPORTED TO EARTHQUAKE RECOVERY COMMITTEE OF THE WHOLE

A: PUBLIC FEEDBACK RECEIVED FROM ONLINE SURVEYS

1. Proposed Direction: **Concentrating Retail Activity in Centres**
2. The proposed direction of concentrating retail activity in the Central City and larger commercial centres and supported by a range of smaller centres was supported by 65 per cent of respondents (22 per cent opposed).

Main reason cited for supporting proposed direction:		Additional comments (summary)
1. <i>Proposed Key Activity Area Intensification Area Respondents</i>	a. Will ensure residential areas remain attractive and pleasant	i. Would preserve residential areas and improve transport
2. <i>General Public Respondents</i>	a. Convenience for consumers of having a hub of businesses and activities in the Central City and key larger centres	i. Encourage development of the city centre to minimise the impacts on residential suburbs, particularly parking and traffic congestion
Main reason cited for opposing proposed direction:		Specific other comments:
3. <i>Proposed Key Activity Area Intensification Area Respondents</i>	a. Retail Activity in key larger centres may impact negatively on residential areas	i. Encourage Central City retail as the shopping malls have negative impacts on surrounding residential areas, particularly parking and traffic congestion
4. <i>General Public Respondents</i>	a. Retail activity should be able to locate throughout the city (freedom of choice)	i. The Central City cannot compete with the shopping malls and needs its own distinctive niche Small businesses cannot afford to locate in the Central City and need the lower cost structures of suburban locations

3. Proposed Direction: **Concentrating Office Activity in Centres**
4. The proposed direction of concentrating office activity in the Central City and larger commercial centres was supported by 65 per cent of respondents (12 per cent opposed).

Main reason cited for supporting proposed direction:		Additional comments (summary)
1. <i>Proposed Key Activity Area</i>	a. To aid Central City recovery	i. Concentration of offices in hubs will ensure sense of

<i>Intensification Area Respondents</i>		community in residential areas free of businesses; will result in transport efficiencies; opportunities for co-location with similar services; will aid Central City recovery
2. <i>General Public Respondents</i>	a. To aid Central City recovery	i. Co-location of offices in hubs is good for consumers and workers: convenience/networking opportunities and efficiencies for business partners and support services and public transport; focus of office development should be in the Central City only to encourage vibrancy and recovery; enables separation of office development from residential areas
Main reason cited for <u>opposing</u> proposed direction:		Additional comments (summary)
3. <i>Proposed Key Activity Area Intensification Area Respondents</i>	a. Commercial office hubs impact negatively on neighbouring residential areas	i. Location of offices throughout city will support smaller local businesses and services
4. <i>General Public Respondents</i>	a. Freedom of choice	i. Freedom of choice with office developments spread throughout city so people can live and work in same localities (work/life balance); choice to locate where can best meet customer needs; concentration in large office hubs will result in traffic congestion; big hubs aren't user friendly; negative impacts for bordering residential areas (noise and traffic)

5. Staff noted (through survey response, emails and meeting questions) there was the misconception that the proposed District Plan does not permit offices at all outside of the Central City and larger District Centres and therefore limits 'choice'. The proposed District Plan enables office development outside of the Central City in all centres, and to a more limited extent in residential and industrial areas subject to addressing the outcomes sought for these areas, e.g. residential amenity, supporting industrial activity, and vibrant and appropriately sized centres.
6. **Large Format Developments** - The majority of respondents (56 per cent) **agreed** that larger format developments such as big retail stores should only be located in larger key commercial centres like Riccarton and Hornby (26 per cent disagreed).
7. **Urban Design** – A significant majority (87 per cent) of respondents **agreed** with the need for rules to ensure the design of new development in key commercial areas is attractive.
8. **Active Frontages** - A significant majority of respondents (82 per cent) **agreed** that the ground floor in commercial centres should be used for retail and similar activities, which encourages pedestrian activity on the street.

