



Mackenzie
DISTRICT PLAN REVIEW

TOMORROW'S MACKENZIE
KA AWATEA HŌU

**Section 32 Report: Plan Change 21 – Implementing the
Spatial Plans (Residential, Commercial and Industrial Zoning
and Zone Frameworks)**

Date: 20 September 2022

1. Introduction

Purpose of this report

- 1.1. Section 32 ('s32') of the Resource Management Act 1991 ('the RMA') requires an evaluation to be undertaken of the changes proposed to the Mackenzie District Plan ('District Plan') through Plan Change 21 (PC21). The evaluation must be provided in a report which examines whether the objectives are the most appropriate in achieving the purpose of the RMA, and whether the policies and methods, taking into account their costs, benefits, efficiency and effectiveness, are the most appropriate way to achieve the objectives. The report must also assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions. The analysis set out in this report is to fulfil the obligations of the Council under s32 of the RMA.

Topic

- 1.2. This s32 report relates to the zoning and management of the residential, commercial and industrial areas. It proposes to largely replace Sections 5 (Business) and 6 (Residential) of the operative District Plan, with new 'Residential Zones', 'Commercial and Mixed Zones' and 'General Industrial Zone' chapters, aligning with the National Planning Standards framework, along with two 'Precincts' chapters and two 'Development Area' chapters.

District Plan Review Process

- 1.3. The introduction of chapters relating to residential, commercial and industrial areas, as well as application of these zones, is part of Stage 2 of the overall review of the District Plan.
 - 1.4. Prior to the District Plan Review, the Mackenzie District Council (the Council), prepared the Mackenzie Spatial Plans, to provide a high-level plan for growth and development of each of the District's towns and small settlements over the next 30 years. These Plans were developed with input from each community, and are intended to ensure each town can grow in a sustainable way, while protecting what makes them special for years to come. While the Spatial Plans form the basis for the zoning proposed in PC21, further background work was undertaken to consider the zoning, and determine the appropriate framework to apply to each zone.
 - 1.5. The background technical work involved:
 - a review of the operative District Plan provisions relating to Business and Residential Zones;
 - identification of key issues arising from the current provisions;
 - a review of relevant planning documents;
 - a review of the approach taken in other district plans;
 - technical input (landscape, ecological, infrastructure and hazards) in relation to the potential rezoning of areas beyond the current urban boundary identified in the Spatial Plans; and
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- urban design advice in relation to the rule framework applying within the Medium Density Residential Zone (refer Appendix A) and the Takapō / Lake Tekapo Precinct (refer Appendix B), alongside the preparation of Design Guides relating to these.

1.6. Engagement with the community was then undertaken on the key issues identified from the background work undertaken, as well as potential options to address those issues, and the feedback received was then used to inform a 'Preferred Approach' to the zoning and management of residential, commercial and industrial areas within the District. The Preferred Approach was then used to draft the proposed provisions, which are evaluated in this report.

Provisions

1.7. This s32 report relates to the following chapters proposed within Part 3 – Area-Specific Matters of the District Plan and Part 4 – 'Appendices and Maps':

- Residential Zones:
 - Large Lot Residential Zone (LLRZ)
 - Low Density Residential Zone (LRZ)
 - Medium Density Residential Zone (MRZ)
- Commercial and Mixed Use Zones
 - Neighbourhood Centre Zone (NCZ)
 - Large Format Retail Zone (LFRZ)
 - Mixed Use Zone (MUZ)
 - Town Centre Zone (TCZ)
- General Industrial Zone (GIZ)
- Precincts
 - Takapō / Lake Tekapo Precinct (PREC1)
 - Commercial Visitor Accommodation Precinct (PREC2)
- Development Areas
 - Takapō / Lake Tekapo West Future Development Area (DEV1)
 - Takapō / Lake Tekapo North-West Future Development Area (DEV2)
- APP1 – Height in Relation to Boundary
- APP2 – Takapō / Lake Tekapo Character Guide and Medium Density Residential Design Guide

1.8. PC21 proposes to introduce the following definitions from the National Planning Standards:

- accessory building;
 - ancillary activity
 - building
 - building coverage
 - building footprint
 - commercial activity
 - community facility
 - educational facility
 - environment
 - gross floor area
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- ground level
- habitable room
- height
- height in relation to boundary
- home business
- industrial activity
- minor residential unit
- net floor area
- net site area
- outdoor living space
- residential activity
- residential unit
- retirement village
- road
- site
- structure
- visitor accommodation

1.9. PC21 also proposes to introduce the following definitions:

- commercial visitor accommodation
- food and beverage outlet
- heavy industrial activity
- impervious coverage
- impervious surface
- landscaping
- residential visitor accommodation
- retail activity
- trade-based retail

1.10. PC21 also proposes to apply the Zones, Precincts and Development Areas, to those properties identified in the planning maps.

1.11. As a consequence of the above changes, PC21 proposes to make changes to the following sections of the Operative District Plan:

- Section 3 – Definitions
 - Section 5 – Business Zones
 - Section 6 – Residential Zones
 - Section 10 – Hazardous Substances
 - Section 13 – Subdivision
 - Section 15 – Transportation
 - Section 16 - Utilities
 - Appendix P - Lake Tekapo Design Guide
 - Appendix Q – Lake Tekapo Village Centre Outline Development Plan
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Relationship with other stages

- 1.12. PC21 does not include land zoned Tourist G. As this zone applies to a specific site in Glentanner that is separate from any urban area, it is intended to be considered as part of the consideration of 'Special Purpose Zones' in Stage 5 of the District Plan Review. PC21 therefore does not propose to delete the relevant parts of the Business Section in the current Plan that relate to this zone.
 - 1.13. PC21 does not include land zoned Industrial on Talbot Road legally described as RS 22282, Pt RS 26243, RS 20517, Lot 1 DP 310705 and Lot 1 and 2 DP 379684. This land is intended to be considered as part of Stage 3 'Rural and Subdivision Provisions' of the District Plan Review. PC21 therefore does not propose to delete the relevant parts of the Business Section in the current Plan that relate to the zoning of this land.
 - 1.14. PC21 does not include land zoned Industrial Deferred northeast of Ohau Road/Ostler Road in Twizel as this land is intended to be considered as part of Stage 5 of the District Plan Review. PC21 therefore does not propose to delete the relevant parts of the Business Section in the Plan that relate to this zone.
 - 1.15. PC21 does not include any Open Space and Recreation Zones, including those located within urban areas. These are intended to be considered in Stage 5 of the District Plan Review.
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2. Statutory context

- 2.1. Sections 74 and 75 of the RMA set out legal obligations when changing a District Plan. Consideration needs to be given to matters including whether the plan accords with the Council's functions under Section 31 of the RMA and the provisions of Part 2 of the RMA. They also direct how the plan is to be drafted/considered in relation to a range of other statutory documents. The following section sets out those matters addressed in sections 74 and 75 that are relevant to this topic.

Functions under s31

- 2.2. Section 31 sets out the functions given to territorial authorities for the purpose of giving effect to the RMA in their district. Of relevance to this topic, territorial authorities have the function of establishing, implementing and reviewing objectives, policies and methods to:
- achieve integrated management of the effects of the use, development or protection of land and associated natural and physical resources in the district (s31(1)(a));
 - ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district (s31(1)(aa));
 - control the actual and potential effects of use, development or protection of land (s31(1)(b)).

Part 2 of the RMA – Sections 5, 6, 7 & 8

- 2.3. Section 5 of the RMA sets out the purpose of the RMA as being to promote the sustainable management of natural and physical resources.
- 2.4. Sustainable management, as defined in section 5, relates to how natural and physical resources are managed so as to provide for the well-being and for their health and safety of people and communities while also: sustaining the potential of those resources for future generations; safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and managing the adverse effects of activities on the environment. This is relevant to the zone frameworks in PC21, as these chapters seek to articulate how community well-being is to be provided for in the management of resources located in these urban areas, and provides a framework for how adverse effects on the environment from activities in these areas are to be managed. The rezoning of land also responds to the expected demand for growth, in order to meet the needs of future generations.
- 2.5. Section 6 contains a number of matters which requires persons exercising functions under the Act to recognise and provide for, as matters of national importance. This includes the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development; and the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna. This is relevant to PC21, as it proposes to rezone two areas of land located at the edges of the Takapō / Lake Tekapo and Twizel townships which are currently located within the Mackenzie Basin, and located within the Outstanding Natural Landscape (ONL), a landscape which is also known to have areas of significant indigenous biodiversity.
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- 2.6. Section 7 lists other matters to which particular regard must be had and relevant to the zone frameworks in PC21, includes: the efficient use and development of natural and physical resources (s7(b)); the maintenance and enhancement of amenity values and the quality of the environment (s7(c) and s7(f)). The PC21 provisions therefore need to consider the maintenance and enhancement of the amenity values anticipated in each zone, as well as their environmental quality. Consideration must also be given to the efficient use of land and existing physical resources, both in terms of the zone frameworks, as well as in the zoning of properties.
- 2.7. Section 8 requires that the principles of Te Tiriti o Waitangi / the Treaty of Waitangi shall be taken into account when exercising powers and functions under the RMA. These principles are relevant to the PC21 chapters, in terms of how mana whenua are involved in resource management matters in these areas.

National Planning Standards

- 2.8. Section 75(3)(ba) of the RMA requires the district plan to give effect to any national planning standard. The District Plan Structure Standard is particularly relevant to PC21, as it directs the choice of zones and structure of these zone chapters within the Plan Framework. The Zone Framework Standard directs that a district plan must only contain the zones listed in that standard, and consistent with the descriptions set out for each zone. Notably, none of the current zones used within the District Plan align with the options from this Standard. There are specific criteria that must be met in order to create an additional special purpose zone. The District Spatial Layers Standard also sets out the spatial layers that can be used within district plans, and when they can be used. These include zones, overlays, precincts, specific controls and development areas.

Planning Documents

Table 1: Planning Documents

Regional Policy Statements		
Relevance: District Plan must give effect to (Section 75(3)(c))		
Canterbury Regional Policy Statement	<p>Objective 5.2.1 Development is located and designed so that it functions in a way that:</p> <ol style="list-style-type: none"> 1. achieves consolidated, well designed and sustainable growth in and around existing urban areas as the primary focus for accommodating the region's growth; and 2. enables people and communities, including future generations, to provide for their social economic and cultural well-being and health and safety; and which: <ul style="list-style-type: none"> • provides sufficient housing choice to meet the region's housing needs; • encourages sustainable economic development by enabling business activities in appropriate locations; 	<p>The location of residential and business activities will need to be aligned with achieving consolidated growth focussed on existing urban areas, and ensuring that sufficient housing choice is provided to meet housing needs, and a range of business activities are enabled in the right places.</p> <p>Management of the District's business areas will also need to consider significant resources, and the need to manage potentially incompatible activities.</p>

	<ul style="list-style-type: none"> • is compatible with, and will result in the continued safe, efficient and effective use of regionally significant infrastructure; • avoids adverse effects on significant natural and physical resources including regionally significant infrastructure, and where avoidance is impracticable, remedies or mitigates those effects on those resources and infrastructure; • avoids conflicts between incompatible activities. 	
	<p>Policy 5.3.1 To provide, as the primary focus for meeting the wider region’s growth needs, sustainable development patterns that:</p> <ol style="list-style-type: none"> 1. ensure that any <ol style="list-style-type: none"> a. urban growth; and b. limited rural residential development occur in a form that concentrates, or is attached to, existing urban areas and promotes a coordinated pattern of development; 2. encourage within urban areas, housing choice, recreation and community facilities, and business opportunities of a character and form that supports urban consolidation; 3. promote energy efficiency in urban forms, transport patterns, site location and subdivision layout; 4. maintain and enhance the sense of identity and character of the region’s urban areas; and 5. encourage high quality urban design, including the maintenance and enhancement of amenity values. 	<p>Similar to Objective 5.2.1, implementation of this policy requires that any urban expansion is concentrated in, or attached to existing urban areas; that housing choice is provided, and that business opportunities are of a character and form that supports urban consolidation. The existing character of each urban area should also be maintained or enhanced, and high quality urban design encouraged.</p>
	<p>Policy 5.3.2 To enable development including regionally significant infrastructure which:</p> <ol style="list-style-type: none"> 1. ensure that adverse effects are avoided, remedied or mitigated, including where these would compromise or foreclose: <ol style="list-style-type: none"> a. existing or consented regionally significant infrastructure; b. options for accommodating the consolidated growth and development of existing urban areas; c. the productivity of the region’s soil resources, without regard to the need to make appropriate use of soil which is valued for existing or foreseeable future primary production, or through further fragmentation of rural land; 	<p>This policy requires that development does not compromise regionally significant infrastructure, nor foreclose options for accommodating consolidated growth of existing urban areas, or productivity of soils. It further requires that development avoids or mitigates hazards, and reverse sensitivity effects, and is integrated with infrastructure, including traffic networks.</p>

	<ul style="list-style-type: none"> d. the protection of sources of water for community supplies; e. significant natural and physical resources; <p>2. avoid or mitigate:</p> <ul style="list-style-type: none"> a. natural and other hazards, or land uses that would likely result in increases in the frequency and/or severity of hazards; b. reverse sensitivity effects and conflicts between incompatible activities, including identified mineral extraction areas; and <p>3. integrate with:</p> <ul style="list-style-type: none"> a. the efficient and effective provision, maintenance or upgrade of infrastructure; and b. transport networks, connections and modes so as to provide for the sustainable and efficient movement of people, goods and services, and a logical, permeable and safe transport system. 	
	<p>Policy 5.3.5 Within the wider region, ensure development is appropriately and efficiently served for the collection, treatment, disposal or re-use of sewage and stormwater, and the provision of potable water, by:</p> <ul style="list-style-type: none"> 1. avoiding development which will not be served in a timely manner to avoid or mitigate adverse effects on the environment and human health; ... 	This policy requires that any urban development is able to be adequately serviced.
	<p>Policy 7.3.5 To avoid, remedy or mitigate adverse effects of land uses on the flow of water in surface water bodies or the recharge of groundwater by:</p> <ul style="list-style-type: none"> 1. controlling the diversion of rainfall run-off over land, and changes in land uses, site coverage or land drainage patterns that will, either singularly or cumulatively, adversely affect the quantity or rate of water flowing into surface water bodies or the rate of groundwater recharge; and ... 	The method under this policy directs local authorities, as part of zoning of land for residential, commercial or industrial uses, to consider the effects of changes in land uses on land drainage patterns and stormwater disposal requirements.
<p>Regional Plans Relevance: District Plan must not be inconsistent with (Section 75(4)(b))</p>		
Canterbury Air Regional Plan	Contains provisions aimed at managing air pollution.	It is noted that the current Plan includes rules relating to dust that duplicate this regional plan.
Land and Water Regional Plan	Directs how land and water is managed in the Canterbury region in relation to the regional council's functions for those activities.	It is noted that the current Plan includes rules relating to discharges that duplicate this regional plan.

Plans or strategies prepared under other legislation Relevance: District Plan must have regard to (Section 74(2)(b)(i))		
Mackenzie Spatial Plans 2021	Set a 30-year vision for the future of the District's towns and settlements, including identification of locations for growth and changes of zoning/ land use within the District's townships.	<i>This is discussed further below.</i>
Economic Development Strategy 2021 - 2025	Sets out the criteria that Council uses to guide decision making relating to the District's economic and business sector development. In recognising the impact of the tourism downturn on the community's wellbeing, seeks to facilitate enhanced tourism, or other economic opportunities.	Emphasises the importance of business activities to the community's economic and social well-being. The District Plan can help facilitate these activities, while also ensuring their adverse effects are appropriately managed.
Long Term Plan 2021-31	Identifies the activities Council intends to carry out over the next ten years, their cost, and how they will be funded.	The servicing requirements for new growth should take into account upgrades planned in the Long Term Plan.
Te Manahuna Ki Uta / Destination Mackenzie	Is intended to provide strategic direction on how tourism within the District will be managed, to guide planning within and across agencies.	The document provides direction that is relevant to how the District Plan manages tourism activities, including visitor and workers accommodation.

Mackenzie Spatial Plans

2.9. The Mackenzie Spatial Plans were adopted in September 2021 and provide a high-level blueprint for how the townships and rural settlements in the District will grow and develop over the next 30 years. The Plans were drafted based on extensive community engagement along with expert advice and are intended to inform future land use patterns and District Plan Zones as well as create a shared vision for how the towns and rural settlements will develop.

Residential Zones

2.10. Three Residential Zones were included in the Spatial Plans: Large Lot; Low Density; and Medium Density. Within the Plans, these were described as follows:

Table 2: Spatial Plan Residential Zones Description

Zone	Description
Medium Density Residential Density – 30 to 40 Dwellings/Hectare Typical Section Size – 250 to 300m ² Typical Housing Types – Semi attached terrace houses, attached terrace houses, low	Medium density residential housing offers high density housing such as two storey townhouse style development. It has been identified in areas closest to town centers in the three main townships and: <ul style="list-style-type: none"> • Offers a wide range of housing opportunities, particularly for those looking for smaller houses and lower maintenance properties • Improves affordability of housing by offering economies of scale and efficient use of land • Offers higher densities of residential populations close

rise apartments	<p>to town centers, encouraging walking and cycling over car use</p> <ul style="list-style-type: none"> • Provides for a mix of residential and visitor accommodation options without impacting traditional residential communities.
<p>Low Density Residential</p> <p>Density – 10 to 20 Dwellings/Hectare</p> <p>Typical Section Size – 400 to 600m²</p> <p>Typical Housing Types – Detached house</p>	<p>Low density residential offers the 'traditional' residential offering with standalone houses on sections between 400-600 sqm. It creates neighborhoods with regular contact between neighbours and larger spaces for indoor and outdoor recreation activities and:</p> <ul style="list-style-type: none"> • Are generally, within convenient walking or cycling distances to town centre and community facilities • Typically offered through large-scale subdivisions, creating affordability through volume. • Allows a balance of privacy and space, with a lower level of maintenance required. • Accommodates small to large household sizes, with space for children to play, vegetable gardens, recreation etc.
<p>Large Lot Residential</p> <p>Density – 2 to 4 Dwellings/Hectare</p> <p>Typical Section Size – 2,000 to 4,000m²</p> <p>Typical Housing Types – Detached houses on a large section</p>	<p>Large lot residential housing offers larger sections and a more rural feel. They are located further away from town centres and community facilities than higher density housing and:</p> <ul style="list-style-type: none"> • Provide detached housing on a larger section which can accommodate larger household sizes. • More privacy and space for a range of recreational activities, increased ability to be self-reliant. • More reliance on the use of vehicles to access most destinations. • Higher property maintenance requirements due to larger section sizes. • Less affordable due to larger property size and higher infrastructure costs.

2.11. The Low-Density Residential Zone tends to cover the existing Residential 1 Zone. The Large Lot Residential Zone tends to cover the existing Residential 3 and 4 Zones and the Medium Density Residential Zone tends to cover the existing Residential 2 Zone. However, to allow for infill and township growth the Spatial Plans envisage the following expansions:

- The Medium Density Residential Zone in Fairlie, Takapō / Lake Tekapo and Twizel has been expanded in areas close to the town centres and along State Highway 8;
- New Large Lot Residential and Low Density Residential land has been identified south and west of Fairlie;
- New Low Density Residential land off Andrew Don Drive has been identified in Takapō / Lake Tekapo;
- New Low Density and Medium Density Residential land off Murray Place and Highwayview Lane has been identified south of Takapō / Lake Tekapo;

- Pockets of new residential land has been identified within the Takapō / Lake Tekapo Golf Course;
- New residential land adjacent to Godley Peaks Road has been identified west of Tekapo / Lake Tekapo;
- The Low Density Zone in Twizel has been expanded to encompass North West Arch, which is currently zoned Residential 4;
- Some of the surrounding Rural Residential 1 Zone land in Twizel has been identified as Large Lot Residential;
- New Large Lot Residential land has been identified northwest of Twizel;
- New Large Lot Residential land has been identified in Kimbell; and
- New Low Density Residential land has been identified in Albury and Te Kopi-O-Ōpihi / Burkes Pass.

Business Zones

- 2.12. It is noted that the commercial areas in the Spatial Plans are labelled 'retail'. While a number of retail activities are located in these areas, the range of activities anticipated within them, such as commercial services and offices, is broader than simply retail, and would more usually be encompassed by the term 'commercial'. As such, the 'retail' areas identified in the Spatial Plans are referred to below as commercial areas.
- 2.13. In Fairlie, the Spatial Plan envisages a slight expansion/consolidation of the current commercial and main industrial area.
- 2.14. In Takapō / Lake Tekapo, the Spatial Plan proposes the retention of the existing commercial area with only a small expansion at its south-east edge, and anticipates some small additional, separate, areas of commercial zoning described as either "*opportunities for smaller scale community-based retail*", or for "*a business park development... for professional services and medical practices to establish away from the lake front*". It identifies land located to the west of the current commercial area, (currently zoned Residential 1 and 2) for 'High density Residential / Mixed Use'. It is also proposed to reduce the industrial-zoned area, rezoning its northern portion for large format retail.
- 2.15. In Twizel, the Spatial Plan proposes the expansion of the commercial area outwards along roads to the north east, and further consolidation of the area to the west. The western industrial area would be retained, with the eastern area identified for Large Format Retail zoning. An additional industrial area, to the east of SH79, is also identified.
- 2.16. In addition to the three main townships, new commercial zoning is proposed in the Spatial Plan for Albury, Kimbell and Te Kopi-O-Ōpihi / Burkes Pass. Two small areas are identified in Albury for industrial zoning.
- 2.17. In addition to rezoning, the following matters in the Spatial Plan are relevant to this topic:
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- Improving people’s access to water and the surrounding environment through better trails and views.
- Developing design guidance that builds on the distinctive local identity and character of each location.
- Ensuring there is a mix of activities and spaces within town centres to encourage their use and increase vibrancy.
- Encouraging building design and urban form that improves sustainability, both in terms of environmental footprint and impact on infrastructure.
- Making sure the right type of development happens in the right place, reducing negative impacts on the landscape and reverse sensitivity.

Visitor Accommodation

2.18. Specific Visitor Accommodation areas were identified in all three main townships in the adopted Spatial Plans. These are described in the Spatial Plan as being areas for “*higher density visitor accommodation, such as hotels and motels*”. The Visitor Accommodation areas include:

- The Fairlie Holiday Park on State Highway 79 (currently zoned Travelers Accommodation and Rural) and along Mt Cook Road (currently zoned Residential 2).
- The Takapō / Lake Tekapo Saleyards (currently zoned Residential 1), land on the corner of State Highway 8 and Grieg Street containing a hotel under construction (currently zoned Residential 2), Peppers Blue Water Resort and the Tourist Zone, the Takapō / Lake Tekapo Campground (currently zoned Special Travelers Accommodation Zone) and land within the Takapō / Lake Tekapo Golf Course.
- The Ruataniwha Holiday Park, the existing Tourist Zone in Twizel and within the Mackenzie Park Subdivision.

2.19. The approach to residential visitor accommodation activity was not addressed in the Spatial Plans, which instead noted that controls would likely be developed to address issues associated with this type of accommodation, through the District Plan review.

