
DISTRICT PLAN ROLLING REVIEW: URBAN GROWTH MANAGEMENT

1 Purpose of Report

To seek approval from the Committee to publicly notify Proposed District Plan Change 52, to manage the adverse effects of large scale buildings on the urban design of Suburban Centres, and to manage the potential effects of large scale retail activities locating outside of main retail centres.

2 Recommendations

It is recommended that the Committee:

- 1. Receives the information.*
- 2. Agrees to publicly notify Proposed District Plan Change 52 as set out in Appendix 1 of this report in accordance with Schedule 1 of the Resource Management Act 1991.*
- 3. Agrees to adopt the Section 32 report for Proposed District Plan Changes 52 as included in Appendix 2 of this report.*
- 4. Agrees to delegate to the Portfolio Leader for Urban Development the authority to approve minor editorial changes to the documentation of Proposed District Plan Changes 52 as may be required before public notification.*

3 Background – Suburban Centres

The District Plan uses two zones to cover the retail, commercial and industrial areas of the city. The Central Area zoning covers the central city, and the Suburban Centre zone applies elsewhere. Suburban Centre zones are located in all suburbs, and include the main retail centres, neighbourhood shopping centres, industrial and service areas and special areas such as Kiwi Point Quarry. Each centre has its own character and role that it plays in the city's day to day functioning.

The former District Scheme controlled non residential development in suburban areas through a variety of industrial and retail zones. This approach was changed in 1994 when the Proposed District Plan introduced a generic Suburban Centre zone to manage all these areas.

Suburban Centre rules provide for a wide range of activities provided certain conditions are met. Similarly, most building developments are permitted (within certain height limits and other controls). The flexibility afforded by the rules has been generally successful in enabling Suburban Centres to adapt to changing economic and social trends.

It has become increasingly clear that the current Suburban Centre provisions are not sufficiently refined to deal with two important issues:

1. the adverse effects of larger scale buildings on the urban design and quality of the built environment in Suburban Centres
2. the adverse effects of 'out of centre' retailing, including potential effects on the viability of existing town centres, a compact urban form and sustainable transport systems.

These issues were acknowledged when the plan was prepared. With regard to building design, it was noted in the Introduction to the Suburban Centres that:

Council is particularly concerned to raise the general standards of design in Suburban Centres, and intends to promote urban design initiatives and further District Plan measures to achieve this end (District Plan, chapter 6 page 2)

While there has been considerable effort in promoting improvements through the programme for town centre upgrades, there has not been a corresponding push to require private developers to improve the design quality of their proposals.

With respect to retailing, it was noted in the explanation to the policies that:

Where Council wishes to encourage activities such as retailing in particular locations, this will be promoted through strategy planning, urban design or related initiatives (District Plan, chapter 6 page 3)

In the main, the existing suburban retail centres have continued as the focus of their surrounding communities. Again this has been supported by Council initiatives including the upgrade programme and the provision of community facilities.

The Urban Development Strategy 2006 also provides guidance on the outcomes that the Council seeks to achieve:

Wellington will have a contained urban form, with intensification in appropriate areas and mixed land-use, structured around a vibrant central city, key suburban centres and major transport corridors (1.2).

There is increasing evidence, however, of pressure to establish 'out of centre' large format retailing on available land. The cumulative effect of dispersing retail activities throughout the city has the potential to undermine the viability of established centres.

As there is now mounting pressure for development in most of the larger Suburban Centre zones, it is considered that changes to the plan are urgently required to ensure

appropriate planning responses and design outcomes are achieved. Under Proposed District Plan Change 48 for the Central Area, new provisions have recently been included to provide for the assessment of large format retailing in fringe CBD areas. Although a full review of the Suburban Centre provisions is programmed to commence next year, it is nevertheless recommended that rule changes be initiated now to ensure that the effects of more major developments can be addressed.