B. PUBLIC FEEDBACK RECEIVED VIA PUBLIC MEETINGS AND EMAILS

Chapter reference/issue	Public comment	No.	Staff comments	Response/action
New Key Activity Centre				
1. North Halswell Key Activity Centre	a. Desire to retain some 'green' along Halswell Road	2	i. Proposed landscaping provisions will incorporate some greening but road setbacks will be reduced to help integrate adjoining developments, reduce speeds along Halswell Road and promote efficient land use	No change
	b. Centre should be designed with good walking linkages throughout—smaller blocks needed	1	i. Agreed. Good permeability for pedestrians through the site is a key component of the North Halswell ODP. Urban design controls (bulk and location standards) are proposed to address scale	No change
	c. Support design approach—much improved on existing subdivisions and 'big-box' developments	1	i. Support noted	No change
	d. Will school site be reactivated?	1	i. This is a MoE decision. No designation has been sought through the DPR to date	No change
	e. Concern about the quantum of retail and office floor space—potential impacts on the Central City and need for clear limits, policy direction and supporting s 32 evaluation that considers the impacts		i. Analysis indicates the need for additional floor space to meet future demand in the south west. It is proposed that development is staged to align with population growth, limiting the potential impacts on the Central City	No change
	f. Queries lack of restrictions on office activity establishing above ground floor	1	i. Consideration is being given to caps on office floor space, informed by economic analysis	Ongoing work
	g. Why not expand the existing Halswell Centre?	1	i. Halswell Centre was considered as a location to accommodate additional commercial floor space, but is too constrained to	No change

			provide for the amount of floor space needed to accommodate growth in the south west without the purchase of a significant number of good quality homes	
Urban design and amenity				
2. Building height	a. Concern about 3 storeys at Linwood	2	The effects of 3-storey commercial buildings as an extension of the mall on adjoining residential areas has been considered with rules to minimise these effects including: i. controls to maintain sunlight and outlook ii. setback iii. design assessment	No change
	b. The Palms causes significant shading already—need to avoid this happening in future as centres expand	2	i. Agreed that the bulk and location of large buildings can have adverse effects on neighbours. Bulk and location provisions and new design assessment requirements seek to limit such effects. Note that The Palms Mall breaches a number of City Plan standards (resource consent was granted—neighbour consents were obtained)	New rule proposed to limit height to 12m within 30m of a residential zone to minimise the impact of commercial development at the interface
	c. Where will the taller buildings be sited within centres?	1	i. The Commercial Core Zones provide for taller buildings than the Commercial Fringe Zones with some allowance for limited additional height (1 storey) on corner sites in Commercial Fringe Zones	No change
3. Residential interface	a. Careful consideration of interface (including appropriate setbacks) needed	2	i. Agreed. Proposed new rules (setbacks and urban design assessment requirements) have been incorporated to improve these matters	No change
4. Design quality	a. High quality commercial environment needed to attract high quality residential	1	i. Agreed and provisions proposed to enable improved design and amenity outcomes	No change
5. Amenity	a. Greater Council investment in centres needed including upgrades and incentives, e.g. Bishopdale Mall	2	i. Possible improvements to public spaces can be provided for subject to funding being set aside in the Long Term Plan and Annual Plan. The District Plan can assist through enabling good quality development but is one of a number of tools to address issues	No change

6. Active frontages	a. Support new requirements for more glazing in commercial developments	2	i. Support noted	No change
	b. Shame more cannot be done to improve existing problem areas (blank facades)	1	i. Noted	No change
7. Landscaping	a. Need for landscaping in centres—maintaining the garden city image	1	i. Agree that landscaping contributes to amenity. With an urban design assessment for a large proportion of new development, consideration can be given to the landscaping proposed in achieving a high quality environment	No change
8. Urban design rules	a. Opposition to the extent of regulatory intervention and control proposed and the resulting requirements for resource consents. Specific rules cited	7	i. Acknowledged there is a natural tension between achieving improved urban design outcomes and seeking to reduce consenting requirements. Officers have sought to achieve the right balance	No change
	b. Unintended consequences of rules identified such as the 1000 sq m urban design assessment being triggered by most activity	1	i. Agreed—term ‘activity’ too broad and therefore captures very small scale activity such as small alterations and additions and changes of use	Exceptions made to rule
	c. Inflexible and prescriptive rules	3	i. Officers consider the right balance between prescription and flexibility has been achieved	No change
	d. Preference for existing rules and effects-based District Plan	2	i. Noted	No change
	e. Notification requirements should be reduced	1	i. Agreed	Amendments made to notification requirements for applications subject to a design assessment,

