



YOUR PLAN OUR FUTURE
TIMARU DISTRICT PLAN REVIEW

Commercial and Mixed-Use Zones S.32

May 2022



YOUR PLAN OUR FUTURE
TIMARU DISTRICT PLAN REVIEW
LAND USE PLAN

Timaru District Council

Section 32 Report **Commercial and Mixed-Use Zones**

May 2022

Contents

1	Commercial and Mixed-Use zones	1
1.1	Introduction	1
1.2	Community / Stakeholder / Iwi Engagement	1
1.3	Strategic directions	4
1.4	Problem definition	5
1.5	Statutory and Planning Context	13
2	Approach to Evaluation.....	19
2.1	Scale and significance	19
2.2	Approach to managing the Commercial zones	21
2.3	Quantification of Costs and Benefits	30
2.4	Choice of Evaluation Method	30
2.5	Proposed objectives.....	31
3	Evaluation of Objectives	34
4	Identification of Options	41
5	Evaluation of Options	42
5.1	Evaluation table.....	42
5.2	Risk of Acting or Not Acting.....	49
6	Preferred Option	50

1 Commercial and Mixed-Use zones

1.1 Introduction

This topic relates to the commercial and mixed-use zones (also referred to within this report as 'commercial areas') within the Proposed Timaru District Plan and how these areas are managed. This report identifies and evaluates the outcomes sought for the district's commercial areas and the proposed provisions to achieve those outcomes.

The Plan includes six commercial and mixed-use zones: Neighbourhood Centre; Local Centre; Large Format Retail; Mixed Use; Town Centre and City Centre.

The Neighbourhood Centre Zone covers the small commercial areas located within residential neighbourhoods. This zone is intended to provide for small-scale commercial and community activities that serve the needs of the immediate residential neighbourhood. Under the Operative District Plan, this represents the Commercial 3 Zone.

The Local Centre Zone represents medium-scale shopping areas located in suburban areas in Timaru. This zone is intended to provide for the daily and weekly goods and service needs of, and community facilities for, the surrounding areas. Currently these areas are within the Commercial 2 Zone. The Large Format Retail Zone is intended to provide primarily for retail activities that have large footprint or yard areas. This zone is intended to complement the overall retail offering in the district, providing for larger retail activities that are not suited to other centres. This zone applies to the former A & P Showgrounds site, located in the north-east of Timaru township. This area is currently zoned Commercial 2A.

The Mixed-Use Zone is located adjacent to the main Central City area in Timaru and encompasses what is currently zoned Commercial 1C Zone, and some of the western areas of Commercial 1B land, as well as 3 Industrial L zoned pockets located adjacent to these areas. Within this area, a wide range of activities are anticipated, providing for a consolidated commercial focal point, a transition over time to include residential activities that will increase the vibrancy and liveability of the central area, while also continuing to provide for existing light industrial activities.

The Town Centre Zone encompasses the commercial centres in Geraldine, Pleasant Point and Temuka townships. This zone is intended to provide a focal point for commercial and community activities to support residents within the township and wider rural areas, as well as visitors. Currently these townships are zoned Commercial 1 (Geraldine), Commercial 1 (Pleasant Point) and Commercial 1 (Temuka), respectively.

The City Centre Zone covers the main retail area within Timaru City. This zone is intended to be the principal commercial and civic centre for both the district and the wider sub-region beyond. This zone includes those sites currently zoned Commercial 1A and some of the current Commercial 1B zoned area.

1.2 Community / Stakeholder / Iwi Engagement

Consultation with the community on the commercial zone's framework was undertaken via a Discussion Document released in December 2016. This identified four main issues with how the current District Plan manages commercial zones. Each issue is listed below, along with a

summary of the issue, and the initial direction of the Environmental Services Committee (ESC) following community feedback.

Issue 1 – Should the District Plan provide a clearer distinction between town centres, and supporting commercial zones (the commercial centre hierarchy), and be more directive in terms of where commercial activity should be located?

While the operative District Plan provides a range of commercial zones, their roles and functions are not clearly articulated, particularly in relation to the primacy of the Timaru town centre. The provisions also do not ensure that commercial activity is consolidated into the zoned business areas, with the risk of commercial activities being disbursed away from town centres potentially resulting in adverse effects on the amenity, vitality and viability of existing centres. Following feedback, the initial direction of the ESC was for the District Plan to provide a clearer commercial centre hierarchy, with commercial activities directed to occur within commercial zones.

Issue 2 – Do the Commercial Zones enable a diverse range and mix of activities to promote vitality and viability?

This issue relates to the limitations currently placed on commercial activities within commercial zones, both in terms of the types of activities provided for, and how they are managed to address potential adverse effects on adjoining Residential zones. In addition, more sensitive activities locating within town centres need to be managed to ensure they are compatible with the character and amenity of commercial zones. Following feedback, the initial direction of the ESC was for the District Plan to enable a more diverse range and mix of activities within town centres to promote vitality and viability.

Issue 3 – Balancing consenting requirements with encouraging investment

The Discussion Document identified that while there are areas of town centres where reinvestment would be beneficial, this can be hindered by complex or uncertain planning requirements, particularly where there are provisions that overlap each other. Conversely, too little management of development could result in the character and amenity of these areas being adversely affected. The initial direction resulting from consultation was that overlapping requirements and poorly targeted controls should be removed from the District Plan, and instead the Plan should focus on agreed outcomes that improve certainty and reinvestment and reduce processing costs.

Issue 4 – Should the District Plan provide for heritage character recognition for part of the Timaru town centre main street?

This issue pertains to clusters of heritage buildings within the Timaru town centre that make a significant contribution to the identity of Timaru. The Discussion Document identified that District Plan rules could be used to assist in recognising and enhancing the existing heritage character in particular areas, while not discouraging economic development. Following feedback, the initial direction of the ESC was to provide for “heritage character areas” in the town centre, to focus resources and efforts to areas with the highest values and remove consenting requirements for demolitions and new buildings outside these areas.

It is noted that this issue is also partly addressed in the Historic Heritage Chapter of the Plan. However, it affects the proposed commercial zones topic insofar as the consenting requirements for demolitions and new buildings outside schedule heritage items and the proposed Historic Heritage Area.

In relation to iwi consultation, two matters specific to commercial zones were identified in the Discussion document in relation to Takata whenua values: providing for heritage character areas in the Timaru town centre, so resources can be targeted at maintaining and improving the amenity and design in those areas; and removing the consenting requirements for demolitions and new builds outside of identified heritage character areas.

Feedback was also sought from iwi (via Aoraki Environmental Consultants Ltd) on the brief for drafting the provisions and section 32 evaluation for the draft Plan, who identified a desire to provide policy support for indigenous species planting and for biodiversity when requiring landscaping.

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
<p>Increase height limits in CCZ and TCZ zones</p>	<ul style="list-style-type: none"> • It is proposed that the height limit in the CCZ is increased to 20m. This reflects the role of the CCZ as a focal point and provides greater encouragement for intensification and redevelopment within this zone. It also acknowledges that the current height limit is low when compared to city centre areas in other district plans, and with the surrounding zones. It is acknowledged that within this zone, there is a need to consider how higher buildings would integrate or potential adversely affect heritage values in that zone. It is proposed that consent is required for new buildings in the CCZ, to consider urban design as well as integration with the character of the surrounding area. This allows for height to be considered as part of that process. As such, while 20m is generally indicated through the increased height limit as being an appropriate height, a case-by-case assessment of height can still consider this. • It is not recommended that the height is increased, given the limited extent and nature of the TCZ as rural townships.
<p>Provide a more permissive framework for Emergency Services Facilities (ESF) in CCZ and TCZ</p>	<ul style="list-style-type: none"> • It is proposed that ESF are permitted within the CCZ, consistent with the proposed policy direction to provide for a wide range of activities that are consistent with the purpose, character, and qualities of the CCZ. It is noted that buildings themselves will be controlled through the requirement for consent for buildings. • It is proposed that ESF are a controlled activity in the TCZ, consistent with the objective and policy framework to provide for activities that support the residents of the township and surrounding residential areas. As the TCZ is a smaller zone than the CCZ, and

	<p>there is not a requirement in all cases for a resource consent for new buildings, the controlled status is considered appropriate as it allows for the specific design and operation of a facility to be considered, while sending a clear signal that the activity is anticipated.</p>
<p>Opposition to a Large Format Retail zone in central Timaru</p>	<ul style="list-style-type: none"> The LFRZ proposed in the central city area in Timaru has been changed to a Mixed-Use zone (MUZ). This reflects that this area is already mixed use in nature, containing a range of commercial and light industrial activities. While the LFRZ reflected a desire for how the area could change over time to better support the CCZ, this is less relevant now that a large area of large format retail has been consented at Showgrounds Hill. It is now considered that a mixed-use zoning that seeks to support the CCZ and consolidate the overall central city area, through a range of activities, including providing for some residential development, as well as large format retail and other commercial uses, is most appropriate.
<p>Revisit the zoning and/or controls on the LFRZ at Showgrounds Hill</p>	<ul style="list-style-type: none"> It is not considered appropriate to do this given that consent has already been issued for this type of development. The controls have been the subject of economic input and in any case will only apply to any changes to what is currently consented.

1.3 Strategic directions

The following Strategic directions are relevant to the commercial zone’s topic:

SD-O6 Business Areas and Activities

Business and economic prosperity in the district is enabled in appropriate locations, including by:

- i. providing sufficient land for a range of business activities to cater for projected growth.
- ii. providing opportunities for a range of business activities to establish and prosper, provided that commercial activities outside of commercial areas are limited so they do not detract from the role and function of the City Centre and Town Centre zones.

This strategic direction is directly relevant to how commercial areas are managed. Any provisions for commercial areas will need to be targeted to enable business and economic prosperity, provide opportunities for a range of business activities within commercial zones, and in a manner that does not detract from the role and function of the City and Town centre zones.

SD-O7 Centres

The district's city and town centres:

- i. are maintained and enhanced as vibrant, attractive community focal points, providing a high level of amenity and opportunities for social interaction;
- ii. are the primary focus for retail, office and other commercial activity;
- iii. provide for the highest density of business, residential and visitor accommodation, and for intensification opportunities.

This direction provides guidance as to the outcomes sought from activities and built form within key urban centres. The provisions for these centres will also need to encourage retail, office, and other commercial activity within them, and provide for higher density business, residential and visitor accommodation development.

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 seeks that the pattern of urban development is well-designed, high quality, attractive and functional, and retains existing character and amenity. The Commercial and mixed-use zones outcomes will need to align with this and include provisions that direct the achievement of this in relation to commercial areas. Similarly, the provisions for commercial areas will need to manage potential conflicts between incompatible activities, including identifying activities that are expected to be incompatible with the activities anticipated within a commercial or mixed-use zone, and avoiding such activities where the conflict that might arise would result in significant adverse effects.

1.4 Problem definition

1.4.1 Operative Plan

The Operative District Plan contains a range of commercial zones. The Commercial 1A, 1B, 1C, 2, 2A and 3 zones are located only in Timaru city.

