

**BEFORE THE INDEPENDENT HEARINGS PANEL**

**IN THE MATTER** of proposed Plan Change 14: Housing and Business Choice to the Christchurch District Plan

**AND**

**IN THE MATTER** of Woolworths New Zealand Ltd (Submitter 740)

[1] The purpose of this correspondence is to respond to the IHP Minute(s) 29 and 33 as to directions for the following information based on Planning evidence and Hearing attendance on behalf of Woolworths NZ Ltd on 26 October 2023:

- (a) Copy / Link to the Auckland IHP zone guidance referred to in evidence [refer **Attachment A**]; and
- (b) Provision of a marked-up version of plan change [refer **Submission / Attachment A to evidence / Attachment B**] and table format for s32AA [refer **Attachment C**].

[2] Matter (a) relates to the WWNZ submission seeking amendment to the **North Halswell Key Activity Centre Commercial zoning boundary** (and North Halswell ODP) as accepted by Mr Bayliss<sup>1</sup>. The Planning evidence<sup>2</sup> referenced 'Best Practice Approaches for Rezoning' as contained in the Auckland Unitary Plan – IHP Process Guidance Note.

[3] Matter (b) relates to the request for rezoning the St Albans Neighbourhood Centre to Local Centre (retail thresholds and the ODP are not sought to be amended). **Attachment B** identifies the relief within the context of the Christchurch City Council updated PC14 provisions as dated 18 August 2023.



Matt Bonis

15 April, 2024

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<sup>1</sup> S42A Bayliss [8.7, 8.7.6, 8.7.7(c)]

<sup>2</sup> EiC Bonis [20]

**Attachment A – Auckland IHP – Interim Guidance:  
Best Practice Approaches to Rezoning...**

**AUCKLAND UNITARY PLAN  
INDEPENDENT HEARINGS PANEL**

*Te Paepae Kaiwawao Motuhake o te Mahere Kotahitanga o Tāmaki Makaurau*

**Interim Guidance  
Best practice approaches to re-zoning, precincts and changes  
to the Rural Urban Boundary (RUB)  
31 July 2015**

This interim guidance is provided for topics 016 and 017 Changes to the RUB and topics 080 Re-zoning and precincts (General) and 081 Re-zoning and precincts (Geographical Areas).

The purpose of this guidance is to help parties prepare for the hearings on these topics by informing them of the Panel's interim position on best practice approaches to changing the RUB, rezoning and precincts.

Parties should ensure that any evidence provided for the hearings on these topics clearly and succinctly addresses the matters set out below.

**1. BEST PRACTICE APPROACHES FOR RE-ZONING**

- 1.1. The change is consistent with the objectives and policies of the proposed zone<sup>1</sup>. This applies to both the type of zone and the zone boundary.
- 1.2. The overall impact of the rezoning is consistent with the Regional Policy Statement<sup>2</sup>.
- 1.3. Economic costs and benefits are considered.
- 1.4. Changes should take into account the issues debated in recent plan changes.
- 1.5. Changes to zone boundaries are consistent with the maps in the plan that show Auckland-wide rules and overlays or constraints (e.g. hazards).
- 1.6. Changes should take into account features of the site (e.g. where it is, what the land is like, what it is used for and what is already built there).
- 1.7. Zone boundary changes recognise the availability or lack of major infrastructure (e.g. water, wastewater, stormwater, roads).
- 1.8. There is adequate separation between incompatible land uses (e.g. houses should not be next to heavy industry).
- 1.9. Zone boundaries need to be clearly defensible e.g. follow roads where possible or other boundaries consistent with the purpose of the zone.
- 1.10. Zone boundaries should follow property boundaries.
- 1.11. Generally no "spot zoning" (i.e. a single site zoned on its own).
- 1.12. Zoning is not determined by existing resource consents and existing use rights, but these will be taken into account.
- 1.13. Roads are not zoned.

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<sup>1</sup> The 1 October prehearing meeting on rezoning and precincts will tell you where to find the most up to date version of zone objectives and policies and the Regional Policy Statement.

<sup>2</sup> See footnote 1.

## **Supporting information required**

- 1.14. A list of the layers in the Proposed Auckland Unitary Plan (PAUP) that apply to your site.
- 1.15. The proposed change is supported by a pdf map marked up to show:
  - a. address(s);
  - b. zone (current and the changes you seek);
  - c. any property boundaries;that are the subject of your submission. If you have GIS software, provide this map as both a pdf and shape file.
- 1.16. If the zoning relates to someone else's land, provide details of your consultation with the owner and their position on the proposed change.