				i.e. no notification to the public
Heritage				
9. Akaroa	a. Zone description should acknowledge the NZHPT registered Akaroa Historic Area, which overlays Akaroa Town Centre	1	i. Noted and agreed	Zone description to be included in the Introduction with reference to the Banks Peninsula Commercial Zone
	b. Concern that Banks Peninsula Commercial Zone rules only permit residential above ground floor level	1	ii. Noted and agreed. The intention is for the residential exceptions for residential development in Akaroa to be retained	Change to Banks Peninsula Commercial Zone rules to retain existing BPDP provisions
Activities in centres				
10. Mixed use	a. Opportunities for mixed use?	1	The proposed Commercial Core and Fringe Zones enable mixed-use development	No change
11. Vacancies	a. Eastgate empty shops a concern	1	The DPR seeks to promote attractive and viable centres by directing commercial activities into them, limiting their location outside centres and by promoting environmental improvements to attract further investment and consumer spend	No change
12. Central City	a. More residential development needed rather than commercial	1	Experience and policy at all levels recognises that commercial development is a vital component of the mix of activities needed for a vibrant Central City (along with residential activity) while recognising the importance of a resident population	No change
13. Nuisance	a. Need to consider the impact of nightlife on nearby residents (e.g. Merivale and Shirley Palms)	2	These issues require a multi-faceted approach to their resolution including policing. The DPR can assist through rules around noise and hours of operation	No change
Growth strategy and specific commercial centres				
14. The Palms/ Shirley	a. How have the plans for the Palms Mall been incorporated?	1	i. Proposals for the future expansion of the Palms have not been received or considered by Council staff. Opportunity exists for the mall owners to make a submission on the proposed plan	No change
15. Focus on	a. Why focus on intensifying	1	i. KACs have been identified as being suitable for intensification due	No change

Central City and Key Activity Centres	the larger centres in support of the Malls—why not smaller ones? We need more small shops		to their locations, accessibility, existing amenities and potential to accommodate growth. Investment in smaller centres and new centres is also promoted by the District Plan to provide a mix of centres of different scales to meet the needs of the community	
	b. Should recognise and provide for commercial development along key corridors such as Papanui Road	1	i. A corridor approach is not supported at the present time. Policies in higher order documents direct commercial activities primarily to centres and economic advice indicates there is not sufficient growth to provide for commercial activity along corridors without impacting on centres	No change
	c. Development of suburban centres should not be restricted on account of Central City recovery	1	i. Suburban commercial centres have significant capacity to increase their floor space through intensification. Proposed restrictions relate primarily to existing industrial areas	No change
	d. Support restrictions on office and retail out of centre to support CBD recovery	1	i. Noted	No change
16. Merivale	a. Should plan for its growth to meet the needs of the proposed residential growth (intensification). Suggest commercial rezoning from St Albans Street to Innes Road to reflect current (predominant) uses	3	i. Minor zoning changes are proposed for Merivale (to reflect existing uses). Capacity exists to intensify within current boundary. Further expansion of centre cannot be justified in light of Merivale's role and close proximity to Northlands and the Central City	No change
17. Barrington	a. Potential implications of intensification of the centre (through rezoning B2P Zone) on car parking provision capacity?	1	i. Any redevelopment of Barrington Mall will trigger the need for an urban design assessment and integrated transport assessment to enable the effects on car parking to be assessed	No change
18. Linwood	a. Impact of building heights on sunlight for adjoining private properties	1	i. Recession plane requirements are unchanged ensuring access to sunlight is maintained	No change
19. Warrington	a. Seeks rezoning of	1	i. A need has not been identified for expanding the Warrington Road	No change