The Commercial 1A Zone encompasses the main retail area of the inner city of Timaru. This is described as having the highest heritage and townscape values, is pedestrian-oriented and provides

for a range of commercial and social activities. The Commercial 1B Zone includes “*the balance of the historical central business area adjoining the Commercial 1A Zone*”.¹ It is intended to provide a range of commercial activities, with less focus on pedestrian integration, and moderate amenity standards. The Commercial 1C Zone reflects the outer areas on the edge of the central business area, where a mix of large-scale convenience retailing activities are anticipated, which cannot be accommodated within the core retail area, as well as industrial activities that have a lesser range of effects.

The Commercial 2 Zone encompasses suburban shopping areas known as Ashbury, Le Cren/Wilson Streets and Highfield and include a supermarket as well as other commercial activities. The Commercial 2A Large Format Store (Retail Park) Zone applies to the currently under development, A & P Showgrounds. The Commercial 3 Zone is in neighbourhood areas within the current Residential 1 Zone within Timaru and is intended to provide the opportunity for commercial activities within suburban areas.

Outside of Timaru, there are three other commercial zones – Commercial 1 (Temuka), Commercial 1 (Geraldine) and Commercial 1 (Pleasant Point). These generally encompass the central commercial area in each township.

The Plan includes a range of objectives to manage these commercial areas. Objectives 3.1.1.1 and 3.1.1.2 seek to minimise conflict between commercial activities and other land uses and mitigate adverse effects of activities within commercial zones on adjoining residential zones. The policies intended to implement these outcomes direct the use of the various zones to separate commercial activities from residential areas and other sensitive uses (3.1.2.1) and concentration of commercial activities where they will have limited effects on, or adequately mitigate effects on sensitive activities (3.1.2.2). The policies also include direction on how noise (3.1.2.3), odour and dust (3.1.2.4) and hazardous substance use (3.1.2.5) are to be managed in these zones.

Objective 3.2.1.1 seeks that the amenity and quality of the environment in retail areas is provided for. This is implemented through policies which direct protection of amenity and public safety in the development of commercial areas (3.2.2.1 and 3.2.2.2), and the avoidance of clustering businesses of prostitution where there is potential to cause nuisance or serious offence, or incompatibility with character and amenity of an area (3.2.2.3).

Objective 3.3.1 seeks recognition and protection of heritage values in commercial areas. This is implemented through policies aimed at protecting and enhancing resources or features of historic or cultural value in Timaru’s inner city and Temuka’s main street areas (3.3.2.1); protecting the most important heritage resources of commercial areas from development that would threaten the heritage values of these areas (3.3.2.2); and protecting heritage character and visual quality in commercial zones by ensuring new buildings in identified parts of Timaru and Temuka are of an appropriate scale to retain continuity of the townscape, and demolitions are not approved until consent for replacement buildings are approved (3.3.2.3).

Objective 3.4.1 is to promote the sustainable use and development of physical resources in commercial zones. The related policy direction seeks to provide for commercial activities and development and encourage sustainable use and development of physical resources (3.4.2.2); require road access to new commercial allotments (3.4.2.3); directs more permissive standards for noise and

¹ Operative District Plan, Part D3 – Page 2

hazardous substances (3.4.2.4); and efficient use of existing services and efficient servicing of future development (3.4.2.5).

There are also specific provisions for the Commercial 2A zone, including Objective 3.1.1.3 which seeks to maintain or enhance amenity values within and adjacent to the Taitarakahi Creek. The related policies include control of landscaping and building location in relation to effects on Taitarakahi Creek, and management of effects on surface and groundwater quality. There are also policies specific to the Commercial 2A zone which relate to the other objectives set out above and include requirements for vehicle access to the zone and other transport connections to meet an Outline Development Plan (3.4.2.4(a) and 3.4.2.4(c)) and for intersection upgrades to be provided (3.4.2.4(b)). Policy 3.4.2.6 also directs that development in this zone should not undermine or displace the wider social and economic function of the established Timaru Commercial 1A and 1B zones.

There is a separate rule framework applying to each zone, which lists a range of commercial, community and other activities that are permitted in each zone. The permitted activities are highly specific and list out specific activities that would be captured under the definition of 'commercial activities' and include shops, offices, commercial services, banks, bakeries, theatres and so on.

The list of activities permitted in various zones is similar in all Commercial 1 zone, with the exception of the Commercial 1A zone, where potentially larger or less customer-focussed activities are not permitted. Conversely, in the Commercial 1C Zone, shops are generally required to be of a larger size, and a range of light industrial activities are also permitted. It is not clear from the policy framework why, except for the descriptions of zones for the Commercial 1A and 1C Zones, the variations exist. The reason for the slight variations between exactly what types of commercial or community activities are permitted in each of the Commercial 1 zone in Geraldine, Pleasant Point and Temuka is also unclear. There is also a risk that other commercial activities that are not specifically listed, but which are likely to be appropriate in these zones, are discouraged.

Within the Commercial 1A Zone there are design controls that seek to provide active frontage, consistent provisions of verandahs' and buildings built up to the road, in specified locations within the zone. In addition, the demolition of any building visible from a street frontage requires a discretionary activity consent, as does the erection of any new building along a street frontage.

Within the Commercial 1 (Temuka) zone, there are also requirements for the consistent provisions of verandahs' for buildings fronting King Street and a resource consent is required as a discretionary activity for the demolition of any building fronting onto King Street and the erection of any new building or structure fronting onto King Street.

Within the Commercial 1 (Geraldine) zone, there are also requirements for the consistent provisions of verandahs' for buildings fronting Talbot Street.

There are no similar provisions applying in the Commercial 1 (Pleasant Point) Zone.

The Commercial 2 Zone also permits a range of commercial activities, but community, residential and accommodation-based activities are not anticipated.

Within the Commercial 2A Zone, only a limited range of activities are permitted: community facilities; retail activities with a minimum gross floor area of 500m²; places of assembly; public toilets; and

trade suppliers. Offices, personal services and restaurants are also permitted but only up to a small percentage of the overall gross floor area of the development within the site. There are also development thresholds that limit the quantum of development within the zone that can occur within specified time periods. The development of the zone is also subject to an outline development plan and various requirements, including transport matters and stormwater management controls. All buildings require consent as a controlled activity, with consideration against a set of design guidelines.

Within the Commercial 3 Zone, a range of commercial activities are permitted, but with a retail floor area limit of 300m² for shops. Residential activities are permitted, as well as visitor accommodation limited to 10 people.

Activities within all commercial zones are subject to performance standards that manage matters such as height, access to sunlight, setbacks from road and internal boundaries and screening of outdoor storage areas.

1.4.2 Issues identified

Within the Operative District Plan, there are a range of Commercial Zones, as set out above. However, the Plan does not clearly articulate the role and function of each commercial zone, nor the importance of the Timaru central business area as the main centre for the South Canterbury area, except in relation to one policy applying to the Commercial 2A Zone. Because of this, there is a risk that the establishment or expansion of commercial activities away from current commercial centres could adversely affect the amenity, vitality and viability of these existing commercial centres.

An Economic Assessment undertaken of the business land market in the district has also shown that there is sufficient commercially zoned land to meet the future requirements of the district over the next 20 years². This assessment also considered whether the City Centre is performing its role and function and whether a policy response is required to assist with its economic performance, role, function and vitality. This assessment recommends that the Proposed Plan should develop a consolidation approach to commercial activity to assist the existing zoned network perform its role and function better and improve the economic efficiencies.

In relation to the current Commercial 2A zone, the economic assessment identifies that the scale and timing of retail development enabled within the Operative District Plan has the potential to create significant adverse effects on the Timaru City Centre, because the retail demand growth projected for the District would not be able to sustain the level of additional retail supply that is enabled, without diverting significant retail spend away from the City Centre.

Within the Operative District Plan, there are limitations on the scale and type of commercial activities in each of the various zone. While some of these limitations can be justified to ensure the viability of existing town centres, there are others where the distinctions between the approach in different zones is less clear. This may result in the activities provided for not enabling a range and mix of activities that would better promote the vitality and viability of these centres.

There are also urban design provisions in the Operative District Plan that may be affecting the viability of reinvestment or redevelopment in commercial areas where this would be beneficial and increase

² Property Economics (2019). *Timaru District Business Land Economic Assessment*, p. 12 (<https://www.timaru.govt.nz/pdp-supporting-info>).

the vitality and viability of these areas. For example, there are standards that impose minimum urban design requirements on buildings in central Timaru, while also requiring a resource consent be obtained for the design of any new building. This potentially creates over-regulation of urban design matters. Conversely, the design of development within commercial areas if not managed appropriately, can erode the qualities of the town centre character that are valued by the community and can affect how the developments interact with the public realm, and the extent to which they integrate with the functioning of the wider commercial area.

1.4.3 Relevant documents and reports

Title	Brief Synopsis	Link
District Town Centres Study 2016 (Timaru District Council 7 February 2021)	The report identifies the current issues faced by the town centres in the district – Timaru, Temuka, Geraldine and Pleasant Point. It identifies opportunities for each town centre and makes suggestions on how to address the issues and opportunities. It is intended as a starting point for discussion that will lead to a process of improvement of town centres. The report acknowledges the opportunity for the District Plan Review to review the current planning rules applicable to town centres to provide a clear and effective planning regime that supports investment in these areas. A number of the opportunities identified fall outside the scope of the District Plan, but there are also a series of recommendations relating specifically to the planning framework and how it could be revised.	Click here
Timaru District Business Land Economic Assessment (Property Economics, October 2019)	Provides an economic assessment of the business land market in the district to determine whether there is sufficient demand to meet the requirements of the district for the next 20 years. It also assesses whether the Timaru City Centre is performing its role and function as intended and whether a policy response is required to help improve its economic performance, role and function. It concludes that business land provision is generally sufficient	https://www.timaru.govt.nz/pdp-supporting-info

	<p>to accommodate the district’s future growth requirements. It recommends that policy direction is required to redirect business growth into areas that improve the economic efficiency, performance and competitiveness of the district as a business location and improve the economic wellbeing and social amenity of District residents. This is particularly important for the City Centre, where refocusing commercial development and redevelopment into this area will improve its ability to fulfil its role and function successfully. The report also emphasises that the dispersal of commercial activity has the potential to generate significant adverse economic impacts on the district’s economy.</p>	
<p>Showgrounds Hill Timaru Retail Threshold Overview (Property Economics June 2020)</p>	<p>Provides an overview of the existing staging thresholds and activity restrictions for development at Showgrounds Hill (proposed large format retail zone) to determine what changes are appropriate given the updated data available since the introduction of the thresholds. Outlines that the development potential for the site is greater than the current retail provisions within the City Centre. Based on the high percentage of large format stores within the City Centre, these stores are considered to be integral to the City Centre’s economic performance, viability, vibrancy and wellbeing. Coupled with the low anticipated growth rates to support additional retail, relocating these stores to the proposed LFRZ is stated as having the potential to have a material adverse effect on the City Centre as a retail destination. Recommends that either the amount of retail enabled in the LFRZ is significantly reduced, or the staging thresholds are amended. Also</p>	<p>https://www.timaru.govt.nz/pdp-supporting-info</p>

	<p>recommends tightening restrictions on other commercial activities in the proposed zone. (Note, the final report is a version that has been updated in response to the peer review referred to below.)</p>	
<p>Showgrounds Hill retail report peer review (Market Economics May 2020)</p>	<p>Provides a peer review of Property Economics' Showgrounds Hill Report (above). It concludes that the recommends thresholds are appropriate and agrees that faster development could result in significant adverse effects on the City Centre. It also supports the recommended limits on other commercial activities, while recommending some additional changes. (For completeness it is noted that the Showgrounds Hill Report was updated in response to the peer review comments.)</p>	<p>https://www.timaru.govt.nz/pdp-supporting-info</p>
<p>Timaru Retail Market Assessment (Property Economics February 2015)</p>	<p>Provides a retail supply and demand study of the Timaru District, to estimate the likely future scale and type of retail provisions required to cater for the projected future growth within the townships of Timaru, Geraldine, Temuka and Pleasant Point. Concludes that the existing on-the-ground provisions, combined with unimplemented resource consents will provide enough retail floorspace to meet current and anticipated retail requirements of the district over the foreseeable future. Notes that for the district to remain competitive, it will be important to improve the quality of the experience, offer and environment. They note that the District Plan can provide investment certainty to assist with incentivising the refurbishment and redevelopment of the relatively high</p>	<p>https://www.timaru.govt.nz/pdp-supporting-info</p>

	proportion of 'other stores' ³ to make the use of the existing built form more productive and efficient.	
--	---	--

1.4.4 Best Practice / other Council approaches

The management of commercial areas is an issue that has been addressed by several Council's around New Zealand. The approaches taken in the Christchurch, New Plymouth, Waimakariri and Selwyn District Plans and are documented below.