Other Zones within the Spatial Plans and how they are addressed in PC21

2.20. The Spatial Plans identified areas for ‘Community Facilities’ (applied to existing activities such as schools, early childhood centres, emergency service facilities, medical centres and churches), ‘Car Parking’ and for ‘Utilities’ (such as wastewater treatment ponds). It is noted that the NP Standards do not provide specifically for these types of zones. Where these areas are included in the land proposed to be rezoned through PC21, they have instead been zoned as the most logical residential, commercial and mixed use or industrial zone.

2.21. The Spatial Plans also identified ‘Open Space’ and ‘Natural Open Space’ areas. It is intended that the Open Space and Recreation Zones are addressed in Stage 5 of the District Plan review. However, where the areas identified in the Spatial Plan are narrow corridors intended as open space connections (for walking and cycling) and extending over land that is currently in private ownership, the most logical adjoining zoning has instead been applied. This is because it is not usual for such connections to be achieved through zoning, and they would more commonly be considered at the time of subdivision. As such, direction relating to

provisions of such connections is intended to be addressed when the subdivision provisions are reviewed in Stage 3 of the District Plan review.

Areas within the Spatial Plans not included in PC21

- 2.22. The Spatial Plans included some areas that have not been included in PC21. Those areas and the reason they are not included in this stage of the District Plan review are set out below.

Additional areas of MRZ and LRZ (south of the current urban boundary) identified in the Spatial Plans to the east of the Takapō / Tekapo River

- 2.23. The high-level ecological assessment identified that development may be problematic in some areas in this location due to lizard values and at least one ephemeral wetland. Ecological surveys are therefore considered necessary to assess ecological values prior to any rezoning. It is intended that the zoning of this area is revisited as part of Stage 3 of the District Plan review, once surveys are completed.

New areas of LRZ identified in the Spatial Plans in Te Kopi-O-Ōpihi / Burkes Pass

- 2.24. The infrastructure assessment identified insufficient wastewater and water capacity to provide for further expansion of this settlement. It is intended that the zoning of this area is revisited as part of Stage 3 of the District Plan review, once further assessment of the feasibility of upgrades that would be required is undertaken.

New area of industrial zoning identified in the Spatial Plans in Twizel, east of the State Highway

- 2.25. The high-level ecological assessment identified that ecological surveys are required before determining if development in this area is appropriate. Given its location on the east side of the State Highway, there are also traffic effects that need to be considered prior to development occurring, which was a concern raised in community feedback. It is intended that the zoning of this area is revisited as part of Stage 3 of the District Plan review, once further assessment is undertaken of the potential traffic effects and the site's ecological values.
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3. Strategic Directions

3.1. The following Strategic Directions, proposed in Plan Change 20, are relevant to this topic:

ATC-O1

The Mackenzie District is a desirable place to live, work, play and visit, where:

- 1. there are a range of living options, businesses, and recreation activities to meet community needs;*
- 2. activities that are important to the community's social, economic and cultural well-being, including appropriate economic development opportunities, are provided for;*
- 3. the amenity values and character of different areas are maintained or enhanced.*

MW-O1 Mana Whenua Involvement

Mana whenua are able to:

- 1. be actively involved in decision making that affects their values and interests to the extent to which they wish to be involved;*
- 2. exercise their kaitiakitaka responsibilities; and*
- 3. carry out customary activities in accordance with tikanga.*

NE-O1 Natural Environment

The values of the natural environment that make the District unique, contribute to its character, identity and economic well-being, and have significant intrinsic values, are recognised and provided for, and where appropriate, protected and enhanced. This includes values associated with:

- 1. mahika kai resources;*
- 2. night sky darkness;*
- 3. outstanding natural features and landscapes;*
- 4. significant indigenous biodiversity; and*
- 5. water bodies and their margins.*

UDF-O1 Urban Form and Development

The District's townships and settlements grow and develop in a consolidated way that:

- 1. is integrated into, and respects the values of the surrounding natural and physical environment;*
 - 2. achieves good connectivity with other parts of the urban area;*
 - 3. is supported by appropriate infrastructure;*
 - 4. maintains the character of each township, and its attractiveness to residents, businesses and visitors; and*
 - 5. responds to the needs of the community, including diversity in housing and business opportunities.*
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4. Current Approach

Residential Zones

- 4.1. The Operative Plan includes four Residential Zones. The Residential 1 Zone covers the majority of the residential areas of Albury, Fairlie, Kimbell, Takapō / Lake Tekapo, Te Kopi-O-Ōpihi / Burkes Pass, and Twizel. The Residential 2 Zone contains land, which because of its location on or near main roads, has been identified as being particularly suitable for visitor accommodation and the Residential 3 and 4 Zones, which apply to Twizel, provide for areas of low-density residential development.
- 4.2. The level of density (minimum allotment size) provided in each of the residential zones is as follows:

Table 3: Residential Zones Allotment Sizes

Zone	Minimum Allotment Size	
Residential 1	Front Lots – 400m ²	Rear Lots – 500m ²
Residential 2	250m ²	
Residential 3	2000m ²	
Residential 4	4000m ²	

Residential 1 and 2 Provisions

- 4.3. The Residential 1 Zone is the District's main residential zone and allows for residential activity, home occupation and visitor accommodation for up to six guests as permitted activities, provided the standards are complied with. Any other unspecified activities are also permitted provided they meet the standards. Activities not meeting the standards are typically assessed as discretionary or non-complying activities.
- 4.4. The Residential 2 Zone is a higher density zone and allows for greater intensity of residential activity, home occupation and visitor accommodation than the Residential 1 Zone. Visitor accommodation activity, for example, is a permitted activity for any number of guests provided the standards are complied with. All visitor accommodation in the Residential 2 Zone within Takapō / Lake Tekapo requires land use consent as a Restricted Discretionary Activity subject to design/amenity controls. All new residential development in the Residential 2 Zone is required to comply with the Lake Tekapo Design Guide (Appendix P). Similar to the Residential 1 Zone any activity not provided for in the zone is permitted provided the standards are met. Activities not meeting the standards are typically assessed as discretionary or non-complying activities.
- 4.5. Visitor accommodation, as defined in the Operative Plan, does not distinguish between more commercial forms of visitor accommodation such as motels and hotels, and short-term rentals of residential units (except for homestays) such as holiday homes.

Residential 3 and 4 Provisions

- 4.6. The Residential 3 and 4 Zones, introduced by Plan Change 15 in October 2011, are intended to ensure efficient development of residential land in Twizel and provide opportunities for
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different lifestyle options in residential living. These zones are more spacious, given the minimum allotment size of 2,000m² and 4,000m² respectively; increased setbacks (10-20m from most boundaries, versus 2-3m generally in the Residential 1 and 2 Zones) lower building coverage (20-25% and 10-15% respectively, versus 40-50% and 65-75% respectively in the Residential 1 and 2 Zones), to preserve the characteristics of each zone.

- 4.7. Similar to the Residential 1 Zone, residential activity, home occupations, and visitor accommodation for up to six people are permitted activities in the Residential 3 and 4 Zones. All other activities are also permitted provided they meet the standards. Activities not meeting the standards are assessed as discretionary or non-complying, consistent with the Residential 1 and 2 Zone provisions.
- 4.8. The rule and policy framework for the Residential 3 and 4 Zones is essentially identical except for the minimum allotment size and total building coverage.

Approach to Built Form

- 4.9. Built form in all Residential Zones is generally controlled through Performance Standards including residential density, height, recession planes, setbacks, and building/hard surface coverage. The Residential 1, 3, and 4 Zones are generally consistent in approach and allow for one residential unit and one minor unit per site for residential activity and visitor accommodation for up to six guests, but vary in terms of density, setbacks and coverage relative to the character of the individual zones.
- 4.10. The Residential 2 Zone in comparison does not restrict the number of dwellings to be constructed on a site provided each residential unit has a minimum site area of 250m² exclusive of access.
- 4.11. It is noted that the bulk and location standards vary depending on the specific activity. The residential standards, for example, differ from the visitor accommodation standards and the standards for other activities such as minimum setbacks and building coverage.
- 4.12. With respect to urban design, the finishing and painting of all new and existing buildings in a colour or colours set out in the Mackenzie District Council Colour Palette is encouraged in all residential zones. There is however no rule framework to support this. The Rural Residential 1 Zone in comparison requires all new buildings to have a reflectivity index of no more than 40%.
- 4.13. Development in the Residential 2 Zone in Takapō / Lake Tekapo or on land legally described as Lot 2 DP 455053 between Lakeside Drive and State Highway 8, is required to comply with the Lake Tekapo Design Guide contained in Appendix P and all new visitor accommodation in the Takapō / Lake Tekapo Residential 2 Zone requires resource consent as a Restricted Discretionary Activity in respect of design and appearance. Outside of these areas there are no design rules or guidelines for development in the Residential 1, 3 and 4 Zones or the Rural Residential 1 Zone.

Relationship Between Provisions

- 4.14. The issues, objectives and policies for Residential Zones are essentially split into two themes: residential activities; and non-residential activities. In general, the objectives and policies are
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focused on maintaining and enhancing amenity and safety outcomes in the residential zones and are generally enabling of residential and non-residential activities provided the pleasantness and amenity of residential areas is maintained. Direction is not included about the actual outcomes sought for each of the residential zones and what level of activity is anticipated in each of the zones. In addition, while certain activities are discouraged in residential areas (Policy 2A) the rule framework allows for all activities as a permitted activities provided the standards limiting the scale and intensity of the activity are met.

Business Zones

- 4.15. The Operative Plan includes three different 'Town Centre' zones – Village Centre Zone (VCZ), Lake Tekapo Village Centre 1 Zone (VCZ1) and Lake Tekapo Village Centre 2 Zone (VCZ2). The VCZ is located in both Fairlie and Twizel, while the VCZ1 and VCZ2 are only located in Takapō / Lake Tekapo, with VCZ1 applied to the eastern side of the commercial area and VCZ2 to the western side. The two key distinctions between VCZ and VCZ1/VCZ2, are that:
- VCZ1/VCZ2 are subject to a consent requirement for consideration of urban design matters; and
 - the types of activities anticipated in the VCZ1/VCZ2 area are more targeted - with particular types of commercial activity provided for as restricted discretionary activities (and therefore subject to design considerations only) with others defaulting to a discretionary activity status; whereas in the VCZ the default activity status is permitted.
- 4.16. The distinction between the VCZ1 and VCZ2 zone appears to relate to a greater focus on fine-grained retail and cafes and restaurants in VCZ1. This is demonstrated through:
- additional requirements in VCZ1 relating to the scale of retail and active frontage;
 - a restriction on visitor accommodation and other commercial activities (other than retail and cafes and restaurants) being located at the ground floor level in VC1; and
 - recreation and community activities also being anticipated in VCZ2.
- 4.17. The Tourist Zone (TZ) is located in Twizel in two areas - to the south of the VCZ, and on the north side of Ostler Road near the intersection with SH8; and in Takapō / Lake Tekapo – located on the eastern side of the township. It is intended to “*provide a focus for visitor oriented activities*”. However, the rule framework is almost identical to that of the VCZ.
- 4.18. The Travellers Accommodation Zone (TAZ) is located in Fairlie – a small area at western edge of township, and in Twizel – on the western side of Wairepo Road (at the towns eastern edge) and another area in south-east of Twizel Township. The Zone Purpose indicates that these areas are suited to use for visitor accommodation. However residential activities are also anticipated through the rule framework.
- 4.19. There are Industrial zones in each main township. Commercial activities, visitor accommodation and residential activities are limited in this zone.
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- 4.20. Fairlie is the only township with the Service Zone, located on west side of Gray Street, adjoining the VCZ to the west. The rule framework for this area is similar to that of the Industrial Zone, except that it is focussed on specified types of less intensive industrial activities, and residential activities are also anticipated in this area.

Approach to Built Form in Business Zones

- 4.21. Built form is controlled in the VCZ1 and VCZ1 in Takapō / Lake Tekapo with respect to consideration of urban design matters. This also applies to built form within the TZ and TAZ in Takapō / Lake Tekapo. Lower height limits apply within VCZ1/VCZ2 – of 8m, compared to 10.5m in the VCZ and TZ. As noted above, within VCZ1 there are also additional requirements aimed at ensuring an active frontage between buildings and public areas.
- 4.22. Recession plane requirements are only applied in the VC and TZ, where they adjoin a residential zone. However, it is noted that in some zones, residential development is subject to meeting the built form standards outlined in the residential chapter.
- 4.23. Screening of materials and goods from public view is generally required in all zones, as is landscaping along road boundaries, albeit the specific requirements differ between zones.
- 4.24. Internal setbacks generally apply from residential zone boundaries in all business zones, and some setbacks also apply from Recreation zones. Varying road setbacks also apply in most zones, whereas in others the standards allow for buildings to be built up to the road frontages. Verandahs are also required in all cases in VCZ1 and VCZ2, and along specified road frontages in VCZ.
- 4.25. In the VCZ and TZ, there are also requirements relating to discharges and dust.
- 4.26. In addition to the above, there are some location specific rules applying particular setbacks or limiting built form in specified no build areas.

Relationship Between Provisions

- 4.27. The issues, objectives, policies and rules are generally driven by two key topics: consolidating business activities; and managing amenity values. The former relates to both business activities more broadly, as well as including specific direction in relation to consolidating Takapō / Lake Tekapo and Twizel's central commercial areas in order to provide a vibrant, compact and pedestrian-friendly centre. The latter relates to both managing the amenity values within business zones, as well as the potential impacts of activities within the zone on the amenity of surrounding residential areas.
- 4.28. At the objective level, there is a lack of clear direction about the outcomes sought for business areas, both collectively and also in terms of the distinctions between zones. While some detail is provided in the 'Zone Statement' for each zone, it is generally limited and, in any case, not supported at the objective and policy level.
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5. Issues

Investment Logic Map (ILM)

- 5.1. The ILM development for the District Plan review identified four key problems which the Plan Review should address. Of particular relevance to this topic are:
- *Uncoordinated & fragmented development is enabled, disrupting social & economic wellbeing, putting pressure on infrastructure.*
 - *The outdated & permissive nature of the plan, results in inconsistent and ad hoc decision making, creating perverse & undesirable outcomes.*
- 5.2. The ILM process further noted that this includes (amongst other things) that the Operative Plan does not give effect to all relevant higher order documents, including the National Planning Standards, nor does it reflect the Mackenzie Spatial Plans. A lack of strong policy direction for some issues and zones is also acknowledged, as is the reliance on numerous assessment matters. It is also specifically identified that there are issues associated with how visitor accommodation is managed.

Complexity

- 5.3. There are seven business zones in the District Plan¹ and four residential zones. As noted in the 'Current Approach' section above, there are limited distinctions between some of these, and a lack of direction at the objective and policy level to clearly differentiate the different outcomes sought in each. There is an opportunity to rationalise the number of zones and use other methods – such as spatial control tools – to maintain any site or area-specific distinctions that are appropriate to carry forward.
- 5.4. There is also an opportunity to rationalise some of built form standards that differ slightly between zones – such as taking a consistent approach to things like screening and landscaping in business zones.

Township Growth

- 5.5. Townships within the District are expected to grow over the life of the District Plan and beyond. It is important to manage this growth to ensure it is co-ordinated and integrated with existing development and infrastructure, and located in appropriate areas. In recognition of the need to plan for and manage anticipated growth, the Council prepared the Mackenzie Spatial Plans which provides a high-level blueprint for the future, showing where growth should go to ensure it happens in a positive and sustainable way. There are various matters identified in the Spatial Plans that need to be implemented through the District Plan, in order to achieve the vision and outcomes sought in the Spatial Plans, including changes to the zoning of residential and business areas.
- 5.6. The Spatial Plans also include the identification of land for residential development outside the current urban boundary in Albury, Fairlie, Kimbell, Takapō / Lake Tekapo, Te Kōpi-O-Ōpihi

¹ This excludes the Tourist G Zone, which is being considered as part of the Special Purpose zones.

/ Burkes Pass and Twizel. There is a need to further investigate the appropriateness of specific areas proposed. This is necessary to ensure development of these areas can be integrated with infrastructure, and that they do not contain values or constraints of such significance that their development would not be appropriate. In particular, the expansion in four areas in Takapō / Lake Tekapo and one in Twizel extend into areas that are identified as part of the Mackenzie Basin Outstanding Natural Landscape “ONL” and within the Mackenzie Basin sub-zone, where much remaining indigenous vegetation has high ecological value. Accordingly, any intention to extend urban boundaries into the ONL requires fine grained, robust analysis to understand the specific landscape and ecological values of each site and determine whether the sites have capacity to absorb development, and if so, to what extent.

Visitor Accommodation

- 5.7. There are a range of issues associated with visitor accommodation. The Plan currently treats residential visitor accommodation (e.g. holiday homes) the same as other more commercial forms of visitor accommodation such as motels and hotels. The effects of a standalone house being rented out for short term visitor accommodation are however considered to be different to the effects of multiple purpose-built visitor accommodation facilities and purpose built motels and hotels (in terms of appearance, traffic volumes, carparking etc). The parking requirements for visitor accommodation activities for example are the same for a single stand-alone dwelling and multiple visitor accommodation units and hotels (one space per five guests and one space per two staff), whereas motels are required to have one space per unit.
- 5.8. Another issue is that there has been a significant increase in the amount of housing stock being used for short-term visitor accommodation in residential areas. This is particularly evident in Takapō / Lake Tekapo and Twizel where there is a high percentage of unoccupied homes and multiple homeowners, i.e. those who own more than one home in New Zealand (Mackenzie Housing Stocktake, May 2020) with many holiday homes being let out as visitor accommodation during the periods when the landowner is away. This is also evident in the number of resource consents and building consents for visitor accommodation activity in residential zones. Visitor accommodation within residential areas can have both positive and adverse effects including:
- Economic – An adequate supply of visitor accommodation units is important to the long-term growth of the local economy and tourism sector.
 - Appearance and Design – Multiple purpose-built visitor accommodation buildings on a site tend to have a different appearance to residential units and can appear more motel like and repetitive in nature. The intensification of visitor accommodation in residential areas can also result in poor design outcomes including limited or low-quality landscaping. The effects of a standalone residential unit being rented out for short term accommodation in comparison are less apparent.
 - Loss of Privacy and Residential Character – Visitor accommodation has different characteristics when compared to residential activities. Visitors can be more social, noisy, and inconsiderate of neighbours compared to occupiers of permanent residential development. Another concern raised as part of the Spatial Planning
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Project is residential zones are becoming dominated by visitor accommodation activities and are no longer an area for permanent residents given the erosion of feeling of being in a neighbourhood.

- Increase in Traffic Movements – More people coming and going and arriving and departing at different hours of the day. This is particularly evident for multiple visitor accommodation buildings on a site.
- Lack of Sufficient On-Site Parking.

5.9. Visitor accommodation is generally provided for in the Business Zones and the Residential 2 Zone. The rule framework in the Business Zones tends to be extremely permissive and while visitor accommodation is generally provided for, limited purpose-built visitor accommodation facilities have been constructed. The development of the Takapō / Lake Tekapo Tourist Zone, for example, is characterised by a combination of residential and visitor accommodation development.

5.10. Another issue is that the inconsistency between the residential and visitor accommodation standards has resulted in an increase in buildings on residential sites particularly in the Residential 1, 3 and 4 Zones. A landowner for example can construct as a permitted activity on a single site, one primary dwelling for residential use, one minor unit for residential use and three one-bedroom visitor accommodation units each hosting two guests, provided the bulk and location standards for residential and visitor accommodation are met.

Workers Accommodation

5.11. Community feedback during the Spatial Plans development identified an issue with the lack of supply of affordable workers accommodation to service the tourism industry. The Operative Plan does not specifically provide for workers accommodation in any of the residential or business zones. Workers accommodation is instead assessed as residential activity, provided the length of stay is greater than three months. Where the length of stay is less than three months the activity is assessed as visitor accommodation.

5.12. There are no specific thresholds to control the scale of workers accommodation in the residential zones. Residential activity/workers accommodation is instead permitted for any number of people provided the bulk and location standards are met. Workers accommodation at a larger scale can have both positive and adverse effects, similar to those for short term visitor accommodation. Despite the rule framework being generally permissive, limited purpose-built workers accommodation buildings have actually been constructed. This may be due to the amount of housing stock being used for short-term visitor accommodation and the increased potential revenue for visitor accommodation as buildings can be rented per night rather than on a weekly basis.

Tourist Zone

5.13. The TZ provisions are permissive, allowing for a range of activities to establish, and are almost identical to that of the VCZ. If developed in line with the current framework, a range of commercial activities could be established in this area, drawing people away from, and undermining the core town centre area.

Out of Step with Best Practise

- 5.14. The Plan takes a somewhat unusual approach of applying, in several cases, different built form standards to different types of built form. For example, residential activities in some business zones are required to meet built form standards applicable only to residential activities, rather than those applying to buildings for other activities. As noted above, different standards are applied to visitor accommodation activities in residential zones than those applied to residential activities. In addition to the specific issues this raises in relation to visitor accommodation noted above, this approach does not take into account that use of buildings can change, nor that effects of built form are not usually altered by the building use. The more commonly used approach is to apply one set of built form standards to any built form within a zone, regardless of the use of that built form.
 - 5.15. There are also some rules applied in the VCZ and TZ that relate to regional council functions (discharges and dust) and which are managed under the regional plan. It is appropriate to remove these types of controls from the District Plan.
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6. Technical Input and Consultation

Technical Input

- 6.1. The Council received high-level landscape and ecological assessments in relation to the potential rezoning of areas beyond the current urban boundary in Takapō / Lake Tekapo and Twizel (as identified in the Spatial Plans) and which are within the Mackenzie Basin Outstanding Natural Landscape and within the Mackenzie Basin Subzone. This was to determine if the values associated with any of the specifically proposed areas is such that urban expansion would not be appropriate. These assessments identified that in some locations there is capacity for some development, but that within these areas, specific development needs further consideration. These areas have been identified in PC21 as Future Development Areas (DEV1 and DEV2). In other locations, desk-top ecological assessments have identified that ecological surveys are required before determining if development is appropriate. These areas have not been included in PC21, but are intended to be revisited in Stage 3 of the District Plan review.
- 6.2. Advice was sought from Environment Canterbury regarding whether there were any hazards precluding urban expansion proposed in the Spatial Plans. No hazards were considered to be of such significance that they precluded rezoning.
- 6.3. The Council's infrastructure team provided advice on infrastructure constraints. In general, these were not considered to be of such significance that they precluded rezoning but have been included as relevant considerations in the Future Growth Areas. In addition, limitations on infrastructure capacity in Te Kopi-O-Ōpihi / Burkes Pass require further consideration and therefore additional residential zoning in Te Kopi-O-Ōpihi / Burkes Pass has not been included in PC21. It is intended that this is revisited in Stage 3 of the District Plan review, subject to further consideration of how infrastructure limitations might be addressed.
- 6.4. Urban design advice has also been provided in relation to the rule framework applying within the Medium Density Residential Zone and the Takapō / Lake Tekapo Precinct, alongside the preparation of a Design Guide which is included as part of PC21.