St shops	automotive business and several shops near the local centre to commercial		local centre in the vicinity. These businesses can continue their operations under existing use rights	
20. Commercial Retail Park (CRP) Zone – Cranford Park	a. Opposes rezoning of Cranford Park to CRP as it restricts the size and type of activities that can locate there. Seeks Commercial Fringe Zoning or similar	1	i. Current zoning (residential and general industrial) inappropriate. Alternative options considered. CRP most appropriate commercial zoning due to poor accessibility of site by public transport and therefore caters more to car-borne shoppers. CRP zoning does not prevent current uses operating under their existing resource consent and existing use rights	No change
21. Belfast District Centre	a. Seeks removal of the floor space caps and phasing requirements on retail and offices imposed by the Environment Court plus other amendments to rules (access, urban design and consenting requirements)	1	i. Officers have not substantively changed the provisions for this centre imposed by the Environment Court in 2011 in the absence of any identified change in circumstances since this time	No change
22. Support for specific zoning	a. Wairakei/Greens, Avonhead Mall, Marriner St Sumner	3	i. Noted	No change
Other				
23. Temporary activities	a. Should legitimise commercial activities that were granted Temporary Accommodation Permits until 2016, particularly where located close to a centre	3	i. Temporary approvals were given on the basis that they are temporary. Any extension to the time business stays in a location should be assessed on a case-by-case basis through the resource consent process to avoid effects on adjoining areas, particularly residential areas	No change
24. Policy inconsistency	a. LURP (Actions 24 and 11), Central City Recovery Plan (CCRP), CRPS	3	i. Officers consider the proposed provisions are appropriate in the context of directions in the LURP that commercial activity is to be provided for primarily within centres	No change
25. DPR	a. Various amendments	2	i. The functional requirements of business are recognised and there	Amendment proposed

objectives and policies	(additions) sought including recognition of functional requirements of businesses in suburban centres and CCRP direction that it is not necessary for development of suburban centres to be constrained		is considered to be merit in having regard to this when assessing the design of any proposed building	to policy on urban design to recognise the functional requirements of business
26. Process	a. Short timescales, insufficient opportunities for engagement	6	i. Noted	No change
27. Activities-based structure of plan	a. Opposed due to prescriptive nature, effects-based plan preferred, more consents	3	i. Activity-based plan provides clarity for those wanting to know whether they need resource consent	No change

Further amendments to Commercial chapter arising from ERCOW feedback to date and further public feedback 29 May 2014

Councillor feedback	Staff response	Amendment
Zoning of Café Metro site	Recognition that zoning the site as a Commercial Local zone would enable a greater scale/ range of uses than is provided for through consent and to rezone the land as commercial would not be appropriate without further assessment.	Retain residential zoning of 121 Papanui Road
Introduce green building requirements	Options and draft standards circulated separately	Introduction of standards included in memo
Effects on Community infrastructure	Options and recommendation circulated separately	Recommendation for ODP to be required for a centre as a part of any large development in a District centre
Cycle parking -Consider the location of visitor cycle parking when buildings are built to the footpath.	It is proposed that no cycle parking is required where a building is up to the road frontage on Key Pedestrian Frontages. Good urban design outcomes can be achieved through building to the street front	Removal of requirement for cycle parking where a site has a Key Pedestrian Frontage in the Commercial chapter

	<p>while still encouraging cycling through other methods.</p> <p>Provisions could be considered as part of phase 2 to enable financial contributions to be taken for funding cycle parking on the footpath i.e. new development could be required to make a contribution.</p>	
--	---	--