Plan	Local Authority	Description of Approach
<p><i>Christchurch District Plan</i> (Operative December 2017) Prepared prior to the National Planning Standards Chapter 15 Commercial, in particular Objective 15.2.2 and Policy 15.2.2.1. Objective 15.2.4, Policy 15.2.4.1, 15.2.4.2</p>	<p>Christchurch City Council</p>	<p>A centres-based approach is taken to commercial activities, with commercial activity to be focussed within the network of centres. The role of each centre is outlined, and its place in the hierarchy of centres within the district. Policies are aimed at providing for well-designed and laid out development within commercial zones, consistent with the role of each centre. A consent pathway for consideration of urban design matters is generally required for all new buildings within the central city and in other larger commercial areas for development over a specified size.</p>
<p><i>Proposed New Plymouth District Plan</i> (notified September 2019) Prepared under the National Planning Standards</p>	<p>New Plymouth District Council</p>	<p>The Commercial and Mixed-Use Zones chapter comprises five zones taken from the National Planning Standards: Local Centre (LCZ), Large Format Retail (LFRZ), Mixed Use (MUZ), Town Centre (TCZ) and City Centre (CCZ). The CCZ encompasses the New Plymouth City Centre, which is intended to be the principal centre in the district and wider Taranaki region. The TCZ applies to Waitara and Inglewood, which are intended to function as service town for the retail and convenience needs of surrounding residential and rural communities. The MUZ is located in various areas and intended to provide for a mix of activities, while limiting some commercial activities to ensure the viability and vibrancy of the city centre,</p>

³ These are described as representing smaller, lower quality, second hand and unbranded store types that do not perform or generate the same level of retail productivity as stores in other sectors, and which can affect the long-term vitality, quality and overall sales performance and health of a centre.

		town centres and local centres is not compromised. The LFRZ is an area located north of the city centre and intended for large format retail activities. The LCZ encompasses various rural service centres, village centres, suburban shopping centres and neighbouring shops, which serve the retail and convenience needs of local neighbourhoods.
Waimakariri District Plan (Operative November 2005) Prepared prior to the National Planning Standards	Waimakariri District Council	Buildings over 450m ² in identified townships require consent with consideration to be given to retail distribution and urban design matters.
Selwyn Proposed District Plan notified in October 2020 Prepared under the National Planning Standards	Selwyn District Council	The Plan provides a Town Centre Zone, Local Centre Zone, Neighbourhood Centre Zone and Large Format Retail Zone, which are intended to operate as an Activity Centre Network. Throughout the district, the Activity Centre Network is comprised of 4 Key Activity Centres, being Rolleston, Lincoln, Darfield and Leeston and several Service Activity Centres and Rural Activity Centres. The PDP has a range of objectives which focus on supporting the town centres and not allowing activities within the other zones to undermine the Town Centre Zones. The hierarchy of centres is used to do this. The matters of discretion appear to be flexible in terms of urban design matters and buildings standards, as for example, building height and setbacks, are not prescribed but are instead related to the role, character and context of the development and visual impacts.

1.5 Statutory and Planning Context

This section provides a key summary of the statutory requirements of relevance to commercial 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 commercial 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 commercial areas. 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 commercial areas, as well as the quality of commercial 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)	The NPS-UD directs local authorities in relation to development of urban environments. Broadly, it seeks that urban environment are well-functioning, including integration with infrastructure, and directs that a minimum amount of supply is provided, taking into account demand. It also seeks that planning decisions assist in improving housing affordability. 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 3 is relevant to the framework for commercial zones. It seeks that district plans enable more people to live in, and more business and community services to be located in, areas of an urban environment which are in or near a centre zone, or other areas with many employment opportunities. Objective 4 also anticipates that urban environments, including their amenity values, will develop and change over time. Policy 1 directs that planning decisions contribute to well-functioning urban environments, including that they have or enable a variety of homes and a variety of sites suitable for different business sectors. 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.
National Planning Standards 2019	The purpose of the National Planning Standards (NP Standards) is to improve consistency in plan and policy statement structure, format and content. The District Plan must give effect to the NP Standards.

	<p>Of relevance to commercial zones, the NP 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>
<p>Canterbury Regional Policy Statement 2013 (CRPS)</p>	<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 encourages sustainable economic development by enabling business activities in appropriate locations; and avoids conflicts between incompatible activities. • Policy 5.3.1 which directs that development patterns: encourage business opportunities within urban areas that are of a character and form that supports urban consolidation; 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. <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>

District Plan must not duplicate or conflict with:	
Document	Relevance
<p>National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (NESCS)</p>	<p>The NESCS is a nationally consistent set of planning controls and soil contaminant values. The NESCS ensures that land affected by contaminants in soil is appropriately identified and assessed before it is developed. The District Plan must not contain rules that duplicate or conflict with the NESCS. The NESCS may apply to activities within commercial zones, particularly where a land use change is proposed, soil disturbance is involved, or the activity includes the removal or replacement of a fuel storage system. This will depend on what the land has been used for previously.</p>

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 commercial areas may also be regulated under the CLWRP, for example, in relation to stormwater discharges or hazardous substances.
Canterbury Regional Air Plan 2017	The CARP manages discharges to air within the Canterbury Region, seeking to manage them in the best practicable manner. This includes provisions relating to discharges of contaminants to air broadly, as well as specific provisions relating to: outdoor burning; industrial, trade and commercial activities; large scale fuel burning devices; and heating appliances. The District Plan must not be inconsistent with the CARP. If an activity within the commercial zone involves the discharge of contaminants to air, it will also be regulated under the CARP, for example, those that discharge odour, involve the storage of petroleum products, or include a laundry vent

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 commercial 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 commercial chapter of the District Plan.

District Plan must have regard to:	
Document	Relevance
Growth Management Strategy (GMS) ⁴	<p>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. Of relevance to this topic is Strategic Direction 6 - Sustainable Economy - which seeks <i>“To encourage areas of economic and district strength through the consolidation and provision of an adequate supply of commercial and industrial zoned land in appropriate locations, as efficiently and effectively serviced by supporting infrastructure.”</i> Strategic Direction 1 – District Character - also seeks that urban growth positively contributes to consolidated urban areas that reinforce the strengths, character and identity of each settlement, and reinforces and consolidates the Timaru settlement as the main (amongst other things) commercial settlement for the district.</p> <p>The GMS identifies that the district has sufficient commercial floorspace to meet demands for the district until at least 2028, with improved vitality and viability of the district’s town centres to be achieved primarily through consolidation and reinvestment, as well as improvements in the public realm.</p> <p>The relevant directives in the growth management approach are:</p> <ul style="list-style-type: none"> • District Character 3: <i>Recognise Timaru City’s functions and role as the primary business, retail, recreational, civic, and entertainment hub for the district; and</i> • Landscape and Amenity 5: <i>Maintain and enhance an integrated pattern of development, and a high-quality urban environment that is attractive to residents, business and visitors.</i> • Landscape and Amenity 6: <i>Minimise conflicts between incompatible activities, whilst avoiding conflicts where there may be significant impacts on the health, safety and amenity of people and communities.</i> • Landscape and Amenity 8: <i>To the extent appropriate in the circumstances, promote high quality urban design for: the district’s commercial centres...</i> • Settlement Patterns and Urban Form 7: <i>Promote the consolidation of the commercial areas of Timaru’s settlements, through restricting inappropriate commercial activities in industrial and rural locations.</i> • Sustainable Economy 4: <i>Encourage the efficient use and development of business land and associated infrastructure.</i> • Sustainable Economy 5: <i>Consolidate commercial development primarily within existing commercial zones of the district’s settlements, recognising and providing limited opportunities for more localised and trade-based needs outside of centres.</i>

⁴ <https://www.timaru.govt.nz/services/planning/district-plan/district-plan-review/growth-management-strategy>

	<p>The GMS also identifies that there needs to be a balanced approach to requirements for urban design for in-centre commercial activity. Urban design matters should be applied to the extent that they increase the desired quality in commercial centres. Urban design, however, is a subservient consideration to promoting commercial development in the district’s commercial centres and ensuring the community has access to a wide range of goods and services.</p>
<p>Long Term Plan 2021-31 (LTP)⁵</p>	<p>The LTP sets out the Council’s strategic direction, including a vision, community outcomes and strategic priorities. The Vision includes a ‘where people, place and business prosper’. One of the Community Outcomes sought is a Diverse Economy, supported by thriving businesses, growth in the right locations.</p>
<p>Timaru District Economic Development Strategy 2015-35⁶</p>	<p>This Strategy seeks to stimulate and support sustainable business growth over the long term, to enhance and build on lifestyle opportunities and lead to a stronger future profile for the area. It includes objectives relating to economic growth and job creation. The commercial zone provisions are potentially relevant to the achievement of the strategy as the management of commercial areas can assist with (or conversely) hinder the achievement of the objectives.</p>
<p>Canterbury Regional Economic Development Strategy 2015⁷</p>	<p>This Strategy is intended to be an action plan focusing on what the mayors of the region can achieve, in relation to regional economic development, through leadership and facilitation. It is focused on encouraging economic development planning that steer resources, business and investment decisions toward shared goals and common objectives. Of relevance, an objective of the strategy is <i>“Planning and consenting processes, and infrastructure managed by local government, enable value-added production in Canterbury.”</i> One target is for local authorities’ planning, rules and regulations to align in ways that enable sustainable value-added production.</p>
<p>New Zealand Urban Design Protocol 2005⁸</p>	<p>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.</p>

⁵ <https://www.timaru.govt.nz/council/publications/plans/long-term-plan>

⁶ https://www.timaru.govt.nz/_data/assets/pdf_file/0008/37394/Timaru-District-Economic-Development-Strategy.pdf

⁷ https://www.canterburymayors.org.nz/wp-content/uploads/2016/09/CREDS-summary_2015.pdf

⁸ <https://environment.govt.nz/assets/Publications/Files/urban-design-protocol-colour.pdf>

<p>Timaru District Council 50 Year Infrastructure Strategy 2018-2068⁹</p>	<p>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. Of relevance to this topic, it identifies that significant growth in demand for infrastructure services is expected to occur in the Timaru CBD and the Showgrounds land for commercial use.¹⁰</p>
--	---

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 Commercial zones chapter have been assessed in accordance with the following issues:

Issue 1: Commercial activities established or expanded away from the current commercial centres can adversely affect the amenity, vitality and viability of the existing commercial centres.

