



General Residential Zone and Mixed Use Zone Report S.32



YOUR PLAN OUR FUTURE
TIMARU DISTRICT PLAN REVIEW
LAND USE PLAN

Timaru District Council

Section 32 Report

General Residential Zone

And

Mixed Use Zone Report

June 2022

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1 Residential Zones

1.1 Introduction

This topic covers urban and suburban areas within the Timaru District which have the primary role of providing for the residential needs the resident population. These areas include the larger urban and suburban areas within Timaru City and the medium sized towns of Temuka, Geraldine and Pleasant Point. This topic does not cover the smaller settlements such as Pareora, Peel Forest and Cave, which are proposed to be zoned Settlement zone and managed under the Rural Chapter.

In general, the past and present planning regimes for these residential areas have provided a good basis for development within these zones and have maintained an acceptable level of amenity for residents. However, some refinement of these provisions to achieve more efficient use of residential land is considered to be timely.

1.2 Community / Stakeholder / Iwi Engagement

The initial identification of issues involved consultation with Council's technical working group. In particular discussions were held with the Council's Property Manager who has been involved in developing multi-residential units on Council land within Timaru. These issues were then included in Council's Discussion Documents prepared and made available to the public as part of the District Plan review process.

Due to the Growth Management Strategy not having been finalised at this stage, the Residential Discussion Document focussed on the issue of what standards are needed to maintain the amenity of Residential Zones if housing is developed at greater densities.

Options considered in the Discussion Document to address this issue were:

- retaining the status quo.
- performance standards to enable greater density while also providing sufficient on-site amenity for new development, and protection of amenity on the adjacent land.
- performance standards to limit stormwater run-off onto adjacent land occurring from new residential development.
- provision for combined land use and subdivision applications.

As a result of community feedback on the Residential Discussion Document the following additional issues have been identified:

- the need for housing options for older people.
- a desire for health facilities in residential zones to be encouraged.
- whether additional control is needed on Home-based visitor accommodation.

With regard to the takata whenua consultation Aoraki Environmental Consultants Ltd have advised that the following should be considered for Residential Zones:

- the need to consider the relationship between the residential zone and other chapters, for example management of earthworks.
- if the Residential zone is to include precincts/placemaking/design guidelines, particularly around areas of significance to manawhenua, or place making opportunities that reflect manawhenua in the landscape then they would like to be involved with that.

These matters have been taken into account in the drafting of the residential chapter provisions, except that stormwater run-off is a matter addressed in the proposed Plan's Stormwater management chapter.

Feedback on the draft District Plan

A range of feedback was also provided on the Draft District Plan. Key areas of feedback, and the way they have been responded to, are set out below:

Feedback Summary	Response
Greater delineation is needed between the height limits in the MRZ and GRZ zones	It is proposed that greater distinction is provided between the GRZ and MRZ by applying a 9m height limit in GRZ, and a 12m height limit in MRZ. This essentially provides for 2-storey buildings in the GRZ and 3-storey buildings in the MRZ.
Remove density controls (minimum area requirements per residential unit) in residential zones	<p>It is proposed that density standards are not included in the MRZ and GRZ chapters, but that additional requirements to manage the density of built form are introduced instead. This includes limiting building coverage and requiring a minimum amount of landscaping in both zones. This reflects that a density control is a blunt tool for managing effects of new housing development and may have the unintended consequence of encouraging larger houses, rather than providing for a mix of housing types. Application of other standards is considered sufficient to address the effects of bulk and form to achieve the type of built form outcomes sought</p> <p>It is also proposed that the number of permitted units in the MRZ is increased from two to three and within the GRZ from one to two, subject to all standards being met. Three units is a commonly used threshold in other plans for medium density zones.</p>
Provide for emergency services facilities in the GRZ as a controlled activity	It is not recommended that ESF are provided for as a controlled activity within the GRZ, because such an application cannot be declined by the Council and these activities could have effects that are not consistent with the character anticipated in the GRZ, and there would be limited opportunity to address these through consent conditions.
Amend site coverage rule	The site coverage rule in the GRZ has been amended so that it applies only to building coverage, rather than to impervious surfaces as well. This reflects that the DDP includes a stormwater chapter and avoids the potential for duplicating or conflicting provisions in relation to stormwater management.

1.3 Strategic directions

The Strategic Directions relevant to Residential Zones are set out below with comments.

SD-O1 Residential Areas and Activities

- i. There is sufficient residential development capacity in existing and proposed urban areas to meet demand and household choice, provided through:
 - a. the use of existing zoned greenfield areas;
 - b. a range of densities in existing urban areas; and
 - c. higher residential densities in close proximity to the Timaru and Geraldine town centres, and Highfield Village Mall;
 - d. the new General Residential Zoned areas.
- ii. limited rural residential development opportunities are provided where they concentrate and are attached to existing urban areas, achieve a coordinated pattern of development and are capable of efficiently connecting to reticulated sewer and water infrastructure; and
- iii. limited residential opportunities are maintained in existing rural settlements, subject to adequate servicing.

This Direction sets the scene for consideration of Residential zones and provisions and makes it clear that a range of mechanisms are proposed to provide for population and household growth in existing urban areas. Importantly, it includes a directive that existing residential zones are to provide for a range of densities, and higher residential densities are to be provided in identified areas. This is reflected in the distinction between areas zoned General residential and those zoned Medium density residential.