## **2. BEST PRACTICE APPROACHES FOR PRECINCTS**

- 2.1. The purpose of the precinct is clearly stated and justified in terms of the purpose of the RMA (i.e. sustainable management of natural and physical resources).
- 2.2. Precincts should take into account the issues debated in recent plan changes.
- 2.3. Precincts should not override an overlay.
- 2.4. The purpose of the precinct can't be achieved through the use of the underlying zone and Auckland-wide provisions.
- 2.5. The purpose of the precinct can't be achieved through applying for a resource consent.
- 2.6. When the proposal changes most of the underlying zone, a new zone should be created instead of a precinct.
- 2.7. A precinct is not determined by existing resource consents and existing use rights, but these will be taken into account.
- 2.8. The structure should be simple – ideally no more than one layer.
- 2.9. Precinct boundaries should follow property boundaries.
- 2.10. Precincts must use the definitions in the PAUP.

## **Supporting information required**

- 2.11. A list of the layers in the proposed PAUP that apply to the site.
- 2.12. Proposals for new precincts should be complete i.e. should include objectives, policies, activity table, development and use controls, notification provisions, matters of discretion, assessment criteria and any special information requirements.
- 2.13. The proposal is supported by the following maps:
  - a. a pdf zoning map, marked up to show the exact sites that are the subject of your submission;
  - b. a precinct plan map. This map needs to be as accurate as possible.

## **3. BEST PRACTICE APPROACHES FOR CHANGES TO THE RURAL URBAN BOUNDARY (RUB)**

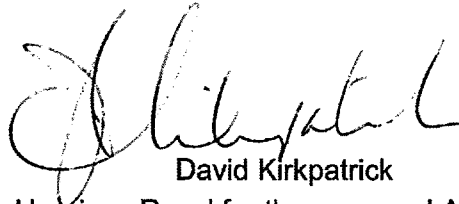
- 3.1. The change enables the efficient provision of development capacity and land supply for residential, commercial and industrial growth.
- 3.2. The change promotes the achievement of a quality compact urban form.

- 3.3. Where moving the RUB results in rezoning, the provision of infrastructure is feasible.
- 3.4. The change avoids:
  - a. scheduled areas with significant environmental, heritage, Māori , natural character or landscape values;
  - b. the Waitakere Ranges Heritage Protection Area;
  - c. mineral resources that are commercially viable;
  - d. elite soils.
- 3.5. The change avoids, where possible:
  - a. areas prone to natural hazards, including coastal hazards;
  - b. conflicts between residents and infrastructure.
- 3.6. The RUB should aim to follow property boundaries.

### Supporting information required

- 3.7. A summary of the layers in the Proposed Auckland Unitary Plan (PAUP) that apply to the site.
- 3.8. The proposed change is supported by a pdf map marked up to show:
  - a. address(s);
  - b. the RUB line (current and the changes you seek);
  - c. any property boundaries;that are the subject of your submission. If you have GIS software provide this map as both a pdf and shape file.
- 3.9. If the RUB change (and any related zone changes) relates to someone else's land, provide details of your consultation with the owner and their position on the proposed change.

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David Kirkpatrick

Chairperson, Hearings Panel for the proposed Auckland Unitary Plan

This interim guidance is prepared as a result of having read the submissions and having heard evidence and legal submissions from submitters (including Auckland Council) across the hearing topics to date. This guidance also reflects the Panel's understanding of relief sought within submissions on topics 016, 017, 080 and 081 that are yet to be heard.

This interim guidance is not a recommendation within the meaning of section 144 of the Local Government (Auckland Transitional Provisions) Act 2010. It is not binding on submitters (including the Council) or on the Panel.

**Submitters and their representatives are welcome to contact the IHP office to seek clarification of this interim guidance ([info@aupihp.govt.nz](mailto:info@aupihp.govt.nz) or 09 979 5566).**

# Attachment B – Marked up version of relief: St Albans

This Attachment includes the WWNZ relief as tracked changed within the City Council’s updated Planning provisions dated 18 August 2023<sup>3</sup>, as requested by the Panel.

Track changes in response to Minute 29 in the relief are in red, bold and underlined or strikethrough, with remaining amendments (font colour, underlined, strikethrough) as contained within the provisions as filed by the Christchurch City Council as dated 18 August 2023. Where text has been relocated (to apply to a Local Centre zone, but otherwise remains unchanged) is identified in orange bold underlined.