To deal with these concerns, it is proposed that new rules be introduced to ensure that any potential adverse effects of large developments are adequately managed.

4 Discussion

4.1 Proposed controls for larger scale buildings and retail activities

The proposed district plan change introduces new rules that require:

1. new building works with a gross floor area over 500m² to be assessed against urban design principles through a resource consent (as a discretionary activity (restricted)), and
2. any proposal to establish retail activities with a gross floor area over 500m² outside the established retail centres of Tawa, Johnsonville, Karori, Newtown, Kilbirnie and Miramar to obtain resource consent (also as a discretionary activity (restricted)).

A threshold of 500m² for a design assessment was selected because initial studies have indicated that above this level, the scale of building rapidly increases. For larger retailing activities, a threshold of 500m² was also selected because it is consistent with that already proposed in the Lincolnshire Farm structure plan (proposed plan change 45). Having also reviewed other district plans this threshold is similar to those used elsewhere around the country.

Appendix 2 details the analysis of the benefits and costs of the options considered in preparing this plan change (as part of a section 32 analysis under the Resource Management Act).

4.1.1 Design assessment of larger scale buildings

With the proposed plan change, any new building that exceeds a floor area of 500m² will need to show that it addresses specified urban design matters for it to obtain resource consent. The urban design principles relate to the siting and massing of buildings and the treatment of its walls, as well as the treatment of ground floor frontages, and any residential units or parking areas.

The new rules will apply design guidance to large building works, irrespective of the building's intended use (for office, retail, residential or industrial purposes).

One exception is provided that relates to work on existing buildings – where that work is not visible from a public space. It is considered that works that do not impact on the public environment should not be required to seek resource consent.

The proposed design principles will apply to any larger scale buildings. They are not intended to duplicate matters already dealt with under existing character-based design guides (in Thorndon, Newtown, and Shelly Bay).

The proposed approach is consistent with the Council's ongoing review of the District Plan, and strengthened requirements for quality urban design (as reflected in the Central Area review, and the Oriental Bay Design Guide).

4.1.2 Effects of larger scale retailing activities locating outside retail centres

Council is committed to achieving a compact urban form, both within the city centre and in established retail centres. While this intent is reflected in Council's strategies and various planning initiatives, it is not currently reflected adequately in the District Plan.

There is increasing evidence of proposals to locate large scale retailing activities outside of established retail centres. While in some circumstances these proposals may be desirable, the ability to manage adverse effects in situations where they are not desirable is also important.

With the proposed plan change, there will be a new requirement to assess the impact of any retail activity that exceeds a gross floor area of 500m², which is located outside the established retail centres of Tawa, Johnsonville, Karori, Newtown, Kilbirnie and Miramar. These centres are the hub of their surrounding communities, provide community facilities and services, and are located on main public transport routes.

Large format retailing in dispersed locations has the potential to undermine the benefits of more contained centres and the sustainability of the urban environment in general. For these reasons it is considered that any proposed 'out of centre' retailing should be carefully assessed. To this end a report will be required to be submitted with any resource consent application that considers the impacts of the proposal, particularly on the vitality and viability of existing retail centres. It is believed that this will provide an appropriate level of management until the comprehensive Suburban Centre review is completed.

5 Conclusion

The proposed changes aim to manage the visual effects associated with large scale building developments, and likewise large scale retailing activities locating outside the established retail centres of Tawa, Johnsonville, Karori, Newtown, Kilbirnie and Miramar.

The approach will ensure that larger buildings contribute positively in visual design terms to all Suburban Centres. It will also ensure that larger scale retailing activities do not compromise the sustainability and compact urban form of existing retail centres.

This is the first step in a review of the Suburban Centres chapter, and fills an identified gap in the rules pending a more comprehensive review in 2007.

It is recommended that the Committee agrees to publicly notify the proposed plan change.