Other amendments/ comments from public feedback

Topic	Public feedback	Staff response	Amendment
Rezoning of land on corner of Blighs Road and Papanui Road	<p>The site is considered suitable for rezoning to Commercial Fringe. A resource consent has previously been granted for an 18 unit motel complex on the site, and greater flexibility is sought for a wider range of uses.</p> <p>Blighs Road would provide a defensible boundary to the commercial zone, and non-residential units would effectively be across the road from one another.</p>	<p>An assessment to determine the effects of rezoning the subject land for commercial activity has yet to be undertaken and there is a need to consult with adjoining landowners.</p> <p>It is therefore not appropriate at this point to rezone the land</p>	No change.
Commercial Local Zone (Wigram)	<p>Strong objection to proposed provisions where they are more restrictive than the Operative City Plan/ any plan change/ any approved resource consent</p>	<p>The introduction of a requirement for resource consent is to enable an assessment of the design of new buildings/ additions to buildings, which can contribute to enhancements through input from Council staff. This is consistent with other local centres proposed in new greenfield areas.</p>	No change
Large format activities in North Halswell KAC	<p>It could be made clearer in Policy 1, Table 1 and Policy 3 that large format retailing is not limited to Large Format centres i.e. The Commercial Core zone at North Halswell will provide for large format activities</p>	<p>The Commercial Core rules provide for large format activities, and policy 3 makes it clear that a supply of large and finer grain retail activity is anticipated</p>	No change
	<p>It should be acknowledged in Policy 3 that entrances to large format activities can be</p>	<p>Policy 3 refers to strong linkages between large format activities, which</p>	No change

Topic	Public feedback	Staff response	Amendment
	onto the 'mains street' through the new North Halswell KAC	enables the consideration of access to the main street	
	Policy 7 on the scale and form of development should refer to District centres in addition to Large Format centres with regard to enabling large floor plates	Agree that reference should be made given District centres can support large floor plates.	Policy 7(b)(iv) amended
Central City	The Central City should be recognised in Table 1 below Policy 1	Agree that the Table is intended to reflect the hierarchy, and should therefore include the Central City	Table 1 amended to include Central City
Master Plans	The chapter should refer to Commercial Centre Master Plans rather than just Suburban Centre Master Plans	The reference to Master Plans in the chapter relates to specific documents known as Suburban Centre Master Plans	No change
Flexibility in standards	Flexibility should be provided for in the standards, specifically referencing North Halswell, where variation should be provided for.	To provide for variation in rules does not provide certainty as to compliance with a rule	No change
Transmission lines/ infrastructure	Restrictions on commercial development should be included to avoid risk to the safety and integrity of infrastructure, while also minimising effects such as potential health issues	Agree, provisions should be included as per submission	Amendments to activity tables for the Commercial Core zone at Yaldhurst and Commercial Local zone, reflecting the zones that transmission lines run through
Reverse sensitivity/ birdstrike risk associated with activities in proximity to the airport	Provisions should be included to avoid noise sensitive activities inside the air noise contour line (50 dBA Ldn). Concern regarding the absence of rules for dealing with the risk of bird strike hazard from the creation of bird strike risk activities for new developments	Agree, provisions should be included to avoid noise sensitive activities inside the air noise contour line and also for minimising the risk of bird strike. However, a requirement for consent for any development within 13 km of the airport is unreasonable and the proposed 3km buffer is retained in the Commercial chapter, consistent with the residential and industrial chapters	Amendments to activity tables with reference to the 'creation of surface water management structures' (Discretionary) and noise sensitive activities (Non-complying in the air noise contour line)

6.2 Overview of consultation undertaken to inform provisions for a Key Activity Centre at North Halswell including an Outline Development Plan

A range of consultation sessions were undertaken during the development of the Halswell ODP, all of which included discussion around the proposed KAC.