## Amend as follows:

### Policy 15.2.2.1 (a) Policy – Role of centres

Table 15.1 – Centre’s role

	Role	Centre and size (where relevant)
C.	<p><b>Neighbourhood <u>Local</u> Centre</b></p> <p>A destination for weekly and daily <u>retailing shopping</u> needs as well as for <u>community facilities</u>.</p> <p><u>In some cases, Neighbourhood Centres offer a broader range of activities including comparison shopping, entertainment (cafes, restaurants and bars), residential activities, small scale offices and other commercial activities.</u></p> <p><u>In some cases, .....</u></p>	<p><b>Centres: <u>Spreydon/ Barrington</u> (<del>Key Activity Centre</del>), <u>New ...</u></b></p> <p><b><u>Local Centres (small):</u></b>  Addington, Avonhead, Sumner, Akaroa, Colombo/Beaumont (Colombo Street between Devon Street and Angus Street), Cranford, Edgeware, <b><u>St Albans</u></b>, Fendalton, Beckenham, Halswell, Lyttelton, Ilam/Clyde, Parklands, Redcliffs, Richmond, St Martins, <u>Stanmore/Worcester Linwood Village</u>, Sydenham South (Colombo Street between</p>

<sup>3</sup> <https://chch2023.ihp.govt.nz/assets/Council-Memo/Correspondence/Memorandum-of-Counsel-for-Christchurch-City-Council-18-August-2023.pdf>

<p>The extent of the centre <del>is the</del> <b>Local Centre Zone</b></p> <p>a. <del>is the</del> <b>Commercial Core Zone in the identified centres, Commercial Local Zone at Wigram and Beckenham</b> and <del>the</del> Commercial Banks Peninsula Zone at Lyttelton and Akaroa; <del>and</del></p> <p>b. <del>Community facilities within walking distance (400 metres) of the centre.</del></p> <p>(Plan Change 5B Council Decision)</p>	<p>Brougham Street and Southampton Street), Wairakei/Greens Road, Wigram (<del>emerging</del>), Woolston, Yaldhurst (<del>emerging</del>), <del>West Spreydon (Lincoln Road) Hillmorton, Aranui,</del> North West Belfast <del>Prestons, Barrington (Key Activity Centre), New Brighton (Key Activity Centre), Bishopdale.</del></p> <p>Size: 3,000 to 30,000m<sup>2</sup> <del>GFA.</del></p>
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### 15.3 How to interpret and apply the rules...

- a. The rules that apply to activities in ...
- b. Area specific rules also apply to activities within the ~~Commercial Core~~ **Town Centre, Local Centre, and Neighbourhood Centre Zones** and Commercial Local Zone in the following areas:
  - vi. ~~Commercial Core~~ **Local Centre** Zone (Other areas) - ~~Rule 15.4.6~~ **15.5.6**  
~~these being:~~
    - ~~Commercial Core~~ **Local Centre** Zone (Land between Huxley Street and King Street)
    - ~~Commercial Core~~ **Local Centre** Zone (Fendalton)
    - ~~Commercial Core~~ **Local Centre** Zone (Wigram – The Runway)
    - Local Centre Zone (St Albans) as identified in Appendix 15.15.5**
  - vii. ~~St Albans~~ **Neighbourhood Centre Zone** (as identified in Appendix 15.15.5) – ~~Rule 15.5.3~~ **15.6.3**

## 15.5 Rules – Commercial Core Local Centre Zone

### 15.5.6. Area-specific activities - Commercial Core Local Centre Zone (Other areas)

#### 15.5.6.1 Area specific permitted activities b.

- a. The activities listed below are permitted activities if they meet the activity specific standards set out in this table.

Activity		Activity specific standards
<b>P1</b>	Any activity or building in the <b>Commercial Core Local Centre</b> Zone between Huxley Street and King Street (Refer to <a href="#">Appendix 15.15.4</a> )	Development is to comply with the development plan for the land between Huxley Street and King Street (Refer to <a href="#">Appendix 15.15.4</a> ).
<b>P2</b>	Any activity or building in the North-West Belfast Commercial Core Zone (Refer to <a href="#">Appendix 15.15.11</a> ).  (Plan Change 5F Council Decision subject to appeal)	Development is to comply with the outline development plan for the North-West Belfast Commercial Core Zone (Refer to <a href="#">Appendix 15.15.11</a> ).  Development is to comply with the North West Belfast Outline Development Plan (Refer to <a href="#">Appendix 8.10.23</a> )  (Plan Change 5F Council Decision subject to appeal)
<b>P3</b>	<b><u>Any activity or building in the St Albans Local Centre Zone (Refer to Appendix 15.15.5)</u></b>	<b><u>Development is to comply with:</u></b> a. <b><u>All the following key structuring elements on the Commercial Local Neighbourhood Centre Zone (St Albans) Development Plan (see Appendix 15.15.5), being:</u></b> i. <b><u>Public access and circulation within Local Centre Zone to enable permeability through the site; and</u></b> ii. <b><u>Semi-public access and circulation with Residential Zone.</u></b>



### 15.4.6.1.2 Area-specific controlled activities

There are no controlled activities.