Consultation

- 6.5. In accordance with Schedule 1, clause 3(1), consultation was undertaken with the Minister for the Environment, other Ministers of the Crown who may be affected the plan change, adjoining local authorities who may be affected, the regional council, and tangata whenua.
 - 6.6. Mana Whenua, via Aoraki Environmental Consultants Limited staff being part of the project team, have been involved in the background work associated with, and drafting of, the provisions proposed in PC21.
 - 6.7. During the development of the plan change, community engagement was undertaken on Stage 2 of the District Plan. A summary of key information was provided through the Council's online engagement platform, allowing for interested parties to provide comment by email. An online survey was also developed and promoted through a number of channels. Drop-in sessions were also held in Fairlie, Takapō / Lake Tekapo and Twizel. Meetings were also held with key stakeholders. The summary material was promoted to the community using a range of Council channels, including:
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- Mailing to full ratepayer database
 - Council placements in print media
 - Council newsletter (Mackenzie Messenger)
 - Social media posts (Facebook and LinkedIn)
 - Targeted social media advertising
 - Email to stakeholders
- 6.8. This provided the community the opportunity to comment on matters addressed in this stage of the Plan Review. While this included the ability to provide any feedback, comments were specifically sought on identified key issues, including: identification and management of visitor accommodation; provision for workers accommodation; management of medium density areas; and zoning changes proposed in the Spatial Plans.
- 6.9. The following feedback, in broad terms, was received on visitor accommodation:
- No one raised concerns with defining and managing residential-based visitor accommodation separately.
 - There was support for applying the same built form controls to any building regardless of its use.
 - Key feedback was that the approach taken should “avoid another Riverside”.
 - While there was mixed feedback on whether residential visitor accommodation should be provided for in all residential zones, the majority supported this approach.
 - While there was mixed feedback, a majority supported residential visitor accommodation being enabled but subject to controls (as opposed to having no controls).
 - Many people support the current limitation on the number of guests, but there were a large number of comments that this is not currently, and should be better, enforced.
 - Several people commented on the need to have better controls/requirements for on-site parking.
- 6.10. The approach proposed in PC21 takes into account this feedback.
- 6.11. In terms of workers accommodation, feedback indicated that there is no strong preference for managing workers accommodation separately to other types of residential activity. While some parties were concerned that treating it differently would not provide for integrated communities and that controls would essentially disincentivise it being provided; others were concerned with large groups or workers near their house and the need to have appropriate controls to mitigate effects. Taking into account this feedback, PC21 does not propose to manage workers accommodation on a separate basis and instead the same framework will apply to workers accommodation as applies to other types of residential activity.
- 6.12. Regarding the proposed zoning of the rural settlements of Albury, Kimbell and Te Kopi-O-Ōpihi / Burkes Pass, the majority of survey respondents indicated that they would prefer separate zonings for residential and business activity, consistent with the Spatial Plans (as opposed to applying a Settlement Zone across the whole settlement). Key stakeholders in Kimbell also had a preference for delineated zones with a desire for commercial zoning along the highway. Taking into account this feedback, PC21 does not propose to introduce a Settlement Zone.
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- 6.13. In addition to the above, a facilitated workshop was held in Takapō / Lake Tekapo, to help inform a review of the Plan provisions and Design Guide applying to the Takapō / Lake Tekapo. Feedback obtained at this workshop and through other community feedback has been taken into account in the urban design advice and recommendations that have in turn informed the drafting of the proposed provisions.
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7. Scale and Significance

- 7.1. Section 32(1)(c) of the RMA requires that the s32 evaluation report contains a level of detail that corresponds with the scale and significance of the of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.
- 7.2. The following have been considered in determining the scale and significance of the effects anticipated from the implementation of the PC21 provisions:
- The geographic area of the District impacted by PC21 extends to all currently zoned residential and business areas, in addition to some areas of rural land on the edge of townships which are proposed to be rezoned residential.
 - The effects of development of urban areas also impact on landowners with properties adjoining these urban zones and more broadly affect those who visit or utilise these areas.
 - There is a reasonable degree of change from the current provisions as PC21 proposes to introduce new zones, but there are a number of existing provisions proposed to be carried forward. Where changes are proposed, these largely relate to responding to known issues; reflecting technical advice received; rationalising the current approach in various ways; and updating the provisions to reflect best practise.
 - The provisions will in some cases introduce new consenting requirements, particularly in terms of non-residential activities in residential zones, and non-commercial activities in commercial zones, and non-industrial activities in the General Industrial Zone. However, these are also expected to provide clearer direction, resulting in greater certainty for developers and the wider community about what is anticipated in each zone. They are also not considered to impose significant costs on landowners.
 - The proposed approach to managing urban areas is not inconsistent with the approaches taken in other district plans.
 - PC21 is largely implementing the Mackenzie Spatial Plans, which have been subject to extensive community consultation and reflect the agreed options for managing growth.
 - PC21 does not generally relate to resources that are matters of national importance under s6 of the RMA, except in relation to zoning of areas currently located within the Mackenzie Basin ONL.
- 7.3. The scale and significance of the proposed provisions introduced by PC21 is overall considered to be moderate-high.
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8. Evaluation of objectives – Residential Zones

Introduction

- 8.1. Section 32(1)(a) requires an evaluation of the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA. The s32 report for the Strategic Directions has examined the extent to which the proposed Strategic Directions are the most appropriate way to achieve the purpose of the RMA. This section of the report therefore considers whether the objectives proposed in the Residential zone chapters are the most appropriate way to achieve the Strategic Directions and the purpose of the RMA.

Table 4: Residential Zones Objectives

<p>Proposed 'Zone Purpose' Objectives</p> <p><i>LLRZ-01</i> The Large Lot Residential Zone provides primarily for residential living opportunities, and other small scale non-residential activities which are ancillary to residential activity.</p> <p><i>LRZ-01</i> The Low Density Residential Zone provides primarily for residential living opportunities, and other compatible activities that support and are consistent with the character and amenity values of the zone.</p> <p><i>MRZ-01</i> The Medium Density Residential Zone provides primarily for higher density residential living opportunities, and other compatible activities that support and are consistent with the character and amenity values of the zone.</p>
<p>Relevant Strategic Directions</p> <p><i>ATC-01 Live, Work, Play and Visit</i> The Mackenzie District is a desirable place to live, work, play and visit, where:</p> <ol style="list-style-type: none"> 1. there are a range of living options, businesses, and recreation activities to meet community needs; 2. activities that are important to the community's social, economic and cultural well-being, including appropriate economic development opportunities, are provided for; and 3. the amenity values and character of different areas are maintained or enhanced. <p><i>UDF-01 Urban Form and Development</i> The District's townships and settlements grow and develop in a consolidated way that:</p> <ol style="list-style-type: none"> 1. is integrated into, and respects the values of the surrounding natural and physical environment; 2. achieves good connectivity with other parts of the urban area; 3. is supported by appropriate infrastructure; 4. maintains the character of each township, and its attractiveness to residents, businesses and visitors; and 5. responds to the needs of the community, including diversity in housing and business opportunities.
<p>Assessment</p> <p>These objectives are considered the most appropriate way to achieve the purpose of the Act because they:</p> <ul style="list-style-type: none"> • address the current lack of direction at the objective level by outlining the specific purpose of each of the residential zones. • will give effect to the purpose of the RMA by managing natural and physical resources in residential areas in a way that provides for the community's well-being (s5(2)). • will assist in maintaining and enhancing the amenity values and qualities of the residential zones (s7(c) and s7(f)), by providing clear direction on their anticipated purpose.

- will assist the Council in achieving integrated management of the use and development of land and to carry out its functions under s31 by providing direction for the subsequent framework.
- align with the description in the National Planning Standards for each zone.
- will give effect to the CRPS by providing sufficient housing choice across zones and by encouraging activities that support and are consistent with the character and amenity of the residential areas.
- align with the Strategic Directions, by providing a range of living options to meet the needs of the community and by enabling activities that are important to the community's social, economic and cultural wellbeing where they are consistent with the character and amenity values of the residential zones.
- reflect community consultation undertaken as part of the Spatial Plans on the anticipated character and amenity values of residential areas.
- will not result in unjustifiably high costs on the community or any part of the community.
- have an acceptable level of uncertainty or risk associated with them.

An alternative option considered was to retain the status quo. The existing residential objectives are split into two themes: residential activities (Residential Objective 1); and non-residential activities (Residential Objective 2) and generally aim to maintain and enhance the amenity and safety outcomes in the residential zones, to protect the surrounding natural and physical environment and to meet the needs of the community.

While the existing objectives broadly align with the requirement to manage adverse effects of activities (s5(2)(c)) there is no distinction between residential areas and no clear direction regarding the outcomes sought for each of the residential zones. As such, it is not clear what qualities and amenity values are to be maintained and enhanced in each of the residential zones (under ss7(c) and 7(f) of the RMA). The proposed objectives are therefore anticipated to address the resource management issues identified and will give effect to the relevant planning documents including the National Planning Standards.

Proposed Character and Amenity Values Objective

LLRZ-O2

The Large Lot Residential Zone is a desirable low density living environment, which:

1. *contains predominantly detached residential units on large lots;*
2. *maintains a predominance of open space over built form; and*
3. *provides on-site amenity and maintains the spacious character and amenity values of adjacent sites.*

LRZ-O2

The Low Density Residential Zone is a desirable suburban living environment, which:

1. *contains predominantly one to two story detached residential units; and*
2. *provides on-site amenity and maintains the suburban character and amenity values of adjacent sites.*

MRZ-O2

The Medium Density Residential Zone is a desirable, higher density, residential living environment, which:

1. *contains a range of housing typologies including semi-detached, terraced housing and low rise apartments;*
2. *is well designed with good design outcomes; and*
3. *provides on-site amenity and maintains the anticipated amenity values of adjacent sites.*

Relevant Strategic Directions

ATC-O1 Live, Work, Play and Visit

The Mackenzie District is a desirable place to live, work, play and visit, where:

1. *there are a range of living options, businesses, and recreation activities to meet community needs;*

2. *activities that are important to the community's social, economic and cultural well-being, including appropriate economic development opportunities, are provided for; and*
3. *the amenity values and character of different areas are maintained or enhanced.*

UDF-O1 Urban Form and Development

The District's townships and settlements grow and develop in a consolidated way that:

1. *is integrated into, and respects the values of the surrounding natural and physical environment;*
2. *achieves good connectivity with other parts of the urban area;*
3. *is supported by appropriate infrastructure;*
4. *maintains the character of each township, and its attractiveness to residents, businesses and visitors; and*
5. *responds to the needs of the community, including diversity in housing and business opportunities.*

Assessment

These objectives are considered the most appropriate way to achieve the purpose of the Act because they:

- provide clear direction about the character and outcomes sought in each of the residential zones.
- provide direction on how adverse effects of activities within the Residential Zones are to be managed (s5(2)(c)).
- will assist in maintaining and enhancing amenity values and qualities of the residential zones (s7(c) and s7(f)).
- will assist the Council to carry out its functions under s31 by providing direction on how the actual and potential effects, of the use, development or protection of land in the residential zones are to be controlled.
- will assist in giving effect to the CRPS by encouraging greater housing choice and diversity of built form across zones and by providing direction to avoid conflicts between activities.
- align with the Strategic Directions, in terms of ensuring that the amenity values and character of different areas are maintained or enhanced.
- reflect community consultation undertaken as part of the Spatial Plans on the anticipated character and amenity values of residential areas.
- will not result in unjustifiably high costs on the community or any part of the community.
- have an acceptable level of uncertainty or risk associated with them.

Retention of the status quo is not considered appropriate as the existing objectives do not distinguish between residential areas. There is therefore no clear direction regarding the amenity outcomes sought for each of the residential zones. Nor the amenity values that are to be maintained or enhanced. The character of each of residential zone is considered to be different and therefore warrants a specifically targeted objective.

Proposed Commercial Visitor Accommodation Objective

PREC2-O1

The Commercial Visitor Accommodation Precinct provides for higher density visitor accommodation activities and is a desirable residential environment for both residents and visitors.

PREC2-O2

Development within Commercial Visitor Accommodation Precinct is well designed and maintains the character and amenity values of the underlying residential zone.

Relevant Strategic Directions

ATC-O1 Live, Work, Play and Visit

The Mackenzie District is a desirable place to live, work, play and visit, where:

1. *there are a range of living options, businesses, and recreation activities to meet community needs;*
2. *activities that are important to the community's social, economic and cultural well-being, including appropriate economic development opportunities, are provided for; and*

3. *the amenity values and character of different areas are maintained or enhanced.*

UDF-O1 Urban Form and Development

The District's townships and settlements grow and develop in a consolidated way that:

1. *is integrated into, and respects the values of the surrounding natural and physical environment;*
2. *achieves good connectivity with other parts of the urban area;*
3. *is supported by appropriate infrastructure;*
4. *maintains the character of each township, and its attractiveness to residents, businesses and visitors; and*
5. *responds to the needs of the community, including diversity in housing and business opportunities.*

Assessment

These objectives are considered the most appropriate way to achieve the purpose of the Act because they:

- provide clear direction about the purpose and character sought in the Commercial Visitor Accommodation Precinct.
- will help address some of the key resource management issues identified in relation to the provision of visitor accommodation in the residential zones.
- provide direction on how adverse effects are to be managed (s5(2)(c) and will assist in maintaining and enhancing amenity values and qualities of the underlying residential zones (s7(c) and s7(f)).
- will give effect to higher order documents including the CRPS by enabling intensive visitor accommodation activities in appropriate locations and by providing direction that will help to avoid conflicts.
- align with the Strategic Directions, in terms of ensuring that the amenity values and character of the underlying residential zones are maintained and by allowing for commercial visitor accommodation opportunities to meet the needs of the community and visitors to the district in areas identified through the Spatial Plans process.
- reflect community consultation undertaken as part of the Spatial Plans.
- will not result in unjustifiably high costs on the community or any part of the community.
- do not have an acceptable level of uncertainty or risk associated with it.

An alternative option is to retain the status quo. The Operative Plan does not include objectives focussed on visitor accommodation activities in the residential zones. Visitor accommodation activity is instead assessed under Residential Objective 2 (Non-Residential Activities) which is focussed on meeting the needs of the community while maintaining and enhancing the amenity and safety outcomes in the residential zones. No direction is therefore given regarding the anticipated location of intensive visitor accommodation activities, or the character or amenity values sought. Specific objectives focussed on commercial visitor accommodation activities are considered more appropriate to address the key resource management issues identified above. The precinct also reflects community consultation undertaken as part of the Spatial Plans and will give effect to higher order documents.

Summary

- 8.2 Overall, the proposed objectives for the Residential Zones and Visitor Accommodation Precinct will provide clearer direction about the outcomes sought in each of the residential zones. In doing so, they are considered to more appropriately articulate how: the physical resources in this zone will be managed in a way that provides for the community's well-being; and the amenity values and qualities of the zone and surrounding areas that are to be maintained and enhanced. They align with the Strategic Direction objectives and will give

effect to the relevant direction in the CRPS. They are therefore considered the most appropriate way to achieve the purpose of the RMA.

9. Evaluation of objectives – Commercial and Mixed Use Zones

Introduction

- 9.1. Section 32(1)(a) requires an evaluation of the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA. The s32 report for the Strategic Directions has examined the extent to which the proposed Strategic Directions are the most appropriate way to achieve the purpose of the RMA. This section of the report therefore considers whether the objectives proposed in the Commercial and Mixed Use Zones chapters are the most appropriate way to achieve the Strategic Directions and the purpose of the RMA.

Table 5: Commercial and Mixed Use Zones Objectives

Proposed 'Zone Purpose' Objectives
<p><i>NCZ-O1 Purpose</i> The Neighbourhood Centre Zone contains a range of primarily small-scale commercial and community activities that support the surrounding residential area.</p> <p><i>LFRZ-O1 Purpose</i> The Large Format Retail Zone provides primarily for large-scale retail activities.</p> <p><i>MUZ-O1</i> The Mixed Use Zone contains residential activities, along with a range of primarily small-scale commercial and community activities that serve the convenience needs of the surrounding residential and rural neighbourhood or visitors.</p> <p><i>TCZ-O1 Purpose</i> The Town Centre Zone is the primary retail destination for comparison and convenience shopping in the District, and is a focal point for the community, providing for a range of community and community-focused activities, along with activities that support the vibrancy of these areas.</p>
Relevant Strategic Directions
<p><i>ATC-O1 Live, Work, Play and Visit</i> The Mackenzie District is a desirable place to live, work, play and visit, where:</p> <ol style="list-style-type: none"> 1. there are a range of living options, businesses, and recreation activities to meet community needs; 2. activities that are important to the community's social, economic and cultural well-being, including appropriate economic development opportunities, are provided for; and 3. the amenity values and character of different areas are maintained or enhanced. <p><i>UDF-O1 Urban Form and Development</i> The District's townships and settlements grow and develop in a consolidated way that:</p> <ol style="list-style-type: none"> 1. is integrated into, and respects the values of the surrounding natural and physical environment; 2. achieves good connectivity with other parts of the urban area; 3. is supported by appropriate infrastructure; 4. maintains the character of each township, and its attractiveness to residents, businesses and visitors; and 5. responds to the needs of the community, including diversity in housing and business opportunities.

Assessment

These objectives are considered the most appropriate way to achieve the purpose of the Act because they:

- Address the current lack of direction at the objective level by clearly outlining the specific purpose of each of the Commercial and Mixed Use Zones.
- Will assist in managing the physical resources in these zones in a way that provides for the community's well-being (s5(2)).
- Will assist in maintaining and enhancing amenity values and qualities of the Commercial and Mixed Use Zones (s7(c) and s7(f)) through providing clear direction on their anticipated purpose.
- Assist the Council to carry out its functions under s31 by providing direction for the subsequent framework that will provide integrated management of effects, and control the actual and potential effects, of the use, development or protection of land in these zones.
- Align with the description in the National Planning Standards for each zone.
- Will assist in giving effect to the CRPS in terms of enabling particular types of business activities in appropriate locations, and providing direction that will help to avoid conflicts between incompatible activities.
- Align with the Strategic Directions, in terms of providing for particular types of business activities to meet community needs in areas identified through the Spatial Plans process.
- Are consistent with feedback from consultation on the Spatial Plans.
- Will not result in unjustifiably high costs on the community or any part of the community.
- Have an acceptable level of uncertainty or risk associated with them.

An alternative option considered was to retain the status quo. This approach seeks: consolidated and convenient business areas and the efficient use of buildings, land and infrastructure in business areas (Business Objective 1); and Business areas where physical amenities and activities within these areas create a pleasant and safe environment for shoppers, visitors and workers (Business Objective 2). With respect to Takapō / Lake Tekapo, an objective is also include seeking a compact, pedestrian-friendly and co-ordinated Village Centre that is vibrant and provides for a wide range of activities and community focus (Business Objective 5) and for Twizel, the reinforcement of the role and function of community and commercial activities within the Twizel Village Centre, to provide for a vibrant, compact and pedestrian friendly Village Centre (Business Objective 6).

These objectives are not considered appropriate, as they do not distinguish between the different roles intended for each type of business zone, and in particular they do not reflect the requirement under the National Planning Standards for industrial zones to be managed in a separate chapter from commercial and mixed use zones. It also provides limited direction about the specific role of this Zone.

Proposed 'Character' Objectives

NCZ-O2 Character

The Neighbourhood Centre Zone contains built form of a scale that reflects the character of the surrounding residential neighbourhood, and which maintains the amenity values anticipated within and beyond the zone.

LFRZ-O2 Character

The adverse effects of activities and built form within the Large Format Retail Zone are managed in a way that:

- 1. recognises the functional and operational requirements of activities within it;*
- 2. maintains a reasonable level of amenity within the zone; and*
- 3. maintains the amenity values anticipated in adjoining areas.*

MUZ-O2 Character

The Mixed Use Zone contains built form of a scale that reflects the character of the surrounding residential neighbourhood, and which maintains the amenity values anticipated within and beyond the zone.

TCZ-O1 Character

The Town Centre Zone is a vibrant, pedestrian-focused environment with attractive and functional buildings and public areas of a moderate scale, which maintains the amenity values anticipated in within and beyond the zone.

Relevant Strategic Directions

ATC-O1 Live, Work, Play and Visit

The Mackenzie District is a desirable place to live, work, play and visit, where:

- 1. there are a range of living options, businesses, and recreation activities to meet community needs;*
- 2. activities that are important to the community's social, economic and cultural well-being, including appropriate economic development opportunities, are provided for; and*
- 3. the amenity values and character of different areas are maintained or enhanced.*

UDF-O1 Urban Form and Development

The District's townships and settlements grow and develop in a consolidated way that:

- 1. is integrated into, and respects the values of the surrounding natural and physical environment;*
- 2. achieves good connectivity with other parts of the urban area;*
- 3. is supported by appropriate infrastructure;*
- 4. maintains the character of each township, and its attractiveness to residents, businesses and visitors; and*
- 5. responds to the needs of the community, including diversity in housing and business opportunities.*

Assessment

These objectives are considered the most appropriate way to achieve the purpose of the Act because they:

- Provide clear direction about the character sought in each Commercial and Mixed Use Zone.
- Seek to articulate how adverse effects of activities on the environment within each Zone are to be managed (s5(2)(c)).
- Will assist in maintaining and enhancing amenity values and qualities of each zone as well as other areas impacted by effects of activities within the zone (s7(c) and s7(f)).
- Assist the Council to carry out its functions under s31 by providing direction on how the actual and potential effects, of the use, development or protection of land in this zone are to be controlled.
- Will assist in giving effect to the CRPS in terms of providing direction that will help to avoid conflicts between incompatible activities.
- Align with the Strategic Directions, in terms of ensuring that the amenity values and character of different areas are maintained or enhanced.
- Will not result in unjustifiably high costs on the community or any part of the community
- Have an acceptable level of uncertainty or risk associated with them.

An alternative option considered was to retain the status quo. This approach seeks: consolidated and convenient business areas and the efficient use of buildings, land and infrastructure in business areas (Business Objective 1); Business areas where physical amenities and activities within these areas create a pleasant and safe environment for shoppers, visitors and workers (Business Objective 2); and Residential areas where amenity is not adversely affected by business activities located in the vicinity (Business Objective 3). The status quo is considered less appropriate, as it does not distinguish between different business zones. In particular, the amenity values and character of each commercial zone is considered to be different from each other to warrant a specifically targeted objective for each. The proposed objective is also considered to better articulate the type of area that each commercial zone is expected to be.

Summary

- 9.2. Overall, the proposed objectives for the Commercial and Mixed Use Zones are considered to provide clearer direction about the outcomes sought in each of these zones, than the current objectives do. In doing so, they are considered to more appropriately articulate how: the physical resources in this zone will be managed in a way that provides for the community's well-being; and how the amenity values and qualities of each zone and surrounding areas are to be maintained and enhanced. They align with the Strategic Direction objectives and will give effect to the relevant direction in the CRPS. They are therefore considered the most appropriate way to achieve the purpose of the RMA.
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10. Evaluation of objectives – General Industrial Zone

Introduction

- 10.1. Section 32(1)(a) requires an evaluation of the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA. The s32 report for the Strategic Directions has examined the extent to which the proposed Strategic Directions are the most appropriate way to achieve the purpose of the RMA. This section of the report therefore considers whether the objectives proposed in the General Industrial Zone chapter are the most appropriate way to achieve the Strategic Directions and the purpose of the RMA.