Contact Officer: Marian Smith, Policy Advisor (Planning Policy)

Supporting Information

1) Fit with Strategic Objectives/Strategic Outcomes

The proposed District Plan Change relates to the Urban Development Strategy and specifically the long term outcome to promote a city that has:

A contained urban form, with intensification in appropriate areas and mixed land-use, structured around a vibrant central city, key suburban centres and major transport corridors.

2) LTCCP/Annual Plan reference and long term financial impact

Relates to the ongoing review of the District Plan. District Plan Project C533t

3) Treaty of Waitangi considerations

There are no specific Treaty of Waitangi implications.

4) Decision-Making

This is not a significant decision. It is part of the on-going review of Wellington City's District Plan.

5) Consultation

a) General Consultation

Statutory consultation has been carried out in accordance with the 1st Schedule of the RMA.

b) Consultation with Maori

Iwi were contacted as part of the consultation process.

6) Legal Implications

The proposed Plan Change has been prepared in accord with the Resource Management Act 1991.

7) Consistency with existing policy

The proposed Plan Change is consistent with existing WCC policy expressed in the Urban Development and Transport Strategies

Proposed District Plan Change

Annotated provisions of the Operative District Plan showing proposed changes

Proposed amendments to existing provisions, and proposed new provisions are showed underlined. Proposed deletions are shown as ~~struck out~~.

3.10 Definitions

RETAIL ACTIVITY (FOR THE PURPOSE OF SUBURBAN CENTRES): means any activity or activities within a building involving the sale of goods, merchandise, equipment or services to the public, but excludes:

- service stations and motor vehicle service premises
- takeaway food bars, restaurants, cafes or other eating places

7. SUBURBAN CENTRE RULES

7.1 Permitted Activities

7.1.1 Any activity, except for:

- those specified as **Controlled Activities, Discretionary Activities (Restricted) or Discretionary Activities (Unrestricted)**
- **new residential activities, within the airnoise boundary depicted on Map 35 (refer to rule 7.4.4)**
- **those activities listed under the Third Schedule to the Health Act 1956**
- **helicopter landing areas**
- **the total or partial demolition, destruction or removal of any building constructed prior to 1930 in the Thorndon Character Area**
- **cleanfills greater than 100m³ [, except as provided for in rule 7.1.3A in part of the Kiwi Point Extension Area in Ngauranga Gorge.]¹**
- **landfills**

Refer to District Plan Maps 17 and 18

Appendix 1

- [quarrying, other than that provided for in Ngauranga Gorge under rules 7.1.3 and 7.1.3A.
- any activity in the area defined as the Kiwi Point Quarry Extension Area in Ngauranga Gorge, other than that provided for in rule 7.1.3A.]²

is a Permitted Activity provided that it complies with the following conditions:

...

7.1.1.10 Gross floor area of retail activities outside identified Suburban Centre areas

7.1.1.10.1 The maximum gross floor area that any retail activity may occupy is 500m². This condition does not apply to retail activities located within the Suburban Centre areas identified below:

Standards and terms for discretionary activities (restricted) set out the matters to be addressed in any application for resource consent for retail activities exceeding the specified gross floor area

Tawa



Johnsonville



Karori



Appendix 1

Newtown



Kilbirnie



Miramar



A limitation on the scale of retail activities has been imposed to provide for the assessment of larger activities proposed for sites outside the main retail centres. The Council is concerned to maintain a compact urban form, sustainable transport systems, the viability of existing centres and their continuation as the hub of community activity.

7.1.2 The construction, alteration of, and addition to buildings and structures except for:

- those specified as Controlled Activities, Discretionary Activities (Restricted) or Discretionary Activities (Unrestricted)

are Permitted Activities provided that they comply with the following conditions:

...

7.1.2.7 Gross floor area (design controls)

7.1.2.7.1 The gross floor area of any building must not exceed 500m². This condition does not apply to any addition or alteration that is not visible from a public space.