### 15.5.6.1.3 Area-specific restricted discretionary activities

- a. The activities listed below are restricted discretionary activities.
- b. Discretion to grant or decline consent and impose conditions is restricted to the matters of discretion set out in [Rule 15.134.3](#) and [15.134.4.8](#), as set out in the following table.

(Plan Change 5F Council Decision)

	Activity	The Council's discretion shall be limited to the following matters:
RD1	Any activity or <b>building</b> not complying with the development plan for the land between Huxley Street and King Street (Refer to <a href="#">Appendix 15.15.4</a> ).	Development Plan for land between Huxley Street and King Street – <a href="#">Rule 15.134.3.11</a>
RD2	<ul style="list-style-type: none"> <li>a. <b>Vehicle access</b> from Otarā Street to the <b>Commercial Core Local Centre</b> Zone (Fendalton)</li> <li>b. Any application arising from <a href="#">Rule 15.5.6.1.3</a> RD2 shall not be limited or publicly notified.</li> </ul>	Access off Otarā Street at <b>Commercial Core Local Centre</b> Zone (Fendalton) – <a href="#">Rule 15.134.3.14</a>
RD3	<p>Any activity that does not comply with <a href="#">Rule 15.4.8.2.1</a> <a href="#">15.5.6.2.1</a>.</p> <p>(Plan Change 5B Council Decision)</p>	<p>Maximum retail activity threshold – <a href="#">Rule 15.134.4.7.1</a></p> <p>(Plan Change 5B Council Decision)</p>

RD4	<p>a. Any activity or building that does not comply with the outline development plan in Appendix 15.15.11.</p> <p>(Plan Change 5F Council Decision subject to appeal)</p>	<p>Matter of discretion in Rule 15.134.4.8</p> <p>(Plan Change 5F Council Decision subject to appeal)</p>
RD5	<p><u>Any activity or building that does not comply with one or more of the key structuring elements on the Local Centre Zone (St Albans) Development Plan (refer Appendix 15.15.5).</u></p>	<p>a. <u>Development Plan – Rule 15.14.4.5.1</u></p>
RD6	<p><u>Any activity or building that does not meet one or more of the built form standards in Rule 15.6.6.2.2 on the Local Centre Zone (St Albans) Development Plan (refer Appendix 15.15.5).</u></p>	<p>b. <u>Maximum retail activity threshold – Rule 15.14.4.5.2</u></p>

#### 15.5.6.2 Area-specific built form standards – ~~Commercial Core~~ Local Centre Zone (Other Areas)

~~Advice note: There is no spare, or limited, wastewater, storm water, or water supply infrastructure capacity in some areas of Christchurch City which may create difficulties in granting a building consent for some developments. Alternative means of providing for those services may be limited or not available. Compliance with the District Plan does not guarantee that connection to the Council's reticulated infrastructure is available or will be approved. Connection to the Council's reticulated infrastructure requires separate formal approval from the Council. There is a possibility that approval to connect will be declined, or development may trigger the need for infrastructure upgrades or alternative servicing at the developer's cost. Anyone considering development should, at an early~~

~~stage, seek information on infrastructure capacity from Council's Three Waters Unit. Please contact the Council's Three Waters Unit at [WastewaterCapacity@ccc.govt.nz](mailto:WastewaterCapacity@ccc.govt.nz), [WaterCapacity@ccc.govt.nz](mailto:WaterCapacity@ccc.govt.nz) and [Stormwater.Approvals@ccc.govt.nz](mailto:Stormwater.Approvals@ccc.govt.nz).~~

**15.5.6.2.1** Maximum retail activity threshold – Wigram (The Runway)

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**15.5.6.2.2** Maximum retail activity threshold – St Albans

**a. The maximum GLFA for non-residential activity shall be as follows:**

- i. There shall be a maximum 3500m<sup>2</sup> GLFA of non-residential activities within combined areas A and B defined on the Commercial Local Neighbourhood Centre Zone (St Albans) Development Plan (see Appendix 15.15.5); and**
- i. One individual tenancy in areas A and B shall have a maximum of 800m<sup>2</sup> GLFA of retail activity; and**
- ii. no other individual tenancy in areas A and B shall have greater than 450m<sup>2</sup> GLFA of retail activity.**

**b. Any application arising from this rule shall not be limited or publicly notified.**

**15.56 Rules – Commercial Local Neighbourhood Centre Zone**

**~~15.5.6.3 – Area specific rules – Commercial Local Neighbourhood Centre Zone (St Albans)~~**

~~The following rules apply to the areas specified. All activities specified are also subject to Rules~~

~~[15.56.1](#) and [15.56.2](#) unless otherwise specified.~~

**~~15.56.3.1 Activity-specific activities – Commercial Local Neighbourhood Centre Zone (St Albans)~~**

**~~15.56.3.1.1 – Permitted activities~~**

~~**a.** The activities listed below are permitted activities if they meet the activity specific standards set out in this table and the built form standards in Rule~~