Table 6: General Industrial Zone Objectives

Proposed Zone Purpose Objective
<i>GIZ-O1 Purpose</i> <i>The General Industrial Zone provides primarily for industrial activities and other compatible activities, as well as activities that support the functioning of industrial areas.</i>
Relevant Strategic Directions
<i>ATC-O1 Live, Work, Play and Visit</i> <i>The Mackenzie District is a desirable place to live, work, play and visit, where:</i> <ol style="list-style-type: none"> 1. <i>there are a range of living options, businesses, and recreation activities to meet community needs;</i> 2. <i>activities that are important to the community's social, economic and cultural well-being, including appropriate economic development opportunities, are provided for; and</i> 3. <i>the amenity values and character of different areas are maintained or enhanced.</i> <i>UDF-O1 Urban Form and Development</i> <i>The District's townships and settlements grow and develop in a consolidated way that:</i> <ol style="list-style-type: none"> 1. <i>is integrated into, and respects the values of the surrounding natural and physical environment;</i> 2. <i>achieves good connectivity with other parts of the urban area;</i> 3. <i>is supported by appropriate infrastructure;</i> 4. <i>maintains the character of each township, and its attractiveness to residents, businesses and visitors; and</i> 5. <i>responds to the needs of the community, including diversity in housing and business opportunities.</i>
Assessment
The objective is considered the most appropriate way to achieve the purpose of the Act because it: <ul style="list-style-type: none"> • Addresses the current lack of direction at the objective level by clearly outlining the purpose of the General Industrial zone. • Will assist in managing the physical resources in this zone in a way that provides for the community's well-being (s5(2)). • Will assist in maintaining and enhancing amenity values and qualities of the General Industrial Zone (s7(c) and s7(f)) through providing clear direction on its anticipated purpose. • Assists the Council to carry out its functions under s31 by providing direction for the subsequent framework that will provide integrated management of effects, and control the actual and potential effects, of the use, development or protection of land in this zone. • Aligns with the description in the National Planning Standards for this zone. • Will assist in giving effect to the CRPS in terms of enabling particular types of business activities in appropriate locations, and providing direction that will help to avoid conflicts between incompatible activities, including reverse sensitivity effects. • Aligns with the Strategic Directions, in terms of providing for particular types of business activity to meet community needs in areas identified through the Spatial Plans process. • Is consistent with feedback from consultation on the Spatial Plans. • Will not result in unjustifiably high costs on the community or any part of the community. • Has an acceptable level of uncertainty or risk associated with it.

An alternative option considered was to retain the status quo. This approach seeks: consolidated and convenient business areas and the efficient use of buildings, land and infrastructure in business areas; and Business areas where physical amenities and activities within these areas create a pleasant and safe environment for shoppers, visitors and workers. This is not considered appropriate, as it does not distinguish between different business zones, and in particular does not reflect the requirement under the National Planning Standards for industrial zones to be managed in a separate chapter from commercial and mixed use zones. It also provides limited direction about the specific role of this Zone.

Proposed Character Objective

GIZ-O2 Character

The adverse effects of activities and built form within the General Industrial Zone are managed in a way that:

- 1. recognises the functional and operational requirements of activities within it;*
- 2. maintains a reasonable level of amenity within the zone; and*
- 3. maintains the amenity values anticipated in adjacent zones.*

Relevant Strategic Directions

ATC-O1 Live, Work, Play and Visit

The Mackenzie District is a desirable place to live, work, play and visit, where:

- 1. there are a range of living options, businesses, and recreation activities to meet community needs;*
- 2. activities that are important to the community’s social, economic and cultural well-being, including appropriate economic development opportunities, are provided for; and*
- 3. the amenity values and character of different areas are maintained or enhanced.*

UDF-O1 Urban Form and Development

The District’s townships and settlements grow and develop in a consolidated way that:

- 1. is integrated into, and respects the values of the surrounding natural and physical environment;*
- 2. achieves good connectivity with other parts of the urban area;*
- 3. is supported by appropriate infrastructure;*
- 4. maintains the character of each township, and its attractiveness to residents, businesses and visitors; and*
- 5. responds to the needs of the community, including diversity in housing and business opportunities.*

Assessment

The objective is considered the most appropriate way to achieve the purpose of the Act because it:

- Provides clear direction about the character sought in the General Industrial Zone
- Seeks to articulate how adverse effects of activities within the Zone on the environment are to be managed (s5(2)(c)).
- Will assist in maintaining and enhancing amenity values and qualities of both the General Industrial Zone as well as other areas impacted by effects of activities within the Zone (s7(c) and s7(f)).
- Assists the Council to carry out its functions under s31 by providing direction on how the actual and potential effects, of the use, development or protection of land in this zone are to be controlled.
- Will assist in giving effect to the CRPS in terms of providing direction that will help to avoid conflicts between incompatible activities, including reverse sensitivity effects.
- Aligns with the Strategic Directions, in terms of ensuring that the amenity values and character of different areas are maintained or enhanced.
- Will not result in unjustifiably high costs on the community or any part of the community
- Has an acceptable level of uncertainty or risk associated with it.

An alternative option considered was to retain the status quo. This approach seeks: consolidated and convenient business areas and the efficient use of buildings, land and infrastructure in business areas (Business Objective 1); and Business areas where physical amenities and activities within these areas create a pleasant and safe environment for shoppers, visitors and

workers (Business Objective 2); and Residential areas where amenity is not adversely affected by business activities located in the vicinity (Business Objective 3). This is not considered appropriate, as it does not distinguish between different business zones. In particular, the amenity values and character of the General Industrial Zone are considered to be different from those of commercial zones. The proposed objective is also considered to better articulate the type of area the General Industrial Zone is expected to be.

Summary

- 10.2. Overall, the proposed objectives for the General Industrial Zone are considered to provide clearer direction about the outcomes sought in this Zone than the current objectives do. In doing so, they are considered to more appropriately articulate how: the physical resources in this zone will be managed in a way that provides for the community's well-being; and the amenity values and qualities of the zone and surrounding areas that are to be maintained and enhanced. They align with the Strategic Direction objectives and will give effect to the relevant direction in the CRPS. They are therefore considered the most appropriate way to achieve the purpose of the RMA.
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11. Evaluation of objectives – Takapō / Lake Tekapo Precinct (PREC1)

Introduction

- 11.1. Section 32(1)(a) requires an evaluation of the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA. The s32 report for the Strategic Directions has examined the extent to which the proposed Strategic Directions are the most appropriate way to achieve the purpose of the RMA. This section of the report therefore considers whether the objectives proposed in PREC1 – Takapō / Lake Tekapo Precinct chapter are the most appropriate way to achieve the Strategic Directions and the purpose of the RMA.

Table 7: Takapō / Lake Tekapo Precinct Objective

Proposed Objective
<i>PREC-O1 Takapō / Lake Tekapo Precinct Development within Takapō / Lake Tekapo maintains the distinctive character and identity of the Township and is complementary to the surrounding landscape.</i>
Relevant Strategic Directions
<p><i>ATC-O1 Live, Work, Play and Visit</i> The Mackenzie District is a desirable place to live, work, play and visit, where:</p> <ol style="list-style-type: none"> 1. <i>there are a range of living options, businesses, and recreation activities to meet community needs;</i> 2. <i>activities that are important to the community’s social, economic and cultural well-being, including appropriate economic development opportunities, are provided for; and</i> 3. <i>the amenity values and character of different areas are maintained or enhanced.</i> <p><i>NE-O1 Natural Environment</i> The values of the natural environment that make the District unique, contribute to its character, identity and well-being, and have significant intrinsic values, are recognised and provided for, and where appropriate protected and enhanced. This includes values associated with:</p> <ol style="list-style-type: none"> 1. <i>mahika kai resources;</i> 2. <i>night sky darkness;</i> 3. <i>outstanding natural features and landscapes;</i> 4. <i>significant indigenous biodiversity; and</i> 5. <i>water bodies and their margins.</i> <p><i>UDF-O1 Urban Form and Development</i> The District’s townships and settlements grow and develop in a consolidated way that:</p> <ol style="list-style-type: none"> 1. <i>is integrated into, and respects the values of the surrounding natural and physical environment;</i> 2. <i>achieves good connectivity with other parts of the urban area;</i> 3. <i>is supported by appropriate infrastructure;</i> 4. <i>maintains the character of each township, and its attractiveness to residents, businesses and visitors; and</i> 5. <i>responds to the needs of the community, including diversity in housing and business opportunities.</i>
Assessment
<p>The objective is considered the most appropriate way to achieve the purpose of the Act because it:</p> <ul style="list-style-type: none"> • Seeks to sustain the character derived from natural and physical resources in Takapō / Lake Tekapo for future generations (s5(2)(a)). • Takes into account the surrounding ONL and the impact that development may have on it, assisting in protecting this landscape from inappropriate use and development (s6(b)). • Will assist in maintaining and enhancing amenity values and qualities of this township (s7(c) and s7(f)).

- Assists the Council to carry out its functions under s31 by providing direction on how the actual and potential effects, of the use, development or protection of land in this area are to be controlled.
- Assists the Council to carry out its functions under s31 by providing direction on how the actual and potential effects, of the use, development or protection of land in these areas are to be controlled.
- Will assist in giving effect to the CRPS because it seeks to maintain and enhance the sense of identity and character of this particular urban areas and to encourage the maintenance and enhancement of amenity values;
- Aligns with the Strategic Directions, in terms of ensuring that the amenity values and character of this area is maintained; the values of the surrounding natural environment and its influence on the character of the existing Township are recognised and provided for; with new development respecting the values of the surrounding environment.
- Will not result in unjustifiably high costs on the community or any part of the community
- Has an acceptable level of uncertainty or risk associated with it.

An alternative option considered was to retain the status quo. This approach seeks to provide for a compact, pedestrian-friendly and co-ordinated Village Centre that is vibrant and provides for a wide range of activities and community focus (Business Objective 5). This objective is more focussed on the purpose of the zone, (which is now covered in TCZ-O1) rather than being focused on the particular character of the Takapō / Lake Tekapo township. A character-specific objective is considered more appropriate to give effect to the CRPS and Strategic Objectives that are specific to character.

Summary

- 11.2. Overall, the proposed objective for PREC1 - Takapō / Lake Tekapo Precinct is considered appropriate to achieve the purpose of the RMA. It seeks to ensure that Development with Takapō / Lake Tekapo aligns with the purpose and principles of the RMA and the CRPS, and achieves the relevant Strategic Directions, taking into account the specific amenity values and character of this area, as well as the values associated with the surrounding natural environment.

12. Evaluation of objectives – Development Areas (DEV1 & DEV2)

Introduction

- 12.1. Section 32(1)(a) requires an evaluation of the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA. The s32 report for the Strategic Directions has examined the extent to which the proposed Strategic Directions are the most appropriate way to achieve the purpose of the RMA. This section of the report therefore considers whether the objectives proposed in DEV1 – Takapō / Lake Tekapo West Future Development Area and DEV2 – Takapō / Lake Tekapo North-West Future Development Area chapters are the most appropriate way to achieve the Strategic Directions and the purpose of the RMA.

Table 8: Development Areas Objectives

<p>Proposed Objectives</p> <p><i>DEV1-O1 Comprehensive Development</i> <i>The Takapō / Lake Tekapo West Development Area is developed to provide residential living opportunities and other compatible activities in a comprehensive manner, which maintains a high level of open space character, is appropriate to its landscape setting, protects important ecological values and is integrated with infrastructure.</i></p> <p><i>DEV2-O1 Comprehensive Development</i> <i>The Takapō / Lake Tekapo North-West Future Development Area is developed for residential activities in a comprehensive manner, providing for a range of housing options and densities and other supporting activities, that is appropriate to its landscape setting, protects important ecological values and is integrated with infrastructure.</i></p>
<p>Relevant Strategic Directions</p> <p><i>ATC-O1 Live, Work, Play and Visit</i></p> <ol style="list-style-type: none"> 1. <i>The Mackenzie District is a desirable place to live, work, play and visit, where:</i> 2. <i>there are a range of living options, businesses, and recreation activities to meet community needs;</i> 3. <i>activities that are important to the community’s social, economic and cultural well-being, including appropriate economic development opportunities, are provided for; and</i> 4. <i>the amenity values and character of different areas are maintained or enhanced.</i> <p><i>NE-O1 Natural Environment</i> <i>The values of the natural environment that make the District unique, contribute to its character, identity and well-being, and have significant intrinsic values, are recognised and provided for, and where appropriate protected and enhanced. This includes values associated with:</i></p> <ol style="list-style-type: none"> 1. <i>mahika kai resources;</i> 2. <i>night sky darkness;</i> 3. <i>outstanding natural features and landscapes;</i> 4. <i>significant indigenous biodiversity; and</i> 5. <i>water bodies and their margins.</i> <p><i>UDF-O1 Urban Form and Development</i> <i>The District’s townships and settlements grow and develop in a consolidated way that:</i></p> <ol style="list-style-type: none"> 1. <i>is integrated into, and respects the values of the surrounding natural and physical environment;</i>

2. *achieves good connectivity with other parts of the urban area;*
3. *is supported by appropriate infrastructure;*
4. *maintains the character of each township, and its attractiveness to residents, businesses and visitors; and*
5. *responds to the needs of the community, including diversity in housing and business opportunities.*

Assessment

The objectives are considered the most appropriate way to achieve the purpose of the Act because they:

- Seek to provide for use and development within particular areas, to provide for the community's wellbeing, in a way that sustains the important natural and physical resources in Takapō / Lake Tekapo for future generations (s5(2)(a)) and manages adverse effects on the surrounding environment (s5(2)(c)).
- Recognise the locations of these sites within the current Mackenzie Basin ONL and the impact that development may have on it, assisting in protecting this landscape from inappropriate subdivision, use and development (s6(b)).
- Recognise the potential ecological values associated with some areas of these sites, ensuring the protection of any areas of significant indigenous vegetation and significant habitats of indigenous fauna (s6(c)).
- Will assist in maintaining and enhancing amenity values and qualities of this township (s7(c) and s7(f)).
- Assists the Council to carry out its functions under s31 by providing direction on how the actual and potential effects, of the use, development or protection of land in these areas are to be controlled.
- Will assist in giving effect to the CRPS because it:
 - Provides an indication of where growth is generally anticipated, in locations which will achieve consolidated and sustainable growth attached to the existing urban area;
 - Assists in enabling people and communities, including future generations, to provide for their wellbeing, including through providing housing choice to meet expected needs identified through the Spatial Plans process;
 - Ensures development occurs in a way that avoids adverse effects on significant natural resources and integrates with infrastructure; and
 - Will ensure that the sense of identity and character of this particular urban area is maintained.
- Aligns with the Strategic Directions, in terms of:
 - contributing to the provision of a range of housing options;
 - ensuring that the amenity values and character of the Takapō / Lake Tekapo area is maintained;
 - recognising those values of the surrounding natural environment that contribute to the character and identify of the Township, and ensuring they are provided for in any development of these areas;
 - ensuring new development respects the values of the surrounding environment, is supported by appropriate infrastructure, and responds to the needs of the community in terms of housing.
- Will not result in unjustifiably high costs on the community or any part of the community
- Has an acceptable level of uncertainty or risk associated with it.

An alternative option considered was to retain the status quo, by not including objectives for these areas (meaning only the relevant rural objectives would apply). This approach was

not considered more appropriate as it would not provide any guidance around where township growth is considered to be generally appropriate to meet the outcomes sought.

A further alternative approach considered was to rezone these areas in accordance with the specific zones indicated in the Spatial Plans, thus applying the relevant objectives for the respective zones within these areas. However, high-level landscape and ecology assessments, while indicating that there is capacity for some development in these locations, identify specific areas that need further consideration. The location and nature of development therefore requires more detailed consideration, in order to ensure that any development in these areas meet the outcomes sought in the Strategic Directions.

Summary

- 12.2. Overall, the proposed objectives for the Development Areas are considered to be the most appropriate way to achieve the purpose of the RMA and the relevant Strategic Directions. They provide an indication of the suitability of particular areas of land for future growth, while also indicating the outcomes sought for development of those areas which require further detailed consideration.
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13. Evaluation of proposed policies, rules and other methods – Residential Zones

Introduction

- 13.1. 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.
- 13.2. 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.
- 13.3. The proposed provisions relating to the Residential Zones, have been grouped, for the purposes of this assessment, as follows:
- Provisions that relate to the residential zoning of areas and how activities, excluding visitor accommodation, within the Residential Zones are managed.
 - Provisions that relate to the management of visitor accommodation activities in the Residential Zones, including the mapping of the Commercial Visitor Accommodation Precinct.
 - Provisions that relate to the effects of activities, including built form, and how they are managed in Residential Zones.

Management of Activities Excluding Visitor Accommodation

- 13.4. The policies in the residential zones seek to provide direction on the types of activities that are anticipated in each of the residential zones, and activities which are not suitable. This direction is reflected in the activity status of different activities and the rule framework.
- 13.5. The relevant provisions that are assessed in this section are:

Table 9 – Residential Zone Mapping, Policies and Activity Rules

Maps	Where Applied	Reason
Large Lot Residential (LLRZ)	Areas identified LLRZ within the Spatial Plans in Fairlie, Kimbell, Takapō / Lake Tekapo and Twizel.	Consistent with the Spatial Plans and the intention of the zone as outlined in its description in the National Planning Standards.
Low Density Residential (LRZ)	Areas identified LRZ within the Spatial Plans in Albury, Fairlie, Kimbell, Takapō / Lake Tekapo, Te Kopi-O-Ōpihi / Burkes Pass and Twizel	Consistent with the Spatial Plans and the intention of the zone as outlined in its description in the National Planning Standards.

	Areas identified as 'Light Industrial' within the Spatial Plans in Albury	The areas identified in the Spatial Plans relate to existing industrial activities. These activities can continue to operate under existing use rights. However, applying an industrial zone to them would allow for other industrial activities to be established on these sites in future, which could adversely affect the amenity values and character of the adjoining residential sites. The LRZ framework does however acknowledge existing industrial activities located in residential zones and provides a consent pathway for their expansion.
	Current 'Tourist Zone' in Takapō / Lake Tekapo.	Applying LRZ as the underlying zoning (with a Commercial Visitor Accommodation Precinct) reflects the established density in this area.
	Whitestone Contracting Yard Ohau Road Twizel - Lot 4 DP 52250	This site is shown in the Spatial Plan as part of Open Space area, and is also currently zoned open space. However, it is currently used as a contracting yard, not for open space purposes. Given its location surrounded by residential zoning, it is considered appropriate to include it in the residential low density zone, consistent with the surrounding area. This does not affect the current land use, but indicates its suitability in future for residential development consistent with its surrounds.
	Area identified as 'Natural Open Space' in Fairlie, on western edge of the township north of School Road, adjoining expanded LRZ area.	It has been identified that there is an existing house in this area. Community feedback also indicated that while there was support for additional open space provision as part of the development of this area, the particular location in the Spatial Plan may not be the most suitable area for open space. Rather than identifying a specific area, it is considered more appropriate to include requirements at time of subdivision to provide open space and connections.
Medium Density Residential (MRZ)	Areas identified MRZ within the Spatial Plans in Fairlie, Takapō / Lake Tekapo and Twizel.	Consistent with the Spatial Plans and the intention of the zone as outlined in its description in the National Planning Standards.
	Areas identified as 'Visitor Accommodation' in the Spatial Plans which are currently zoned Tourist (excluding the Tourist Zone in Takapō / Lake Tekapo) or have underlying residential zoning.	Applying MRZ as the underlying zoning (with a Commercial Visitor Accommodation Precinct) reflects the anticipated density in this area.
	The area identified as 'High Density Residential / Mixed Use' zone in Takapō	There is no specific "high density residential/ mixed use" option in the

	<p>/ Lake Tekapo in the Spatial Plans, but excluding area at the bottom of the terrace, between the Lakeside Drive/State Highway 8 corner and the no-build areas.</p>	<p>National Planning Standards. The intent of this area outlined in the Spatial Plans is that it will contribute to the provision of a range of housing types to meet changing needs and preferences and to offer opportunities “for a combination of residential living and complementary commercial and/or visitor accommodation activities.” This area is particularly appropriate for commercial activities at ground floor level along Lakeside Drive, which are of a type that interact with the road, for example small-scale retail and food and beverage. Taking this into account, it is considered most appropriate to apply TCZ to the land adjoining Lakeside Drive where it is close to the existing town centre, and to apply MRZ to the balance of the land.</p>
<p>Policies</p>	<p>LLRZ-P1, LRZ-P1 and MRZ-P1 – Residential Activities <i>Enable residential activities within a range of residential unit types and sizes.</i></p> <p>LLRZ-P2 – Compatible Activities <i>Provide for activities other than residential activities where:</i></p> <ol style="list-style-type: none"> 1. <i>they are ancillary to a residential activity;</i> 2. <i>they are consistent with the anticipated character, amenity values and purpose of the zone; and</i> 3. <i>the effects of the activity are compatible with the amenity of adjoining sites.</i> <p>LRZ-P2 and MRZ-P2 – Compatible Activities <i>Provide for activities other than residential activities where:</i></p> <ol style="list-style-type: none"> 1. <i>they are ancillary to a residential activity or are consistent with the character, amenity values and purpose of the zone;</i> 2. <i>they service the local community and do not detract from the purpose or character of the Neighbourhood Centre or Town Centre Zones;</i> 3. <i>the effects of the activity, including its scale, hours of operation, parking and vehicle manoeuvring are compatible with the amenity values of adjoining sites.</i> <p>LLRZ-P3 and LRZ-P3 <i>Provide for workers accommodation which exceeds the density requirements, where:</i></p> <ol style="list-style-type: none"> 1. <i>the scale and design of the workers accommodation maintains the character and amenity values of the surrounding area;</i> 2. <i>sufficient parking and servicing is provided on-site;</i> 3. <i>parking and vehicle manoeuvring areas are appropriately designed; and</i> 4. <i>road safety and efficiency is maintained.</i> <p>LRZ-P4 and MRZ-P3 – Retirement Living <i>Provide for retirement living and retirement villages, where:</i></p> <ol style="list-style-type: none"> 1. <i>the scale, form, composition and design of the retirement living or village maintains the character and amenity values of the surrounding area;</i> 2. <i>they are designed to provide safe, secure convenient, and comfortable living conditions for residents, with good on-site amenity and facilities;</i> 	

	<p>3. <i>any parking and vehicle manoeuvring provided on-site is appropriately designed; and</i></p> <p>4. <i>road safety and efficiency is maintained.</i></p> <p>LLRZ-P4 – Other Non-Residential Activities <i>Avoid non-residential activities and buildings not provided for in LLRZ-P2, unless:</i></p> <ol style="list-style-type: none"> 1. <i>any adverse effects of the activity do not compromise the amenity values of the surrounding area; and</i> 2. <i>the nature, scale and intensity of the activity is compatible with the character and purpose of the zone.</i> <p>LRZ-P5 – Other Non-Residential Activities <i>Avoid non-residential activities and buildings not provided for in LRZ-P2 or LRZ-P4, unless:</i></p> <ol style="list-style-type: none"> 1. <i>the activity is an expansion of an existing activity;</i> 2. <i>any adverse effects of the activity do not compromise the amenity values of the surrounding area; and</i> 3. <i>the nature, scale and intensity of the activity is compatible with the character and purpose of the zone.</i> <p>MRZ-P4 – Other Non-Residential Activities <i>Avoid non-residential activities and buildings not provided for in MRZ-P2 or MRZ-P3, unless:</i></p> <ol style="list-style-type: none"> 1. <i>the activity is an expansion of an existing activity;</i> 2. <i>any adverse effects of the activity do not compromise the amenity values of the surrounding area; and</i> 3. <i>the nature, scale and intensity of the activity is compatible with the character and purpose of the zone.</i>
Rules	<p>LLRZ-R1, LLRZ-R2, LLRZ-R3, LLRZ-R4, LLRZ-R6, LLRZ-R7, LLRZ-R8, LLRZ-R9, LLRZ-R10, LLRZ-R11, LLRZ-R13, LLRZ-R14</p> <p>LRZ-R1, LRZ-R2, LRZ-R3, LRZ-R4, LRZ-R6, LRZ-R7, LRZ-L8, LRZ-L9, LRZ-L10, LRZ-L11, LRZ-R13, LRZ-R14</p> <p>MRZ-R1, MRZ-R2, MRZ-R3, MRZ-R5, MRZ-R6, MRZ-R7, MRZ-R8, MRZ-R9, MRZ-R10, MRZ-R12, MRZ-R13</p> <p>Permitted Activities LLRZ – <i>Residential Activity, Residential Units, Minor Units, Buildings and Structures Not Otherwise Listed, Home Business (scale thresholds), Recreation Activities and Community Gardens, Education and Childcare Facilities (scale thresholds).</i></p> <p>LRZ – <i>Residential Activity, Residential Units, Minor Units, Buildings and Structures Not Otherwise Listed, Home Business (scale thresholds), Recreation Activities and Community Gardens, Education and Childcare Facilities (scale thresholds), community facilities (scale thresholds).</i></p> <p>MRZ – <i>Residential Activity, Residential Units (on sites over 400m²), Buildings and Structures Not Otherwise Listed, Home Business (scale thresholds), Recreation Activities and Community Gardens, Education and Childcare Facilities (scale thresholds), community facilities (scale thresholds).</i></p> <p>Restricted Discretionary Activities LLRZ – <i>Education and Childcare Facilities (above scale thresholds)</i></p> <p>LRZ – <i>Education and Childcare Facilities (above scale thresholds), Retirement Villages, Community Facilities (above scale thresholds), Expansion to Existing Industrial Activities.</i></p>

	<p>MRZ – <i>Supplementary Residential Units or units on sites less than 400m², Education and Childcare Facilities (above scale thresholds), Retirement Villages, Community Facilities (above scale thresholds), Expansion to Existing Industrial Activities.</i></p>
	<p>Discretionary Activities</p> <p>LLRZ – <i>Home Business (above scale thresholds), Commercial Activities, Community Facilities, Retirement Villages and Activities Not Otherwise Listed</i></p> <p>LRZ – <i>Home Business (above scale thresholds), Commercial Activities and Activities Not Otherwise Listed</i></p> <p>MRZ – <i>Home Business (above scale thresholds), Commercial Activities and Activities Not Otherwise Listed</i></p>
	<p>Non-Complying Activities</p> <p>LLRZ – <i>Industrial Activities</i></p> <p>LRZ – <i>New Industrial Activities</i></p> <p>MRZ – <i>New Industrial Activities</i></p>
Definitions	<p><i>Ancillary activity, commercial activity, community facility, educational facility, home business, industrial activity, minor residential unit, residential activity, residential unit, retirement village.</i></p>

- 13.6. The following table identifies the strategic directions and objectives that are relevant to the assessment of the group of provisions set out in Table 9 above, and provides an assessment of the effectiveness and efficiency of the proposed provisions in achieving those objectives. The assessment includes identification and assessment of the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions.