Issue 2: Limitations on the scale and type of commercial activities in each zone may not enable the range and mix of activities that would best promote the vitality and viability of these centres.

Issue 3: Urban design provisions can affect the viability of reinvestment or redevelopment in commercial areas, but conversely, the design of development and how it integrates with the surrounding area affects the character and amenity of these areas.

2.1 Scale and significance

The table below summarises the scale and significance of the issues related to the management of commercial areas, 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 commercial and mixed-use zone 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.

⁹ https://www.timaru.govt.nz/data/assets/pdf_file/0008/183644/LTP-2018-28-Draft-Infrastructure-Strategy-2018-69.pdf

¹⁰ Page 53.

<p>Issues: Commercial activities established or expanded away from the current commercial centres can adversely affect the amenity, vitality and viability of the existing commercial centres. Limitations on the scale and type of commercial activities in each zone may not enable the range and mix of activities that would best promote the vitality and viability of these centres. Urban design provisions can affect the viability of reinvestment or redevelopment in commercial areas, but conversely, the design of development and how it integrates with the surrounding area affects the character and amenity of these areas.</p>		
Reasons for change in policy	<p>District Plan Review, including responding to the issues identified as part of the District Plan review, as well as issues identified in the <i>District Town Centres Study 2016</i>¹¹ Giving effect to the National Planning Standards. Having regard to the efficient use and development of physical resources (s7(b) of the RMA); the maintenance and enhancement of amenity values (s7(c) of the RMA); and the maintenance and enhancement of the quality of the environment (s7(f) of the RMA) Giving effect to the NPS-UD. Giving effect to the CRPS. Implementing direction in Growth Management Strategy. Issues identified in economic assessment.</p>	Medium - High
Relevant Statutory Considerations / Drivers	<p>RMA Sections 5, 7(b), (c) and (f). CRPS Chapter 5.</p>	Medium
Degree of shift from status quo required	<p>Introduction of a clearer commercial centre hierarchy. This results in the promotion of greater diversity of activities in town and city centres, but some increased restrictions on other commercial areas. Overall reduction in consenting requirements, with zone provisions rationalised to consider urban design and built form requirements, alongside effects on heritage values.</p>	Medium
Who and how many will be affected?	<p>The functioning, viability and vibrancy of the district's commercial areas affects the district's residents and workers. Provisions managing commercial areas directly affect owners and occupiers of commercially zoned land within the district's townships.</p>	Medium - High
Degree of impact on, or interest from iwi / Maori	<p>Takata whenua have indicated support for removing the consenting requirements for demolitions and new builds outside of identified heritage character areas; and for policy support for indigenous species planting and for biodiversity when requiring landscaping.</p>	Low-Medium
When will affects occur?	<p>Changes to the current provisions will affect any landowners or occupiers from the point where they intend to change the use of a building, redevelop commercial-zoned land or build on vacant land.</p>	Low-Medium

¹¹ https://www.timaru.govt.nz/_data/assets/pdf_file/0006/108627/1045463-Town-Centre-Study-Report-Final.pdf

	The intended outcomes relating to consolidating commercial areas and enhancing their vibrancy and vitality will emerge over time, and while influenced by the District Plan provisions will also depend on the level of change, reinvestment and redevelopment of commercial areas.	
Geographic scale of impacts / issue	The direct impact will be on those areas zoned commercial. However, as commercial areas are important and central areas within the district, they can make an important contribution to the well-being of people and communities, including the attractiveness of the district to residents and visitors and to its prosperity.	Medium - High
Type of effect(s)	Primarily economic effects resulting from additional regulation, including implementation of a centres-based hierarchy, or additional urban design controls. In other cases, the rationalisation of existing provisions will result in less regulation and associated costs and in a broader range of activities being enabled. Flow-on economic, social and cultural effects resulting from the provisions, which in combination with non-statutory methods are intended to increase the vibrancy, viability and functioning of centres.	Medium
Degree of policy risk, implementation risk, or uncertainty	The proposed policy approach to commercial centres hierarchy is an increasingly common policy approach to assist with consolidating commercial activities in appropriate areas, and better ensuring the amenity and vitality.	Medium
Overall Assessment of Scale and Significance		Medium

2.2 Approach to managing the Commercial zones

It is proposed to apply the following zones to the district's commercial areas:

Operative Plan Zone	Proposed Plan Zone
Commercial 1A Zone	City Centre Zone
Commercial 1B Zone	City Centre Zone Mixed Use Zone
Commercial 1C Zone	Mixed Use Zone
Commercial 1 (Temuka)	Town Centre Zone
Commercial 1 (Geraldine)	Town Centre Zone
Commercial 1 (Pleasant Point)	Town Centre Zone
Commercial 2 Zone	Local Centre Zone
Commercial 2A Zone	Large Format Retail Zone
Commercial 3 Zone	Neighbourhood Centre Zone

A Large format retail zone was also considered for the Commercial 1C and outer parts of the Commercial 1B zone instead of a mixed-use zone. This is because over time it was considered more desirable that this area be developed with a large format retail focus, to help consolidate and support the overall function of the central city area in Timaru as a commercial focal point. However, following community feedback on the draft Plan, and as a resource consent has since been issued for large format retail development on the Showgrounds site, a Mixed-Use Zone is considered more appropriate. This reflects the nature of the existing mix of activities within this area, as well as signalling an intention that over time, residential activities will establish in this area, increasing the overall vibrancy and vitality of the central city area.

In accordance with the National Planning Standards, each zone is contained within its own chapter, with each including objectives, policies and rules for managing activities in each zone. It is proposed to introduce a hierarchy to commercial centres, by clearly setting out the role and function of each zone and emphasising the role of the City Centre Zone as the largest and principal centre for a range of commercial and community activities.

The approach taken is to rationalise the current detailed approach to listing various types of permitted commercial and community activities, and to instead provide more broadly for commercial activities of the scale and nature anticipated in each zone, while identifying any specific commercial activities for which a consent process is appropriate. This is shown in the table below, which sets out the operative and proposed provisions for each zone.

Neighbourhood Centre Zone (NCZ)

	Operative Plan	Proposed Plan
Commercial activities	<ul style="list-style-type: none"> Shops up to 300m² in retail floor area = permitted Consulting rooms for health practitioners, veterinary clinics, banks, home occupations, personal services, dressmaking or tailoring, offices or studios, day care establishments = permitted Restaurants or licensed premises = discretionary Service stations = discretionary Emergency services facilities = discretionary 	<ul style="list-style-type: none"> Not exceeding 300m² GFA = permitted More than 300m² GFA = discretionary Licensed premises and service stations = discretionary
Residential activities	<ul style="list-style-type: none"> Household units = Permitted Conversion of commercial premises to household units = controlled activity 	<ul style="list-style-type: none"> Permitted
Visitor Accommodation	<ul style="list-style-type: none"> Boarding or lodging houses, travellers' accommodation, hostels and community care facilities, up to 10 beds = permitted 	<ul style="list-style-type: none"> Discretionary
Industrial activities	<ul style="list-style-type: none"> Repairs and servicing of personal household goods, garden equipment, appliances or cycles; hire of tools or 	<ul style="list-style-type: none"> Repairs and servicing of personal household goods, garden equipment, appliances or cycles; hire of tools or

	<p>general equipment, storage = discretionary</p> <ul style="list-style-type: none"> • Otherwise, non-complying 	<p>general equipment, storage = discretionary</p> <ul style="list-style-type: none"> • Otherwise, non-complying
Any other activity	<ul style="list-style-type: none"> • Non-complying 	<ul style="list-style-type: none"> • Discretionary
Buildings	<ul style="list-style-type: none"> • Buildings accessory to any permitted activity = permitted 	<ul style="list-style-type: none"> • Buildings for or ancillary to a permitted activity = permitted
Standards	<ul style="list-style-type: none"> • Maximum height = 10m • Recession plane requirements • Setback of non-residential activities from adjoining residential activities = 3m • Buildings within 6m of boundary limited to 30m in length parallel to boundary. • Storage or goods or material to be screened from adjoining sites by 2m fence. • Open space requirements for household units. 	<ul style="list-style-type: none"> • Maximum height = 10m • Recession plane requirements • Setback of non-residential activities from adjoining residential or open space zoned sites or residential activities = 3m • Buildings within 6m of boundary limited to 30m in length parallel to boundary. • Storage or goods or material to be screened from adjoining sites by 2m fence. • Open space requirements for residential units.

Local Centre Zone (LCZ)

	Operative Plan	Proposed Plan
Commercial activities	<ul style="list-style-type: none"> • Shops, offices, banks, consulting rooms for health practitioners, veterinary clinics, personal services, day care centres, plant nurseries, emergency services facilities • Restaurants or licensed premises = discretionary • Service stations = discretionary • Hire of tools or general equipment = discretionary 	<ul style="list-style-type: none"> • Permitted • Service stations = discretionary
Community facilities	<ul style="list-style-type: none"> • Public toilets, places of assembly = discretionary 	<ul style="list-style-type: none"> • Permitted
Industrial activities	<ul style="list-style-type: none"> • Vehicle repair garages, repairs and servicing of personal household goods, garden equipment, appliances or cycles; hire of tools or general equipment, storage = discretionary • Otherwise, non-complying 	<ul style="list-style-type: none"> • Vehicle repair garage, repairs and servicing of personal household goods, garden equipment, appliances or cycles; hire of tools or general equipment, storage = discretionary • Otherwise, non-complying
Any other activity	<ul style="list-style-type: none"> • Non-complying 	<ul style="list-style-type: none"> • Discretionary

Buildings	<ul style="list-style-type: none"> Buildings accessory to any permitted activity = permitted 	<ul style="list-style-type: none"> New buildings or building additions with a gross floor area of less than 450m² = permitted New buildings or building additions with a gross floor area of 450m² = restricted discretionary (for urban design matters)
Standards	<ul style="list-style-type: none"> Maximum height = 10m Recession plane requirements Setback of buildings from adjoining residential or recreation zones = 5m Storage or goods or material to be screened from adjoining sites by 2m fence. Specific establishment and ongoing landscaping requirements for Hobbs Street and Highfield Shopping Centre 	<ul style="list-style-type: none"> Maximum height = 10m Recession plane requirements Setback of non-residential activities from adjoining residential or open space zoned sites or residential activities = 5m Storage of goods or materials to be screened from adjoining sites by 2m fence. Specific ongoing landscaping requirements for Hobbs Street and Highfield Shopping Centre

Large Format Retail Zone (LFRZ)

The following approach is proposed in the LFRZ:

