

4. PROPOSED PLAN CHANGE 53 – LIVING 3 AND 4 ZONES



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PURPOSE OF REPORT

1. This report provides background to the purpose and content of proposed Plan Change 53 - Living 3 and 4 Zones and seeks a Council decision on whether or not to proceed in notifying the proposed plan change. The recommendation is for the Council to notify the proposed plan change.

EXECUTIVE SUMMARY

2. The Living 3 and 4 Zones provide for medium and higher density residential development. They are located mostly within, and close to the city centre, and adjoining larger suburban shopping malls. Within the last 10 to 15 years, much of the new residential development occurring in these areas has been of a less than satisfactory standard in terms of urban design, appearance and amenity (according to public and professional opinion).
3. It is recognised that poorly designed places can have a detrimental impact on the character of an area and on people's attitude to, experience and enjoyment of, a place. A key stimulus for this proposed plan change has been in response to feedback about the perceived poor quality of development occurring in the L3 and L4 Zones. This feedback has come from a range of sources including from Residents' Associations, Councillors, officers, professionals and the general public. A second key stimulus for the review comes as part of the Council's implementation of the Greater Christchurch Urban Development Strategy and the provisions of proposed Change 1 of the Regional Policy Statement which places increased emphasis on accommodating urban growth through the intensification of the existing urban area. For this growth management strategy to be effective, it is important that more intensive residential development achieves good standards of urban design and amenity.
4. Preparation for this Council initiated plan change has included consultation in 2007 in the form of two Issues and Options papers relating to design and appearance of buildings in the respective L3 and L4 zones. Subsequent research and technical analysis has been carried out to more clearly identify the issues and how improved built outcomes could be better achieved. An urban design site survey found some good examples of developments in the L3 and L4 Zones, although many were found to inadequately incorporate the principles of good urban design.
5. Having considered the type and scale of issues, community feedback and the existing regulatory and non-regulatory framework it was evident that changes to the City Plan's provisions were necessary. Consideration has been given to a wide range of options for bringing forward improvements. The purpose of the proposed change is to facilitate improved urban design, appearance and amenity outcomes in these existing medium and higher density living areas. It includes a set of amendments, additions and deletions to the City Plan provisions. The proposal does not recommend changes to the zone boundaries. It does not propose changes to the key density controls relating to building height or residential floor area ratios.
6. Amendments are recommended to the City Plan policies relating to City Identity, Urban Growth, Living and Transport. An emphasis is placed on achieving a good standard of urban design, appearance and amenity. In terms of the rules relating to the L3 and L4 Zones there are two main directions that this proposed plan change takes. The first includes a review of the existing rules. The traditional bulk and location approach to rules continues to be supported with some changes recommended. The second is that the majority of new developments in these zones would be assessed against a set of urban design criteria. The details of the proposed changes to the City Plan are provided in **Attachment 1**.

7. Staff consider that the overall package of changes would assist in achieving improved urban design outcomes while still enabling medium and high density development to occur in these zones. It would also assist in meeting residential densities required under proposed Change 1 to the Regional Policy Statement. The proposed changes and additions to the City Plan are considered to be a more efficient and effective means of achieving the City Plan's objectives and policies than the current Plan's provisions. The recommendation is for the Council to notify the proposed plan change.

FINANCIAL IMPLICATIONS

8. Should the Council resolve to proceed with notifying the plan change there are legal processes which must be followed in accordance with the First Schedule of the Resource Management Act (RMA) 1991. This is a standard process that all plan changes must follow and there are no particular issues or risks that would be incurred if the processes are correctly followed. There would be costs arising at various stages of the plan change process relating to the preparation of officer reports and a hearing in response to submissions. The scale of costs would depend on the level and complexity of the submissions received. There is the potential for costs associated with responding to any Environment Court appeals received. Funding is provided from existing budget as part of the District Planning work programme agreed by Council.

Do the Recommendations of this Report Align with 2009-19 LTCCP budgets?

9. The recommendations and costs incurred align with the District Planning budget and work programme as provided for under the 2009-2019 LTCCP budget.

