Memorandum

Re: Section 32 Analysis

OPTION		BENEFITS	COSTS
Option 1 – Status Quo / Do Nothing	**This option involves retaining the operative District Plan zoning, and associated Qualifying Matters.**	Environmental • No environmental benefits identified. Economic • No change required to the District Plan provisions. • Avoids the costs associated with initiating a plan change, and those other parties who may be obligated to participate in the plan change process. Social and Cultural • No social and cultural benefits identified.	Environmental • The planning framework associated with this option may lead to inefficient land use and suboptimal development outcomes, as the current zoning provisions do not support commercial activities. This misalignment between the residential planning expectations for Area B and the site's intended commercial use could result in greater environmental impacts such as reduced land-use efficiency, and pressure on surrounding infrastructure and ecosystems. Economic • The status quo, which requires future development to proceed through the resource consent process, introduces significant cost and uncertainty. Preparing complex applications and navigating a high-risk consenting pathway is likely to result in delays or even consent decline, given that Policy 2A.3.8.1 of the District Plan seeks to avoid the establishment of commercial activities in the Medium Density Residential Zone.

Planning Focus Limited
Level 5, Tower One, 205 Queen Street, Auckland, New Zealand
Telephone 0-9-379 5020
Facsimile 0-9-379 5021
www.planningfocus.co.nz
PO Box 911-361
Auckland 1142
New Zealand

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			<u>Social and Cultural</u> • Constraining the growth of Large Format Retail on the subject site, which supports the community's social and economic well-being, may require the acquisition and development of alternative sites. This could lead to inefficient land use, displacement of other valued activities, and fragmentation of the established Te Awamutu Large Format Retail Centre ('**TALFRC**'). Such outcomes may undermine the identity of the area as a central hub, reduce accessibility to essential goods and services, and force people and communities to travel further, weakening existing social connections and sense of place.
Option 2 – Rezone Area B to Commercial Zone	**This option involves rezoning Area B to Commercial zone, with no specific statutory provisions for the management of Large Format Retail Activities**	<u>Environmental</u> • This option provides greater certainty that Area B can be developed for commercial use in line with the planning provisions of Section 6 – Commercial Zone. It also aligns land use expectations with the adjacent Te Awamutu Large Format Retail Centre, reducing land use conflicts and supporting more sustainable development patterns. The Commercial Zone provisions, such as building setbacks, boundary screening, and landscaping adjacent to the Medium Density Residential zone, offer environmental benefits by helping to manage the visual and ecological effects of development, protecting local amenity values, enhancing green buffers, and contributing to overall site resilience. • The use of the land for a building improvement centre as a permitted activity, provided all bulk and location	<u>Environmental</u> • The Commercial Zone currently lacks specific provisions for the restoration and enhancement of natural wetlands, increasing the risk of adverse environmental outcomes such as degradation of ecological values, loss of biodiversity, and negative impacts on water quality both on and beyond the site. Additionally, permitting the use of Area B as a building improvement centre as a permitted activity—without requiring resource consent—may reduce oversight of these potential environmental effects. The absence of a formal consent process limits opportunities to thoroughly assess and mitigate impacts on local ecosystems, water quality, and amenity values, especially given the proximity to sensitive environmental features.

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		requirements are met, ensures that development complies with established standards designed to protect the environment. These requirements help manage building size, placement, and site layout, which can minimise impacts on natural features, preserve open space, and maintain water quality. By eliminating the need for resource consent while enforcing these controls, this approach balances streamlined development with safeguards that support environmental outcomes as anticipated by the Plan. <u>Economic</u> • Following on from the above, the reduced or eliminated resource consenting requirements would result in lower costs for the Applicant and may also benefit third parties by minimising the risk and expense of public notification processes. • This option supports local economic growth by creating employment opportunities and fostering business agglomeration. A larger store footprint can attract complementary services, forming a hub for home improvement activities and encouraging collaboration, innovation, and competitiveness within the Te Awamutu community. <u>Social and Cultural</u> • As outlined above, the development of a building improvement centre within Area B, which will be perceived as an expansion of the TALFRC, will create additional local employment opportunities and foster	<u>Economic</u> • While this option provides greater certainty for commercial use, the provisions are not specifically tailored to enable large-format retail on site, allowing for smaller-scale retail activities that could potentially detract from the vitality of the Town Centre, and consequently the social, economic wellbeing of the town. • Cost to Council to administer the new provisions. • Cost to Council and the Applicant to process the Plan Change. <u>Social and Cultural</u> • No social and cultural costs identified.

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		social cohesion by supporting the growth of a connected and engaged community.	
Option 3 – Rezone Area B to Commercial Zone and form part of the Large Format Retail Centre	**This option involves rezoning Area B to Commercial Zone, and include Area B to form part of the Large Format Retail Centre**	In addition to the Option 2 above benefits: Environmental • Amendments to the provisions for the Large Format Retail Area will be more directive as to the manner in which the bulk and location of development is to be controlled to manage adverse effects on the amenity values of adjoining land. • Specific building setback and landscaping controls will provide an attracted landscaped buffer to the site, which will benefit the amenity values of adjoining land. • The landscaping provisions will also provide environmental benefits by supporting and enhancing existing indigenous biodiversity. • Rules requiring controlled activity consent for development within the Large Format Retail Area will enable an assessment of the design and appearance of buildings (and landscaping), and how these elements are designed to respond to residential interface. Economic • This option will signal the intended use of Area B for a building improvement centre, which will complement the existing Large Format Retail Centre and therefore creating a business 'hub' that would encourage economic growth. Social and Cultural	In addition to the cost identified in Option 2: Environmental • No additional environmental costs identified. Economic • Loss of development capacity through more restrictive development controls. • Cost to the Applicant for seeking a resource consent to develop within the Large Format Retail Centre. Social and Cultural • No social and cultural costs identified.

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		• The provisions include clear directives for restoration and enhancement planting, which provides opportunity to foster social and cultural benefits, especially by creating opportunities for cultural harvesting. Furthermore, the provisions for the development framework of Area B will deliver significant social and cultural benefits through ongoing consultation with mana whenua.	
Option 4 – Rezone Area B to Industrial Zone	**This option involves rezoning Area B to Industrial Zone.**	<u>Environmental</u> • This option provides greater certainty that Area B can be developed for building improvement centre in line with the planning provisions of Section 7 –Industrial Zone. <u>Economic</u> • As identified in Option 2. <u>Social and Cultural</u> • As identified in Option 2.	<u>Environmental</u> • As with Option 2, although this option provides greater certainty and permits a building improvement centre in Area B, it results in a fragmented zoning pattern and spot zoning of an industrial site within an area primarily intended for residential use. This disjoint in zoning increases the risk of incompatible land uses, which can lead to adverse environmental effects such as noise, light, and traffic impacts on the adjoining residential interface, undermining the amenity and ecological quality of the surrounding neighbourhood. • The Industrial Zone provisions require a minimum building setback of 5 metres and 3 metres of landscaping along boundaries adjoining the Medium Density Residential zone. However, these standards are less stringent than those in Option 3 and may result in reduced protection of local amenity and environmental quality. Additionally, the provisions lack specific controls for vegetation planting near waterbodies, increasing the risk of ecological degradation, reduced riparian buffer effectiveness,

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			and negative impacts on water quality and biodiversity. <u>Economic Costs</u> • The provisions are not specifically tailored to enable large-format retail on site, and allowing for industrial activities could detract from the vitality of the Commercial Centre, and consequently the social, economic wellbeing of the town. <u>Social and Cultural</u> • Enabling Industrial activities on the site could detract from the amenity of the Medium Density Residential zone