Table 10: Assessment Against Relevant Objectives

<p>Relevant Strategic Directions</p> <p><i>ATC-O1 Live, Work, Play and Visit</i></p> <p><i>The Mackenzie District is a desirable place to live, work, play and visit, where:</i></p> <ol style="list-style-type: none"> <i>there are a range of living options, businesses, and recreation activities to meet community needs;</i> <i>activities that are important to the community's social, economic and cultural well-being, including appropriate economic development opportunities, are provided for; and</i> <i>the amenity values and character of different areas are maintained or enhanced.</i> <p><i>UDF-O1 Urban Form and Development</i></p> <p><i>The District's townships and settlements grow and develop in a consolidated way that:</i></p> <ol style="list-style-type: none"> <i>is integrated into, and respects the values of the surrounding natural and physical environment;</i> <i>achieves good connectivity with other parts of the urban area;</i> <i>is supported by appropriate infrastructure;</i> <i>maintains the character of each township, and its attractiveness to residents, businesses and visitors; and</i> <i>responds to the needs of the community, including diversity in housing and business opportunities.</i>
<p>Relevant Objective</p> <p><i>LLRZ-O1</i></p> <p><i>The Large Lot Residential Zone provides primarily for residential living opportunities, and other small scale non-residential activities which are ancillary to residential activity.</i></p>

LRZ-01

The Low Density Residential Zone provides primarily for residential living opportunities, and other compatible activities that support and are consistent with the character and amenity values of the zone.

MRZ-01

The Medium Density Residential Zone provides primarily for higher density residential living opportunities, and other compatible activities that support and are consistent with the character and amenity values of the zone.

	Benefits	Costs
Environmental	Ensures activities establishing in the residential zones are consistent with the purpose, character and amenity values of the zones.	Provides greater opportunities for some activities which can have different effects from residential use such as traffic, parking and noise. The effects of these activities are however considered to be generally compatible with the residential character and amenity values of the zone.
Social	<p>Provides for residential growth and increased housing choice across the different zones.</p> <p>Provides for retirement villages and other compatible activities that support the wellbeing of the community including recreation activities, education and childcare services.</p> <p>Avoids the establishment of non-residential activities that are considered to be out of character in the residential zones and ensures development does not detract from the purpose or character of the surrounding commercial and industrial zones.</p> <p>Recognises and provides for existing non-residential activities that service the community.</p> <p>Provides certainty for communities as to the anticipated development and character of residential areas.</p>	The provisions may alter the residential amenity and character of existing residential areas by enabling greater opportunities for some activities.
Economic	Provides for diversity of housing choice across the different residential zones and introduces opportunities for other activities to establish that support the wellbeing of the community	The framework is more restrictive towards some activities than the current plan. This may lead to additional costs in terms of lost opportunity to establish activities or the costs associated with a resource consent process.
Cultural	None identified.	None identified.

Efficiency
The proposed provisions will be efficient in achieving the relevant objectives by enabling activities that achieve the outcomes sought in each of the zones and by requiring a resource consent for other activities where the effects of the activity are to be assessed on a case-by-case basis. The direction given in the policy framework and associated rules will provide greater efficiency for plan users regarding the character and level of activities anticipated in each of the zones.
Effectiveness
The proposed provisions are considered the most effective at achieving the objectives as they provide for a range of living opportunities across the residential zones and will manage activities within residential areas to maintain the character and amenity values of each zone.
Alternative Approach 1
Continuation of the current policies and rules.
Appropriateness Assessment
The current policy and rule framework does not include clear direction regarding the actual outcomes sought for each of the residential zones. For example, while some non-residential activities are discouraged in residential areas (Policy 2A) the rule framework allows for all activities as a permitted activity provided the standards limiting the scale and intensity of the activity are met. Targeted provisions that are focussed on the outcomes sought in each of the zones will provide greater clarity for plan users and will set clear expectations for landowners regarding the character and amenity values sought in each of the residential zones. The proposed rule framework is also targeted towards activities that are considered compatible in residential zones such as education and childcare facilities, recreation activities, community facilities and retirement villages. Whereas other non-residential activities that are considered to be generally out of character in residential areas are discouraged. The current policy and rule frame is therefore considered to be not as efficient or effective in achieving the objectives.
Alternative Approach 2
Use of prohibited activity status for new industrial activities in the residential zones.
Appropriateness Assessment
The use of a prohibited activity status for new industrial activities in the residential zones is considered to be an effective way of achieving the outcome sought in the residential zones. However, it would never allow for industrial activities to be established and does not reflect other district plans. The proposed non-complying activity status is considered more appropriate as it provides a pathway for consideration of the appropriateness of these activities through the resource consent process and allows for consent to be granted in circumstances where the effects of the activity are consistent with the character and amenity values of the zone or where the activity aligns with the relevant objectives and policies.
Alternative Approach 3
Introduce new workers accommodation rules and treat workers accommodation different to residential activity
The lack of accommodation available for short term workers was raised as a concern by the community as part of the Spatial Plan Project. In attempting to define and manage workers accommodation separately there is however a concern that this would act as a disincentive towards its development as purpose-built accommodation facilities would likely require a consent to maintain the character and amenity of residential areas. Based on community consultation there was also more community support for providing a mix of options for workers and not segregating particular types of workers away from other residential use. In addition, the operative plan does not define and manage workers accommodation separately to residential activity. The proposed provisions which support the establishment of workers accommodation at a policy level is therefore considered more appropriate at achieving the objectives.
Alternative Approach 4
Not providing for minor units in the LRZ and LLRZ
While minor units have benefits for landowners, by providing accommodation for dependent family members or the generation of additional income, the intensification of residential and residential visitor accommodation has had negative effects on the amenity values of the residential zones, as seen in the Riverside Subdivision with the rise of residential visitor accommodation. Setting a

minimum density requirement and not providing for minor units in the LRZ and LLRZ was therefore considered as one way limit the intensity of accommodation occurring in residential zones. This approach however would limit the development potential of residential sites and not allow for accommodation of dependent family members or family units. The proposed provisions which allow for minor units where they are ancillary to or for the purpose of residential accommodation are therefore considered more appropriate at achieving the objectives as they will limit the intensification of residential visitor accommodation occurring (as a main unit and minor unit cannot both be used for residential visitor accommodation) but will allow greater flexibility for landowners. The provision of minor units is also common in other second-generation plans.

Risk of acting or not acting

- 13.7. Section 32(2)(c) of the RMA requires that the efficiency and effectiveness assessment also assesses the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.
- 13.8. The proposed framework is more targeted and outcomes focused compared to the existing plan and will provide certainty for the community as to the anticipated development and character of residential areas. The risk of acting is therefore considered to be low.

Management of Visitor Accommodation Activities

- 13.9. The policies in the Commercial Visitor Accommodation Precinct and residential zones seek to provide direction on how visitor accommodation is managed in residential areas. This direction is then reflected in the activity status of visitor accommodation activities. Of note:
- residential visitor accommodation activities (e.g. holiday homes) have been defined and treated separately to other commercial forms of visitor accommodation; and
 - the Visitor Accommodation Areas in the adopted Spatial Plans have been identified via a Commercial Visitor Accommodation Precinct.
- 13.10. The relevant provisions that are assessed in this section are:

Table 11 – Visitor Accommodation Policies and Activity Rules and Mapping of the Commercial Visitor Accommodation Precinct

Maps	<p>Commercial Visitor Accommodation Precinct (PREC2) - Areas identified as Visitor Accommodation in the Spatial Plans in Fairlie, Takapō / Lake Tekapo and Twizel (excluding the Travellers Accommodation Zones and Special Travellers Accommodation Zones which are not in scope of PC21).</p> <p>Reason: There is no Visitor Accommodation-focussed zone identified in the National Planning Standards, and it is more common for commercial visitor accommodation to be addressed within a commercial or residential zone framework. A focus on only commercial visitor accommodation is also considered to be too narrow and may result in inefficient use of land in these areas. Applying an underlying residential zone, with a commercial visitor accommodation precinct, is considered to best reflect the intent of the Spatial Plans to provide for this type of activities within these areas, while also allowing for residential development. It also acknowledges that these areas are expected to retain a residential character.</p>
Policies	<p>Residential Visitor Accommodation – Residential Zones LLRZ-P2 – Compatible Activities <i>Provide for activities other than residential activities, where:</i></p>

	<ol style="list-style-type: none"> 1. they are ancillary to a residential activity; 2. they are consistent with the character, amenity values and purpose of the zone; and 3. the effects of the activity are compatible with the amenity values of adjoining sites. <p>LRZ-P2 and MRZ-P2 – Compatible Activities Provide for activities other than residential activities, where:</p> <ol style="list-style-type: none"> 1. they are ancillary to a residential activity or are consistent with the character, amenity values and purpose of the zone; 2. they service the local community and do not detract from the purpose or character of the Neighbourhood Centre or Town Centre Zones; 3. the effects of the activity, including its scale, hours of operation, parking and vehicle manoeuvring are compatible with the amenity values of adjoining sites. <p><u>Residential and Commercial Visitor Accommodation – Residential Zones</u></p> <p>LLRZ-P4 – Other Non-Residential Activities Avoid non-residential activities and buildings not provided for in LLRZ-P2, unless:</p> <ol style="list-style-type: none"> 1. any adverse effects of the activity do not compromise the amenity values of the surrounding area; and 2. the nature, scale and intensity of the activity is compatible with the character and purpose of the zone. <p>LRZ-P5 – Other Non-Residential Activities Avoid other non-residential activities and buildings not provided in LRZ-P2 or LRZ-P4, unless:</p> <ol style="list-style-type: none"> 1. the activity is an expansion of an existing activity; 2. any adverse effects of the activity do not compromise the amenity values of the surrounding area; and 3. the nature, scale and intensity of the activity is compatible with the character and purpose of the zone. <p>MRZ-P4 – Other Non-Residential Activities Avoid other non-residential activities and buildings not provided in MRZ-P2 or MRZ-P4, unless:</p> <ol style="list-style-type: none"> 1. the activity is an expansion of an existing activity; 2. any adverse effects of the activity do not compromise the amenity values of the surrounding area; and 3. the nature, scale and intensity of the activity is compatible with the character and purpose of the zone. <p><u>Commercial Visitor Accommodation – Commercial Visitor Accommodation Precinct</u> Provide for commercial visitor accommodation, where:</p> <ol style="list-style-type: none"> 1. the design and appearance of buildings maintains the character and amenity values of the surrounding area; 2. any adverse effects on the amenity values of adjoining residential properties and the surrounding area are avoided where practicable or otherwise mitigated; 3. any parking and vehicle manoeuvring on site is appropriately designed; and 4. road safety and efficiency is maintained.
Residential Zones	Permitted : Residential visitor accommodation where no more than one residential unit on a site is used for residential visitor accommodation and the

	<i>maximum occupancy of a site used for visitor accommodation does not exceed six guests.</i>
	Restricted Discretionary: <i>Residential visitor accommodation where no more than one residential unit on a site is used for residential visitor accommodation and the maximum occupancy of a site used for visitor accommodation does not exceed twelve guest.</i>
	Discretionary: <i>Residential visitor accommodation where more than one residential unit on a site is used for residential visitor accommodation and the maximum occupancy of a site used for visitor accommodation exceeds twelve guests.</i>
	Discretionary: <i>Commercial visitor Accommodation.</i>
Commercial Visitor Accommodation Precinct	Restricted Discretionary: <i>Commercial Visitor Accommodation.</i>
Definitions	<i>Commercial visitor accommodation, residential visitor accommodation, visitor accommodation.</i>

- 13.11. The following table identifies the strategic directions and objectives that are relevant to the assessment of this group of provisions, and provides an assessment of the effectiveness and efficiency of the proposed provisions in achieving those objectives. The assessment includes identification and assessment of the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions.

Table 12: Assessment Against Relevant Objectives

Relevant Strategic Directions
<p><i>ATC-O1 Live, Work, Play and Visit</i></p> <p><i>The Mackenzie District is a desirable place to live, work, play and visit, where:</i></p> <ol style="list-style-type: none"> <i>1. there are a range of living options, businesses, and recreation activities to meet community needs;</i> <i>2. activities that are important to the community's social, economic and cultural well-being, including appropriate economic development opportunities, are provided for; and</i> <i>3. the amenity values and character of different areas are maintained or enhanced.</i> <p><i>UDF-O1 Urban Form and Development</i></p> <p><i>The District's townships and settlements grow and develop in a consolidated way that:</i></p> <ol style="list-style-type: none"> <i>1. is integrated into, and respects the values of the surrounding natural and physical environment;</i> <i>2. achieves good connectivity with other parts of the urban area;</i> <i>3. is supported by appropriate infrastructure;</i> <i>4. maintains the character of each township, and its attractiveness to residents, businesses and visitors; and</i> <i>5. responds to the needs of the community, including diversity in housing and business opportunities.</i>
Relevant Objectives
<p><i>LLRZ-O1</i></p> <p><i>The Large Lot Residential Zone provides primarily for residential living opportunities, and other small scale non-residential activities which are ancillary to residential activity.</i></p> <p><i>LRZ-O1</i></p> <p><i>The Low Density Residential Zone provides primarily for residential living opportunities, and other compatible activities that support and are consistent with the character and amenity values of the zone.</i></p>

MRZ-01

The Medium Density Residential Zone provides primarily for higher density residential living opportunities, and other compatible activities that support and are consistent with the character and amenity values of the zone.

PREC2-01

The Commercial Visitor Accommodation Precinct provides for higher density visitor accommodation activities and is a desirable residential environment for both residents and visitors.

PREC2-02

Development within Commercial Visitor Accommodation Precinct is well designed and maintains the anticipated character and amenity values of the underlying residential zone.

	Benefits	Costs
Environmental	Ensures visitor accommodation activities establishing in the residential zones are consistent with the purpose, character and amenity values of the zone/precinct.	None identified.
Social	<p>The Commercial Visitor Accommodation Precinct applies to the existing Residential 2, and Tourist Zones which are already identified as being suitable for commercial visitor accommodation activity. The residential visitor accommodation provisions also largely reflect the existing cascade in the Residential 1, 3 and 4 Zones and will therefore maintain the existing character and amenity values of the residential zones.</p> <p>The proposed provisions will limit the scale of visitor accommodation activity occurring in residential zones to protect the amenity of adjoining sites and will encourage the establishment of higher density visitor accommodation in areas that have been identified as being suitable for visitor accommodation activity.</p>	None identified.
Economic	The provisions will provide for residential visitor accommodation in all residential zones which is important to the long-term growth of the local economy and tourism sector and will provide opportunities for the generation of additional income for landowners.	The provisions restrict the scale of residential visitor accommodation occurring, with only one unit on a site being able to be used for visitor accommodation. In addition, the cascade in activity status is being applied to the Medium Density Zone which may hinder development opportunities for land owners or incur additional costs through the consenting process.
Cultural	None identified.	None identified.

Efficiency
The proposed provisions will be efficient in achieving the relevant objectives by enabling visitor accommodation at a scale that maintains the character and amenity values of the residential zones and by requiring resource consent for visitor accommodation activities that have the potential to have adverse effects. The direction given in the policy framework and associated rules will also provide greater efficiency for plan users regarding the character and level of visitor accommodation anticipated in the residential zones and will address the resource management issues identified.
Effectiveness
The proposed provisions are considered the most effective at achieving the objectives as they will manage the scale of residential visitor accommodation activities to maintain the character and amenity values of the residential zones and will provide for the establishment of commercial visitor accommodation activities in areas that based on community consultation have been identified as being suitable for more intensive forms of visitor accommodation activity.
Alternative Approach 1
Continuation of the current policies and rules.
Appropriateness Assessment
The current visitor accommodation policy treats residential visitor accommodation (e.g. holiday homes) the same as other more commercial forms of visitor accommodation such as motels and hotels. The effects of a standalone house being rented out for short term visitor accommodation are however different to the effects of multiple purpose-built visitor accommodation facilities and purpose-built motels and hotels. In addition, the inconsistency between the existing residential and visitor accommodation standards has resulted in an increase in buildings on residential sites particularly in the Residential 1, 3 and 4 Zones that is degrading the amenity values of the residential zones. The proposed rules will treat residential visitor accommodation differently to commercial visitor accommodation activities to maintain the residential amenity values of the residential zones and will limit the intensity of built form by allowing only one unit on a site to be used for residential visitor accommodation. The proposed provisions are therefore more appropriate at achieving the objectives as they will essentially discourage commercial visitor accommodation activities to maintain the anticipated character of the residential zones. Commercial visitor accommodation will only be provided in the Commercial Visitor Accommodation Precinct which contains areas that have been identified by the community as able to absorb a higher intensity of visitor accommodation activity. The majority of people who participated in the pre-engagement consultation also supported this approach.
Alternative Approach 2
Require resource consent for all residential and commercial visitor accommodation
While this approach may be effective in achieving the purpose of the relevant zone, it is not considered to be efficient, particularly where residential visitor accommodation is of a scale/nature that is not noticeably different to a permanent residential activity.
Alternative Approach 3
Permit residential and commercial visitor accommodation in all residential zones without any controls (apart from built form standards)
This approach is not considered to be effective as it will not address the resource management issues identified and would not allow for site-specific consideration of effects where they are different to permanent residential activity. In addition, this approach does not reflect the Spatial Plans and community engagement which identified specific areas that are able to absorb a higher density of visitor accommodation activity.
Alternative Approach 4
Limit the number of visitor nights
Limiting the number of visitor nights would be efficient in achieving the objectives, during the time where the residential unit is not being used for visitor accommodation activity. This approach however would not manage the effects of residential visitor accommodation when in use and is not considered to mitigate the issues identified above. In addition, there was limited support for this option in the consultation process with some people concerned that approach was not an efficient use of houses, while others had concerns that it would result in an inequitable approach between the opportunities provided to owners previously, than those provided for new owners. This approach is also likely to be difficult to monitor and enforce.

Risk of acting or not acting

- 13.12. Section 32(2)(c) of the RMA requires that the efficiency and effectiveness assessment also assesses the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.
- 13.13. The framework proposed will assist in maintaining the amenity values of the residential zones by limiting the scale of visitor accommodation activities occurring in residential areas. In addition, while the existing cascade in activity status is being applied to the Medium Density Zone the commercial visitor accommodation precinct will enable more intensive visitor accommodation to establish in areas that have been identified by the community as being suitable for commercial visitor accommodation. As such, the risk of acting in the manner proposed is considered to be low.