UFD-O1 Settlement Patterns

UFD-O1 Settlement Patterns

- A consolidated and integrated settlement pattern that:
- i. efficiently accommodates future growth and capacity for commercial, industrial, community and residential activities, primarily within the urban areas of the Timaru township, and the existing townships of Temuka, Geraldine, and Pleasant Point;
 - ii. is integrated with the efficient use of infrastructure;
 - iii. reduces adverse effects on the environment, including energy consumption, carbon emissions and water use;
 - iv. protects drinking water supplies from the adverse effects of subdivision, use and development;
 - v. is well-designed, of a good quality, recognises existing character and amenity, and is attractive and functional to residents, business and visitors;
 - vi. avoids areas with important natural, cultural and character values;
 - vii. minimises the loss of versatile soils;
 - viii. enables kāika nohoaka to occur on ancestral lands;
 - ix. avoids locating new growth in areas where the impacts from natural hazards are unacceptable or which would require additional hazard mitigation; and
 - x. controls the location of activities, primarily by zoning, to minimise conflicts between incompatible activities and avoid these where there may be significant adverse effects.

This Direction provides high-level guidance on the desired settlement pattern for Timaru District. It seeks to efficiently accommodate growth of residential activities primarily in the urban areas of Timaru and the existing townships of Temuka, Geraldine and Pleasant Point. While much of this Direction is more relevant to what areas are zoned for various purposes, it is also relevant to how identified residential areas are managed. This includes that development within residential areas is to be well-designed, of good quality, attractive and functional and recognise the existing character and amenity of these areas.

1.4 Problem definition

1.4.1 Operative Plan

The Operative District Plan contains a range of residential zones. The Residential 1 Zone is intended to provide for suburban residential development of moderate to low density, and activities which service residential activities. This zone is found in Timaru, Temuka, Geraldine and Pleasant Point.

The Residential 2, 4 and 6 Zones are located in Timaru only. The Residential 2 Zone is located centrally in Timaru and is intended to provide for higher density development. The Residential 4 Zone provides for low density residential development in areas within Washdyke. The Residential 6 zone is located in Gleniti and provides for provides for integrated residential development, subject to an indicate Development Plan.

The Residential 3 Zone provides for low density residential activities in the District's smaller townships of Acacia Drive, Cave, Orari, Pareora, Winchester, Peel Forest township and Woodbury.

The Residential 5 zone is located in Geraldine only, and is an area identified for future residential zone, subject to servicing requirements and demand for residential land.

The Plan includes objectives to manage these residential areas which are largely focused on amenity of these areas: Objective 2.1.1 seeks to recognise the importance of maintaining and enhancing the amenity values of residential areas; Objective 2.2.1 seeks that residential zones are areas of rest and relaxation; and Objective 2.3.1 seeks that residential character and a high standard of amenity is retained. These are implemented through a range of policies and related rules that limit the types of activities provided for in residential zones, and impose controls on activities, including on density intended to manage potential effects on amenity.

The provisions in this chapter also provide direction on a range of matters that are addressed in the proposed Plan in other chapters, for example noise, stormwater management and natural hazards.¹

There is a separate rule framework applying to each zone, which lists the range of activities that are permitted in each zone. Performance standards also apply in each zone, controlling matters such as height, shading, setbacks, provision of open space for household units, lighting and fences.

1.4.2 Issues identified

Housing Choice

Provision for increased residential density and intensification

It is good planning to provide for sufficient residential development capacity to meet demand and household choice. Compact patterns of development and integration with infrastructure can achieve greater efficiencies as compared to spread-out development. To achieve efficiencies it is therefore necessary to provide for and encourage higher density housing development within both existing and new residential areas. The Growth Management Strategy seeks to encourage opportunities for higher density in close proximity to the Timaru and Geraldine town centres and Highfield Village Mall.

However, issues of loss of residential amenity and privacy arise with more intensive residential development. The impacts include reduced areas of open space and planting and loss of larger scale trees, all of which provide a sense of spaciousness. In addition, residential buildings are likely to occupy a greater proportion of sites and be closer to neighbouring boundaries. Multi-unit residential developments also often have a more utilitarian design as compared to traditional single dwellings. The impacts of more intensive residential

¹ Objective 2.2.1 and Policy 2.2.2; Policy 2.4.2.2; Objective 2.5.1 and Policy 2.5.2.

development therefore have the potential to impact the character of neighbourhoods as well as having more localised impacts on immediate neighbours.

While the Operative District Plan rules provide a pathway for intensification, they generally do not promote or encourage this form of development as is shown by the lack of take-up of the existing rules which provide for greater intensification than currently exists. It is noted however that in recent years there has been a small, but noticeable, uptake of smaller residential units in Timaru.

Greater residential provision for older people

The Growth Management Strategy 2045 notes that providing for an aging population results in increased opportunities for: smaller houses on smaller sites; minor residential units to provide for family members in addition to existing dwellings; and retirement complexes. Providing these choices close to town centres and requiring good quality housing will improve the quality and resilience of the district's housing supply. It also improves accessibility to shops and services. However, the current District Plan provisions do not provide for all of these forms of housing in the Residential zones. In addition, there can be issues of amenity and privacy if housing is intensified without compensatory open space and access to community and shopping facilities in nearby areas.

Managing non-residential activities within residential zones

Provision for health facilities

Health facilities have traditionally located in residential areas to serve the local residents. Such facilities include doctors surgeries, which are frequently located within houses with a small number of health professionals. More recently there has been a move away from smaller single purpose health facilities to combined or integrated medical facilities. The services of a range of health professionals such as doctors, physiotherapists, chemists and dentists can be found in these facilities.