	Operative Plan	Proposed Plan
Commercial 2A Zone and Large Format Retail Zone	<ul style="list-style-type: none"> Community Facilities, individual retail units with a GFA no less than 500m², multiple retail activities, offices and personal services, places of assembly, public toilets, trade suppliers. Restaurants = permitted, subject to development thresholds. The Development thresholds are now out of date, with construction work underway on site at present. The ODP makes provision for development to commence in 2015 onwards. Only one supermarket. 	<ul style="list-style-type: none"> Large format retail, trade supplier, car parking facilities, supermarkets are permitted. Ancillary offices Permitted, subject to standards such as outdoor storage and height. Supermarkets are permitted providing there is only one. Development staging applies.
Community facilities	<ul style="list-style-type: none"> Permitted 	<ul style="list-style-type: none"> Non-complying
Industrial activities	<ul style="list-style-type: none"> Noncomplying 	<ul style="list-style-type: none"> Non-complying
Restaurants	<ul style="list-style-type: none"> Permitted but subject to a threshold rule and level that 	<ul style="list-style-type: none"> Noncomplying

	does not exceed 4% of the developed floor area.	
Offices	<ul style="list-style-type: none"> Permitted but subject to a threshold rule and level that does not exceed 2% of the developed floor area. 	<ul style="list-style-type: none"> Discretionary
Any other activity	<ul style="list-style-type: none"> Non-complying 	<ul style="list-style-type: none"> Discretionary
Buildings	<ul style="list-style-type: none"> Buildings accessory to any permitted activity = permitted 	<ul style="list-style-type: none"> Restricted discretionary, subject to standards on height (10m), height in relation to boundary and outdoor storage.
Standards	<ul style="list-style-type: none"> Maximum height = 10 – 12m Recession plane requirements Setback of buildings from adjoining residential or recreation zones = 5m Storage of goods or material to be screened from adjoining sites by 2m fence. 	<ul style="list-style-type: none"> Maximum height = 10m Recession plane requirements Setback of 5m from road. Storage of goods or materials to be screened from adjoining sites by 2m fence. Development staging thresholds assigns a quantum of floor area that is allowed to be open to the public.

Mixed Use Zone (MUZ)

The following approach is proposed in the MUZ:

	Operative Plan – Commercial 1C	Proposed Plan – Mixed Use Zone
Retail Activities	<ul style="list-style-type: none"> Shops permitted, with requirements that GFA of individual shops in specified locations are a minimum of either 500m² or 2000m² (but excluding trade suppliers) 	<ul style="list-style-type: none"> Large format retail = permitted Other retail = discretionary
Commercial Activities	<ul style="list-style-type: none"> Offices, bakeries, consulting rooms for health practitioners, restaurants or licensed premises, personal services, day care centres, emergency services facilities, brothels, auction rooms, veterinary clinics, undertakers, trade suppliers, equipment hire, Service stations = discretionary 	<ul style="list-style-type: none"> Permitted
Community facilities	<ul style="list-style-type: none"> Public toilet, places of assembly = permitted, otherwise non-complying 	<ul style="list-style-type: none"> Public toilet = permitted Community facilities = permitted, where on land or within a building used as an education

		facility; and where community use is secondary to the education use. Otherwise, discretionary
Residential Activity	<ul style="list-style-type: none"> Household units = permitted 	<ul style="list-style-type: none"> Residential activity = permitted New residential units = Restricted discretionary
Industrial activities	<ul style="list-style-type: none"> Storage = permitted, otherwise discretionary 	<ul style="list-style-type: none"> Where existing, up to lesser of 10% or 75m² expansion of existing activity = permitted
Any other activity	<ul style="list-style-type: none"> Discretionary 	<ul style="list-style-type: none"> Discretionary
Car parking	<ul style="list-style-type: none"> Permitted 	<ul style="list-style-type: none"> Permitted
Buildings	<ul style="list-style-type: none"> Permitted 	<ul style="list-style-type: none"> Buildings accessory to permitted activity = permitted Otherwise, buildings = controlled
Standards	<ul style="list-style-type: none"> Maximum height = 10m Recession plane requirements Setback of buildings from adjoining residential zoned sites = 3m Storage of goods or materials to be screened from adjoining sites by 2m fence. 	<ul style="list-style-type: none"> Maximum height = 16m Recession plane requirements Setback of buildings from adjoining residential zoned sites = 3m Storage of goods or materials to be screened from adjoining sites by 2m fence. Outdoor living, storage and service spaces required for residential units

	Operative Plan – Commercial 2A	Proposed Plan – Large format retail zone
Retail Activities	<ul style="list-style-type: none"> Retail activities with GFA of 500m² or greater = permitted GFA of less than 500m² = non-complying Restaurants (up to specified % threshold of total GFA within zone) = permitted Trade suppliers = permitted 1 supermarket = permitted Service stations = discretionary 	<ul style="list-style-type: none"> Minimum GFA of 500m² = permitted Minimum GFA of less than 500m² = non-complying Restaurants = non-complying 1 supermarket = permitted
Staging Thresholds for retail	<ul style="list-style-type: none"> All development Prior to 1 July 2020 limited to 23,000m² Prior to 1 July 2022 limited to 27,000m² Prior to 1 July 2025 limited to 29,000m² 	<ul style="list-style-type: none"> Retail GFA (excluding trade suppliers) Prior to 1 July 2028 limited to 10,000m² Prior to 1 July 2033 limited to 15,000m² Prior to 1 July 2038 limited to 20,000m²

	<ul style="list-style-type: none"> • Prior to 1 July 2027 limited to 34,000m² • Exceedance of any threshold by up to 6% = discretionary • Otherwise = non-complying 	<ul style="list-style-type: none"> • After 1 July 2038 limited to 34,000m²
Commercial Activities	<ul style="list-style-type: none"> • Offices and personal services (up to specified % threshold of total GFA within zone) = permitted 	<ul style="list-style-type: none"> • Ancillary offices up to 15% of GFA; up to 2 cafes with GFA of 150m² or less; up to 2 ATMs = permitted • Otherwise: Non-complying
Community facilities	<ul style="list-style-type: none"> • Places of assembly (up to 6000m²) = permitted 	<ul style="list-style-type: none"> • Public toilets and car parking = permitted • Otherwise = non-complying
Industrial activities	<ul style="list-style-type: none"> • Non-complying 	<ul style="list-style-type: none"> • Non-complying
Any other activity	<ul style="list-style-type: none"> • Non-complying 	<ul style="list-style-type: none"> • Non-complying
Buildings	<ul style="list-style-type: none"> • Controlled 	<ul style="list-style-type: none"> • Accessory to permitted activity = permitted, otherwise restricted discretionary
Standards	<ul style="list-style-type: none"> • Maximum façade height = 10m, maximum building height = 12m • Setback of buildings from roads = 5m • Storage of goods or materials to be screened from adjoining sites by 2m fence. • Development conditions, including adherence to ODP, intersection upgrade and fencing requirements and stormwater management. 	<ul style="list-style-type: none"> • Maximum height = 10m • Recession plane requirements • Setback of buildings from adjoining residential zoned sites = 3m • Storage of goods or materials to be screened from adjoining sites by 2m fence. • Development conditions generally carried forward.

Town Centre Zone (TCZ)

	Operative Plan	Proposed Plan
Commercial activities	<ul style="list-style-type: none"> • Shops, offices, banks, bakeries, cinemas & theatres (not Pleasant Point), consulting rooms for health practitioners, restaurants or licensed premises (not Pleasant Point), personal services, day care centres (not Pleasant Point), emergency services facilities, brothels • Auction rooms = discretionary (Temuka & Geraldine) or non-complying (Pleasant Point) 	<ul style="list-style-type: none"> • Permitted • Service stations = discretionary

	<ul style="list-style-type: none"> • Veterinary clinics = discretionary (Geraldine) or non-complying (Temuka & Pleasant Point) • Service stations = discretionary (Geraldine & Pleasant Point) or non-complying (Temuka) • Hire of tools or general equipment = permitted (Pleasant Point) or discretionary (Geraldine) if for agriculture, or non-complying (Temuka & Geraldine) 	
Community facilities	<ul style="list-style-type: none"> • Public toilets = permitted in Temuka only, non-complying in Geraldine and Pleasant point • Places of assembly = permitted 	<ul style="list-style-type: none"> • Permitted
Visitor Accommodation	<ul style="list-style-type: none"> • Boarding or lodging houses, hostels and community care facilities = permitted in Temuka only, non-complying in Geraldine and Pleasant point • Travellers' accommodation = permitted in Temuka and Pleasant point, non-complying in Geraldine 	<ul style="list-style-type: none"> • Permitted
Residential Activity	<ul style="list-style-type: none"> • Household units = permitted 	<ul style="list-style-type: none"> • Permitted above ground floor level
Industrial activities	<ul style="list-style-type: none"> • Storage = permitted (Pleasant Point) or discretionary (Geraldine) or non-complying (Temuka) • Tradesmen's workshops and stores = permitted (Pleasant Point) or non-complying (Temuka & Geraldine) • Otherwise, non-complying 	<ul style="list-style-type: none"> • Discretionary
Any other activity	<ul style="list-style-type: none"> • Non-complying 	<ul style="list-style-type: none"> • Discretionary
Buildings	<ul style="list-style-type: none"> • Buildings accessory to any permitted activity = permitted • Demolitions & new building fronting King Street (Temuka) = discretionary 	<ul style="list-style-type: none"> • Buildings for or ancillary to a permitted activity = Permitted
Car parking	<ul style="list-style-type: none"> • Permitted (Pleasant Point) or discretionary (Temuka & Geraldine) 	<ul style="list-style-type: none"> • Restricted discretionary

Standards	<ul style="list-style-type: none"> • Maximum height = 10m or 30m for church towers/spires • Recession plane requirements • Building setback from residential sites = 3m • Storage of goods or material to be screened from adjoining sites by 2m fence. 	<ul style="list-style-type: none"> • Maximum height = 10m or 30m for church towers/spires • Recession plane requirements • Building setback from residential or open space zoned sites = 3m • Storage of goods or materials to be screened from adjoining sites by 2m fence. • Specific ongoing landscaping requirements for Hobbs Street and Highfield Shopping Centre
Verandah	<ul style="list-style-type: none"> • Requirement to provide verandahs on sites fronting Talbot Street (in Geraldine) and King Street (in Temuka) 	<ul style="list-style-type: none"> • (Requirement retained)

City Centre Zone (CCZ)

	Operative Plan	Proposed Plan
Commercial activities	<ul style="list-style-type: none"> • Shops, offices, banks, bakeries, cinemas & theatres, consulting rooms for health practitioners, personal services, day care centres, brothels • Restaurants or licensed premises = permitted (Commercial 1B) or controlled (Commercial 1A) • Plant nurseries, auction rooms, veterinary clinics, undertakers, trade suppliers = permitted (Commercial 1B) or non-complying (Commercial 1A) • Service stations = discretionary (Commercial 1B) or non-complying (Commercial 1A) • Hire of tools or general equipment = permitted (Commercial 1B) or non-complying (Commercial 1A) 	<ul style="list-style-type: none"> • Permitted • Service stations = discretionary
Community facilities	<ul style="list-style-type: none"> • Public toilets = permitted • Places of assembly = permitted 	<ul style="list-style-type: none"> • Permitted
Visitor Accommodation	<ul style="list-style-type: none"> • Boarding or lodging houses, hostels, community care facilities and travellers' accommodation = permitted 	<ul style="list-style-type: none"> • Permitted
Residential Activity	<ul style="list-style-type: none"> • Household units = permitted 	<ul style="list-style-type: none"> • Permitted above ground floor level