LEGAL CONSIDERATIONS

10. There is a legal process which must be followed for plan changes in accordance with the First Schedule of the RMA. Proceeding in accordance with these procedures should create no particular risks.

Have you considered the legal implications of the issue under consideration?

11. The legal process to be followed in accordance with the First Schedule of the RMA is familiar to the Council through both the private plan change process and in respect of Council initiated plan changes.

ALIGNMENT WITH LTCCP AND ACTIVITY MANAGEMENT PLANS

12. The process of Council initiated plan changes is provided for under the LTCCP and Activity Management Plans. This proposed plan change is specifically identified as a project within the Council's District Planning Work Programme.

Do the recommendations of this report support a level of service or project in the 2009-19 LTCCP?

13. The LTCCP identifies an ongoing programme of maintaining and reviewing the City Plan improvements in respect of enhancements to ensure an attractive built environment and to minimise adverse effects on the environment. The proposed plan change is specifically identified as a project within the Council's District Planning work programme.

ALIGNMENT WITH STRATEGIES

14. The plan change aligns with: Greater Christchurch Urban Development Strategy (UDS); Proposed Change 1 to Chapter 12A of the Regional Policy Statement (RPS) and also with National Urban Design Protocol 2005.

Do the recommendations align with the Council's strategies?

15. The proposed plan change aligns with the Greater Christchurch Urban Development Strategy (UDS) particularly in respect of achieving well designed places in areas which are subject to residential intensification.

CONSULTATION FULFILMENT

16. Consultation was carried out in respect of two Issues and Options papers in July 2007. This included consulting with a range of representatives from the community including: Residents Associations and Groups; professionals; and developers. A more detailed discussion of the consultation is contained in the Section 32 report (**Attachment 2** (available to view in the the Civic offices, 163 Tuam Street, Christchurch)) and this report's consultation section.
17. During the preparation of this proposed plan change presentations were made to the Community Boards. This took the form of two Joint Community Board Seminars on 12 November 2008 and 8 September 2009.
18. Should the plan change be notified, a submission, further submissions and hearings process will follow thereby enabling interested and affected parties to comment formally on the proposal. The recent amendments to the RMA now mean that changes to rules proposed in plan changes (with some exceptions) do not generally have any effect until after decisions on submissions have been released. An exception is if an Environment Court order allows a rule to have legal effect on a different date. Prior to the recent RMA amendments, proposed rules had effect from the time they were publicly notified. This means that unlike past plan change processes, interested parties will now have the opportunity to submit on the proposed rule package and seek changes to that package prior to the proposed rules coming into force.

STAFF RECOMMENDATION

That the Regulatory and Planning Committee recommend that the Council:

- (a) Adopt the attached proposed plan change and assessment under Section 32 of the Resource Management Act.
- (b) Proceed to publicly notify proposed Plan Change 53 to the City Plan pursuant to the provisions of the First Schedule of the Resource Management Act 1991.

BACKGROUND AND ISSUES

LOCATION AND DESCRIPTION OF THE LIVING 3 AND 4 ZONES

19. The City Plan provides for a range of housing densities across the City. The L3 and L4 Zones are primarily sited close to and within the city centre and adjacent to some of the larger suburban shopping centres forming a core area of medium to higher density living accommodation. The L3 Zone is defined in the City Plan as a Medium Density zone. The L4 Zone is split into three sub zones comprising the Living 4A (Central City – Diverse); Living 4B (Central City and North Beach – High Rise); and Living 4C (Central City – Character). These zones provide for a higher density of residential development than the L3 Zones and are located inside of the Four Avenues, except for areas of L4C zone at New Brighton, and Living 4B at Carlton Mill and North Beach. A map showing a location of the zones is attached to the Section 32 report (Attachment 2) at Appendix 1.