Ideally it is efficient and convenient if these facilities are located where they are easily accessed, such as in residential areas. However this raises an issue as to whether their scale and associated traffic generation can be accommodated without detracting from the character and amenity of the surrounding residential environment.

Homebased visitor accommodation

Homebased visitor accommodation such as Airbnb and Book-a-Bach in most cases requires resource consent under the Operative District Plan as it constitutes "travellers accommodation" due to charging a daily tariff. While travellers' accommodation is a permitted activity in the Residential 1 zone for up to 10 people, the combination of a household unit with visitor accommodation will often result in non-compliance with the required on-site parking. However not all operators of this form of accommodation have sought resource consent.

The issue raised with the popularity of providing and using homebased visitor accommodation is whether it is something that should be enabled and encouraged due to the associated economic and social benefits of reasonably priced accommodation and an additional form of income for house-owners; or whether enabling this type of accommodation would detract from provision of other types of visitor accommodation within commercial areas. If houses are used on a regular basis for commercial accommodation this could also result in additional traffic and noise. However, in many cases these effects are likely to be similar to what may occur with any residential activity. Other Council-related issues arise with home based visitor accommodation including Building Act requirements and implications for rating of properties.

Consolidation of residential zones

The Council is required to adopt the zoning framework and district plan structure specified in the National Planning Standards (Standards) created under the RMA. The Standards state that the number/type of residential zones to be established in any District Plan is limited to the following five zones:

- Large lot residential – areas used for residential activities on large lots due to particular landscape characteristics, physical limitation or other constraints.
- Low-density residential – areas used predominantly for residential activities and buildings consistent with a suburban scale and subdivision pattern.
- General residential – areas used predominantly for residential activities with a mix of building types and other compatible activities.
- Medium density residential - provide primarily for residential activities with a moderate concentration and bulk of buildings and other compatible activities such as detached, semi-detached and terrace housing.
- High-density residential - provide primarily for residential activities with a high concentration and bulk of buildings such as apartments and other compatible activities.

The Standards also provide for a Settlement Zone, which can be included within either the Residential or Rural zones chapters. In the proposed District Plan, the existing Residential 3 zone is proposed to be zoned Settlement zone and included within the Rural Section of the proposed District Plan.

1.5 Statutory and Planning Context

This section provides a key summary of the statutory requirements of relevance to residential zones, and the relevant planning context.

1.5.1 Resource Management Act

Section 5 - Purpose

Section 5 of the RMA sets out its purpose, being to promote the sustainable management of natural and physical resources. As applicable to the residential areas within the District, sustainable management includes managing the use, development, and protection of the natural and physical resources of these areas, to enable people and communities to provide for their social, economic and cultural wellbeing and for their health and safety. This includes avoiding, remedying and mitigating the adverse effects of activities within these zones on the environment (section 5(2)(c)).

Section 7 - Other matter

Section 7 lists matters to which persons exercising functions and powers under the RMA are to have particular regard to. Section 7(b) relates to the efficient use and development of natural and physical resources, which in relation to this topic, requires the Council to consider the existing resources associated with Timaru's residential areas and ensure the residential land resource is used efficiently. Section 7(c) relates to the maintenance and enhancement of amenity values and Section 7(f) relates to the maintenance and enhancement of the quality of the environment. This requires the District Plan to consider the amenity values associated with the district's residential areas, as well as the quality of these environments and how they are to be maintained and enhanced.

Section 31 - Functions of territorial authorities

Section 31(1)(a) of the RMA provides the Council with the function of establishing, implementing and reviewing provisions to achieve integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district. Section 31(1)(b) also provides the Council with the function of controlling the adverse effects of the use, development or protection of land. Section 31(1)(aa) also provides the Council with the function of establishing, implementing and reviewing provisions to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district.

District Plan must give effect to	
Document	Relevance
National Policy Statement on Urban Development 2020 (NPS-UD)	<p>The NPS-UD directs local authorities in relation to development of urban environments. Broadly, it seeks that urban environments are well-functioning, including integration with infrastructure, and directs that a minimum amount of supply is provided, taking into account demand. Much of the NPS-UD is not relevant to the Timaru District, who are classified as Tier 3 authority; with the majority of provisions directed at Tier 1, or Tier 1 and 2 authorities. However, of those provisions that do apply within the District, Objective 4 and Policy 6 are relevant to the framework for residential zones. They provide for urban environments, including amenity values, to develop and change over time in response to changing needs. In some parts of the District, this may mean that the type of development anticipated and enabled under the plan provisions result in different type of character and related amenity values than those existing at present. Policy 1 also directs that that planning decisions contribute to well-functioning urban environments, including that they have or enable a variety of homes that meet the needs of different households. Policy 5 also directs that district plans enable heights and density of urban form commensurate with the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or relative demand for housing and business use in that location. Policy 3.35 also directs that the Council must ensure that the objectives for urban zones “<i>describe the development outcomes intended for the zone over the life of the plan and beyond</i>” and that the policies and rules are consistent with those outcomes.</p>
National Planning Standards 2019	<p>The purpose of the National Planning Standards (Standards) is to improve consistency in plan and policy statement structure, format and content. The District Plan must give effect to the Standards. Of relevance to residential zones, the Standards includes (8) Zone Framework Standard, which specifies that the Council can only use the zones which are provided for within the standard, except where specified criteria are met for the use of an additional special purpose zone. While the objectives, policies and rules specific to a particular zone can be determined by the Council, these need to align with the description of the zone specified in this standard.</p> <p>Standard (12) - District Spatial Layers Standard, sets out the spatial layers that can be used within the draft District Plan. These allow for the use of zones, overlays, precincts, specific controls and development areas.</p>
Canterbury Regional Policy Statement 2013 (CRPS)	<p>Chapter 5 of the CRPS provides direction in relation to land-use and infrastructure and applies to all parts of Timaru District. The following provisions are particularly relevant to the framework for commercial zones:</p> <ul style="list-style-type: none"> • Objective 5.2.1 which seeks that development is located and designed so that it functions in a way that: achieves consolidated, well designed and sustainable growth focussed primarily in and around