Management of Effects

- 13.14. The policies in the residential zones seek to provide direction on how activities, including built form, are to be managed to achieve the purpose and to maintain the character and amenity values of the residential zones. This direction is then implemented through the built form standards.
- 13.15. The relevant provisions that area assessed in this section are:

Table 13 – Residential Policies and Effects Rules

Policies	LLRZ-P5 Adverse Effects
	<p><i>Mange development within the Large Lot Residential Zone to ensure:</i></p> <ol style="list-style-type: none"> 1. <i>built form is of a scale and design that is compatible with the character, amenity values and purpose of the zone;</i> 2. <i>larger lot sizes are retained in areas subject to servicing constraints in Specific Control Areas 1 and 2, until such time appropriate services are in place; and</i> 3. <i>a predominance of open space over built form is maintained.</i> <p>LRZ-P6 Adverse Effects</p> <p><i>Mange development within the Low Density Residential Zone to ensure:</i></p> <ol style="list-style-type: none"> 1. <i>built form is of a scale and design that is compatible with the character, amenity values and purpose of the zone;</i> 2. <i>larger lots sizes are retained in areas subject to servicing constraints in Specific Control Area 3, until such time appropriate services are in place; and</i> 3. <i>buildings and structures located in Specific Control Area 4 do not dominate the identified ridgeline when viewed from a public place.</i> <p>MRZ-P5 Adverse Effects</p> <p><i>Mange development within the Medium Density Residential Zone to ensure:</i></p> <ol style="list-style-type: none"> 1. <i>built form is of a scale and design that is consistent with the Medium Density Design Guidelines and is compatible with the character, amenity values and purpose of the zone; and</i> 2. <i>within Specific Control Area 5 that the safety and efficiency of State Highway 8 is maintained.</i>

Standards	LLRZ	LRZ	MRZ
Density	<p>Where the residential unit is connected to a reticulated sewage system or the residential unit is not connected to a reticulated sewage system but the wastewater discharge is authorised by Environment Canterbury – 2,000m²</p> <p>Specific Control Area 1 – 4,000m²</p> <p>Specific Control Area 2 – 1 hectare</p>	<p>Where the residential unit is connected to a reticulated sewage system – 400m²</p> <p>Where the residential unit is not connected to a reticulated sewage system – 1,500m²</p> <p>Specific Control Area 3 – 4,000m²</p>	<p>One residential unit per site, where the site has a minimum site area of 400m² – Permitted</p> <p>Supplementary units and sites less than 400m² is one residential unit per 200m² – Restricted Discretionary</p>
Height	8m Max	8m Max	<p>10m Max, except a gable roof may exceed the maximum height by no more than 1m.</p> <p>All floors shall have a minimum ceiling height of 2.7m.</p>
Height in Relation to Boundary	2.5m + angle	2.5m + angle	3.5m + angle
Setbacks	<p>10m – Res Units</p> <p>10m – Accessory Buildings and Structures: Road, Accessways and Reserve Boundaries</p> <p>5m - Accessory Buildings and Structures: Internal Boundaries</p>	2m, except any site with road frontage to Pioneer Drive shall be setback 4.5m	<p>2m, except any site with road frontage to Lakeside Drive shall be setback 4.5m</p> <p>Any building or structure on the true right bank of the Tekapo River shall be setback a minimum of 6m from the edge of the upper terrace</p>
Coverage	<p>25% Max Building Coverage</p> <p>40% Max Impervious Coverage</p>	<p>40% Max Building Coverage</p> <p>50% Max Impervious Coverage</p>	40% Max Building Coverage
Ridgeline – Specific Control Area 4	N/A	No buildings or structures shall protrude above the ridgeline extending towards the Tekapo River	N/A
Landscaping	N/A	N/A	30% Min Coverage

Outdoor Living Space	N/A	N/A	Min of 25m ² at ground level with a min dimension of 3m or a balcony of at least 12m with a min dimension of 2m
Minimum Outlook Space	N/A	N/A	4m x 4m – Principal living rooms 3m x 3m – Principal bedrooms 1m x 1m – Other habitable rooms
Fencing	N/A	N/A	1.8m Max Any part of fence higher than 1.2m shall be visually permeable
Access – Specific Control Area 5	N/A	N/A	All activities shall obtain vehicular access to SH8 from Lakeside Drive
Matters of Discretion	RES-MD1 Height RES-MD2 Height in Relation to Boundary RES-MD3 Setbacks RES-MD4 Coverage RES-MD5 Landscaping RES-MD6 Outdoor Living Space RES-MD7 Minimum Outlook Space RES-MD8 Fencing		
Definitions	<i>Access, accessory building, boundary, building, building coverage, building footprint, gross floor area, ground level, habitable room, height, height in relation to boundary, impervious coverage, impervious surface, landscaping, net floor area, net site area, outdoor living space, outdoor storage, road, setback, site, structure.</i>		

- 13.16. The following table identifies the strategic directions and objectives that are relevant to the assessment of this group of provisions, and provides an assessment of the effectiveness and efficiency of the proposed provisions in achieving those objectives. The assessment includes identification and assessment of the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions.

Table 14: Assessment Against Relevant Objectives

<p>Relevant Strategic Directions</p> <p><i>ATC-O1 Live, Work, Play and Visit</i> <i>The Mackenzie District is a desirable place to live, work, play and visit, where:</i></p> <ol style="list-style-type: none"> 1. <i>there are a range of living options, businesses, and recreation activities to meet community needs;</i> 2. <i>activities that are important to the community's social, economic and cultural well-being, including appropriate economic development opportunities, are provided for; and</i> 3. <i>the amenity values and character of different areas are maintained or enhanced.</i> <p><i>UDF-O1 Urban Form and Development</i> <i>The District's townships and settlements grow and develop in a consolidated way that:</i></p>
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1. *is integrated into, and respects the values of the surrounding natural and physical environment;*
2. *achieves good connectivity with other parts of the urban area;*
3. *is supported by appropriate infrastructure;*
4. *maintains the character of each township, and its attractiveness to residents, businesses and visitors; and*
5. *responds to the needs of the community, including diversity in housing and business opportunities.*

Relevant Objective

LLRZ-02

The Large Lot Residential Zone is a desirable low density living environment, which:

1. *contains predominantly detached residential units on large lots;*
2. *maintains a predominance of open space over built form; and*
3. *provides on-site amenity and maintains the spacious character and amenity values of adjacent sites.*

LRZ-02

The Low Density Residential Zone is a desirable suburban living environment, which:

1. *contains predominantly one to two story detached residential units; and*
2. *provides on-site amenity and maintains the suburban character and amenity values of adjacent sites.*

MDRZ-02

The Medium Density Residential Zone is a desirable, higher density, residential living environment, which:

1. *contains a range of housing typologies including semi-detached, terraced housing and low rise apartments;*
2. *is well designed with good design outcomes; and*
3. *provides on-site amenity and maintains the amenity values of adjacent sites.*

	Benefits	Costs
Environmental	<p>The provisions will ensure the character and amenity values of the residential zones are maintained and will appropriately manage adverse effects on the environment.</p> <p>The provisions will limit the level of activity in areas where servicing constraints have been identified until those constraints have been addressed.</p>	<p>The provisions allow for greater built form in some areas, particularly the Medium Density Residential Zone. This has the potential to have adverse effects such as increased building dominance. The Medium Density Standards have however been informed by Urban Design Advice.</p>
Social	<p>Most provisions reflect the existing built form controls and will maintain the character and amenity values of the residential zones.</p> <p>The provisions will contribute to the wellbeing of residents by providing clearer direction and expectations for built form.</p> <p>The provisions will limit the intensity of built form by setting clear density standards.</p>	<p>Areas of infill may result in a change to the residential amenity and character of existing areas.</p>

	Urban design controls in the Medium Density Residential Zone will help ensure development is well-designed and contributes to the character and amenity values of the site and surrounding area.	
Economic	Reductions in built form standards particularly in the Medium Density Residential Zone may increase development opportunities.	<p>Changes to the standards, particularly residential density, will restrict the scale of development opportunities as the built form controls will apply to all buildings no matter their use.</p> <p>In the Medium Density Residential Zone new standards have been introduced based on urban design advice. The new standards may have financial impacts for land owners.</p> <p>The proposed rules may limit some activities from establishing in residential zones.</p>
Cultural	None identified.	None identified.
Efficiency		
<p>Overall, the proposed provisions are considered to be efficient in achieving the outcome sought. The provisions will provide greater efficiencies for plan users through clearer direction and expectations for built form in the residential zones and will protect the amenity and character of residential areas. The proposed provisions will also remove the current issue regarding different built form standards being applied to different activities and will reflect provisions in other second-generation District Plans. The residential character and amenity values of the residential zones will therefore be maintained.</p> <p>In addition, while additional controls have been introduced in the Medium Density Residential Zone, the new controls reflect that a greater level of built form is being enabled and ensures that development in this zone will be undertaken in a way that will meet the outcomes sought. The costs associated with any new controls are therefore considered to be outweighed by the benefits.</p>		
Effectiveness		
<p>The proposed provisions are considered to be effective in achieving the outcome sought in the residential zones as they will:</p> <ul style="list-style-type: none"> • provide for buildings to be established which are consistent with the character and amenity values of the residential zones; • provide for onsite amenity and will help maintain the character and amenity values of adjacent sites. • ensure the Medium Density Residential Zone is well designed and achieves good urban design outcomes. • give effect to CRPS by enabling greater housing choice across the residential zones. • Will limit the activity in areas where servicing constraints have been identified. 		
Alternative Approach		
Continuation of the current policies and rules.		
Appropriateness Assessment		
<p>The existing provisions apply different built form standards to different types of built form. For example, different standards are applied to commercial and visitor accommodation activities in residential zones than those applied to residential activities. This existing approach has had unintended consequences and allowed for increased activity on sites that is essentially out of character in the residential zones. Targeted built form controls that apply to all activities in the residential zones will provide clear expectations for landowners and the community. Provisions that are suitable and that reflect other second generation District Plan have been retained.</p>		

Alterative Approach
Delaying the up zoning of Specific Control Areas 1, 2 and 3
Delaying the up zoning of Specific Control Areas 1, 2 and 3 would be effective in retaining the status quo in areas where servicing constrains have been identified by Councils Engineering Department. Retention of the current zoning however does not signal that intensification in these areas is anticipated. Councils Engineering Department are investigating the serving constraints in these areas and once they have been overcome the Specific Control Areas can be amended via a plan change or variation, which could be included in a subsequent stage of the District Plan review.

Risk of acting or not acting

- 13.17. Section 32(2)(c) of the RMA requires that the efficiency and effectiveness assessment also assesses the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.
- 13.18. The Council has sufficient information about the proposed standards, as they are, to a large degree, a continuation of the current framework. Where changes have been recommended, these are consistent with standards applied in other second-generation District Plans, reflect urban design advice, or are anticipated to address the resource management issues identified.
- 13.19. Based on the above, it is considered that there is sufficient and certain information to act in the manner proposed, and that the risk of doing so is low.

Overall evaluation of appropriateness

- 13.20. Overall, the proposed provisions applying to the Residential zones are considered the most appropriate way to achieve the outcomes sought. The proposed framework is more targeted and outcomes focused compared to the existing plan and will provide certainty for the community as to the anticipated development and character of residential areas and how these areas are expected to be developed and managed. Any additional costs associated with changes from the current approach are considered to be outweighed by the benefits, and are considered necessary to ensure the achievement of the objectives.

14. Evaluation of proposed policies, rules and other methods – Commercial and Mixed Use Zones

Introduction

- 14.1. 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.
- 14.2. 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.
- 14.3. The proposed provisions relating to Commercial and Mixed Use Zones, have been grouped, for the purposes of this assessment, as follows:
- Provisions that relate to the zoning of Commercial and Mixed Use areas and how activities within these zones are managed; and
 - Provisions that relate the effects of activities, including built form, within the Zones are managed.
- 14.4. The specific provisions assessed within each group are set out in more detail below.

Management of Activities

- 14.5. The relevant provisions that are assessed in this section are:

Table 15 – Commercial and Mixed Use Zones Mapping, Policies and Activity Rules

Maps	Where Applied	Reason
Neighbourhood Centre (NCZ)	Smaller separated commercial areas in Takapō / Lake Tekapo identified as 'Retail' and 'Business Park' in the Spatial Plans.	Reason: Consistent with the intention of the Spatial Plan to provide additional smaller scale commercial areas to serve the local community in the Takapō / Lake Tekapo Township. These areas are expected to have different characteristics than those of the town centre areas, and as such they are considered to align best with the description of the Neighbourhood Centre Zone in the National Planning Standards.
Mixed Use (MUZ)	Areas identified as 'Retail' in Spatial Plans in Albury, Kimbell and Te Kōpi-O-Ōpihi / Burkes Pass.	There is currently no commercial zoning in these areas, but they do contain some existing commercial activities. The Spatial Plans identified these areas as being appropriate to consolidate these existing activities and provide for further commercial opportunities. Due to the small scale of these settlements, their existing

		<p>mix of uses, and the need to provide greater flexibility for these to transition over time, they are considered to align best with the description of the Mixed Use Zone in the National Planning Standards.</p>
	<p>Additional sites in Kimbell adjoining this area along the State Highway.</p>	<p>A small expansion of the commercial zoning identified in the Spatial Plans (as sought by the landowners) is considered appropriate, as this provides more flexibility as to where commercial activities can establish, while maintaining a consolidated area. The MUZ framework is also flexible, providing for a mix of residential, commercial and visitor accommodation activities in this area, which is consistent with the current mix of land uses.</p>
<p>Large Format Retail (LFRZ)</p>	<p>Areas identified LFRZ within the Spatial Plans in Takapō / Lake Tekapo and Twizel.</p>	<p>Consistent with the Spatial Plans and the intention of the zone as outlined in its description in the National Planning Standards.</p>
<p>Town Centre Zone (TCZ)</p>	<p>Main commercial areas in Fairlie, Takapō / Lake Tekapo and Twizel (identified as 'Retail' in the Spatial Plans).</p>	<p>Consistent with the intention of the zone as outlined in its description in the National Planning Standards. Consistent with the intent of Spatial Plans, noting that while the commercial areas in the Spatial Plans are labelled 'retail', the description of these in the Spatial Plan, as well as the existing activities located in these areas, are broader and include a range of commercial activities.</p>
	<p>The area at the bottom of the terrace, between the Lakeside Drive/State Highway 8 corner and the no-build areas (part of the area identified as 'High Density Residential / Mixed Use' zone in Takapō / Lake Tekapo in the Spatial Plans)</p>	<p>There is no specific "high density residential/ mixed use" option in the National Planning Standards. The intent of this area outlined in the Spatial Plans is that it will contribute to the provision of a range of housing types to meet changing needs and preferences and to offer opportunities <i>"for a combination of residential living and complementary commercial and/or visitor accommodation activities."</i> This area is particularly appropriate for commercial activities at ground floor level along Lakeside Drive, which are of a type that interact with the road, for example small-scale retail and food and beverage. Taking this into account, it is considered most appropriate to apply TCZ to the land adjoining Lakeside Drive where it is</p>

	close to the existing town centre, and to apply MRZ to the balance of the land.
Policies	<p>NCZ-P1 Commercial and Community Activities <i>Enable a wide range of small-scale commercial activities and community facilities to establish and operate within the Neighbourhood Centre Zone.</i></p> <p>NCZ-P2 Compatible Activities <i>Provide for activities that are not enabled by NCZ-P1 to establish and operate within the Neighbourhood Centre Zone where they:</i></p> <ol style="list-style-type: none"> <i>1. are not of a scale or nature which detracts from the purpose or character of the Town Centre Zone; and</i> <i>2. are compatible with the scale and nature of activities permitted within the zone and the amenity values of the surrounding residential area.</i> <p>LFRZ-P1 Large-scale Retail Activities <i>Enable large scale retail activities and activities of a similar nature to establish and operate within the Large Format Retail Zone.</i></p> <p>LFRZ-P2 Other Activities <i>Avoid the establishment of activities that are not enabled by LFRZ-P1 within the Large Format Retail Zone unless they:</i></p> <ol style="list-style-type: none"> <i>1. are not retail activities that are more suited to a location within the Town Centre Zone;</i> <i>2. will not detract from the purpose or character of the Town Centre Zone; and</i> <i>3. will not result in reverse sensitivity effects with activities that are anticipated in the zone.</i> <p>MUZ-P1 Commercial, Community and Residential Activities <i>Enable a wide range of small-scale commercial activities, community facilities and residential activities to establish and operate within the Mixed Use Zone.</i></p> <p>MUZ-P2 Compatible Activities <i>Provide for activities that are not enabled by MUZ-P1 to establish and operate within the Mixed Use Zone where they:</i></p> <ol style="list-style-type: none"> <i>1. are not of a scale or nature which detracts from the purpose or character of the Town Centre Zone; and</i> <i>2. are compatible with the scale and nature of activities permitted within the zone and the amenity values of the surrounding residential area.</i> <p>TCZ-P1 Commercial and Community Activities <i>Enable a wide range of commercial activities and community facilities to establish and operate within the Town Centre Zone.</i></p> <p>TCZ-P2 Compatible Activities <i>Provide for activities that are not enabled by TCZ-P1 to establish and operate within the Town Centre Zone where they:</i></p> <ol style="list-style-type: none"> <i>1. will contribute to the vibrancy of vitality of the Town Centre Zone;</i> <i>2. are compatible with the scale and nature of activities permitted within the zone; and</i> <i>3. are located so that the continuity of retail activities at ground floor level along road frontages and public spaces is maintained.</i>

Rules	NCZ-R2; NCZ-R3; NCZ-R4; NCZ-R5; NCZ-R6; NCZ-R7 LRFZ-R1; LRFZ-R2; LRFZ-R3; LRFZ-R4; LRFZ-R5; LRFZ-R6; LRFZ-R7; LRFZ-R8; LRFZ-R9; LRFZ-R10 MUZ-R2; MUZ-R3; MUZ-R4; MUZ-R5; MUZ-R6; MUZ-R7; MUZ-R8; MUZ-R9 TCZ-R2; TCZ-R3; TCZ-R4; TCZ-R5; TCZ-R6; TCZ-R7
	Permitted Activities NCZ – Commercial Activities (subject to scale thresholds and type), Community Facilities (subject to scale thresholds) and Educational Facilities. LRFZ - Retail Activities (subject to scale thresholds and type) and Ancillary Activities. MUZ – Minor Residential Units, Residential Activities, Residential Visitor Accommodation (subject to scale thresholds), Commercial Activities (with some exceptions and subject to scale thresholds), Community Facilities (expansion of existing) and Educational Facilities. TCZ - Commercial Activities (subject to type and location), Community Facilities, Educational Facilities and Residential Activities (subject to location).
	Restricted Discretionary Activities NCZ – Commercial Activities (above scale thresholds) and Community Facilities (above scale thresholds). MUZ - Residential Visitor Accommodation (above scale thresholds), Commercial Visitor Accommodation, Commercial Activities (above scale thresholds) and new Community Facilities.
	Discretionary Activities NCZ – Residential Activities, Commercial Visitor Accommodation and Activities not otherwise listed. LRFZ – Retail Activities (below scale thresholds), Commercial Activities not otherwise listed; Community Facilities; Industrial Activities and Activities not otherwise listed. MUZ - Service Stations, Industrial Activities and Activities not otherwise listed. TCZ - Service Stations, Commercial Visitor Accommodation (not meeting location controls), Industrial Activities and Activities not otherwise listed.
	Non-Complying Activities NCZ – Service Stations; Industrial Activities. LRFZ - Residential Activities, Commercial Visitor Accommodation and Educational Facility. TCZ - Residential Activities (not meeting location controls).
Definitions	<i>Ancillary activity, commercial activity, commercial visitor accommodation, community facility, educational facility, food and beverage outlet, industrial activity, minor residential unit, residential activity, residential unit, residential visitor accommodation, retail activity, service station, trade-based retail, visitor accommodation, yard-based retail.</i>

14.6. The policies seek to provide direction on the types of activities that are anticipated in each Zone, and those which are not suitable. This is then reflected in the activity status given to different activities in the rule framework.

14.7. The following table identifies the strategic directions and objectives that are relevant to the assessment of this group of provisions, and provides an assessment of the effectiveness and efficiency of the proposed provisions in achieving those objectives. The assessment includes identification and assessment of the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions.

Table 16: Assessment Against Relevant Objectives

Relevant Strategic Directions
<i>ATC-O1 Live, Work, Play and Visit</i>

The Mackenzie District is a desirable place to live, work, play and visit, where:

1. *there are a range of living options, businesses, and recreation activities to meet community needs;*
2. *activities that are important to the community's social, economic and cultural well-being, including appropriate economic development opportunities, are provided for; and*
3. *the amenity values and character of different areas are maintained or enhanced.*

UDF-O1 Urban Form and Development

The District's townships and settlements grow and develop in a consolidated way that:

1. *is integrated into, and respects the values of the surrounding natural and physical environment;*
2. *achieves good connectivity with other parts of the urban area;*
3. *is supported by appropriate infrastructure;*
4. *maintains the character of each township, and its attractiveness to residents, businesses and visitors; and*
5. *responds to the needs of the community, including diversity in housing and business opportunities.*

Relevant Objectives

NCZ-O1 Purpose

The Neighbourhood Centre Zone contains a range of primarily small-scale commercial and community activities that serve the convenience needs of the surrounding residential or rural neighbourhood or visitors, as well as residential activities.

LFRZ-O1 Purpose

The Large Format Retail Zone provides primarily for large-scale retail activities.

MUZ-O1 Purpose

The Mixed Use Zone contains residential activities, along with a range of primarily small-scale commercial and community activities that serve the convenience needs of the surrounding residential and rural neighbourhood or visitors.

TCZ-O1 Purpose

The Town Centre Zone is the primary retail destination for comparison and convenience shopping in the District, and is a focal point for the community, providing for a range of community and community-focused activities, along with activities that support the vibrancy of these areas.

	Benefits	Costs
Environmental	<p>Ensures that activities establishing within each zone are consistent with the purpose of that zone.</p> <p>Provides for consolidated areas for complimentary activities to establish and develop in.</p>	<p>A greater level of activity is anticipated in these zones, with consequential effects on the environment such as increased traffic and noise. However, this is consistent with the status quo.</p>
Social	<p>Provides areas within each township for particular types of activities that are needed to support the wellbeing of the community.</p> <p>Will help to provide vibrant spaces that are attractive to residents, workers and visitors.</p> <p>In the smaller townships, introduces greater opportunities for commercial and community activities to support those townships.</p>	<p>In some cases, introduces a less permissive framework for some activities than currently applies. This could have a consequential impact on social well-being.</p>

	Emphasises the importance of the Town Centre Zone as a community focal point and ensures activities both within the zone and in other zones are managed to maintain that role.	
Economic	<p>In the smaller townships, introduces greater opportunities for commercial and community activities to support those townships.</p> <p>Reinforcing the importance of the Town Centre Zone as a commercial focal point will help to protect existing investment in this area, and help ensure that activities in other commercial areas do not undermine its role, and the economic costs that would result from that.</p> <p>The framework prioritises particular types of commercial activities in different areas, allowing for a range of business activities in appropriate locations.</p> <p>Reducing opportunities for some activities within each zone ensures that commercial land is not taken up by activities that might undermine the role and land supply of each zone.</p>	The framework is more restrictive towards some activities than the current Plan. These may have some additional costs in terms of lost opportunity to establish those activities or the costs associated with a resource consent process.
Cultural	None identified.	None identified.
Efficiency		
Overall, the proposed provisions are considered to be efficient in achieving the outcome sought. In particular, while the framework is more restrictive towards some activities than the current Plan, it creates new opportunities for appropriate commercial development in other areas. The benefits of providing greater certainty about what activities are appropriate in each zone, and maintaining the role of each zone, are considered to outweigh any costs of reduced opportunities in some zones.		
Effectiveness		
The proposed provisions are considered to be effective in achieving the outcome sought through providing clear direction and appropriate activity statuses to ensure that each zone contains activities that align with its articulated purpose.		
Alternative Approach 1		
Continuation of the current policies and rules.		
Appropriateness Assessment		
<p>The current policy approach seeks to: encourage the establishment of new businesses primarily within areas where similar types of business activity already exist (Business Policy 1A); and specific to Twizel, to provide for varying levels of commercial activity to meet the wider community's social and economic needs, primarily through the consolidation of such activities within the Twizel Village Centre (Business Policy 6A). The policy direction goes on to include provision for the centre's ongoing vitality and viability; enhancing Twizel's commercial and community self-sufficiency; and enhancing the village centre as a pleasant, attractive and vibrant place for people and businesses.</p> <p>The consolidation of similar types of business activities is still pursued through the proposed framework, but articulated more clearly in terms of what activities are anticipated in each of the zones. In terms of the Twizel-specific policy, aspects of this are also carried through into the proposed framework, but applied to all Town Centre Zones, not just Twizel, as it is considered</p>		

equally necessary, to achieve the outcomes sought, to apply is across the zone. There are also some aspects of the rule package in the current Plan that are not considered to be particularly effective at achieving the outcomes sought, for example providing for residential activities and commercial visitor accommodation at ground floor level.