A limitation has been imposed on the gross floor area of buildings to provide for the design assessment of larger developments. The Council seeks to promote buildings and building modifications with design qualities, which create a positive relationship to public spaces within Suburban Centres.

For Pt Lot 2 DP 54434, Grenada refer to Appendix 7

Standards and terms for discretionary activities (restricted) set out the matters for a design statement to address in an application for resource consent for any new building exceeding the specified gross floor area

7.3 Discretionary Activities (Restricted)

- 7.3.1 Activities that do not comply with one or more of the following conditions for permitted activities in rule 7.1.1:
- 7.3.1.1 noise
 - 7.3.1.2 dust
 - 7.3.1.3 lighting
 - 7.3.1.4 screening of activities and storage
 - 7.3.1.5 vehicle parking, servicing and site access
 - 7.3.1.6 signs
 - 7.3.1.7 use, storage, handling or disposal of hazardous substances

7.3.1.7A gross floor area of retail activities

are Discretionary Activities (Restricted) in respect of the condition(s) not met.

In respect of 7.3.1.7A Council's discretion is restricted to the matters that must be addressed in the report required under the standards and terms under this rule.

Non-notification

The written approval of affected persons will not be necessary in respect of items 7.3.1.4, 7.3.1.5 and 7.3.1.7A. Notice of applications need not be served on affected persons and applications need not be notified.

Standards and Terms

...

An application for resource consent for a retail activity that occupies a gross floor area exceeding 500m², must supply a report that addresses:

- the extent to which the retail activity avoids any adverse effect on the overall vitality and viability of existing retail centres
- the extent to which the activity promotes the efficient use of resources and a compact urban form
- the extent to which the activity affects existing public investment and minimises the need for additional public investment in infrastructure and public spaces
- how the activity promotes accessibility, enables sustainable transport choices (including public transport), and minimises trip generation through the co-location of similar activities

Appendix 1

*For Pt Lot 2 DP 54434,
Grenada, refer to
Appendix 7*

7.3.2 The construction, alteration of, and addition to buildings and structures which do not meet one or more of the following conditions for Permitted Activities in rule 7.1.2:

7.3.2.1 maximum building height

7.3.2.2 height control adjoining Residential Areas

7.3.2.3 coastal yards

7.3.2.4 verandahs

7.3.2.5 display windows

7.3.2.5A gross floor area (design controls)

or, where the building or structure would be a controlled activity under rule 7.2.1 or 7.2.2 but the standards and terms are not met

are Discretionary (Restricted) Activities in respect of:

- **the condition(s) that are not met, but in respect of 7.3.2.5A design external appearance and siting; and**
- **if consent is required because of failure to meet the standards and terms in rule 7.2.1 or 7.2.2; design, external appearance and siting.**

Non-notification

The written approval of affected persons will not be necessary in respect of:

- item 7.3.2.4,
- item 7.3.2.5A; and
- design, external appearance and siting (provided consent is not also required for one or more of the matters in 7.3.2.1, 7.3.2.2, 7.3.2.3, 7.3.2.5).

...

Appendix 1

Standards and Terms

...

An application for resource consent for any building exceeding a gross floor area of 500m², must supply a design statement that demonstrates:

- the extent to which the design and siting of the building reinforces and defines the adjoining street edge and public space
- the way the treatment of the building bulk mitigates the scale of the building relative to adjacent sites and buildings (eg through providing transitional volumes or contrasting elements)
- the way in which any wall surfaces facing a public space are articulated to avoid featureless or blank walls
- the extent to which the building is designed so that entrances, windows and publicly-relevant activities are located along ground floor street frontages
- whether servicing and vehicle parking is located and functions in a way that does not compromise the quality of the street edge, nor the status of the main entry to the building
- the extent to which the building is designed to respond appropriately to its context
- for any residential unit, the extent to which the proposal meets the Multi Unit Developments Design Guide, in Volume 2 of the District Plan
- the extent to which cultural or heritage values associated with the site are recognised
- the extent to which principles for crime prevention through environmental design are incorporated into the building development. Reference can be made to the Guidelines for Design Against Crime, in Volume 2 of the District Plan.