Industrial activities	<ul style="list-style-type: none"> Storage and printing = permitted (Commercial 1B) or non-complying (Commercial 1A) Otherwise, non-complying 	<ul style="list-style-type: none"> Discretionary
Any other activity	<ul style="list-style-type: none"> Non-complying 	<ul style="list-style-type: none"> Discretionary
Buildings	<ul style="list-style-type: none"> Buildings accessory to any permitted activity = permitted Demolitions & new building fronting Stafford Street = discretionary 	<ul style="list-style-type: none"> Buildings for or ancillary to a permitted activity = Permitted No demolition or new building requirements managed in commercial chapter (targeted provisions in historic heritage chapter)
Car parking	<ul style="list-style-type: none"> Permitted (Pleasant Point) or discretionary (Temuka & Geraldine) 	<ul style="list-style-type: none"> Restricted discretionary
Standards	<ul style="list-style-type: none"> Maximum height = 10m or 30m for church towers/spires Recession plane requirements Building setback from residential sites = 3m Storage or goods or material to be screened from adjoining sites by 2m fence. 	<ul style="list-style-type: none"> Maximum height = 10m or 30m for church towers/spires Recession plane requirements Building setback from residential or open space zoned sites = 3m Storage of goods or materials to be screened from adjoining sites by 2m fence.
Verandahs & Frontages	<ul style="list-style-type: none"> Requirement to provide verandahs on sites fronting Stafford Street (Commercial 1A) Requirement for certain activities to be located in ground floor frontage/provisions of shop displays 	<ul style="list-style-type: none"> Requirements generally retained, but some reduced in application so that they apply only within Retail Core Precinct

2.3 Quantification of Costs and Benefits

Section 32(2)(b) requires that if practicable the benefits and costs of a proposal are quantified. In this case, the economic assessment undertaken by Property Economics includes quantification of the current status quo (a “business as usual” scenario) compared with consolidation of commercial activity into the City Centre¹². Changes proposed to the management framework for each commercial zone is more difficult to quantify in monetary terms.

2.4 Choice of Evaluation Method

Given the 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

¹² Property Economics (2019). *Timaru District Business Land Economic Assessment*, p.13.

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 the most appropriate to achieve the purpose of the Act.

The Strategic Objectives relevant to the Commercial Zones:

SD-O6 Residential Areas and Activities

Business and economic prosperity in the district is enabled in appropriate locations, including by:

1. providing sufficient land for a range of business activities to cater for projected growth;
2. providing opportunities for a range of business activities to establish and prosper, provided that commercial activities outside of commercial areas are limited so they do not detract from the role and function of the City Centre and Town Centre zones.

SD-O7 Centres

The district's city and town centres:

- 1 are maintained and enhanced as vibrant, attractive community focal points, providing a high level of amenity and opportunities for social interaction;
2. are the primary focus for retail, office and other commercial activity;
3. provide for the highest density of business, residential and visitor accommodation, and for intensification opportunities.

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.

How the options relate to the Strategic Directions is outlined later in this assessment, however, the functioning of the town centres is of the utmost importance in the district. Ensuring that there are vibrant and bustling town centres provide focal points for communities and provide places for critical employment, recreational, retail, and social opportunities.

Option 1: Includes the following draft objectives:

NZC-O1 The purpose of the Neighbourhood centre zone

The Neighbourhood centre zone provides for small-scale commercial activities that serve the day-to-day convenience needs of the surrounding residential neighbourhood, and do not undermine the purpose, function and amenity values of the city centre and Local centre zones.

NZC-O2 Character and qualities of the Neighbourhood centre zone

The Neighbourhood centre zone:

- i. is easily accessible by walking and cycling from the surrounding neighbourhood that it serves; and
- ii. contains buildings that are compatible with the use, amenity values and scale of built form of the surrounding residential environment but may be at a greater density and be more visually prominent along road frontages.

LCZ-O1 The purpose of the Local Centre Zone

The Local centre zone provides primarily for community facilities and a range of commercial activities which:

- i. support the daily and weekly goods and services needs of the surrounding residential areas; and
- ii. are of a size and scale that do not undermine the purpose, function and amenity values of the city centre zone.

LCZ-O2 Character and qualities of the local centre zone

The Local centre zone:

1. accommodates large volumes of people; and
2. contains attractive and functional buildings generally of a moderate scale and density, with larger footprints for supermarkets, and associated car parking and storage areas; and
3. integrates with public spaces and reflects good urban design principles; and
4. contains activities and buildings that are compatible with the use and amenity values of adjoining sites.

LFRZ-O1 Purpose of the Large format retail zone

The Large format retail zone provides primarily for large format retail, trade suppliers and other ancillary activities that support these large-scale retail activities, which are developed in a way that:

- i. avoids any significant adverse effects on the purpose, function and amenity values of the city centre zone; and
- ii. is undertaken in a comprehensive manner and avoids significant adverse effects on infrastructure.

LFRZ-O2 Character and qualities of the large format retail zone

The Large format retail zone:

1. accommodates large numbers of people, high traffic movements and requires large car parking areas; and
2. is well integrated with public transport, walking and cycling connections; and
3. contains buildings that have large gross floor areas; and
4. is developed in accordance with good urban design principles, while recognising the functional needs of activities; and
5. enhances the amenity, biodiversity and cultural values within and adjacent to Taitarakihi Creek as well as its flood-carrying capacity.

MUZ-O1 Purpose of the Mixed-Use Zone

The Mixed-use zone provides for a wide range of activities, including commercial activities, educational facilities, residential activities, and existing industrial activities, in a manner that reinforces the Timaru City Centre as the district's key commercial and civic centre.

MUZ-O2 Character and qualities of the Mixed-Use Zone

The Mixed-use zone:

- i. accommodates large numbers of people; and
- ii. is well integrated with public transport, walking and cycling connections; and
- iii. contains buildings of different scales up to 4 storeys, reflecting the mix of activities in the area; and
- iv. is developed in accordance with good urban design principles, while recognising the functional needs of activities; and
- v. provides a safe and functional working and residential environment with a level of amenity that is consistent with the activities provided for within the zone.

TCZ-O1 The purpose of the Town Centre Zone

The Town centre zone is a focal point for the local community and provides for a diverse range of activities that support the residents of the township and surrounding rural areas.

TCZ-O2 Character and qualities of the Town Centre Zone

The Town centre zone:

- i. provides a pleasant, pedestrian-focused environment that visually integrates with public spaces; and
- ii. is of a scale that is commensurate with the population that it serves; and
- iii. contains buildings of a moderate scale and density, with associated car parking and storage areas that do not detract from pedestrian-focused street environments; and
- iv. contains activities or buildings that are compatible with the use and amenity values of adjoining Residential zones and Open space and recreation zones;
- v. are of a size and scale that do not undermine the purpose, function and amenity values of the city centre zone.

TCZ-03 Main Street character and streetscape

The Geraldine and Temuka main street areas maintain their pedestrian-orientated nature and attractive streetscape, and in Temuka, contain built form that contributes to a high-quality streetscape that maintain the character associated with scheduled heritage items.

CCZ-01 The purpose of the City Centre Zone

The city centre zone is the main commercial and civic centre for the district and wider South Canterbury sub-region and the primary destination for retail activity, dining and entertainment, and:

- i. provides for a diverse range of activities, including commercial, visitor accommodation and community facilities; and
- ii. accommodates higher density residential activities which support the viability and vibrancy of the Zone.

CCZ-02 Character and qualities of the City Centre Zone

The city centre zone:

1. is a vibrant area that provides an attractive place to live, work and visit; and
2. contains built form that contributes to a high-quality streetscape that maintains the character associated with scheduled heritage items and historic heritage areas; and
3. accommodates large volumes of people; and
4. includes sites used for centralised car parking; and
5. contains large-scale, high-density buildings; and
6. contains activities that are compatible with the amenity values of adjoining Residential and Open space and recreation zones.

Option 2: Status Quo

- 3.1.1.1: Minimise the situations where there is conflict between commercial activities and other land uses.
- 3.1.1.2: Mitigate the adverse effects of activities in the Commercial Zones on adjoining Residential Zones.
- 3.1.1.3: To maintain or enhance the amenity values within and adjacent to the Taitarakihi Creek in the Commercial 2A Large Format Store (Retail Park) Zone.
- 3.2.1.1: Provide for the amenity and quality of the environment in retail areas.
- 3.3.1: Recognition and protection of heritage values in commercial areas of the district.
- 3.4.1: Promote the sustainable use and development of physical resources in Commercial Zones

3 Evaluation of Objectives

The table below evaluates the following objectives:

- NCZ-01: Purpose of the Neighbourhood Centre Zone
- LCZ-01: Purpose of the Local Centre Zone
- LFRZ-01: Purpose of the Large Format Retail Zone
- MUZ-01: Purpose of the Mixed-Use Zone
- TCZ-01: Purpose of the Town Centre Zone
- CCZ-01: Purpose of the City Centre Zone

Category	Criteria	Comments
Relevance	Directed to addressing a resource management issue	Option 1: Achieves The objectives address the identified issue of the operative Plan not clearly articulating the role and function of each commercial zone, nor clearly articulating the importance of the Timaru City Centre. It does this by providing a clear statement about the purpose of each type of commercial zone. The objectives also provide guidance on the type and range of activities anticipated in each zone, which addresses the issue that there are currently limitations on commercial activities within the operative District Plan that may not be appropriately enabling a range and mix of activities.
		Option 2: Partly achieves The current objectives do not clearly articulate the role and function of each commercial zone, nor the importance of the Timaru City Centre. The current objectives provide some guidance on providing for sustainable use and development of physical resources in Commercial zones, but do not provide clear guidance on range or mix of activities anticipated in each zone.
	Focused on achieving the purpose of the Act	Option 1: Achieves The objectives give effect to the purpose of the RMA, by identifying the way in which each commercial zone is expected to be managed to enable people and communities to provide for their wellbeing. They also address Section 7(b) of the RMA in terms of ensuring the efficient use and development of the physical resources that are already established in these commercial areas.
		Option 2: Achieves The objectives explicitly seek to promote the sustainable use and development of physical resources in Commercial zones.
	Assists a council to carry out its statutory functions	Option 1: Achieves The objectives relate to achieving integrated management of the effects of the use, development or protection of commercial-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.
		Option 2: Achieves As per Option 1.
	Within scope of higher-level documents	Option 1: Achieves The objectives give effect to the direction in the CRPS to enable business activities in appropriate locations