Alternative Approach 2

Use of prohibited activity status for residential activities and commercial visitor accommodation in the Large Format Retail Zone, or at ground floor level in the Town Centre Zone.

Appropriateness Assessment

The use of prohibited activity status for activities not generally anticipated to achieve LFRZ-O1 or TCZ-O1 is considered to be an effective way of achieving the outcome sought. However, it is considered to be inefficient as it would never allow for these specific activities to be established in these zones. The proposed non-complying activity status is considered more appropriate as it provides a pathway for consideration of the appropriateness of these activities through the resource consent process and allows for consent to be granted in circumstances where these activities align with TCZ-P2.

Risk of acting or not acting

- 14.8. Section 32(2)(c) of the RMA requires that the efficiency and effectiveness assessment also assesses the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.
- 14.9. The framework proposed is broadly similar to the current Plan, but provides for a more targeted framework. The approach proposed is consistent with other district plans. As such, the risk of acting in the manner proposed is considered to be low.

Managing Effects

14.10. The relevant provisions that are assessed in this section are:

Table 17 – Commercial and Mixed Use Policies and Effects Rules

Policies	<p>NCZ-P3 Adverse Effects <i>Manage development within the Neighbourhood Centre Zone to ensure that it:</i></p> <ol style="list-style-type: none"> 1. <i>provides a high-quality pedestrian environment;</i> 2. <i>is well-integrated with roads and public areas and positively contributes to their vibrancy;</i> 3. <i>provides a good level of amenity for residents, workers and visitors; and</i> 4. <i>is compatible with its residential setting and maintains the anticipated amenity values of any adjoining residential zone.</i> <p>LFRZ-P3 Adverse Effects <i>Manage the adverse effects of activities within the Large Format Retail Zone to:</i></p> <ol style="list-style-type: none"> 1. <i>ensure that built form is of a scale that is compatible with the role and function of the zone;</i> 2. <i>provide for a good level of amenity for workers within the zone; and</i> 3. <i>mitigate the effects of activities within the zone on areas outside it, particularly more sensitive zones, so that it does not compromise the amenity values anticipated in adjoining areas.</i> <p>MUZ-P3 Adverse Effects <i>Manage development within the Mixed Use Zone to ensure that it:</i></p> <ol style="list-style-type: none"> 1. <i>provides a high-quality pedestrian environment;</i> 2. <i>is well-integrated with roads and public areas and positively contributes to their vibrancy;</i>
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	<p>3. provides a good level of amenity for residents, workers and visitors; and 4. is compatible with its residential setting and maintains the anticipated of any adjoining residential zone.</p> <p>TCZ-P3 Adverse Effects Manage development within the Town Centre Zone to ensure that it:</p> <p>1. provides a high-quality pedestrian environment; 2. is well-integrated with roads and public areas and positively contributes to their vibrancy; 3. provides a good level of amenity for residents, workers and visitors; and 4. mitigate the effects of activities within the zone on areas outside it, particularly more sensitive zones, so that it does not compromise the amenity values anticipated in adjoining areas.</p>			
Rules	NCZ-R1; LFRZ-R1; MUZ-R1; TCZ-R1			
	Permitted Activities All Zones – Buildings and Structures (subject to compliance with standards).			
Standards	NCZ	LFRZ	MUZ	TCZ
Height	7.5m with additional 1m for gable roof	12m	8m	10.5m
Height Relation to Boundary	Applied at all boundaries.	Applied at any residential zone boundary.	Applied at all boundaries.	Applied at any residential zone boundary.
Internal Boundary Setback	2m	7m from any residential, open space or recreation zone. 3m from any rural zone.	2m	3m from any residential zone
Road Boundary Setback	2m	5m	3m	Nil
Outdoor Storage	Screening required and not within road boundary setback	Screening required and not within road boundary setback	Screening required and not within road boundary setback	Screening required and not within road boundary setback
Coverage	45% max building coverage	75% max building coverage	45% max building coverage 50% max site coverage	
Landscaping	Required along residential boundaries and 30% min coverage	Required along zone boundaries and road boundaries	Required along residential boundaries	Required along residential boundaries
Density			As per LRZ (where the residential unit is connected to a reticulated sewage system – 400m ² Where the residential unit is not connected to	

			a reticulated sewage system – 1,500m ²)	
Verandahs				Required on sites fronting Market Place in Twizel, or Main Street in Fairlie
Street Frontages				50% transparent glazing requirement for ground floor façades facing a road or public space
Matters of Discretion	CMUZ-MD1 Height CMUZ-MD2 Height in Relation to Boundary CMUZ-MD3 Internal Boundary Setback CMUZ-MD4 Road Boundary Setback CMUZ-MD5 Outdoor Storage CMUZ-MD6 Coverage CMUZ-MD7 Landscaping			
Definitions	<i>Accessory building, boundary, building, building coverage, building footprint, gross floor area, ground level, height, height in relation to boundary, impervious coverage, impervious surface, landscaping, net floor area, net site area, outdoor living space, outdoor storage, road, setback, site, structure.</i>			

14.11. The policies seek to provide direction on how activities, including built development, are to be managed to achieve the anticipated character of each Commercial and Mixed Use zone. This is then implemented through the standards applied to buildings and structures; and to screening and landscaping.

14.12. The following table identifies the strategic directions and objectives that are relevant to the assessment of this group of provisions, and provides an assessment of the effectiveness and efficiency of the proposed provisions in achieving those objectives. The assessment includes identification and assessment of the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions.

Table 18: Assessment Against Relevant Objectives

Relevant Strategic Directions
<p><i>ATC-O1 Live, Work, Play and Visit</i></p> <p><i>The Mackenzie District is a desirable place to live, work, play and visit, where:</i></p> <ol style="list-style-type: none"> <i>1. there are a range of living options, businesses, and recreation activities to meet community needs;</i> <i>2. activities that are important to the community's social, economic and cultural well-being, including appropriate economic development opportunities, are provided for; and</i> <i>3. the amenity values and character of different areas are maintained or enhanced.</i> <p><i>UDF-O1 Urban Form and Development</i></p> <p><i>The District's townships and settlements grow and develop in a consolidated way that:</i></p> <ol style="list-style-type: none"> <i>1. is integrated into, and respects the values of the surrounding natural and physical environment;</i> <i>2. achieves good connectivity with other parts of the urban area;</i> <i>3. is supported by appropriate infrastructure;</i>

4. maintains the character of each township, and its attractiveness to residents, businesses and visitors; and
5. responds to the needs of the community, including diversity in housing and business opportunities.

Relevant Objective

NCZ-O2 Character

The Neighbourhood Centre Zone contains built form of a scale that reflects the character of the surrounding residential neighbourhood, and which maintains the amenity values anticipated within and beyond the zone.

LFRZ-O2 Character

The adverse effects of activities and built form within the Large Format Retail Zone are managed in a way that:

1. recognises the functional and operational requirements of activities within it;
2. maintains a reasonable level of amenity within the zone; and
3. maintains the amenity values anticipated in adjoining zones.

MUZ-O2 Character

The Mixed Use Zone contains built form of a scale that reflects the character of the surrounding residential neighbourhood, and which maintains the amenity values anticipated within and beyond the zone.

TCZ-O1 Character

The Town Centre Zone is a vibrant, pedestrian-focused environment with attractive and functional buildings and public areas of a moderate scale, which maintains the amenity values anticipated in within and beyond the zone.

	Benefits	Costs
Environmental	The provisions will ensure on-site amenity for occupants and visitors, as appropriate to each Zone Ensures that adverse effects on the surrounding environment are appropriately managed, including taking into account the sensitivity of other zones.	None identified.
Social	Appropriate management of effects will help to ensure that the amenity values and character both within and beyond the zone are maintained or enhanced. Managing development to maintain the desired character for each zone will result in pleasant spaces for residents and visitors.	None identified.
Economic	The standards applying to built form are appropriate to enable development consistent with the purpose of each zone. This includes reducing the setback required for residential zones in the Town Centre Zone.	The standards applying to built form will restrict the scale of development opportunities. However, this is generally consistent with the current restrictions, so does not result in increased costs from those applying under the status quo. In the Town Centre Zone, a new standard is proposed to require a minimum level of glazing along road-facing ground floor facades. This may

		have some financial impact, albeit it is expected to be minimal.
Cultural	None identified.	None identified.
Efficiency		
Overall, the proposed provisions are considered to be efficient in achieving the outcome sought. While some additional controls are proposed, the costs associated with these are considered to be outweighed by the benefits.		
Effectiveness		
The proposed provisions are considered to be effective in achieving the outcome sought through providing an appropriate balance between enabling built form of a scale that is consistent with the purpose of each zone, while appropriately managing its effects on the surrounding area.		
Alternative Approach		
Continuation of the current policies and rules.		
Appropriateness Assessment		
<p>The current policy approach seeks to: avoid or minimise the adverse effects of activities in business areas so as to ensure these areas and adjoining areas remain pleasant, attractive and safe (Business Policy 2A); to maintain the existing scale of buildings and enhance the character of business areas (Business Policy 2B); and to minimise the adverse effects of activities in business areas on the amenity of adjoining residential areas (Business Policy 3A). The Lake Tekapo Village Centre Policies also include various character-related direction applying to built form.</p> <p>While the current policies are broadly consistent with the proposed approach, the proposed policy framework articulates this more clearly and is specific to each Commercial and Mixed Use zone. There are also some aspects of the rule package in the current Plan that are considered to be less effective at achieving the outcomes sought, for example the lack of a targeted control to require active frontages in the Town Centre Zone.</p> <p>With respect to the Lake Tekapo policies, it is considered that there are aspects of these that are relevant to all Town Centre zones, which are therefore captured in TCZ-P3. Other aspects which are specific to the character of the Township are considered to be better addressed through a specific policy targeted to the proposed precinct.</p>		

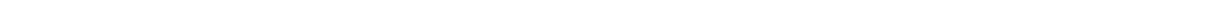
Risk of acting or not acting

- 14.13. Section 32(2)(c) of the RMA requires that the efficiency and effectiveness assessment also assesses the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.
- 14.14. The Council has sufficient information about the proposed standards, as they are, to a large degree, a continuation of the current framework. Where changes have been recommended, such as the introduction of a minimum glazing requirement in the Town Centre Zone and a reduced setback from residential zones, these are consistent with standards applied in other second generation District Plans.
- 14.15. Based on the above, it is considered that there is sufficient and certain information to act in the manner proposed, and that the risk of doing so is low.

Overall evaluation of appropriateness

- 14.16. Overall, the proposed provisions applying to the Commercial and Mixed Use zones are considered the most appropriate way to achieve the outcomes sought. To a large extent they are consistent with the current approach but provide a more targeted policy framework that provides greater certainty to landowners and the public about how these areas are expected to be developed and managed. Any additional costs associated with changes from the

current approach are considered to be outweighed by the benefits, and are considered necessary to ensure the achievement of the objectives.



15. Evaluation of proposed policies, rules and other methods – General Industrial Zone

Introduction

- 15.1. 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.
- 15.2. 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.
- 15.3. The proposed provisions relating to the General Industrial Zone have been grouped, for the purposes of this assessment, as follows:
- Provisions that relate to the zoning of General Industrial areas and how activities within the General Industrial Zone are managed; and
 - Provisions that relate the effects of activities, including built form, within the Zone is managed.

The specific provisions assessed within each group are set out in more detail below.

Management of Activities

- 15.4. The relevant provisions that are assessed in this section are:

Table 19 – General Industrial Zone Mapping, Policies and Activity Rules

Maps	Where Applied	Reason
General Industrial Zone (GIZ)	Areas identified as Industrial in the Spatial Plans in Fairlie, Takapō / Lake Tekapo and Twizel.	Consistent with the intention of the zone as outlined in its description in the National Planning Standards.
Policies	<p>GIZ-P1 Industrial Activities <i>Enable a range of industrial activities and activities of a similar scale and nature to industrial activities, to establish and operate within the General Industrial Zone.</i></p> <p>GIZ-P2 Other Activities <i>Avoid the establishment of activities that are not enabled by GIZ-P1 within the General Industrial Zone unless they will not result in reverse sensitivity effects with activities enabled by GIZ-P1, and they:</i></p> <ol style="list-style-type: none"> <i>1. have a functional need or operational need to establish in the zone; or</i> <i>2. are commercial activities which support the needs of workers within the zone and will not detract from the purpose or character of the Town Centre Zone.</i> 	
Rules	<p>GIZ-R2; GIZ-R3; GIZ-R4; GIZ-R5; GIZ-R6; GIZ-R7</p> <p>Permitted Activities <i>Industrial Activities (subject to type), Yard-Based Retail, Trade-Based Retail, Service Stations, Food and Beverage Outlets (subject to scale) and activities ancillary to these (with some controls).</i></p> <p>Restricted Discretionary Activities</p>	

	NCZ – Heavy Industrial Activities.
	Discretionary Activities <i>Commercial Activities not otherwise listed, Community Facilities and Activities not otherwise listed.</i>
	Non-Complying Activities <i>Residential Activities, Commercial Visitor Accommodation, Educational Facilities.</i>
Definitions	<i>Ancillary activity, commercial activity, commercial visitor accommodation, community facility, educational facility, food and beverage outlet, heavy industrial activity, industrial activity, residential activity, retail activity, service station, trade-based retail, visitor accommodation, yard-based retail.</i>

15.5. The policies seek to provide direction regarding the types of activities that are anticipated in the Zone, and those which are not suitable. This is then reflected in the activity status given to different activities in the rule framework.

15.6. The following table identifies the strategic directions and objectives that are relevant to the assessment of this group of provisions, and provides an assessment of the effectiveness and efficiency of the proposed provisions in achieving those objectives. The assessment includes identification and assessment of the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions.

Table 20: Assessment Against Relevant Objectives

Relevant Strategic Directions		
<i>ATC-O1 Live, Work, Play and Visit</i> <i>The Mackenzie District is a desirable place to live, work, play and visit, where:</i>		
<ol style="list-style-type: none"> <i>1. there are a range of living options, businesses, and recreation activities to meet community needs;</i> <i>2. activities that are important to the community's social, economic and cultural well-being, including appropriate economic development opportunities, are provided for; and</i> <i>3. the amenity values and character of different areas are maintained or enhanced.</i> 		
<i>UDF-O1 Urban Form and Development</i> <i>The District's townships and settlements grow and develop in a consolidated way that:</i>		
<ol style="list-style-type: none"> <i>1. is integrated into, and respects the values of the surrounding natural and physical environment;</i> <i>2. achieves good connectivity with other parts of the urban area;</i> <i>3. is supported by appropriate infrastructure;</i> <i>4. maintains the character of each township, and its attractiveness to residents, businesses and visitors; and</i> <i>5. responds to the needs of the community, including diversity in housing and business opportunities.</i> 		
Relevant Objective		
<i>GIZ-O1 Purpose</i> <i>The General Industrial Zone provides primarily for industrial activities and other compatible activities, as well as activities that support the functioning of industrial areas.</i>		
	Benefits	Costs
Environmental	<p>Ensures that activities establishing within the Zone are consistent with the purpose of the Zone.</p> <p>Provides for consolidation of activities that are expected to have a greater level of adverse effects, in appropriate areas.</p>	<p>The types of activities anticipated in the Zone are those which are expected to have a greater level of adverse effects on the environment. However, this is consistent with the status quo.</p>

Social	<p>Provides areas within each main township for particular types of activities that are needed to support the wellbeing of the community.</p> <p>Reduces the potential for activities within the Industrial Zone to undermine the role of the Town Centre Zone and the negative impact that would have on the community's social well-being.</p>	Introduces a less permissive framework for community activities than currently applies.
Economic	<p>The clearer framework, including management of reverse sensitivity effects, will provide greater protection to the ongoing operation of established industrial activities in this Zone.</p> <p>Reducing opportunities for non-industrial activities within the Zone ensures that the supply of industrial land is not reduced.</p> <p>Reduces the potential for activities within the Industrial Zone to undermine the role of the Town Centre Zone and the economic costs that would result from that.</p>	The framework is more restrictive towards some activities than the current Plan. These may have some additional costs in terms of lost opportunity to establish those activities or the costs associated with a resource consent process.
Cultural	None identified.	None identified.
Efficiency		
Overall, the proposed provisions are considered to be efficient in achieving the outcome sought. In particular, while the framework is more restrictive towards some activities than the current Plan, the benefits of providing greater certainty about what activities are appropriate in the Zone are considered to outweigh any costs of this.		
Effectiveness		
The proposed provisions are considered to be effective in achieving the outcome sought through providing clear direction and appropriate activity statuses to ensure that the Zone contains activities that align with its articulated purpose.		
Alternative Approach 1		
Continuation of the current policies and rules.		
Appropriateness Assessment		
The current policy approach seeks to: encourage the establishment of new businesses primarily within areas where similar types of business activity already exist (Policy 1A); and enable industrial and service activities to establish and operate in the business centres without being adversely affected by activities which require a higher standard of amenity (Policy 2C). While this is broadly consistent with the proposed approach, the proposed policy framework articulates this more clearly and is specific to the General Industrial Zone. There are also some aspects of the rule package in the current Plan that are not considered to be particularly effective at achieving the outcomes sought, for example the permitted activity status for recreational and community activities.		
Alternative Approach 2		
Use of prohibited activity status for residential activities and commercial visitor accommodation.		
Appropriateness Assessment		
The use of prohibited activity status for activities not generally anticipated to achieve GIZ-O1 is considered to be an effective way of achieving the outcome sought. However, it is considered to be inefficient as it would never allow for such activities to be established in this Zone. The proposed non-complying activity status is considered more appropriate as it provides a pathway for		

consideration of the appropriateness of these activities through the resource consent process and allows for consent to be granted in circumstances where these activities align with GIZ-P3.

Risk of acting or not acting

- 15.7. Section 32(2)(c) of the RMA requires that the efficiency and effectiveness assessment also assesses the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.
- 15.8. The framework proposed is broadly similar to the current Plan, but provides for a more targeted framework. The approach proposed is consistent with other district plans. As such, the risk of acting in the manner proposed is considered to be low.

Managing Effects

- 15.9. The relevant provisions that are assessed in this section are:

Table 21 – General Industrial Policies and Effects Rules

Policies	GIZ-P3 Adverse Effects <i>Manage the adverse effects of activities within the General Industrial Zone to:</i> <ol style="list-style-type: none"> 1. <i>ensure that built form is of a scale that is compatible with the purpose of the zone;</i> 2. <i>provide for a reasonable level of amenity for workers within the zone; and</i> 3. <i>mitigate the effects of activities within the zone on areas outside it, particularly more sensitive zones, so that it does not compromise the amenity values anticipated in adjoining areas.</i>
Rules	GIZ-R1 Permitted Activities <i>Buildings and Structures (subject to compliance with standards).</i>
Standards	
Height	12m
Height in Relation to Boundary	Applied at any residential zone boundary.
Internal Boundary Setback	7m from any residential, open space or recreation zone. 3m from any rural zone.
Road Boundary Setback	5m; or 10m from the boundary of Ostler Road.
Outdoor Storage	Screening required and not within road boundary setback
Coverage	75% max building coverage
Landscaping	Required along zone boundaries and road boundaries
Definitions	<i>Boundary, building, building coverage, ground level, height, height in relation to boundary, landscaping, outdoor storage, road, setback, site, structure.</i>

- 15.10. The policy seeks to provide direction on how activities, including built development, are to be managed to achieve the anticipated character of the General Industrial Zone. This is then implemented through the standards applied to buildings and structures; and to screening and landscaping.

- 15.11. The following table identifies the strategic directions and objectives that are relevant to the assessment of this group of provisions, and provides an assessment of the effectiveness and efficiency of the proposed provisions in achieving those objectives. The assessment includes identification and assessment of the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions.

Table 22: Assessment Against Relevant Objectives

Relevant Strategic Directions		
<p><i>ATC-O1 Live, Work, Play and Visit</i> <i>The Mackenzie District is a desirable place to live, work, play and visit, where:</i></p> <ol style="list-style-type: none"> 1. <i>there are a range of living options, businesses, and recreation activities to meet community needs;</i> 2. <i>activities that are important to the community's social, economic and cultural well-being, including appropriate economic development opportunities, are provided for; and</i> 3. <i>the amenity values and character of different areas are maintained or enhanced.</i> <p><i>UDF-O1 Urban Form and Development</i> <i>The District's townships and settlements grow and develop in a consolidated way that:</i></p> <ol style="list-style-type: none"> 1. <i>is integrated into, and respects the values of the surrounding natural and physical environment;</i> 2. <i>achieves good connectivity with other parts of the urban area;</i> 3. <i>is supported by appropriate infrastructure;</i> 4. <i>maintains the character of each township, and its attractiveness to residents, businesses and visitors; and</i> 5. <i>responds to the needs of the community, including diversity in housing and business opportunities.</i> 		
Relevant Objectives		
<p><i>GIZ-O2 Character</i> <i>The adverse effects of activities and built form within the General Industrial Zone are managed in a way that:</i></p> <ol style="list-style-type: none"> 1. <i>recognises the functional and operational requirements of activities within it;</i> 2. <i>maintains a reasonable level of amenity within the zone; and</i> 3. <i>maintains the amenity values anticipated in adjacent zones.</i> 		
	Benefits	Costs
Environmental	<p>The provisions will ensure on-site amenity for occupants appropriate to the Zone</p> <p>Ensures that adverse effects on the surrounding environment are appropriately managed, taking into account the sensitivity of other zones.</p>	<p>The provisions allow for greater built form than that provided in other zones. However, the standards are intended to appropriately manage the effects of this, and are largely consistent with the status quo.</p>
Social	<p>Appropriate management of effects will help to ensure that the amenity values and character both within and beyond the zone are maintained or enhanced.</p>	<p>None identified.</p>
Economic	<p>The standards applying to built form are appropriate to enable development consistent with the purpose of the Zone.</p>	<p>An additional setback from rural zones is proposed, and a 1m increase in the landscaping required along any zone boundary. This will slightly reduce where buildings can be situated on some sites within the Zone and result in slightly increased costs for landscaping.</p>

Cultural	None identified.	None identified.
Efficiency		
Overall, the proposed provisions are considered to be efficient in achieving the outcome sought. While some additional controls are proposed, the costs associated with these are considered to be outweighed by the benefits.		
Effectiveness		
The proposed provisions are considered to be effective in achieving the outcome sought through providing an appropriate balance between enabling built form of a scale that is consistent with the purpose of the Zone, while appropriately managing its effects on the surrounding area.		
Alternative Approach		
Continuation of the current policies and rules.		
Appropriateness Assessment		
The current policy approach seeks to: avoid or minimise the adverse effects of activities in business areas so as to ensure these areas and adjoining areas remain pleasant, attractive and safe (Business Policy 2A); to maintain the existing scale of buildings and enhance the character of business areas (Business Policy 2B); and to minimise the adverse effects of activities in business areas on the amenity of adjoining residential areas (Business Policy 3A). While this is broadly consistent with the proposed approach, the proposed policy framework articulates this more clearly and is specific to the General Industrial Zone. There are also some aspects of the rule package in the current Plan that are considered to be less effective at achieving the outcomes sought, for example the lack of internal setbacks from rural zones, and a lower landscaping requirement along zone boundaries.		