Section 32 Report

PROPOSED DISTRICT PLAN CHANGE 52 SUBURBAN CENTRES – DESIGN CONTROL AND CONTROL OF LARGE FORMAT RETAILING

Introduction

Before a proposed District Plan change is publicly notified the Council is required to evaluate the proposed change and prepare a report documenting this (refer section 32 of the Resource Management Act 1991 (the Act)). The evaluation must examine:

An evaluation must examine:

- (a) the extent to which each objective is the most appropriate way to achieve the purpose of the Act; and*
- (b) whether, having regard to their efficiency and effectiveness, the policies, rules, or other methods are the most appropriate for achieving the objectives.*

An evaluation must also take into account:

- (a) the benefits and costs of policies, rules, or other methods; and*
- (b) the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules or other methods.*

Benefits and costs are defined as including benefits and costs of any kind, whether monetary or non-monetary.

A report must be prepared summarising the evaluation and giving reasons for the evaluation. The report must be available for public inspection at the time the proposed change is publicly notified.

Background

Suburban Centres are physically spread across the city, and include traditional retail centres, neighbourhood centres, industrial and work areas (including quarries). Each centre has its own character and role that it plays in the city's day to day functioning.

The former District Scheme separately controlled industrial and retail activities in different zones. This approach was changed in 1994 when the Proposed District Plan introduced a generic Suburban Centre zone to manage all these areas. The Suburban Centre zone became operative in 2000.

Rules in the District Plan provide for a wide range of activities within Suburban Centres as long as certain conditions are met. Similarly, most building developments are permitted (within certain height limits and other controls). This

Appendix 2

flexibility enables developments in these centres to respond to changing economic and social drivers. It allows residential living, retailing, service providers, entertainment and industrial activities all within the same area (subject to conditions).

This flexibility means there is little control over poor quality development. There is a potential for buildings that have significant adverse effects on the quality of the built environment to occur. Likewise, large format retailing has the potential to cause adverse effects by fragmenting the retail network, detracting from a compact urban form and the viability of existing retail centres.

It has become increasingly clear that the Suburban Centre provisions are not sufficiently refined to deal with two key issues:

1. the adverse effects of larger scale buildings on the urban design and quality of the built environment
2. the adverse effects of ‘out of centre’ retailing, including potential effects on the viability of existing town centres, a compact urban form and sustainable transport systems.

Pressure for certain types of larger scale development in Suburban Centres is growing.

Currently, large scale building works can – as of right – adversely affect the urban design of most Suburban Centres in which they locate. An example of a poor outcome would be lengthy blank walls that provide little visual interest, and by virtue of having no windows limit informal surveillance. The latter is an important factor in people’s safety in public places.

Likewise, larger retailing activities, such as big box retailing, can establish without any need to look at the potential adverse effects on the sustainability and compact urban form of existing retail centres, and their associated services, transport systems and facilities. The extent of these effects depends on the nature of the proposal, and whether it is located in an established retail centre or by itself with no public transport, services or facilities.

The Council has consistently expressed a commitment to promote quality urban design. Likewise, the Council is also committed to promoting a compact urban form in the Central Area and established retail centres.

In response to these commitments and the concerns raised above a new plan change is proposed.

Appendix 2

Options: status quo and new rules

The costs and benefits of two options are examined in the table below. These are:

1. The status quo:
2. Two new rules that require:
 - a. new building works with a floor area over 500m² to be assessed against urban design principles as part of a resource consent process (as a discretionary activity (restricted)), and
 - b. any retail activity with a gross floor area over 500m², located outside established retail centres (of Tawa, Johnsonville, Karori, Newtown, Kilbirnie and Miramar) to obtain a resource consent (as a discretionary activity (restricted)).