CONSULTATION

20. The Council carried out consultation in 2007 in respect of two Issues and Options papers (one each for the respective L3 and L4 zones) relating to matters of design and appearance of buildings. The papers and related pamphlets were sent to Residents Associations in the subject zones, architectural firms, the Canterbury Property Investors Association and various house and building firms that have been involved in developments within these areas. The consultation was advertised in The Press and the Star. The consultation documents were made available at Council Services Centres and Libraries and on the Council website. Two public meetings were held. The first was for representatives of Residents Associations in the L4 Zones (with representatives from the L3 zones also in attendance). The second was held for members of the New Zealand Institute of Architects and Architectural Designers New Zealand.
21. Fifty responses were received. The consultation feedback highlighted that matters such as very dominant bulk buildings and the location and design of buildings were important issues. Concerns were raised about increasing residential activity in these areas resulting in a general increase in noise and disturbance (including from traffic noise). Whilst there was a range of perspectives about how the rules could be amended there was generally agreement that substantial improvements are needed.
22. The feedback was considered and a programme of work identified to ascertain the specific issues and how to address them. This included a number of technical surveys and reports. An urban design site survey of representative sites within the L3 and L4 Zones was undertaken. Further information about the consultation, supporting reports and options investigated is provided in the Section 32 report.
23. Two Joint Community Boards' Seminars were held on 12 November 2008 and 8 September 2009. The Boards were updated on the overall purpose and development of the plan change. There was a focus on discussing urban design issues and how these could be addressed. The main points raised at the Seminar on 8 September 2009 included the following: how prescriptive the proposed changes would be; what sort of development would require resource consent; proposed changes to the minimum car parking space requirements for developments in the L3 Zones; the extent that environmental efficiency and sustainable design measures have been considered; safety considerations; and the type and design of front boundary fencing. Officers consider that the matters raised have been considered satisfactorily throughout the development of this proposed plan change. Further discussion on the issues raised can be found within the Section 32 report.
24. Consultees as set out under Clause 3 of the First Schedule were advised in October 2009 of the more recent development and overall methodological approach adopted for the proposed plan change.

POLICY CONTEXT AND OBJECTIVES

Greater Christchurch Urban Development Strategy, Urban Design Protocol 2005 Proposed Change 1 to Chapter 12a of the Regional Policy Statement

25. The proceeding paragraphs highlight the more significant policy context for the development of this proposed plan change. An increased awareness and drive for good urban design is found in a range of strategies, protocols and policies. The more significant of these include:
 - The Greater Christchurch Urban Development Strategy (UDS)
 - Proposed Change 1 to Chapter 12A of the Regional Policy Statement (RPS)
 - National Urban Design Protocol 2005.
26. The Greater Christchurch Urban Development Strategy (UDS) is a broad scale, long-term land use strategy. It guides the future development of Greater Christchurch. Achieving higher standards of urban design is embraced within the UDS. Some of the guiding principles directly relate to promoting well designed and attractive neighbourhoods which are safe, functional, well connected and liveable. A growth management assumption under Section 3.6 is that 'good urban design is an essential element of implementing this Strategy'. Clause 1.5.1 of the Strategy relates to community values and identifies that during the public consultation process the community asked for (amongst other matters): enhanced community character, diversity and facilities, and enhanced 'sense of place', heritage, open space networks, and urban and site design.
27. Proposed Change 1 (PPC1) to Chapter 12A of the Regional Policy Statement was notified in July 2007. It is an implementation method prescribed under the UDS. It was recently the subject of hearings. At the time of writing this report, the decisions on submissions had not been released. A range of policies and methods in PPC1 are very relevant to this proposal. An example relates to improving design quality under 'Policy 7 – Development Form and Design'. Policy 7 sets out a requirement to observe the principles of the Urban Design Protocol when preparing or assessing any urban development in an intensification area. The policy states matters to be provided for, including a high standard of visual interest and amenity. A method identified to implement the policy is that territorial authorities will apply the Urban Design Protocol. Preparing and implementing district plan changes to reflect the proposed change is a linked and top priority under the UDS.
28. The Council became a signatory to the National Urban Design Protocol in 2005. The Protocol Action pack contains a number of recommendations for local government including a recommendation to review district plans. This is to ensure that they include explicit urban design outcomes. This proposed plan change is one of a number of steps the Council is taking as part of its responsibilities under this Protocol. Under another initiative the Council has set up an Urban Design Panel. Whilst only voluntary at this stage (in terms of matters going before the Panel and the weight of the recommendations) the establishment of this Panel highlights the increasing desire and push to improve urban design outcomes within the City. When considering an application, the Panel, as for other Council officers, must rely on the quality of the City Plan provisions to facilitate improved outcomes.
29. The national, regional and local context is raising awareness of the benefits of good urban design, and the requirement for improvements. Officers consider that this proposed plan change is sufficiently well aligned with this policy context. It would be an important method to assist in improving the standard of urban design standard in the L3 and L4 Zones.