	<p>existing urban areas; and provides sufficient housing choice to meet housing needs.</p> <ul style="list-style-type: none"> • Policy 5.3.1 which directs that growth patterns: encourage housing choice, of a character and form that supports urban consolidation, within urban areas; promote energy efficiency in urban forms; maintain and enhance the sense of identity and character of urban areas; and encourage high quality urban design, including the maintenance and enhancement of amenity values. <p>The methods under Policy 5.3.1 direct territorial authorities to: include district plan provisions which establish an approach for the integrated management of urban development with the primary focus of ensuring consolidated, well-designed and more sustainable urban patterns; and consider methods which promote good planning, building design and urban design that give effect to the New Zealand Urban Design Protocol.</p>
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District Plan must not be inconsistent with:	
Document	Relevance
Canterbury Land and Water Regional Plan 2015	The CLWRP contains objectives, policies and rules that manage land, water and biodiversity within the region, in relation to the functions of the regional council. In particular, it manages activities that relate to water quantity and quality (including land use activities that can affect water quality), and activities that may affect biodiversity, such as vegetation clearance, and various activities within the bed of lakes and rivers. The District Plan must not be inconsistent with the CLWRP. Some aspects of activities located within residential areas may also be regulated under the CLWRP, for example, in relation to stormwater discharges.

District Plan must take into account:	
Document	Relevance
Iwi Management Plan of Kāti Huirapa 1992	In preparing the District Plan, the Council must take into account the Iwi Management Plan, as it is a relevant planning document recognized by an iwi authority, to the extent that it is relevant to the resource management issues of the district. Many of the policies relate to matters which fall within the jurisdiction of the Canterbury Regional Council. None are considered specifically relevant to the residential chapter of the District Plan.
Te Whakatau Kaupapa Ngāi Tahu Resource Management Strategy for the Canterbury Region 1990	This Strategy is a statement of Ngai Tahu beliefs and values, to be taken into account when District Plans are prepared, and intended to assist planners in identifying the resource values and objectives of the tangata whenua. The document contains Ngai Tahu objectives and policy statements in relation to a number of identified resources and activities.

	None of these are specifically relevant to the residential chapter of the District Plan.
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District Plan must have regard to:	
Document	Relevance
Growth Management Strategy (GMS)	The GMS sets out the long-term strategic approach to managing land use growth in the Timaru District. It includes 12 Strategic Directions outlining what the District would look like in 2045 if the GMS were achieved. This strategy provides strong direction on the desired settlement patterns of the district to provide for future anticipated growth. This settlement pattern includes the need to provide for greater density of housing within specific areas of Timaru and Geraldine.
Long Term Plan 2018-28 (LTP)	The LTP sets out the Council's strategic direction, including a vision, community outcomes and strategic priorities. The Vision includes a 'Fantastic, sustainable lifestyle second to none'. Community Outcome 3 seeks 'A valued, healthy and accessible environment'. Community Outcome 4 seeks 'People enjoying a high quality of life' and Community Outcome 6 seeks 'Communities that are safe, vibrant and growing'.
New Zealand Urban Design Protocol 2005	The Urban Design Protocol is a voluntary commitment by central and local government, as well as property developers, investors, design professionals, educational institutes and other groups, to undertake specific urban design initiatives in order to make New Zealand towns and cities more successful through quality urban design. It identifies seven essential design qualities that together create quality urban design – context, character, choice, connections, creativity, custodianship and collaboration. Timaru District Council is a signatory to the Protocol.
Timaru District Council 50 Year Infrastructure Strategy 2018-2068	This Strategy sets out how the Council intends to manage its water, sewer, stormwater, roading and waste minimisation activities for the next 50 years. It includes an overriding direction of 'Responsible Stewardship' and aims to ensure the District's infrastructure is meeting the community's needs. This is relevant to Residential zoning and intensification, as the demand for reticulated services and roading associated with these needs to be taken into account.

2 Approach to Evaluation

Section 32(1)(b) requires an evaluation of whether the provisions are the most appropriate way to achieve the objectives by identifying other reasonably 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.

The proposed provisions relevant to the Residential zones chapters have been assessed in accordance with the following issues:

Issue 1: Providing for increased residential density and intensification while managing its effects.

Issue 2: Appropriately managing non-residential activities within residential zones.

Issue 3: Consolidating residential zones.

2.1 Scale and significance of proposals

The table below sets out the scale and significance of managing residential areas in the District in terms of Council’s statutory obligations, who may be affected by any proposed changes to the management regime, the type of effects that may occur and where in the District is mostly likely to be affected by the proposed changes to the District Plan. This will inform the nature and extent of the analysis of the proposed changes to the residential zones provisions. For example, proposed provisions that will result in an overall high level of scale and significance will require a more in-depth analysis of proposed objectives, policies and rules including, potentially, an economic analysis, compared to changes that will have a low-level significance.