In looking at setting a threshold for the rules, various sub-options were also considered.

In terms of design controls, one option considered was to apply design controls to building works on main retail streets. However, this could simply result in poor design outcomes occurring around the corner of these streets. Another alternative was to apply design guidance to all building works. However, this would capture all small scale developments and would be administratively inefficient. Likewise, developing design guides for each Suburban Centre is also a comprehensive piece of work, and one that is not needed in every case when standard design principles can be used.

A more targeted approach was to apply design principles to larger scale building developments. These are the developments that have a more lasting and dominant presence in the urban environment, and therefore a potential for greater influence on urban design outcomes. The question was then where to set the threshold? In looking at the building footprints in various Suburban Centres, it was evident that once a building exceeds 500m² the scale of building rapidly increases.

In terms of retailing activities, one option considered was to require a resource consent for all larger scale retailing developments. However, this does not encourage retailing activities in appropriate locations such as main retail centres. Such a rule would not be fit for purpose. Another option was to set a different threshold. However, in reviewing other district plans, similar thresholds apply elsewhere, for example in Palmerston North. The threshold of 500m² is also applied in proposed district plan change 45 in relation to Lincolnshire Structure Plan.

Consultation

The following agencies were consulted in accordance with the Act (Clause 3, Schedule 1):

- The Minister for the Environment
- Te Runanga O Toa Rangatira Inc
- The Wellington Tenth Trust
- Greater Wellington Regional Council

Appendix 2

Key Documents

The following documents are the primary sources for the proposed plan change:

- Christmas Package 2001-2002, Wellington City Council
- Economic Geography – Centre Hierarchy in Wellington
- Urban Development Strategy, Wellington City Council July 2006
- *New Zealand Urban Design Protocol*, Ministry for the Environment 2005
- *National Guidelines for Crime Prevention through Environmental Design in New Zealand*, Ministry of Justice (2005)
- Retailing Strategy, Wellington City Council September 2003
- Spatial Analysis of Retailing in Wellington, 2003
- Urban Development Strategy, Wellington City Council 2006
- Transport Strategy, Wellington City Council 2006
- Christchurch City District Plan
- Hamilton City District Plan
- Tauranga District Plan
- North Shore District Plan
- Palmerston North District Plan
- Porirua City District Plan

Evaluation of options

Purpose of the Act

The purpose of the Resource Management Act 1991 is described in section 5 of the Act. It is to promote the sustainable management of natural and physical resources.

Sustainable management includes managing the use, development and protection of natural and physical resources to enable people and communities to provide for their social, economic and cultural well being and their health and safety while avoiding, remedying or mitigating adverse effects on the environment.

Matters of national importance and other matters

Section 6 lists matters of national importance that are to be recognised and provided for in achieving sections 5. The section 6 provisions of relevance for considering urban development area provisions are:

- The relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga
- The protection of historic heritage from inappropriate subdivision, use and development

Appendix 2

Other matters

Section 7 identifies matters that particular regard must be given to. Of relevance are:

- the efficient use and development of natural and physical resources
- the efficiency of the end use of energy
- the maintenance and enhancement of amenity values
- the maintenance and enhancement of the quality of the environment
- any finite characteristics of natural and physical resources

These matters are considered in the assessment below.