~~15.56.3.2.~~

	<b>Activity</b>	<b>Activity specific standards</b>
<b>P1</b>	<del>Any activity or building.</del>	<p>Compliance with:</p> <p>All the following key structuring elements on the <b>Commercial Local Neighbourhood Centre Zone (St Albans) Development Plan</b> (see Appendix 15.15.5), being:</p> <p>i. <del>Public access and circulation within <b>Commercial Local Neighbourhood Centre Zone</b> to enable permeability through the site; and</del></p> <p>ii. <del>Semi-public access and circulation with Residential Zone.</del></p>

**15.56.3.1.2 — Controlled activities**

~~There are no controlled activities.~~

**15.56.3.1.3 — Restricted discretionary activities**

~~a. The activities listed below are restricted discretionary activities.~~

~~b. Discretion to grant or decline consent and impose conditions is restricted to the matters of discretion in Rule 15.14.4.5 ~~15.5.3.3~~, as set out in the following table.~~

	<b>Activity</b>	<b>The Council's discretion shall be limited to the following matters:</b>
<b>RD1</b>	<del>Any activity or building that does not comply with one or more of the key structuring elements on the <b>Commercial Local Neighbourhood Centre Zone (St Albans) Development Plan</b> (see Appendix 15.15.5)</del>	<del>Development Plan — Rule <u>15.134.4.5.1</u></del>
<b>RD2</b>	<p><del>Any activity or building that does not meet one or more of the built form standards in Rule <u>15.56.3.2.1</u>.</del></p> <p>Advice note:</p> <p><del>1. Refer to relevant built form standard for provisions regarding notification.</del></p>	<del>Maximum retail activity threshold — Rule <u>15.134.4.5.2</u></del>

**15.56.3.1.4 — Discretionary activities**

~~There are no discretionary activities.~~

**15.56.3.1.5 — Non-complying activities**

There are no non-complying activities.

**15.56.3.1.6 — Prohibited activities**

There are no prohibited activities.

**15.56.3.2 — Area-specific built form standards — Commercial Local Neighbourhood Centre Zone (St Albans)**

~~Advice note: There is no spare, or limited, wastewater, storm water, or water supply infrastructure capacity in some areas of Christchurch City which may create difficulties in granting a building consent for some developments. Alternative means of providing for those services may be limited or not available. Compliance with the District Plan does not guarantee that connection to the Council's reticulated infrastructure is available or will be approved. Connection to the Council's reticulated infrastructure requires separate formal approval from the Council. There is a possibility that approval to connect will be declined, or development may trigger the need for infrastructure upgrades or alternative servicing at the developer's cost. Anyone considering development should, at an early stage, seek information on infrastructure capacity from Council's Three Waters Unit. Please contact the Council's Three Waters Unit at [WastewaterCapacity@ccc.govt.nz](mailto:WastewaterCapacity@ccc.govt.nz), [WaterCapacity@ccc.govt.nz](mailto:WaterCapacity@ccc.govt.nz) and [Stormwater.Approvals@ccc.govt.nz](mailto:Stormwater.Approvals@ccc.govt.nz).~~

**15.56.3.2.1 — Maximum non-residential floor space limits in the Commercial Local Neighbourhood Centre Zone (St Albans)**

**a.** — The maximum GLFA for non-residential activity in the **Commercial Local Neighbourhood Centre Zone (St Albans)** shall be as follows:

	Standard
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i.	<p><del>There shall be a maximum 3500m<sup>2</sup> GLFA of non-residential activities within combined areas A and B defined on the <b>Commercial Local Neighbourhood Centre Zone (St Albans) Development Plan (see Appendix 15.15.5); and</b></del></p> <p><del>i. one individual tenancy in areas A and B shall have a maximum of 800m<sup>2</sup> GLFA of retail activity; and</del></p> <p><del>ii. no other individual tenancy in areas A and B shall have greater than 450m<sup>2</sup> GLFA of retail activity.</del></p>
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~~b. Any application arising from this rule shall not be limited or publicly notified.~~

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#### **15.1314.4.5 Area-specific rules - Matters of discretion – Commercial **Local Neighbourhood Centre Zone (St Albans)****

##### **15.1314.4.5.1 Development plan**

- a. The extent to which comprehensive, mixed-use development would continue to be achieved;
- b. The nature and degree of any adverse effects caused by proposals not in accordance with the development plan;
- c. The relationship and integration of proposals with any other existing development within the block;
- d. Whether the scale and nature of development is consistent with that anticipated for a **Local Neighbourhood centre**;
- e. The degree to which vehicle, cycle and pedestrian access has provided for internal pedestrian and cycle circulation, including the connections with that part of the blocked zoned Residential **Medium Density Zone**;
- f. The extent to which comprehensive design enables greater use of open space within the development than would be the case with piecemeal development; and
- g. The extent to which stormwater treatment areas are integrated with open space.