Issues: Providing for increased residential density and intensification while managing its effects. Appropriately managing non-residential activities within residential zones. Consolidating residential zones.		
Reasons for change in policy	District Plan Review Giving effect to the National Planning Standards Giving effect to the NPS-UD Implementing direction in Growth Management Strategy	Medium
Relevant Statutory Considerations / Drivers	RMA Sections 5, 7(b), (c) and (f). CRPS Chapter 5.	Medium
Degree of shift from status quo required	Removal of distinctions between different levels of density - resulting in similar housing densities for the main Residential 1 and 2 zones and an increase in density for Residential 4 and 5 zones. Greater opportunity for increased density where either range of built form standards are met, or via a resource consent process. Provide for a greater range of housing types. Makes minor changes to bulk and location standards. Makes minor changes to activity status for different activities, in particular to make more non-residential activities permitted or controlled activities; and greater policy guidance for activities requiring resource consent. More directive provisions included to encourage comprehensively designed higher density development.	Medium
Who and how many will be affected?	Potentially all owners and occupiers of residential-zoned land. For landowners, provides greater opportunities for intensification, and more	Medium

	opportunities to utilize residential land for facilities and services that serve residents For residents of properties neighbouring redeveloped properties, they may experience a change in amenity.	
Degree of impact on, or interest from iwi / Maori	No specific impact on takata whenua values identified.	Low
When will effects occur?	Effects will occur gradually as properties are developed more intensively than could occur under the current zoning, or as new non-residential activities such as health and education facilities establish.	Low
Geographic scale of impacts / issue	Affects all Residential zones	Medium - High
Degree of policy risk, implementation risk, or uncertainty	Limited policy or implementation risk as changes relate primarily to matters of subdivision and redevelopment which occurs sporadically. Slight implementation risk as designing to meet controls may not always result in best design outcomes.	Low
Overall Assessment of Scale and Significance		Low - Medium

2.2 Approach to managing residential zones

It is proposed to apply the following zones to the District's residential areas:

Operative Plan Zone	Proposed Plan Zone
Residential 1 Zone	General residential
Residential 2 Zone	Medium density residential
Residential 3 Zone	Settlement Zone (included in the Rural zones chapter)
Residential 4 Zone	General residential – Old north general residential precinct
Residential 5 Zone	General residential
Residential 6 Zone	General residential

In accordance with the Standards, each zone is contained within its own chapter, with each including objectives, policies and rules for managing activities in each zone.

2.3 Quantification of Costs and Benefits

Section 32(2)(b) requires that if practicable the benefits and costs of a proposal are quantified. The Growth Management Strategy has undertaken assessment of yields at various densities and also researched the size of lots within various residential areas which has assisted in developing the proposals.

However, none of the effects listed in 2.1, both adverse and positive, have been directly quantified, primarily because the rate of development and redevelopment within residential areas of the District is both incremental and slow and so the risk of untoward effects on matters such as land values and the cost of building would be difficult to isolate and discern. It is also noted that effects of the proposals are generally rated as low or low/medium and are therefore limited.

2.4 Choice of Evaluation Method(s)

Given the low-medium scale and significance of the issues related to managing commercial zones, the alignment of the preferred option with direction in the CRPS, GMS and community feedback, the approach taken to evaluation is to assess, using a cost-benefit analysis, the preferred option against the operative plan provisions (status quo).

2.5 Proposed objectives

This section of the report evaluates the proposed objectives as to whether they are appropriate to achieve the purpose of the Act.

GRZ-O1 The purpose of the General Residential Zone

The General residential zone primarily provides for residential activities, a mix of housing types, along with other complimentary activities that support the wellbeing of residents.

GRZ-O2 Character and qualities of the General Residential Zone

The character and qualities of the General residential zone are maintained, including:

1. A low-moderate building site coverage
2. built form of single and two-storey attached or detached buildings; and
3. ample space around buildings; and
4. provision for on-site outdoor living areas; and
5. sites that incorporate plantings; and
6. a good level of sunlight access; and
7. a good level of privacy between properties.

MRZ-O1 Purpose of the Medium Density Residential Zone

The Medium-density residential zone primarily provides for residential activities within a range of housing types and other compatible activities that support the wellbeing of residents.

MRZ-O2 Character and qualities of the Medium Density Residential Zone

The character and qualities of the Medium density residential zone comprise:

- i. a moderate building site coverage; and
- ii. two to three-storey buildings that are well-articulated and that make a positive contribution to neighbouring properties and the streetscape; and
- iii. good quality on-site residential amenity; and
- iv. good quality amenity for adjacent sites; and
- v. upgraded and attractive streetscapes.

3 Evaluation of Objectives

The table below evaluates the following objectives:

- GRZ-O1: The purpose of the General Residential Zone
- GRZ-O2: Character and qualities of the General Residential Zone
- MRZ-O1: The purpose of the Medium Density Residential Zone
- MRZ-O2: Character and qualities of the Medium Density Residential Zone