Table 1: Matrix of Options for the Proposed District Plan Change 52

	Option 1: Status quo – Little control of the urban design outcomes of building works, or the effects of large scale retailing outside existing retail centres	Option 2: Controls on – <ul style="list-style-type: none"> ▪ Design guidance for buildings exceeding a gross floor area of 500m², and ▪ Retailing activities exceeding a gross floor area of 500m² and locating outside main retail centres This is recommended as the most appropriate option
Environmental costs	<ul style="list-style-type: none"> • Without control, poor urban design may detract from the quality of urban environments • Large retail activities may put pressure on the compact urban form of retail centres and efficient use of resources • Potential for greater reliance on private vehicles with associated environmental costs 	<ul style="list-style-type: none"> • Small scale developments with poor urban design can establish as a permitted activity
Environmental benefits	<ul style="list-style-type: none"> • Some developers may choose to build quality buildings • For people located away from established retail centres, there may be benefits if new shopping destinations locate in closer proximity 	<ul style="list-style-type: none"> • Larger scale buildings will achieve a consistent quality of urban design • A compact urban form is promoted and retail centres consolidated • Large scale retail developments will be encouraged to locate along public transport routes, alleviating reliance on private vehicle use
Social costs	<ul style="list-style-type: none"> • Without control, poor urban design can result in people feeling less safe and being less secure • With potential increases in ‘out of centre’ retailing, the central role of existing retail centres may decline along with people’s sense of place 	<ul style="list-style-type: none"> • Potential for fewer choices in shopping destinations if existing town centres are consolidated
Social benefits	<ul style="list-style-type: none"> • With any increase in ‘out of centre’ shopping, people may have more choice of shopping destinations 	<ul style="list-style-type: none"> • Promoting established retail centres as the community hub fosters people’s sense of place, as does quality urban design • Potential for more retailing choices within established

Appendix 2

		retail centres
Economic costs	<ul style="list-style-type: none"> • The existing retail network may become fragmented with increased ‘out of centre’ retailing • With any increase in ‘out of centre’ shopping, established retail centres may decline, affecting the efficient use of resources associated with the facilities, services, and infrastructure provided in these locations 	<ul style="list-style-type: none"> • Large scale building works, and large scale retail activities outside established retail centres will require resource consent at additional cost to the applicant
Economic benefits	<ul style="list-style-type: none"> • Minimising design quality can be a financial saving for some building developments • Shopping destinations may establish with few constraints 	<ul style="list-style-type: none"> • The efficient use of physical resources associated with established retail centres will be promoted • Prevents fragmenting the existing retail network • Small retailing activities and small building developments can develop without additional constraint
Efficiency and Effectiveness of achieving Objectives	<p>Because of the lack of urban design guidance, this approach is ineffective in:</p> <ul style="list-style-type: none"> • maintaining and enhancing the amenity values of Suburban Centres (objective 6.2.2) • maintaining and enhancing the physical character, townscape and streetscape of Suburban Centres (objective 6.2.3) • promoting the development of a safe and healthy city (objective 6.2.9) <p>and therefore lacks efficiency in achieving these objectives.</p> <p>This approach could result in a fragmented retail network, which would lack effectiveness in terms of:</p> <ul style="list-style-type: none"> • To promote the efficient use and development of natural and physical resources within Suburban Centre areas (objective 6.2.1) 	<p>New design principles will assist with:</p> <ul style="list-style-type: none"> • maintaining and enhancing the amenity values of Suburban Centres (objective 6.2.2) • maintaining and enhancing the physical character, townscape and streetscape of Suburban Centres (objective 6.2.3) • promoting the development of a safe and healthy city (objective 6.2.9) <p>This approach seeks to achieve a compact urban form that will help:</p> <ul style="list-style-type: none"> • To promote the efficient use and development of natural and physical resources within Suburban Centre areas (objective 6.2.1) <p>There may be some loss in development potential of some land where the effects of large developments are not able to adequately avoid, remedy or mitigate adverse effects.</p>
Risk of acting or not acting if there is uncertain or insufficient information	<p>Potential for large scale developments to proceed with potential for lasting adverse effects on the viability of existing town centres, and the quality of the built environment.</p>	<ul style="list-style-type: none"> • Not applicable

Appendix 2

Conclusion

Rules are the most effective means of managing the adverse effects of large new buildings on the quality of the urban environment, and the effects of large scale retailing activities proposing to locate out of established retail centres.

The proposed new rules are effective and efficient because they are targeted at a scale of development that is more likely to generate adverse effects.