##### **15.1314.4.5.2 Maximum retail activity threshold**

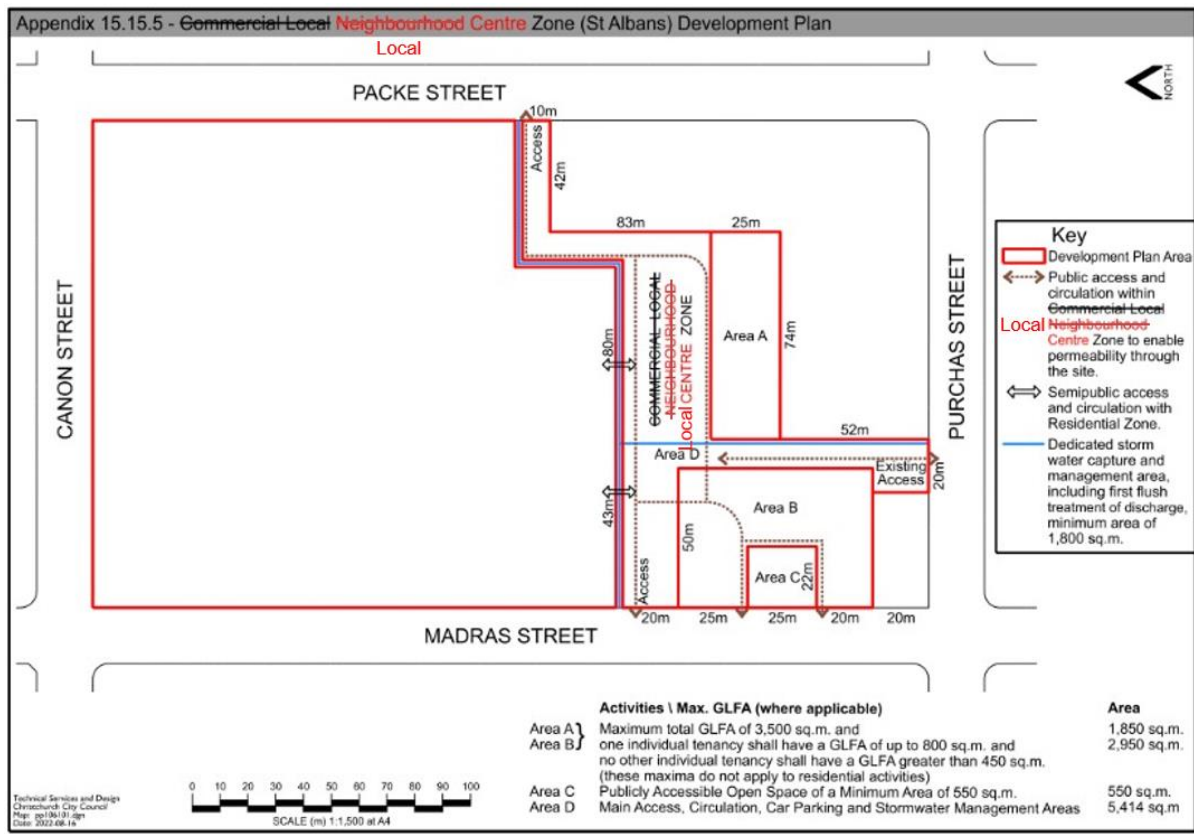
- a. The effects of any larger floor space for non-residential activity on **the Central City, District centres Town Centres and Neighbourhood Local centres.**

- b. Any effects in terms of traffic generation and access.
- c. The maintenance of permeability within the block for internal pedestrian and cycle circulation including the connections with that part of the block within the residential zone.
- d. Form, amenity and function of the **Commercial-Local Neighbourhood Centre** Zoned area as a **Local Neighbourhood centre** would be maintained.
- e. Any potential for the role of other **Commercial centres** to be eroded by development or urban form effects, and any wider transport network effects from any associated transport generation.