Category	Criteria	Comments
Relevance	Directed to addressing a resource management issue	Achieves Describing the purpose, character and qualities of each zone assists with making it clearer what types of activities are anticipated within each zone and the level of density, character and amenity anticipated.
	Focused on achieving the purpose of the Act	Achieves The objectives give effect to the purpose of the RMA, by identifying the way in which each residential zone is expected to be managed to enable people and communities to provide for their wellbeing. They also relate to the direction in Sections 7(c) and (f) to maintain and enhance amenity values and the quality of the environment, through providing guidance on the anticipated character and character of each zone.
	Assists a council to carry out its statutory functions	Achieves The objectives relate to achieving integrated management of the effects of the use, development or protection of residential-zoned land and the natural and physical resources located within those zones and controlling the actual and potential effects of the use, development and protection of land.
	Within scope of higher level documents	Achieves The objectives give effect to the direction in the CRPS to maintain and enhance the sense of identity and character of the urban area; and encourage high quality urban design, including the maintenance and enhancement of amenity values. They do this by providing guidance on the type of built form that is anticipated within each residential area, and what type of identity and character each area is anticipated to have. The objectives also give effect to the NPS direction by setting out clearly what the intended character and qualities of these particular urban areas is, allowing them to develop and change over time in response to identified changing needs. They also align with the direction in Policy 3.35 by clearly describing the development outcomes intended for each residential zone.
Feasibility	Acceptable level of uncertainty and risk	Achieves The objectives outline the outcomes sought within each residential zone. There is a level of uncertainty about whether these outcomes will be achieved, because there are a range of factors that sit outside the District Plan that will influence the level of development that will actually take place. However, this is not considered to be an unacceptable level of uncertainty.

		The level of risk associated the objectives is considered to be low. What is sought generally aligns with strategic documents, as well as the GMS. The outcomes sought are therefore not controversial or unexpected and aligning with these outcomes is therefore considered to be low risk.
	Realistically able to be achieved within council's powers, skills and resources	Uncertain The outcomes sought (to the extent that they differ from the current residential environments) can be facilitated through the District Plan provisions, but their achievement is ultimately dependent on land owners.
Acceptability	Consistent with identified iwi/Māori and community outcomes	Achieves The objectives are consistent with the GMS and will assist in achieving the LTP's outcomes.
	Will not result in unjustifiably high costs on the community or parts of the community	Achieves. The outcomes sought will not result in unjustifiably high costs on landowners or developers and will better ensure that the benefits to land owners and the wider community of well-designed residential developments are realised.

4 Identification of Options

Section 32(1)(b) of the RMA requires an examination of whether the provisions in the proposal are the most appropriate way to achieve the objectives, by: identifying other reasonably practicable options for achieving the objectives; assessing the efficiency and effectiveness of the provisions in achieving the objective; and summarising the reasons for deciding on the provisions. The following sections therefore identify other reasonably practicable options, assess the efficiency and effectiveness of each option, and provide an overall summary on why the proposed approach has been chosen.

The evaluation of provisions has largely been bundled, because the provisions are expected to work together to achieve the objectives, but broken down into two topics:

- Topic 1: How new residential development or redevelopment is controlled; and
- Topic 2: Management of activities within residential areas.

Topic 1, Option 1: Control residential development through standards

This option involves providing for residential development, of any scale, as a permitted activity, subject to compliance with a range of standards intended to manage:

- The effects of built form on adjoining properties and the character of the zone
- On-site amenity
- The interface with public areas

Such standards could include: height limits; recession planes; setbacks from road and internal boundaries and from other units on the site; building coverage limits; impervious surface limits; minimum landscaping requirements (overall and in specified areas such as front yards); restrictions on window location in respect to other buildings; outdoor living space; controls on style and height of fencing; minimum unit sizes; screening of service areas; continuous wall length limits; requirements around what can or cannot be located within front yard areas; and minimum space requirements for waste and recycling storage.

Under this option, development would not be subject to a strict density control (i.e. 1 residential unit per a specified square meter rate), but adherence to all standards would in effect limit density.

Topic 1, Option 2: Control residential development through a consent process

This option involves requiring a resource consent for the development of more than one residential unit per site, through a consent process. The purpose of the consent process would be to allow for consideration on a case-by-case basis of the design of any residential unit, including the effects of built form on adjoining properties and the character of the zone, on-site amenity and the interface with public areas. Under this approach, some basic built form standards or space requirements could be applied (e.g. height, recession planes and setbacks) or left to consideration through the consent process.

Topic 1, Option 3: Combination approach

This option is a combination of Options 2 & 3, with the differentiation based on the number of units being proposed. As such, under this option:

- A specified number of units would be permitted, but subject to controls. This would provide for small-scale development, such as infill, while managing effects through built form controls. Under this option, the controls would not be as numerous as those included in Option 2, but would include a range of controls intended to manage bulk and location, including the ratio of open space to built form.
- Development of units above the specified number would require a resource consent, but would not be subject to all built form controls. This would allow for consideration on a case-by-case basis of the design of multiple residential units, while also allowing the applicant to provide design solutions which may not meet the permitted standards but still achieve the outcomes sought.

5 Evaluation of Options

5.1 Evaluation table – Topic 1

OPTION 1			
<i>Control residential development through standards</i>			
Benefits			
Environmental	Economic	Social	Cultural
Standards will ensure that environment outcomes are achieved, including those relating to effects on neighbouring properties, and effects of built form on the character anticipated for each residential zone.	The parameters for development, and any limitations associated with these will be reasonably clear to developers, who can budget accordingly.	Standards will ensure that effects of design impacting the wider community are adequately addressed, particularly those relating to the interface with public areas.	None identified.
Costs			
Environmental	Economic	Social	Cultural
Designing to standards may result in less innovative design approaches and therefore not necessarily result in the best environmental outcomes that might otherwise be achieved.	There are costs associated with designing to specified parameters. For development of multiple units, designing to parameters may discourage alternative designs that would cost less but still achieve the outcomes sought for the zone. Lack of encourage for alternate approaches may also result in a lack of diversity in housing	Designing to standards may result in a similarity of built form and a lack of diversity in housing. This in turn may not meet community needs.	None identified.