1. *Landowner consultation* (March 2013 and update letter June 2013)

- a. There was general support for the ODP proposals during the early landowner briefings. People were supportive of the decision to develop an ODP and rezone the land simultaneously thereby providing certainty for landowners.
- b. During the second round of consultation, an individual with an option to purchase a site within the overall ODP area opposed the proposed location of the KAC. This opposition was raised in response to clarification that the Council had consolidated the location of the KAC based on ongoing economic and retail advice.

2. *Council Workshop* (May 2013)

- a. There was general support for the ODP proposals although the proposed scale of the KAC over the long term did surprise some councillors. A further session to more fully understand the retail assessment findings was organised and this provided additional information around the demand for the new centre. This assuaged some of the concerns about the potential impacts of a new centre on the rebuild of the city centre.

3. *Community Board consultation* (June 2013)

- a. There was general support for the ODP proposals although there were some concerns about the stormwater issues in the area. The Community Board asked for further discussions around longer term stormwater planning in this area.
- b. The Community Board was supportive of the need to provide a larger centre, which can better meet the needs of the community and were also happy with the green corridor approach and initiatives to provide more cycleways and walkways.
- c. Simon Mortlock (landowner of 70ha of the ODP site) presented his concepts for the site to a joint Community Board meeting in November 2013. This session was organised in response to a request from the Mayor. Whilst Mr Mortlock focussed on the residential concepts, particularly the exemplar housing scheme proposed on the site, he did note that the KAC may be located on his site (at this stage the location was undecided) and he talked about aspirations for the centre more generally. The vision presented for the KAC was in line with the Council's concepts for the centre. Feedback from the Community Board session indicated:
 - i. good support for an increase in retail and service provision to the Halswell communities.
 - ii. support for a public transport interchange within the commercial centre.
 - iii. support of the fact the centre is not proposed as a mall.
 - iv. enthusiasm the centre will not hinder the rebuild of the city centre and that commercial growth is aligned to wider south-west residential growth.

4. District Plan Review Consultation (February–March 2013 stakeholders and community)

- a. Community consultation was undertaken as part of the consultation on the DPR. Much of the feedback focussed on the issues of stormwater, transport and residential densities.
- b. People were interested to know how the stormwater network through the whole ODP block would meet the demanding stormwater issues on this site. They also sought to understand how the road network would cope with the extra demand attributable to this development and also, that connections across main roads would be safe.
- c. In relation to the KAC, members of the public wished to see the next level of detail and to ensure it was pedestrian friendly and integrated well with residential areas. In general there was broad support for the KAC although people considered it important it fitted well in the surrounding low rise environment. There was support for the idea of a main street with a central public space and people were pleased the KAC would not be mall-based.

5. Proposed Changes in Approach following Consultation

- a. The retail assessments developed as part of the ODP preparation were provided to partner organisations and fed into work on the LURP. The final version of the LURP (December 2013) identified a new KAC within the North Halswell ODP area and therefore provided the Council with more certainty about the location of this centre going forward. This clarified staff thinking in relation to the general location of the centre and thereon work focussed more on the identification of the specific location of the centre within the overall ODP block. This was required in order that land could be commercially zoned thereby providing certainty to landowners, developers and the community regarding the centre's location.
- b. There have been several retail and commercial assessments undertaken to underpin the thinking around the size of the new centre. Most recently an Economic Impact Assessment (Insight Economics) identified that up to 25,000 sq m should be provided for in the first stage of the centre's development. This enables the establishment of a critical mass of activity, sufficient to support growth in the south west, which has increased post-earthquake.
- c. There has been a significant amount of work undertaken to understand the impacts of the new centre on surrounding centres and the Central City rebuild. This has led to the introduction of a rule requiring assessment of any development beyond the first stage (of 25,000 sq m) within the centre to avoid adverse impacts upon surrounding centres.
- d. The proposed height of the new centre was originally in line with that of other Commercial Core Zones (20m). Following feedback on the likely scale of the centre, a desire for a reduced scale emerged. This was to ensure the development maximised vistas to the Port Hills and was appropriately scaled with development in the wider area. The revised proposal promotes a maximum height limit of 14m (four storeys) in the zone with a minimum height of 8m (two storeys).