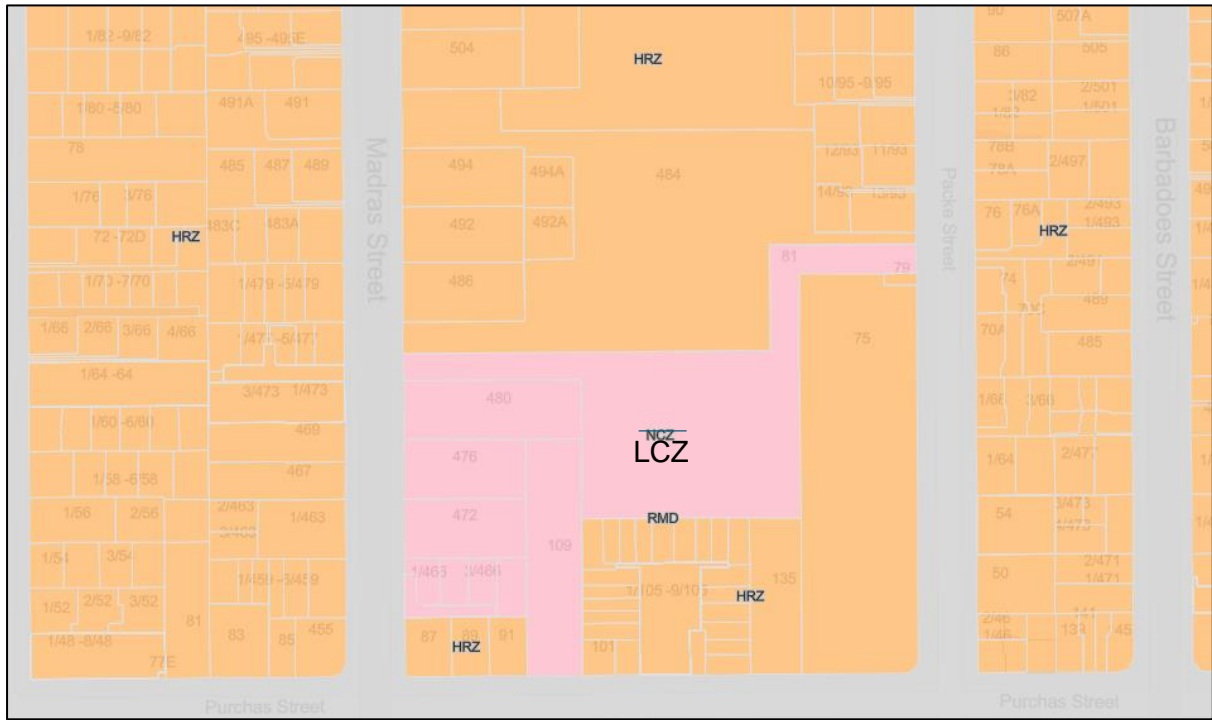
(Plan Change 5B Council Decision)

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### Appendix 15.15.5 Commercial Local Neighbourhood Centre Zone) St Albans Development Plan



# Planning Maps





## Attachment C – s32AA: St Albans

Note: Table 1 below comprises the tabulated form of the s32AA analysis provided in Paragraph 78 of the Evidence in Chief.

	Option 1 – Status Quo (St Albans Neighbourhood Centre)
<b>Environmental</b>	
<ul style="list-style-type: none"> <li>• Benefits</li> </ul>	<ul style="list-style-type: none"> <li>• Some overlap / consistency in terms of land area with largest scale Neighbourhood Centres.</li> <li>• Anticipates some range of convenience retail and community service activities.</li> </ul>
<ul style="list-style-type: none"> <li>• Costs</li> </ul>	<ul style="list-style-type: none"> <li>• Irregular shape reduces comprehensive development.</li> <li>• Bespoke (operative) plan provisions allow up to 3,500m<sup>2</sup> GLFA of total floorspace which would put St Albans beyond the upper limit of local centres according to Table 15.1 of Policy 15.2.2.1 if all floorspace was realised.</li> <li>• Misalignment with bespoke provisions limit the largest store to 800m<sup>2</sup> <sup>4</sup>GLFA as a permitted activity rather than 1,000m<sup>2</sup> GLFA in other Neighbourhood Centres<sup>5</sup>.</li> <li>• Misalignment with bespoke provisions limit the 'other individual' tenancies to a maximum of 450m<sup>2</sup> GLFA as a permitted activity<sup>6</sup> rather than a maximum tenancy (excluding supermarket) to 350m<sup>2</sup> GLFA in other Neighbourhood centres<sup>7</sup>.</li> </ul>
<b>Economic</b>	
<ul style="list-style-type: none"> <li>• Benefits</li> </ul>	<ul style="list-style-type: none"> <li>• Provides some investment certainty as range of commercial and community activities able to be provided for (landowner).</li> <li>• Role and function reinforced at a Policy level in terms of consideration of impacts on centres hierarchy, requiring Plan Change request to</li> </ul>

<sup>4</sup> Rule 15.6.3.2.1(a)(i)

<sup>5</sup> Rule 15.6.1.1(P2) Supermarkets outside the Central City.