	<p>design which in turn may not provide housing affordability.</p> <p>Where a developer does propose an alternate design that does not meet the specified standards, there are costs and uncertainties associated with the consent process.</p>		
Efficiency	This option is considered to be moderately efficient in achieving the outcomes sought. However it does not encourage innovation or comprehensive development and may result in a level of homogeneousness.		
Effectiveness	This option is generally effective at achieving the outcomes sought in relation to the character and qualities of residential zones. However, particularly in terms of medium density, it only encourages one way of achieving aims relating to buildings that are well-articulated and that make a positive contribution to neighbouring properties and the streetscape; provide good quality on-site amenity and amenity for adjacent sites; and attractive streetscapes. Other designs that do not necessarily meet the specified standards may better achieve these aims, but are not encouraged through a strict standards-based framework.		
Strategic Direction(s)	This option is potentially less effective than Options 2 & 3 at achieving SD-O1 with respect to providing household choice; and UFD-O1 in terms of providing attractive development.		
Overall Appropriateness of Option 1	This option is not considered to be the most appropriate way to achieve the preferred objectives. While it will ensure that environmental outcomes are met, it will not encourage alternate designs that are innovative or comprehensive and better achieve the outcomes sought.		

OPTION 2

Control residential development through a consent process

Benefits			
Environmental	Economic	Social	Cultural
A case-by-case assessment provides an avenue to ensure that environmental outcomes are achieved.	This option allows for innovative and comprehensive designs to be considered, including designs that may be more affordable than Option 1, but still achieve the outcomes sought for the zone.	Allowing for developments to be considered on a case-by-case basis is expected to allow for a variety of built form, and better allow for the market to provide development that meets housing needs.	None identified.
Costs			
Environmental	Economic	Social	Cultural
There is some risk that in absence of standards, there will be limited parameters to guide	There are costs and uncertainties associated with the consent process.	None identified.	None identified.

consent decision. This may result in inferior environmental outcomes than might otherwise be achieved through standards.	For small-scale development such as infill, the costs of this option may discourage development.		
Efficiency	This option is considered to be least efficient option, as it has the highest costs. It is particularly inefficient for small-scale developments.		
Effectiveness	This option is expected to be effective at achieving the outcomes sought in relation to the character and qualities of residential zones, because it allows for a case-by-case assessment of this. However, there is a risk than in absence of standards providing a 'bottom line', designs may be less appropriate than they might otherwise be.		
Strategic Direction(s)	This option is expected to achieve SD-O1 in terms of encouraging household choice; and somewhat achieve UFD-O1 in terms of providing attractive development, noting the comments above.		
Overall Appropriateness of Option 2	This option is not considered to be the most appropriate way to achieve the preferred objectives. It is expected to be the least efficient option and not as effective as Option 3.		

OPTION 3

Combination approach

Benefits	Economic	Social	Cultural
Environmental Standards for small-scale developments will ensure that environment outcomes are achieved, including those relating to effects on neighbouring properties, and effects of built form on the character anticipated for each residential zone. For large developments, a case-by-case assessment will provide an avenue to ensure that environmental outcomes are achieved. This will be guided by the permitted standards, but allow for consideration of innovative or comprehensive approaches that will still deliver the environmental outcomes sought.	For small-scale developments, the parameters will be reasonably clear to developers, who can budget accordingly. For larger developments, this option allows for innovative and comprehensive designs to be considered, including designs that may be more affordable than those meeting the standards, but still achieve the outcomes sought for the zone.	The combination of standards and resource consenting is expected to ensure that effects of design impacting the wider community are adequately addressed, while also allowing for a variety of built form, and better allowing for the market to provide development that meets housing needs.	None identified.
Costs	Economic	Social	Cultural
Designing to standards may result in less innovative design	For larger developments, there are costs and	None identified.	None identified.

approaches and therefore not necessarily result in the best environmental outcomes that might otherwise be achieved. However given this is limited to small-scale developments, this risk is considered to be low.	uncertainties associated with the consent process. However these are reduced by the permitted standards providing a baseline for comparison of outcomes sought.		
Efficiency	The option is considered to be the most efficient way to achieve the outcomes sought.		
Effectiveness	This option is expected to be effective at achieving the outcomes sought in relation to the character and qualities of residential zones, because for small-scale developments, this can be achieved through meeting basic design standards, while for larger developments, it allows for a case-by-case consideration of the design.		
Strategic Direction(s)	This option is expected to achieve SD-O1 in terms of encouraging household choice; and achieve UFD-O1 in terms of providing attractive development.		
Overall Appropriateness of Option 3	Overall, Option 3 is considered to be the most appropriate approach because it provides the best balance between efficiency and effectiveness at achieving the outcomes sought for these residential zones.		

5.1.1 Status Quo, Option 1 - Topic 1

In addition to residential activities, the current provisions for the Residential 1 Zone provide for home occupations and some limited accommodation in the form of boarding or lodging houses, community care facilities, and hostels or travellers accommodation, but limited to 10 people. Other visitor accommodation, as well as education and health facilities require resource consent as a discretionary activity. Activities not otherwise specified are non-complying activities.

In the Residential 2 zone, the same approach is taken as set out above, except that consulting rooms for health practitioners are also permitted in this zone and within one specific area within the zone there is no limit on visitor accommodation numbers.

5.1.2 Enable some non-residential activities, with additional targeted policy guidance, Option 2 - Topic 1

This option would include clear policy guidance and related rules that broadly seek to enable a range of small-scale non-residential activities where they meet anticipated outcomes for each zone.