CHRISTCHURCH CITY PLAN

30. It is useful to outline the manner in which the City Plan deals with matters of urban design within the L3 and L4 Zones. A number of the objectives are relevant to this plan change. Three significant objectives are: Objective 4.2 'A pleasant and attractive City'; Objective 6.1 'urban consolidation'; and Objective 11.5 'Good quality building and site design to achieve a high level of amenity throughout the living areas of the City'. The associated policy framework generally sets out a requirement for good design and high standards of residential amenity within the context of accommodating a portion of urban growth through intensification of the inner urban area. In some areas the Plan's policy package lacks a level of specificity and direction about how these objectives can be achieved.
31. The proposed changes to policies are mainly focused on the explanations and reasons to the policies. The proposed plan change text (Attachment 1) details the precise changes and the Section 32 report provides context and discussion thereof. The most substantial policy change recommended is to Policy 11.5.2 – 'Infill and redevelopment'. A new section 11.5.2(b) is proposed to apply to the L3 and L4 Zones. It states, 'To ensure that development in the Living 3 and 4 Zones is designed in accordance with the principles of good urban design, appearance and amenity, including: ...'. Beneath this policy are 13 bullet points which set out the urban design principles to be followed.
32. The L3 and L4 Zone rule package currently sets the specific standards by which new development should comply. Non-compliance with these rules can trigger the requirement for a resource consent for one or more matters. Resource consents may then be notified or non-notified. An example of such a rule is the street scene and building set back from side boundary rules. These rules prescribe the quantitative requirements of development (namely the minimum distances which buildings should be set back from road boundaries and neighbouring site boundaries respectively). Associated assessment matters for these rules enable consideration of those applications which breach the standards. For example, where there would be a reduced setback of building from the road boundary (other than specified within the Plan) consideration would be given to, 'the extent to which the proposed building will have a size, form, proportions, roof line, style, external materials and colour, which are similar to or in keeping with those of existing buildings on the site (clause (ix) of 7.2.3 Street scene). Results from the urban design site survey (appended to the Section 32 report) has shown that such an approach in the L3 and L4 Zones has not achieved a consistent level of good urban design.
33. In addition to the existing rule package, the Council introduced voluntary design guides for the these L3 and L4 zones in 1999. This was in response to community concerns about the poor levels of urban design being displayed in multi-unit developments. It was also an alternative method for achieving the Plan's objectives and policies relating to good design. The design guides are a useful tool for encouraging and guiding good quality design. However, the guides carry very little weight when it comes to assessing development proposals as they fall outside the City Plan. As such they lack sufficient regulatory status to actually require good design. The form of development which has occurred since 1999 has shown that the guides have actually had little influence in raising design standards.
34. The proposed amendments to the bulk and location rules will ensure a more appropriate building envelope is in place that sets the basic parameters for developments. Experience has shown that a bulk and location rule package, accompanied by voluntary design guides, is not sufficient for ensuring that acceptable levels of urban design are achieved. Therefore, the proposed plan change introduces a new requirement whereby most new developments would need to obtain a resource consent (even if the development complies with the general bulk and location rules). This is so that the proposal can be assessed in qualitative terms regarding urban design. The rule's assessment matters do not specify specific architectural styles or designs, rather they set out a series of well established urban design principles that a proposed design should address.
35. This resource consent requirement and associated assessment would capture most new developments in these zones, including all developments of three or more units on a site. It is linked to the policy changes (in particular 11.5.2 (b) as discussed above. Further discussion on the proposed new rule is found in the Section 32 report and within this report.