<sup>6</sup> Rule 15.6.3.2.1(a)(ii)

<sup>7</sup> Rule 15.6.1.1(P3)

	consider a more commensurate consideration of appropriate role and function to service catchment needs (duplicate cost and benefit).
<ul style="list-style-type: none"> <li>• Costs</li> </ul>	<ul style="list-style-type: none"> <li>• Role and function reinforced at a Policy level in terms of consideration of impacts on centres hierarchy, requiring Plan Change request to consider (with greater certainty as to outcome) a more commensurate consideration of appropriate role and function to service catchment needs (duplicate cost and benefit).</li> <li>• Some overlap with Edgware Centre role and function (although this will not exceed anticipated effects from the operative District Plan given existing plan retail floorspace thresholds).</li> </ul>
Social	
<ul style="list-style-type: none"> <li>• Benefits</li> </ul>	<ul style="list-style-type: none"> <li>• Accessibility for immediate catchment as to meeting wellbeing needs.</li> </ul>
<ul style="list-style-type: none"> <li>• Costs</li> </ul>	<ul style="list-style-type: none"> <li>• Smallest centre (zone) in the hierarchy. Policy seeks to anticipate a small group of shops / premises to serve the convenience needs of the immediately surrounding residential area.</li> </ul>
Cultural	
<ul style="list-style-type: none"> <li>• Benefits</li> </ul>	-
<ul style="list-style-type: none"> <li>• Costs</li> </ul>	-
Efficiency	Some costs (environmental and economic) given increasing density of surrounding HDZ, alignment of operative plan thresholds with policy provisions.
Effectiveness	As above, some misalignment between role and function of centre, place in the centres hierarchy and operative thresholds. Some consistency with higher order provisions – <b>Objective 15.2.1, Objective 15.2.2, CRPS Objective 6.2.5, Policy 6.3.6 (4).</b>

	Option 2 – Amend Zoning to Local Centre
<b>Environmental</b>	
<ul style="list-style-type: none"> <li>• Benefits</li> </ul>	<ul style="list-style-type: none"> <li>• Accessible by a range of transport types within a rapidly intensifying inner city residential suburb.</li> <li>• Greater alignment with Policy 15.2.2.1 / Table 15.1 given provisions (operative thresholds) enable larger tenancies and total floorspace than provided in Neighbourhood Centres.</li> <li>• Some overlap / consistency in terms of scale with other 'local centres' (small) – refer Table 15.1.</li> <li>• Alignment with definition of Local Centre in National Planning Standards (Chapter 8) as anticipated supermarket will serve wider catchment than just immediate needs.</li> </ul>
<ul style="list-style-type: none"> <li>• Costs</li> </ul>	<ul style="list-style-type: none"> <li>• Irregular shape reduces comprehensive development.</li> </ul>
<b>Economic</b>	
<ul style="list-style-type: none"> <li>• Benefits</li> </ul>	<ul style="list-style-type: none"> <li>• Increased investment certainty as to more diverse range of commercial and community activities able to be provided for (landowner).</li> <li>• Given scale limited or no ability to generate distributional / agglomeration effects on Central City (noting also restraints on Office activity)<sup>8</sup>.</li> </ul>
<ul style="list-style-type: none"> <li>• Costs</li> </ul>	<ul style="list-style-type: none"> <li>• Some overlap with Edgware Centre role and function (although this will not exceed anticipated effects from the operative District Plan) – as operative retail floorspace thresholds / activity status is retained.</li> </ul>
<b>Social</b>	
<ul style="list-style-type: none"> <li>• Benefits</li> </ul>	<ul style="list-style-type: none"> <li>• Increased certainty as to more diverse range of commercial and community activities (as permitted) provided for, including weekly and daily convenience and wellbeing needs.</li> <li>• Surrounded by HDZ as provided in notified PC14, thereby increased accessibility to a broader role and function as anticipated by a local centre zone.</li> </ul>

<sup>8</sup> In addition to matrix of other provisions (i.e total floorspace of 3,500GLFA) - Local Centre Rule 15.5.1.1(P11) 500m<sup>2</sup> GLFA, Neighbourhood Centre Rule 15.6.1.1(P10) 350m<sup>2</sup> GLFA.

• Costs	-
Cultural	
• Benefits	NA
• Costs	NA
Efficiency	Increased efficiency (compared to Option 1) given improved alignment between scale, operative plan thresholds (to be retained) and role and function of St Albans as a commercial centre.
Effectiveness	Retains retail thresholds (and hence alignment with centres hierarchy) and distributional effects – <b>Objective 15.2.1, Objective 15.2.2, CRPS Objective 6.2.5, Policy 6.3.6 (4).</b>

**Conclusion:** The commercial zoning already exists (including floorspace thresholds). Hence material differences in efficiency and effectiveness are not substantial (including managing distributional effects). However, amendment of the zoning to that of a local centre is more aligned (*effective*) with the Policy framework (and zoned scale and role) of the St Albans Centre and the benefits outweigh the costs (*efficiency*).