		<p>and encourage business opportunities within urban areas.</p> <p>It also aligns with the NPS-UD by ensuring that the commercial areas within the district’s urban environments enable a variety of sites that are suitable for different business sectors and allow for these areas to develop and change over time in response to the changing needs of people and communities and future generations.</p> <p>The zones outlined in the objectives align with those 8. Zone Framework Standard in the NP Standards.</p>
		<p>Option 2: Does not achieve</p> <p>The current objectives do not provide strong guidance to ensure that business activities are encouraged in appropriate locations, and to encourage business opportunities within urban areas.</p> <p>The current zones do not align with the zones required under the 8. Zone Framework Standard in the NP Standards.</p>
Feasibility	Acceptable level of uncertainty and risk	<p>Option 1: Partly achieves.</p> <p>While the objectives outline the outcomes sought within each of the commercial zones, there are a number of uncertainties about whether these outcomes will be achieved, which are largely influenced by factors that sit outside the District Plan, particularly economic circumstances.</p> <p>However, the level of risk associated the objectives is low. What is sought generally aligns with strategic documents, as well as the GMS, and the Timaru District Economic Development Strategy. The outcomes sought are therefore not controversial or unexpected and aligning with these outcomes is therefore considered to be low risk.</p>
		<p>Option 2: Partly achieves.</p> <p>The current objectives do not provide a high level of certainty about what the role, function and purpose of each zone is and therefore there is limited clarity about what is sought for the commercial areas.</p> <p>However, there is a low level of risk with the current approach because it has been operative for some time and people are therefore familiar with the approach taken.</p>
	Realistically able to be achieved within council’s powers, skills and resources	<p>Option 1: Uncertain.</p> <p>The outcomes sought can be facilitated through the District Plan provisions, but their achievement is ultimately dependent on land and business owners. For example, the Council does not have the ability under the RMA or otherwise, to require derelict buildings to be upgraded, or to fill vacant tenancies that might be detracting from the achievement of the outcomes.</p>

		Option 2: Uncertain. As per Option 1.
Acceptability	Consistent with identified iwi/Māori and community outcomes	Option 1: Achieves. The outcomes sought generally align with the GMS to focus on the consolidation of commercial development primarily within existing commercial zones and recognising Timaru City's functions and role as the primary business, retail, recreational, civic, and entertainment hub for the district. The direction in the GMS reflects the strategic vision for the growth of the district and reflects community outcomes. Similarly, the objectives align with the community outcome in the Council's LTP ' <i>smart, diversified economic success and growth supported and enabled</i> '.
		Option 2: Neutral. The current objectives do not hinder the achievement of the outcomes sought in the GMS regarding consolidation and the role of the City Centre, or the outcomes of the LTP. However, they do not provide sufficient guidance to assist with their achievement.
	Will not result in unjustifiably high costs on the community or parts of the community	Option 1: Achieves. The outcomes sought will not result in unjustifiably high costs on owners of business land or businesses and will better ensure that the benefits to land and business owners and the wider community of viable and vibrant town centres are realised.
		Option 2: Achieves. No concerns have been raised that the current aims of the Plan in relation to commercial zones have resulted in unjustifiably high costs.

The table below evaluates the following objectives:

- NCZ-O2: Character and qualities of the Neighbourhood Centre Zone
- LCZ-O2: Character and qualities of the Local Centre Zone
- LFRZ-O2: Character and qualities of the Large Format Retail Zone
- MUZ-O2: Character and qualities of the Mixed-Use Zone
- TCZ-O2: Character and qualities of the Town Centre Zone
- TCZ-O3: Main Street character and streetscape
- CCZ-O2: Character and qualities of the City Centre Zone

Category	Criteria	Comments
Relevance	Directed to addressing a resource management issue	<p>Option 1: Achieves. The objective provides direction regarding the character and qualities anticipated in each type of commercial zone. This allows for the provisions relating to build form and urban design to be targeted to those that are clearly directed to achieving these outcomes.</p>
		<p>Option 2: Partly achieves. The objectives seek to provide for the amenity and quality of the environment in retail areas, minimise conflict with other more sensitive activities and mitigate effects on adjoining residential areas. However, this direction is broad and not specific to the differing outcomes sought for each zone. As such they provide limited guidance on the character and qualities anticipated in each type of commercial zone.</p>
	Focused on achieving the purpose of the Act	<p>Option 1: Achieves. The objectives particularly 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 commercial zone.</p>
		<p>Option 2: Achieves. The objectives particularly relate to the direction in Sections 7(c) and (f) to maintain and enhance amenity values and the quality of the environment, and on avoiding, remedying or mitigating the adverse effects of activities in commercial zones.</p>
	Assists a council to carry out its statutory functions	<p>Option 1: Achieves. The objectives relate to achieving integrated management of the effects of the use, development or protection of commercial-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.</p>
		<p>Option 2: As per Option 1.</p>

	<p>Within scope of higher-level documents</p>	<p>Option 1: 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 commercial area, and what type of identity and character each area is anticipated to have.</p>
		<p>Option 2: Partly achieves. The objectives go some way towards giving effect to the direction in the CRPS to maintain and enhance the sense of identity and character of the urban area, by seeking that amenity and quality of the environment is provided for. However, this does not extend to explicit guidance on the identity and character of each commercial zone.</p>
<p>Feasibility</p>	<p>Acceptable level of uncertainty and risk</p>	<p>Option 1: Achieves. The character and qualities outlined in the objectives largely align with the existing character and qualities of each zone, or in the case of the large format retail zone, with those anticipated through its current zoning. Where these are not currently achieved, there is a level of uncertainty that they can be, due to factors that sit outside the District Plan. In particular, while the District Plan can direct how redevelopment of a site is managed, it cannot require that any site is redeveloped, or vacant lots built upon. However, this level of uncertainty is considered to be acceptable. The level of risk associated with the objectives is low, as they largely reflect the currently existing or anticipated character of these zones. The outcomes sought are therefore not controversial or unexpected and aligning with these outcomes is therefore considered to be low risk.</p>
		<p>Option 2: Partly achieves. The current objectives do not provide a high level of certainty about what particular amenity values or environmental qualities are to be provided for, and therefore there is limited clarity about what is sought for the commercial areas except at a broad level. However, there is a low level of risk with the current approach because it has been operative for some time and people are therefore familiar with the approach taken.</p>

	Realistically able to be achieved within council's powers, skills and resources	<p>Option 1: Uncertain. The outcomes sought can be facilitated through the District Plan provisions, but their achievement is ultimately dependent on land and business owners. For example, the Council does not have the ability under the RMA or otherwise, to require sites to be redeveloped where they do not currently meet the outcomes, or to fill vacant tenancies or build on vacant sites that might be detracting from the achievement of the outcomes.</p>
		<p>Option 2: As per Option 1.</p>
Acceptability	Consistent with identified iwi/Māori and community outcomes	<p>Option 1: Achieves The approach taken generally aligns with feedback provided by the community on Topic 15 – Commercial Zones, in December 2016. It also aligns with the GMS, in terms of:</p> <ul style="list-style-type: none"> • ensuring that urban growth positively contributes to consolidated urban areas that reinforce the strengths, character and identity of each settlement; • Maintaining and enhancing a high-quality urban environment that is attractive to business and visitors and minimising conflicts between incompatible activities • Promoting high quality urban design for the district's commercial centres, to the extent appropriate in the circumstances • Taking a balanced approach to requirements for urban design for commercial centres, balancing urban design with promoting commercial development in these commercial centres and ensuring the community has access to a wide range of goods and services.
		<p>Option 2: Partly achieves. The current objectives do not resolve the issues raised in the community consultation and feedback on Topic 15 – Commercial Zones, in December 2016. They go some way to aligning with the outcomes sought in the GMS (set out above) but do not clearly articulate the strengths, character and identity of the commercial areas within each settlement.</p>

	Will not result in unjustifiably high costs on the community or parts of the community	<p>Option 1: Achieves. As outlined in the issues section, there are provisions in the operative District Plan that may not currently target regulatory intervention in terms of urban design and amenity in the most appropriate way. The objectives will assist in articulating the outcomes sought for each commercial zone so that regulatory intervention can be appropriately targeted to where it is best warranted. This will ensure that the benefits to the community of appropriately designed and managed commercial spaces are realised, without unjustified costs to land and business owners from such intervention.</p>
		<p>Option 2: Neutral. Some of the changes proposed respond to concerns that regulatory intervention is currently not targeted in the most appropriate way. This may be resulting in costs to landowners and developers that are not justified and have wider effects on the community where these regulations are limiting reinvestment and redevelopment of commercial areas. However, this is more related to how the current objectives are implemented, rather than the broader outcomes sought in the objectives themselves.</p>

4 Identification of Options

Section 32(1)(b) of the RMA requires an examination of whether the provisions in the proposal the most appropriate way are 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 been bundled, because they are expected to work together to achieve the objectives.

Option 1: Status Quo

This option involves a continuation of the operative Plan provisions including the current policies and rules.

Option 2: Provide greater guidance on what is anticipated in each zone, target urban design requirements, tighten controls in Large Format Retail Zone

This option involves provide policy guidance on the activities that are anticipated in each zone, and guidance for assessing activities that require resource consent, including specifying what types of activities are not considered appropriate. The proposed rule framework simplifies the range of activities permitted or requiring consent by grouping activities as much as possible, for example permitting 'commercial activities' except for any particular commercial activity for which consent is required.

In terms of urban design, it includes requiring a resource consent in the LCZ, for buildings and developments over a 450m² threshold, to allow for consideration of urban design. This threshold is consistent with that used in other local authority areas (Selwyn and Waimakariri districts). Requirements to provide verandahs and active frontage in key pedestrian areas would continue to be required, generally consistent with the current approach. It is also proposed to include a resource consent requirement for buildings (for urban design assessment) within the Mixed-use zone, in recognition of the larger scale and importance of good design in this zone. This is a new requirement for those areas which are currently zoned Commercial 1B or Commercial 1C. It is also proposed that the activity status for buildings within the large format retail zone would change from controlled to restricted discretionary.

The requirement for resource consent for demolition of buildings and design of replacement buildings would be retained within the City centre zone and Town centre zone in Timaru, but with clear matters of discretion included to allow for consideration of urban design matters as well as impacts on the heritage values in those areas. It is also proposed to increase the height limit within the city centre zone to 20m, to allow for greater density of development in this zone.

This option also proposes to tighten the framework applying to the large format retail zone, specifically to reduce the thresholds for staging of retail activities on the site and limit the type of other commercial activities provided for within this area. This is based on economic advice regarding how development of this site could impact on the city centre zone.

Option 3: Reduce amount or type of retail enabled in Large Format Retail Zone

This option would involve tightening the framework applying to the large format retail zone by either reducing the overall quantum of retail activity enabled within the zone (to less than 34,000m²), or by limiting the type of retail activities within the zone, for example to trade suppliers only. This would be as necessary to avoid development of this area having significant adverse effects on the economic and social functioning of the city centre and therefore compromising achievement of the strategic objective that seeks to maintain and enhance key urban centres as vibrant, attractive community focal points, and as the primary focus for retail, office and other commercial activity.