7.0 BIBLIOGRAPHY

1. General

General	Author
<i>Proposed Christchurch City District Plan Commercial and Industrial Chapters Economic Analysis</i> , Christchurch City Council November 2013 Refer to Appendix 9.3 of Industrial Section 32 report.	Property Economics Limited
Memo dated 10 October 2013 re. review of provisions for B1 and B2 zones including building height, bulk/ scale, corner sites, building setback and car parking location (Appendix 8.6)	David Compton-Moen, Sinclair Knight Mertz
Memo dated 21 October 2013 re. Criteria and identification of Key Pedestrian Frontages 21 October 2013 (Appendix 8.6)	David Compton-Moen, Sinclair Knight Mertz
Evaluation of effects of bonus height on corner sites 2014 (Appendix 8.7)	Christchurch City Council
Evaluation of interface between Commercial Core/Fringe zones and residential zones, March 2014 – Example in Appendix 8.8.	Christchurch City Council
Letter from the Property Group – Review of Proposed City Plan – Commercial chapter (Appendix 8.4)	Property Group
Letter from Property Economics – Review of Proposed City Plan – Commercial chapter (Appendix 8.5)	Property Economics
Effectiveness of the City Plan/s 32 analysis	
Evaluating the Effectiveness and Efficiency of the Christchurch City District Plan, 28 January 2011	Response Planning Consultants Limited
Evaluating the Effectiveness and Efficiency of the Banks Peninsula District Plan, 28 January 2011	Response Planning Consultants Limited
Land Use Recovery Plan Issues Paper, 2013	Environment Canterbury
Centres Policy	
Draft Centres Policy – Christchurch City Council, Working Draft September 2010	Christchurch City Council
Centres Policy Draft, Christchurch City Council, Draft 2011	Christchurch City Council
Commercial Strategy	
Background Paper: Transport, Christchurch City Council, Draft 2011	Christchurch City Council
Background Paper: Legislative and Policy Context, Strategy and Planning, Christchurch City Council, Working Draft – December 2010	Christchurch City Council
Background Paper: Social Well-being, Strategy and Planning, Christchurch City Council, Working Draft December 2010	Christchurch City Council
Background Paper: Emerging Centres, Strategy and Planning Group, Christchurch City Council, Working Draft February 2011	Christchurch City Council
Background Paper: Urban Renewal and Housing Density, Strategy and Planning, Christchurch City Council, Working Draft November 2010	Christchurch City Council
Case Law Notes: The distributional effects of diluted commercial and retail	Christchurch City Council

activity	Council
Terence Stirling v Christchurch City Council [2010] NZEnvC 401 and Appeal (CIV-2010-409-00289), 2010	
Kiwi Property Holdings Limited v Christchurch City Council [2012] NZEnvC 92 (16 May 2012), Environment Court, 2012	
Urban Design	
Christchurch Central City Business Zones and Business 2 Zones Urban Design Issues and Options Study, October 2008	Isthmus, Beca, Greater Christchurch UDS and Christchurch City Council
Urban Design Issues and Options for the Central City Business Zones and Business 2 Zones Summary of Consultation, July 2009	Christchurch City Council
Urban Design – District and Local Centres Issues and Options Consultation Report Process and Feedback Summary, January 2012	Christchurch City Council
Memorandum from Simpson Grierson to Christchurch City Council, 8 November 2012, comprising a summary of urban design case law	Christchurch City Council
Plan Change 56 S32 Report Urban Design Technical Report, February 2013	Christchurch City Council
Plan Change 56 S32 Report Transport Technical Report, February 2013	Christchurch City Council
Plan Change 56 Urban Design Review Issues and Options Report, May 2012	Christchurch City Council
Urban Design Technical Report Plan Change 56, August 2011	Christchurch City Council, Beca, Isthmus
Plan Change 56 – Stage Two Task A Final Report, December 2009	Christchurch City Council, Beca, Isthmus
Review of Potential Economic Costs and Benefits of Proposed Plan Change 56, prepared for Christchurch City Council, February 2013	Market Economics
Letter from Davis Langdon to Christchurch City Council regarding Development Build Cost Comparison – Christchurch City Plan Status Quo and Proposed Plan Change 56, 4 February 2013	Davis Langdon
Consideration of Broad Options to Inform Plan Change 56, Date unknown	Christchurch City Council