Within both zones, this would include permitting home businesses, visitor accommodation and education activities where these are carried out within a residential unit and subject to limits on their scale; and providing for consideration through a discretionary activity pathway beyond these limits. Within the GRZ supported residential care activities would also be permitted, within limits.

Specific provision for retirement villages would also be made through a directive policy and restricted discretionary rule. Activities not anticipated to meet the outcomes sought for each zone, such as industrial activities and large format retailing would be specified as a non-complying activities, while activities not otherwise specified would be treated as discretionary activities.

5.2 Evaluation table – Topic 2

OPTION 1			
<i>Status Quo</i>			
Benefits			
Environmental	Economic	Social	Cultural
Limits on non-residential activities will generally ensure environmental effects of these activities are managed.	None identified.	Limits on non-residential activities will emphasise the role of residential areas as primarily for residential activities.	None identified
Costs			
Environmental	Economic	Social	Cultural
There is limited policy guidance provided for processing resource consents for non-residential activities. Clear direction on the environmental outcomes a non-residential activity should achieve is therefore lacking.	The lack of policy guidance for resource consents for non-residential activities may not encourage suitable developments to be pursued, resulting in lost opportunity costs.	Non-residential activities can serve important social needs, which contribute overall to the well-being of people living in the community, without compromising the overall amenity of that community.	None identified.
Efficiency	This option is considered to be moderately efficient in achieving the outcomes sought. However there are some costs associated with this option.		
Effectiveness	This option is effective at achieving the outcomes sought in relation to the purpose of each residential zone. In particular, it provides clear direction on what non-residential activities will be provided for to support the health and wellbeing of residents.		
Strategic Direction(s)	The Strategic Directions are not specifically relevant to this topic.		
Overall Appropriateness of Option 1	This option is considered to be the most appropriate way to achieve the preferred objectives. In particular, it provides a targeted framework to manage non-residential activities to meet the outcomes sought		

OPTION 2			
<i>Enable some non-residential activities, with additional targeted policy guidance</i>			
Benefits			
Environmental	Economic	Social	Cultural
The combination of providing permitted limits on non-residential activities and clear policy direction to guide the processing of resource consents for non-residential activities beyond these limits is expected to appropriately manage the environmental	The clear policy guidance for resource consents for non-residential activities is expected to encourage suitable developments to be pursued.	The clear and enabling framework is expected to provide for activities within residential areas that are important for the well-being of residents	None identified

effects of these activities are managed.			
Costs			
Environmental	Economic	Social	Cultural
None identified.	None identified	Some residents may not like non-residential activities being located nearby. However, this is considered to be mitigated through limiting the scale of activities that are permitted, and providing clear policy guidance about what non-residential activities are anticipated.	None identified

Efficiency	This option is efficient in achieving the outcomes sought as it provides for activities that are compatible with the zones' primary residential purpose, and which support the health and wellbeing of residents, through a targeted framework
Effectiveness	This option is effective at achieving the outcomes sought in relation to the purpose of each residential zone. In particular, it provides clear direction on what non-residential activities will be provided for to support the health and wellbeing of residents
Strategic Direction(s)	The Strategic Directions are not specifically relevant to this topic
Overall Appropriateness of Option 2	This option is considered to be the most appropriate way to achieve the preferred objectives. In particular, it provides a targeted framework to manage non-residential activities to meet the outcomes sought.

5.3 Risk of Acting or Not Acting

Where there is uncertain or insufficient information about the subject matter of the provisions, section 32(2)(c) requires an evaluation of the risk of acting or not acting in the way proposed. In this case it is considered that there is sufficient information to determine the appropriate approach to managing the District's residential areas. The proposed planning framework builds on the existing framework in the Operative District Plan, which the Council and its community is familiar with.

The key changes are that the proposed Plan seeks to provide a more enabling framework for higher density development, while managing the design of such development through the resource consent framework. The approach proposed is similar to that taken in other second-generation district plans, and therefore considered to be low risk.

The second key change is to provide a more targeted policy framework for non-residential activities, to make it clearer what type, scale and nature of non-residential activities are anticipated in residential zones. Providing clearer policy direction is considered more likely to reduce risk than not acting in the way proposed.

6 Preferred Option

This evaluation has been undertaken in accordance with Section 32 of the RMA in order to identify the need, benefits and costs and the appropriateness of the proposal having regard to its effectiveness and efficiency relative to other means in achieving the purpose of the RMA. The evaluation demonstrates that Option 2 is the most appropriate option as:

- The proposed provisions will achieve the relevant strategic objectives by providing for residential development at a range of densities, while appropriately managing the effects of increased density to achieve the amenity and quality outcomes sought for both residential zones. The proposed provisions are also consistent with ensuring that residential areas are well-designed, of good quality, attractive and functional and recognise the existing character and amenity of these areas.
- The proposed provisions address the resource management issues by:
 - encouraging higher density development and greater residential provision for older people where it meets specified outcomes.
 - managing non-residential activities within residential zones in a targeted way to provide for activities that are compatible with and support the primary residential function of the zones.
 - consolidating the range of residential zones and aligning these with the National Planning Standards.
- The policy and rule framework are considered to be an efficient and effective way to achieve the proposed objectives, particularly in terms of providing for a range of permitted activities where standards are met, and providing clear policy guidance for consideration of resource consents where a case-by-case assessment is considered more appropriate.

Overall, it is considered that the set of preferred provisions is the most appropriate given that the benefits outweigh the costs, and they will be efficient and effective at achieving the outcomes sought.