Risk of acting or not acting

- 15.12. Section 32(2)(c) of the RMA requires that the efficiency and effectiveness assessment also assesses the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.
- 15.13. The Council has sufficient information about the proposed standards, as they are, to a large degree, a continuation of the current framework. Where changes have been recommended, such as an internal setback from rural zones boundaries, and a wider landscaping strip along zone boundaries, these are consistent with standards applied in other second generation District Plans.
- 15.14. Based on the above, it is considered that there is sufficient and certain information to act in the manner proposed, and that the risk of doing so is low.

Overall evaluation of appropriateness

- 15.15. Overall, the proposed provisions applying to the General Industrial Zone are considered the most appropriate way to achieve the outcomes sought. To a large extent they are consistent with the current approach but provide a more targeted policy framework that provides greater certainty to landowners and the public about how these areas are expected to be developed and managed. Any additional costs associated with changes from the current approach are considered to be outweighed by the benefits, and are considered necessary to ensure the achievement of the objectives.

16. Evaluation of proposed policies, rules and other methods – Takapō / Lake Tekapo Precinct

Introduction

- 16.1. 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.
- 16.2. 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.
- 16.3. The proposed provisions relating to the Takapō / Lake Tekapo Precinct (i.e. all provisions in the Takapō / Lake Tekapo Precinct chapter and mapping of the area), have been grouped together for the purposes of this assessment.

Design Standards

- 16.4. The relevant provisions that are assessed in this section are:

Table 23 – Design Policies and Standards

Maps	Where Applied	Reason
Takapō / Lake Tekapo Precinct (PREC1)	All residential, commercial and mixed use and industrial zones in Takapō / Lake Tekapo.	The Spatial Plan identified a need for design guidelines to be developed for the township to maintain and enhance the character in Takapō / Lake Tekapo, particularly in relation to heights in higher density areas. In reviewing the existing Lake Tekapo Design Guide (Appendix P), including design controls, urban design advice is that it is appropriate to apply the revised guide and controls to all of the urban area. This reflects that there is generally good consistency of character traits across the town that are worthy of maintaining and enhancing, and a need to avoid development that is unrepresentative of these traits that might undermine the overall character of the township.
Policies	PREC1-P1 Development <i>Control the scale, appearance and location of buildings to ensure that:</i> <ol style="list-style-type: none"> 1. <i>the built form character of the Township is maintained and enhanced;</i> 2. <i>development is integrated with the landscape setting, including the topography, landform, and views to and from the area;</i> 3. <i>key viewshafts within and through land on the south side of State Highway 8 are protected, and accessibility to the Domain and lake are maintained; and</i> 4. <i>views to the lake from properties on the north side of State Highway 8 are maintained.</i> 	
Rules	PREC-R1	

	<p>Permitted Activities Buildings and Structures (subject to compliance with standards) within the any residential zone, commercial and mixed use zone, or General Industrial Zone.</p> <p>Restricted Discretionary Activities Buildings and Structures (subject to compliance with standards) within the Town Centre Zone.</p>
Standards	
Materials and Colours	Cladding and roof material must be from specified materials. Paints must be in range of browns, greens, greys or black, with a light reflectivity value between 5% and 35%.
Roofs	Primary roof forms for flat or monopitch roofs must have an angle up to 20 degrees, or a gable of between 20 & 65 degrees. Secondary roof forms shall be equivalent or lower.
Building Scale	Walls limited to 20m in total length in any residential zone and 40m in the TCZ. Walls must have a recess where longer than 14m in continuous length in any residential zone and 18m in the TCZ, LFRZ and GIZ. 2m minimum separation distance required between buildings in any residential zone and 4m in the TCZ.
Height	7.5m with additional 1m for gable roof in MRZ and TCZ. 5m in Specific Control Area 1. 12m in Specific Control Area 2.
No build areas	No building or structures to be located within an identified No Build Area.
Garages	Must be setback from primary building façade where attached, and setback from residential unit by 2m where detached.
Fencing	Fences adjoining a road or public space must be located beyond the primary building façade.
Retaining Walls and Level Changes	Retaining walls adjoining a road or public space limited to 1m max height, must be of natural materials with a minimum terraced step or embankment of 500mm between retaining walls. Embankment or bunds can be no steeper than 1:3 (33%) with bunding no higher than 1.2m above road level.
Appendices	Takapō / Lake Tekapo Character Design Guide.
Definitions	<i>Boundary, building, ground level, height, height in relation to boundary, road, setback, site, structure.</i>

16.5. These provisions seek to control built development within the Takapō / Lake Tekapo Precinct to ensure that it is sympathetic to the character of the town and the surrounding landscape. The following is proposed:

- Buildings and structures in the residential area are permitted, where they meet design standards that are expected to achieve the outcomes sought. These include controls on materials, scale, and boundary treatments. Where these standards are not met, resource consent will be assessed against the proposed Takapō / Lake Tekapo Character Design Guide to ensure that they still meet the design outcomes sought.
- Buildings in the Town Centre Zone will require resource consent as a restricted discretionary activity, to allow for consideration of the design of the building against the proposed Takapō / Lake Tekapo Character Design Guide.

16.6. The following table identifies the strategic directions and objectives that are relevant to the assessment of this group of provisions, and provides an assessment of the effectiveness and efficiency of the proposed provisions in achieving those objectives. The assessment includes identification and assessment of the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions.

Table 24: Assessment Against Relevant Objectives

Relevant Strategic Directions		
<p><i>ATC-O1 Live, Work, Play and Visit</i> <i>The Mackenzie District is a desirable place to live, work, play and visit, where:</i></p> <ol style="list-style-type: none"> 1. <i>there are a range of living options, businesses, and recreation activities to meet community needs;</i> 2. <i>activities that are important to the community's social, economic and cultural well-being, including appropriate economic development opportunities, are provided for; and</i> 3. <i>the amenity values and character of different areas are maintained or enhanced.</i> <p><i>NE-O1 Natural Environment</i> <i>The values of the natural environment that make the District unique, contribute to its character, identity and well-being, and have significant intrinsic values, are recognised and provided for, and where appropriate protected and enhanced. This includes values associated with:</i></p> <ol style="list-style-type: none"> 1. <i>mahika kai resources;</i> 2. <i>night sky darkness;</i> 3. <i>outstanding natural features and landscapes;</i> 4. <i>significant indigenous biodiversity; and</i> 5. <i>water bodies and their margins.</i> <p><i>UDF-O1 Urban Form and Development</i> <i>The District's townships and settlements grow and develop in a consolidated way that:</i></p> <ol style="list-style-type: none"> 1. <i>is integrated into, and respects the values of the surrounding natural and physical environment;</i> 2. <i>achieves good connectivity with other parts of the urban area;</i> 3. <i>is supported by appropriate infrastructure;</i> 4. <i>maintains the character of each township, and its attractiveness to residents, businesses and visitors; and</i> 5. <i>responds to the needs of the community, including diversity in housing and business opportunities.</i> 		
Relevant Objective		
<p><i>PREC-O1 Takapō / Lake Tekapo Precinct</i> <i>Development within Takapō / Lake Tekapo maintains the distinctive character and identity of the Township and is complementary to the surrounding landscape.</i></p>		
	Benefits	Costs
Environmental	Helps ensure development is complementary to, and does not undermine the values associated with the surrounding Outstanding Natural Landscape	While the standards are intended to ensure design meets the outcomes sought, they do not control all aspects of development.
Social	Managing development to maintain the character of the Township will result in retention of those aspects of the township that make it special for residents and visitors.	None identified.
Economic	Maintenance of the character of the Township will ensure it remains a desirable location to visit and invest in, which in turn has economic benefits for local businesses.	The proposed standards introduce controls that do not currently apply to the current Residential 1 and Industrial zoned areas. There are costs associated with the requirement for resource consent for development within the Town Centre. However, this is consistent with the status quo.

Cultural	Helps ensure development is complementary to cultural values associated with the surrounding Outstanding Natural Landscape and the Lake.	None identified.
Efficiency		
<p>While the proposed provisions introduce additional standards than currently apply, these are considered necessary to achieve the outcomes sought and the benefits associated with maintaining the Township's character is considered to outweigh the costs. In particular, the provisions are targeted to each area, with the lowest level of control in less sensitive areas (LFRZ and GIZ), and the greatest level of control in the Town Centre Zone, due to its greater visual prominence and the larger number of people that visit it, and due to the likely greater scale of built development. The application of minimum design controls in the Township's residential, large format and industrial areas, while additional to the status quo, are an efficient way to control the main aspects of design that affect the character of development, while still providing a permitted pathway within these areas.</p>		
Effectiveness		
<p>The proposed provisions are considered to be an effective way to achieve the outcomes sought. As noted above, a targeted approach is proposed with greater control applied within the Town Centre where greater management is considered necessary to ensure design outcomes are met. This approach also aligns with the urban design advice received (refer to Appendix XX), except for some recommendations relating to the LFRZ and GIZ where their application is considered to be less effective at achieving the outcomes sought for these zones.</p>		
Alternative Approach 1		
Continuation of the current policies and rules.		
Appropriateness Assessment		
<p>The current Plan includes several policies relating to Lake Tekapo Village (Lake Tekapo Village Centre Policies). These include policies that are considered to relate more to the role of the Town Centre (Lake Tekapo Village Centre Policies a), b), k), l)), or to management of effects generally (policies c), d), j) m)) rather than being specific to the character of the Township, and which are equally applicable to the other Townships. Those more specific to character are considered to be captured, where relevant in the proposed policies (for example e), f), g), h), i), k)).</p> <p>With respect to the rule framework, it is noted that the Plan contains the Lake Tekapo Design Guide in Appendix P. It currently applies to some, but not all zones within the Takapō / Lake Tekapo area, including that it does not apply to the current Residential 1 Zone. The Guide is also a mix of outcomes and directions, principles and considerations for built development and standards/rules. An issue with the current approach is that some rules require 'compliance' with the Guide, but it is unclear what aspects of the Guide this relates to. This approach is therefore considered to be inefficient. The lack of control in the wider residential area could also lead to development that is not consistent with the current character, and therefore risks the achievement of the outcomes sought.</p>		
Alternative Approach 2		
Introduce a consent requirement for any buildings or structures within the Township.		
Appropriateness Assessment		
<p>This option would involve requiring a restricted discretionary activity consent for development in any zone within the Takapō / Lake Tekapo township to ensure consistency with the Takapō / Lake Tekapo Character Design Guide. This would be consistent with the current requirements for the Town Centre Zone, but would be more onerous than is currently the case for residential and industrial areas. In these areas, urban design advice has recommended the application of minimum design controls as being sufficient to maintain the character, without the need for a qualitative assessment of all new buildings. This option is therefore considered to be less efficient.</p>		
Alternative Approach 3		
Do not incorporate the Design Guide within the District Plan.		
Appropriateness Assessment		
<p>Under this option the proposed Takapō / Lake Tekapo Character Design Guide would sit outside the District Plan as a non-statutory document. While it could only be referred to in any resource consent</p>		

process, this would only be to the extent that it related to the relevant policies, objectives or matters of discretion, and it would hold no statutory weight. As such, there is a risk that it would be less effective.

Risk of acting or not acting

- 16.7. Section 32(2)(c) of the RMA requires that the efficiency and effectiveness assessment also assesses the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.
- 16.8. The Council has obtained advice from Boffa Miskell on the proposed provisions (contained in Appendix XX). This has included advice on the proposed controls, as well as a review of the Design Guide. This advice was, in turn, based on input from the community. Design controls, in terms of both permitted built form standards and qualitative resource consent processes, are also commonly used in district plans to maintain the character of specific areas. Based on this, there is considered to be sufficient information on which to base the proposed provisions and the risk of acting in the manner proposed is low.

Overall evaluation of appropriateness

- 16.9. Overall, the proposed Takapō / Lake Tekapo Precinct provisions are considered to be the most appropriate way to achieve the Precinct objective. The proposed approach is considered to appropriately target the design controls and consent requirements in different areas, to provide the most efficient and effective approach overall.
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17. Evaluation of proposed policies, rules and other methods – Development Areas

Introduction

- 17.1. 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.
- 17.2. 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.
- 17.3. The proposed provisions relating to the Takapō / Lake Tekapo West Future Development Area and Takapō / Lake Tekapo North-West Future Development Area (i.e. all provisions in these chapters and the mapping of these areas), have been grouped together for the purposes of this assessment.

Future Development Policies

- 17.4. The relevant provisions that are assessed in this section are:

Table 25 – Future Development Area Policies

Maps	Where Applied	Reason
Takapō / Lake Tekapo West Future Development Area (DEV1) and Takapō / Lake Tekapo North-West Future Development Areas (DEV2)	Areas identified in the Spatial Plans to the west of the current Takapō / Lake Tekapo township for residential development beyond the current urban boundary. Note, underlying rural zoning is still applied.	Residential expansion within these areas is anticipated in the Spatial Plans. Given the location of these within the Mackenzie Basin ONL and sub-zone, where much remaining indigenous vegetation has high ecological value, high-level landscape and ecological assessments were sought to determine if the values associated with any of these areas is such that urban expansion would not be appropriate. These assessments indicate that there is capacity for some development in these locations, but both identify areas or aspects that need further consideration. There are also some infrastructure capacity constraints. Identification of these areas as Future Development Areas, with a policy framework requiring that a master plan be developed before rezoning, and directing what the master plan must address, signal that development is anticipated, while allowing for more site-specific assessment to be undertaken of the exact location and nature of appropriate development. This is consistent with the Spatial Plan, which

		<p>anticipated mixed densities of development in these areas, allowing flexibility in which parts of the overall sites' development should be avoided. This would also allow for servicing capacity to be considered in more detail. To develop these areas a plan change or variation would be required, which could be included in a subsequent stage of the District Plan review. Until this, the current rural zoning will continue to apply to the land..</p>
<p>Policies</p>	<p>DEV1-P1 Master Plan <i>Prior to the rezoning of the Takapō / Lake Tekapo West Future Development Area to enable any residential or commercial visitor accommodation activities, require a comprehensive Master Plan, which achieves the matters set out in DEV1-P2 to DEV1-P4, to be prepared and incorporated into the District Plan.</i></p> <p>DEV1-P2 Landscape <i>Maintain the landscape values associated with the setting of the Takapō / Lake Tekapo West Future Development Area by:</i></p> <ol style="list-style-type: none"> <i>1. clustering buildings in areas where existing topography is better able to absorb the change, to retain a predominantly open character and limit the need for extensive screen planting to mitigate built development;</i> <i>2. locating development in low-lying areas and avoiding development on the top ridgelines of the terraces, to avoid intrusion into the skyline when viewed from the township and lake;</i> <i>3. minimising earthworks and changes to the landform to maintain the undulating landform; and</i> <i>4. limiting planting to maintain the openness of the area.</i> <p>DEV1-P3 Ecology <i>Identify invertebrate, bird, lizard and vegetation values and design any development to maintain these values.</i></p> <p>DEV1-P4 Infrastructure <i>Ensure that any development in the Takapō / Lake Tekapo West Future Development Area is able to be serviced by reticulated water and wastewater.</i></p> <p>DEV2-P1 Master Plan <i>Prior to the rezoning of the Takapō / Lake Tekapo North-West Future Development Area to enable any residential development, require a comprehensive Master Plan, which achieves the matters set out in DEV2-P2 to DEV2-P4, to be prepared and incorporated into the District Plan.</i></p> <p>DEV2-P2 Landscape <i>Maintain the landscape values associated with the setting of the Takapō / Lake Tekapo North-West Future Development Area by:</i></p> <ol style="list-style-type: none"> <i>1. containing development on the lake side of the ridge to reduce the visual prominence of development from the approach along State Highway 8 from Twizel;</i> <i>2. minimising earthworks and recontouring to maintain the natural contours of the land; and</i> <i>3. provision of landscape buffer planting along the State Highway 8 frontage and Godley Peaks Road frontage to assist in containing/minimising visual effects of development.</i> 	

	<p>DEV2-P3 Ecology <i>Identify invertebrate, bird, lizard and vegetation values and manage development to maintain these values.</i></p> <p>DEV1-P4 Infrastructure <i>Ensure that any development in the Takapō / Lake Tekapo North-West Future Development Area is able to be serviced by reticulated water and wastewater.</i></p>
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- 17.5. These provisions seek to provide direction on the matters that need considered before the rezoning of the identified areas, taking into account high-level technical assessments of the appropriateness of the development of these areas. The policies will guide the preparation of a Master Plan for these areas and be relevant to any future plan changes relating to the rezoning of these areas. Until rezoned, these areas will be subject to the rules and policies in the rural chapter.
- 17.6. The following table identifies the strategic directions and objectives that are relevant to the assessment of this group of provisions, and provides an assessment of the effectiveness and efficiency of the proposed provisions in achieving those objectives. The assessment includes identification and assessment of the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions.

Table 26: Assessment Against Relevant Objectives

Relevant Strategic Directions
<p><i>ATC-O1 Live, Work, Play and Visit</i> <i>The Mackenzie District is a desirable place to live, work, play and visit, where:</i></p> <ol style="list-style-type: none"> <i>1. there are a range of living options, businesses, and recreation activities to meet community needs;</i> <i>2. activities that are important to the community's social, economic and cultural well-being, including appropriate economic development opportunities, are provided for; and</i> <i>3. the amenity values and character of different areas are maintained or enhanced.</i> <p><i>NE-O1 Natural Environment</i> <i>The values of the natural environment that make the District unique, contribute to its character, identity and well-being, and have significant intrinsic values, are recognised and provided for, and where appropriate protected and enhanced. This includes values associated with:</i></p> <ol style="list-style-type: none"> <i>1. mahika kai resources;</i> <i>2. night sky darkness;</i> <i>3. outstanding natural features and landscapes;</i> <i>4. significant indigenous biodiversity; and</i> <i>5. water bodies and their margins.</i> <p><i>UDF-O1 Urban Form and Development</i> <i>The District's townships and settlements grow and develop in a consolidated way that:</i></p> <ol style="list-style-type: none"> <i>1. is integrated into, and respects the values of the surrounding natural and physical environment;</i> <i>2. achieves good connectivity with other parts of the urban area;</i> <i>3. is supported by appropriate infrastructure;</i> <i>4. maintains the character of each township, and its attractiveness to residents, businesses and visitors; and</i> <i>5. responds to the needs of the community, including diversity in housing and business opportunities.</i>
Relevant Objectives
<i>DEV1-O1 Comprehensive Development</i>

The Takapō / Lake Tekapo West Development Area is developed to provide residential living opportunities and other compatible activities in a comprehensive manner, which maintains a high level of open space character, is appropriate to its landscape setting, protects important ecological values and is integrated with infrastructure.

DEV2-O1 Comprehensive Development

The Takapō / Lake Tekapo West Development Area is developed for residential activities in a comprehensive manner, providing for a range of housing options and densities and other supporting activities, that is appropriate to its landscape setting, protects important ecological values and is integrated with infrastructure.

	Benefits	Costs
Environmental	Helps ensure development is complementary to, and does not undermine the landscape and ecological values of these areas.	Urban growth will inevitably impact on the surrounding environment.
Social	<p>Managing development to maintain the values of these areas will result in these areas being developed in a way that ensures those things that make the township special for residents and visitors are retained.</p> <p>Provides future opportunities for additional housing development in Takapō / Lake Tekapo which will bring more people to the Township and help support the Township and wider District.</p>	None identified.
Economic	<p>Provides a clear signal of where development is considered generally appropriate, subject to achievement of identified matters. This provides greater certainty for the landowner and the community.</p> <p>Provides future opportunities for additional housing development in Takapō / Lake Tekapo.</p> <p>Managing development to maintain the values of these areas will ensure that any expansion of the Township retains its desirability as a location to visit and invest in, which in turn has economic benefits for local businesses.</p>	The direction in the policies will require further assessments to be undertaken, as well as the preparation of a Master Plan, and there are costs associated with these.
Cultural	Helps ensure development will protect the cultural values associated with the Outstanding Natural Landscape and indigenous biodiversity within these sites.	None identified.
Efficiency		
Overall, the benefits of the proposed provisions are considered to outweigh the costs. In particular, while the direction in the policies will necessitate further assessments to be undertaken, these are considered necessary to ensure the achievement of the outcomes sought in the District Plan. It is		

acknowledged that there is a level of inefficiency in the approach, in that a further plan change will be required to rezone these areas, prior to development being able to commence.
Effectiveness
The proposed provisions are considered to be an effective way to achieve the outcomes sought. They clearly identify those matters that are required to be achieved in the rezoning of these areas, to achieve the overarching outcomes sought.
Alternative Approach
Do not include any policies.
Appropriateness Assessment
In absence of policy direction, a plan change to rezone these areas could still be pursued and considered against the current policy framework of the District Plan. However, this approach would provide less certainty for any applicant or the community and is therefore not considered to be as appropriate as the proposed approach.

Risk of acting or not acting

- 17.7. Section 32(2)(c) of the RMA requires that the efficiency and effectiveness assessment also assesses the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.
- 17.8. The Council has obtained high-level landscape and ecological advice regarding the urban development of these areas and this has informed the content of the provisions. The current framework will also continue to apply to these areas until these matters are addressed through a further plan change. Based on this, there is considered to be sufficient information on which to base the proposed provisions and the risk of acting in the manner proposed is low.

Overall evaluation of appropriateness

- 17.9. Overall, the proposed future development provisions are considered to be the most appropriate way to achieve the Development Area objectives. It is acknowledged that there is a level of inefficiency in the approach, in that a further plan change will be required to rezone these areas, prior to development being able to commence. However, this is considered to be more appropriate than providing no guidance on the future development of these areas, as it takes into account technical advice received and provides greater guidance to developers and the community.

18. Conclusion / Reasons

- 18.1. This evaluation has been undertaken in accordance with Section 32 of the RMA. It has provided an assessment of the appropriateness of the provisions within proposed Plan Change 21, which relates to Residential, Commercial and Industrial Zoning and Zone Frameworks, at achieving the purpose of the Act. This has included considering their efficiency and effectiveness, their alignment with relevant direction in other statutory documents, and their contribution towards achieving the Strategic Directions.
 - 18.2. Plan Change 21 seeks to largely implement the zoning framework set out in the Mackenzie Spatial Plans, which were developed with the community to provide for the growth of the District's townships. Where PC21 differs from the Spatial Plans, this is as a result of a more appropriate approach having been identified through the preparation of this plan change.
 - 18.3. The framework applying to each zone, precinct and development area seeks to provide clearer direction about the outcomes sought in each of these areas, with a corresponding framework that is more targeted and outcomes focused compared to the existing plan. This is considered to be a more efficient and effective approach to managing activities within each area and will provide certainty for the community as to the anticipated development and character of each. The management of built development in each area seeks to incorporate aspects of the current Plan where no issues have been identified with the current approach, while rationalising standards to provide a targeted approach, and taking into account technical advice, particularly in relation to the Takapō / Lake Tekapo Precinct and the Medium Density Residential Zone.
 - 18.4. Overall, the objectives are considered to be the most appropriate to achieve the purposes of the RMA and the higher level proposed Strategic Directions. Taking into account efficiency and effectiveness, including costs and benefits, the proposed provisions are considered to be the most appropriate way to achieve the objectives.
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