2. Area specific Halswell Key Activity Centre

Title	Author	Description of Report
Economic and Social Impacts of the Halswell Key Activity Centre	Insight Economics and Aurecon Ongoing (2014)	Economic and social impact assessment to satisfy s 32 requirements of the RMA
Halswell Key Activity Centre – Multi Criteria Assessment for Site Selection	GHD, March 2014	Consideration and assessment of five potential KAC sites for a Halswell KAC
South West Area Plan Catchment Retail Assessment	Property Economics, Nov 2012	Reviewed retail demand/need within the south west of Christchurch to 2041
South West Christchurch Retail Scoping Study	Harrison Grierson, January 2013	Peer review of Property Economics figures plus consideration of sites as potential locations for a new KAC

South West Non-Retail Commercial Assessment	Property Economics, 2013	Non-retail commercial demand/need within the south west of Christchurch to 2041
Halswell Key Activity Centre Layout Advice	Buchan Group, 2013	Discussions/advice re: potential layout of the KAC
Plan Change 68 Integrated Transport Assessment	MWH and QTP, 2012/2013	Transport modelling and effects
Plan Change 69 Integrated Transport Assessment	Traffic Design Group	Transport modelling and effects
Strategic Transport Network Needs Review Study, SW Christchurch	Aurecon/Abley	Transport impact research
Halswell Key Activity Centre Draft Public Transport Principles	Aurecon	Principles relating to the most suitable location for a public transport interchange within a greenfield centre
Geotechnical Assessment	Riley Consultants, 2012	Land classification of the North Halswell ODP site with recommendations regarding remediation options
Peer review of geotechnical assessment	Tonkin & Taylor, 2013	General support for Riley Consultants' results although clarification of some issues was required. Riley Consultants responded to these issues
Contaminated Site Assessment	Tonkin & Taylor, 2013	Assessment to confirm whether sites will have overly onerous remediation considerations. None established
Archaeological Assessment	Kevin Jones	Determination as to whether archaeological constraints will affect future land use options
Heritage Assessment	Christchurch City Council	Assessment of Spreydon Lodge and wider site and impacts on future land use options for this site
Stormwater Assessment	Christchurch City Council	Final report forthcoming. Discussions and interim notes to date focus on South West Stormwater Management Plan and indicative requirements for this area (based on the plan)
Wastewater and Water Supply Assessment	Christchurch City Council	Reviewed wider network issues and proposals for future provision of south-west servicing.
Greenspace Assessment	Christchurch City Council	Determined future requirements for greenspace provision within the ODP block

8.0 APPENDICES

APPENDIX 8.1: KEY STRATEGIC DOCUMENTS

APPENDIX 8.2: LINKAGES BETWEEN PROVISIONS

APPENDIX 8.3 PROPERTY ECONOMICS REPORT

APPENDIX 8.4 PEER REVIEW OF CHAPTER BY THE PROPERTY GROUP

APPENDIX 8.5 PEER REVIEW OF CHAPTER BY PROPERTY ECONOMICS

APPENDIX 8.6 ADVICE FROM DAVID COMPTON-MOEN, SINCLAIR KNIGHT-MERTZ ON COMMERCIAL CHAPTER

APPENDIX 8.7 ADVICE FROM URBAN DESIGN TEAM, CHRISTCHURCH CITY COUNCIL ON PROVISION FOR BONUS HEIGHT

APPENDIX 8.8 MODELLING OF INTERFACE BETWEEN COMMERCIAL CORE AND RESIDENTIAL ZONES