5 Evaluation of Options

5.1 Evaluation table

OPTION 1 <i>Status-quo Continuation of the operative Plan provisions including the current policies and rules</i>			
Benefits	Economic	Social	Cultural
Environmental			
Current approach manages effects from activities within the zone on residential zones and maintaining environmental amenity and quality within commercial areas.	The current approach provides for a reasonable range of commercial and community activities in the different zones. This option does not have consenting costs associated with urban design consent requirements in the	Continuation of current approach provides a level of familiarity and certainty to plan users. The current urban design controls can also ensure new developments integrate with the public realm and	None identified

	Local centre and Mixed-use zones	provide attractive spaces for people to interact in	
--	----------------------------------	---	--

Costs Environmental	Economic	Social	Cultural
<p>A lack of urban design controls in some zones may lead to development that does not achieve good urban design</p>	<p>The lack of articulation of the importance of Timaru’s central city and other town centres risks the establishment of commercial activities in locations that could adversely affect the amenity, vitality and viability of these existing commercial centres. The economic assessment states that the dispersal of commercial activity has the potential to generate significant impacts on the district’s economy and a decline of the city centre, with consequential adverse effects. In monetary terms, a loss of \$1.19m of GDP per annum is estimated over the life of the proposed Plan under a business-as-usual scenario.¹³ There are potential lost opportunity costs associated with the limits on the range of commercial and community activities provided</p>	<p>The current approach to design requirements may disincentivise reinvestment and redevelopment in commercial areas, which in turn can the vibrancy and vitality of these areas as a focal point for the community. The economic costs of a business-as-usual scenario identified in the economic assessment would also have flow-on social effects</p>	<p>None identified.</p>

¹³ Property Economics (2019). *Timaru District Business Land Economic Assessment*, p.13.

	<p>within some commercial zones. There are costs associated with requirements placed on building design in some commercial areas, as well as with consenting requirements for demolition and new builds</p>		
<p>Efficiency</p>	<p>Overall, the costs associated with the status quo are considered to outweigh the benefits. Although there are some aspects of the current approach that are considered efficient – for example the management of bulk and location to address effects on amenity values and environmental quality within and beyond the zone – there are areas where the controls are targeted wider than necessary to achieve the outcomes sought. There are also inefficiencies associated with having multiple zones that have similar but not the same rule framework. There is no policy direction that explains these slight differences.</p>		
<p>Effectiveness</p>	<p>The provisions are effective at achieving the outcomes sought in relation to the character and quality of each zone. However, the approach taken to listing specific permitted activities is potentially less effective at providing for the full range of activities that would align with the purpose of the zone. The economic assessment also concludes that the status quo approach would not lead to the achievement of the outcomes sought in the Plan in relation to the role and function of the city centre zone and its maintenance and enhanced as a vibrant community focal point and the primary focus for retail, office and other commercial activity</p>		
<p>Strategic Direction(s)</p>	<p>The status quo generally aligns with the direction to ensure urban development is well-designed and of good quality, recognises existing character and amenity, and is attractive and functional to residents, business and visitors. It also controls the location of activities to minimise conflict between incompatible activities (UDF-O1). It is also mostly consistent with providing opportunities for a range of business activities to establish and prosper in appropriate locations, but does not fully achieve this, in terms of the limitations placed on the full range of commercial activities (SD-O6). The current approach is also only somewhat aligned with ensuring the district’s key urban centres are maintained and enhanced as vibrant, attractive community focal points, providing a high level of amenity and opportunities for social interaction (SD-O7). This is because there is a lack of control in design in some areas (Commercial 2/Local Centre Zone and Commercial 1C/Large Format Retail Zone) where it may be necessary to ensure they are attractive focal points, but in other areas the requirement for consent is not necessary to achieve this outcome. There is also limited policy guidance to ensure that the key urban centres are the primary focus for retail, office and other commercial activity. As noted above, the economic assessment also indicates that the status quo would likely risk the maintenance and</p>		

	enhancement of the city centre zone as a vibrant community focal point and the primary focus for retail, office and other commercial activity.
Overall Appropriateness of Option 1	This option is not considered to be the most appropriate way to achieve the preferred objectives. While there are aspects of the status quo that are efficient and effective, there are a number of areas where the provisions are not efficient, because they go beyond what is necessary to achieve the outcomes sought. In other areas, the provisions are not as effective as they could be in achieving the outcomes that are sought.

OPTION 2

Provide greater guidance on what is anticipated in each zone, target urban design requirements, tighten controls in North-east large format retail precinct

Benefits	Economic	Social	Cultural
<p>Environmental</p> <p>The proposed provisions largely retain the current built form and boundary control measures. These controls will continue to manage effects from activities within the zone on residential zones and maintain the environmental amenity and quality within commercial areas. Urban design controls will also assist in ensuring that the important character and qualities of some commercial areas are maintained, and ensure that development integrates with the public realm and provides attractive environments</p>	<p>Rationalising the current approach to permitted activities within the zones provides for a wider and more diverse range of commercial and community activities within various zones, providing greater economic opportunities. Providing targeted regulation with clear guidance over the outcomes sought is also intended to provide certainty for investment and redevelopment in existing centres. As identified in the economic assessment provided specifically in relation to the large format retail zone, the proposed limitations on development are expected to ensure that development does not occur at a faster rate than what market growth could sustain and thus cause significant economic effects on the City Centre.</p>	<p>Urban design controls are expected to ensure new developments in key areas integrate with the public realm and provide attractive spaces for people to interact in</p>	<p>The discussion document on commercial zones identified, in relation to Takata whenua values, that there is support for targeting management towards key areas with heritage character, aimed at maintaining and improving the amenity and design in those areas, while removing the consenting requirements for demolitions and new builds outside of these areas. The rationalisation of consenting requirements in the city centre zone and Temuka town centre zone goes some way towards this.</p>

Costs			
Environmental	Economic	Social	Cultural
<p>The provisions remove control over design in some areas. This could result in some development being less well-designed than if a resource consent was required. However, this is considered to be mitigated by the areas within which the controls will be removed having lower amenity values and not having a particular character that requires protection. The increased height proposed for the city centre zone could have some adverse effects on the current amenity values within this area. However, the increased height is considered to be consistent with the amenity anticipated as the area develops in future.</p>	<p>In the Local centre zone, there will be consenting costs associated with development or redevelopment over a certain threshold and in the Mixed-use zone in central Timaru, there will be consenting costs associated with new development. There will also be lost opportunity costs resulting from the additional limitations proposed for the large format retail zone, due to the reduced staging thresholds on retail activities and additional limitations on other types of commercial activity</p>	<p>None identified</p>	<p>None identified</p>
Efficiency	<p>Overall, the benefits of this approach are considered to outweigh the costs. The refinements to where consents are required for new or redeveloped buildings is considered to be targeted to those areas where this is necessary to achieve the outcomes sought.</p>		
Effectiveness	<p>The proposed approach will be effective at ensuring that the activities provided for in each zone align with the purpose for each zone. Similarly, the rationalisation of controls to target these towards areas where intervention is warranted is an effective way achieve the outcomes sought relating to character and quality. The approach is also an effective way to ensure that the policy and rule framework for each zone is targeted towards achieving the specific outcomes sought in relation to each zone.</p>		
Strategic Direction(s)	<p>The proposed provisions align with UDF-O1, because they provide direction on the design and quality outcomes anticipated for each zone, as well as making clear the character and amenity anticipated for each zone. The provisions also seek to ensure that these areas are attractive</p>		

	<p>and functional to residents, business and visitors, as relevant to the function and purpose of each zone. The proposed approach also continues to control the location of activities to minimise conflict between incompatible activities.</p> <p>The proposed approach is consistent with providing opportunities for a range of business activities to establish and prosper in appropriate locations (SD-O6). It also aligns with ensuring the district's key urban centres are maintained and enhanced as vibrant, attractive community focal points, providing a high level of amenity and opportunities for social interaction and that they are the primary focus for retail, office and other commercial activity (SD-O7).</p>
Overall Appropriateness of Option 2	<p>This option is considered to be the most appropriate way to achieve the proposed objectives. It is more efficient and effective than the status quo, particularly in terms of ensuring that regulatory intervention in urban design is targeted to the key areas where this is necessary to achieve the design outcomes sought and providing a policy and objective framework that provides for the range of activities anticipated by the purpose of each zone.</p>

OPTION 3 <i>Reduce amount or type of retail enabled in North-east large format retail precinct</i>			
Benefits Environmental	Economic	Social	Cultural
None identified.	<p>As identified in the Showgrounds Hill assessment (which specifically relates to the large format retail zone), the economists would support a reduction in the amount of retail enabled in the precinct to address the economic impacts of development enabled under the current plan framework. The report and related peer review also note that there are some types of retail activities (specifically trade retail) that are not considered to be core retail expenditure, nor</p>	<p>As this option would be expected to address potential retail distribution effects, it would also avoid significant impacts on the vibrancy, vitality and amenity and quality of the shopping environment of the city centre and would not compromise social amenity.¹⁴</p>	None identified

¹⁴ Showgrounds, p. 5.

	fundamental retail centre activities and therefore they are not expected to generate retail distribution effects. As such, limiting store types would ensure that the city centre's economic wellbeing would not be compromised.		
Costs Environmental	Economic	Social	Cultural
None identified	There will be lost opportunity costs resulting from additional limitations on the amount or type of retail enabled in the large format retail zone. These are expected to be greater than those under Option 2.	None identified	None identified
Efficiency	Overall, this approach is considered to be a less efficient way to achieve the outcomes sought, than Option 2. It would further reduce the development opportunities within the zone from those enabled under the current plan framework.		
Effectiveness	This option would be effective at ensuring that the zone is developed in a way that avoids significant adverse effects on the economic and social functioning of the City centre zone.		
Strategic Direction(s)	This option would be effective at ensuring that the zone is developed in a way that avoids significant adverse effects on the economic and social functioning of the City centre zone.		
Overall Appropriateness of Option 3	This option is not considered to be the most appropriate way to achieve the preferred objectives. While this option would be effective at achieving the outcomes sought, it would be less efficient than Option 2.		

5.2 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 commercial areas. The proposed planning framework builds on the existing framework in the Operative District Plan, which the Council and its community is familiar with. It is considered that expanding the range of activities provided for within the various commercial zones is low risk, as the types of activities anticipated in each zone will continue to be provided for. Similarly, the changes to urban design controls are considered low risk as including requirements in the Local Centre Zone is consistent with the approach taken in other district plans for larger developments,

while the reduced requirement in other areas ensures controls are targeted to areas where they are most important. There is also considered to be sufficient information to guide the changes proposed to the framework applying to the large format retail zone. This includes specific economic assessment regarding the impact that the continuation of the status quo provisions could have on the City Centre and wider district economy. The risk of not acting is considered to be outweighed by the risks to the achievement of the outcomes sought by 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 direction on the design and quality outcomes anticipated for each zone, as well as making clear the character and amenity anticipated for each zone;
 - ensuring these areas are attractive and functional to residents, business and visitors, as relevant to the function and purpose of each zone;
 - controlling the location of activities to minimise conflict between incompatible activities;
 - providing opportunities for a range of business activities to establish and prosper in appropriate locations; and
 - ensuring the district's key urban centres are maintained and enhanced as vibrant, attractive community focal points, providing a high level of amenity and opportunities for social interaction and that they are the primary focus for retail, office and other commercial activity.
- The proposed provisions address the resource management issues by:
 - providing a framework that clearly articulates the role and function of each zone and the importance of the City Centre zone as the main Centre for the South Canterbury area; and
 - enabling a range and mix of activities in each zone that reflect the purpose of the zone and are expected to promote the vitality and viability of these centres; and
 - targeting urban design controls to those areas where they are necessary to maintain the character of areas that are valued by the community, or to ensure that developments integrate with the public realm, and result in attractive and inviting commercial spaces.
- The policy and rule framework are considered to be an efficient and effective way to achieve the proposed objectives, particularly in terms of providing a better balance between regulation intervention and incentivization of appropriate commercial redevelopment.

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.