ISSUES AND PROPOSED CHANGES

36. To inform the development of this proposed plan change a series of reports were commissioned. Discussion regarding the various streams of work is contained in the Section 32 report. It also discusses the range of issues identified, options available and associated costs and benefits of different approaches. It provides considerable discussion about each issue and the associated change(s) recommended. For the purposes of this report a summary is provided in the following paragraphs regarding some of the more significant urban design issues identified. Discussion is also provided about some of the proposed changes. At the beginning of the Section 32 report there is a summary of the proposed new rules, those rules to be deleted and rules to be amended (Refer to the 'Executive Summary').

Issues

- Lack of landscaping and tree planting
 - Visual dominance of car parking areas and garaging
37. The Urban Design assessment highlighted that many developments have large areas of hard surfacing for access, manoeuvring and car parking. The current rules limits the ability to assess the suitability of the location and design of these areas. Incorporating more trees and soft landscaping within a site can substantially help to soften the appearance of a development. The current landscaping rules are inadequate in this respect. Amendments are proposed to ensure the inclusion of more strategic and well sited tree planting throughout a site (adjacent to the road boundary and one tree for every 250 square metres site area within the site) together with a 0.6 metre landscaping strip along internal driveways and areas at each unit entrance (Refer to proposed rule 4.2.13 'Landscaping and tree planting - residential and other activities' within the proposed plan change text at Attachment 1).
38. The dominance of hard surfacing is of further concern because it restricts the available land at ground floor level which could otherwise be used for indoor or outdoor living space. The existing rules specify a minimum car parking requirement per residential unit and for visiting car parking spaces. The minimum requirement in the L3 Zones is for two parking spaces for each residential unit (as opposed to one space in the L4 Zones). It is evident from the traffic assessment (appended to the Section 32 report) that the two space minimum requirement could be regarded as a slight over-provision of car parking in the L3 Zones when considered in relation to car ownership rates. A further issue with providing too much car parking is the impact it can have on promoting alternative modes of transport.
39. Changes are recommended to the car parking requirements. This is having considered the sometimes competing objectives of providing sufficient off-street parking, car ownership rates, and creating well designed developments in urban design terms. Consideration has also been given to the function of local, collector and arterial roads. To help address these concerns an amendment is proposed to reduce the minimum car parking requirement per residential unit in the L3 Zones from two spaces minimum to one space minimum. This change would be limited to new residential units which have a gross floor area less than 150 square metres and gain access from a local road. As such, much larger residential units would still be required to provide a minimum of two car parking spaces. It is important to note that this continues to be a minimum requirement only. It would not prevent applicants from proposing more car parking spaces should they wish to. This change should assist in achieving developments which are less dominated by hard surfacing. It will also enable more efficient use of sites with more ground floor area being available for either habitable rooms or outdoor living areas. The introduction of a new implementation method under Objectives 7.2 and 7.6 (as set out above and relating to investigation of residential car parking schemes) also highlights a non District Plan matter which could be pursued where there is a high demand for on-street car parking.
- Site layout and design failing to adequately support passive or informal surveillance
 - Location of pedestrian entrances to individual units not easily identifiable
 - Poorly designed and solid, non-transparent front fencing.

40. The Urban Design assessment highlighted a lack of habitable space at the ground floor level within new developments as well as insufficient overlooking of shared access ways (particularly at the ground floor level). Inclusion of such spaces can help support passive or informal surveillance. Moreover, pedestrian entrances to individual units are not always readily identifiable from the street. Such design considerations can assist with a more pleasant experience and feeling of safety when moving into and around a development. Similar safety and visual amenity concerns relate to the use of solid and non-transparent fencing which can limit views into and out of sites. The current provisions do not adequately enable consideration of these matters and changes are recommended.
- Unacceptable levels of overlooking and lack of privacy for occupants of residential units both within a site and for neighbouring occupiers.
 - Requirement for adequately sized and located outdoor and indoor storage space and outdoor living space which is directly accessible from habitable rooms.
 - High levels of traffic noise for habitable rooms sited near to road boundaries.
41. Issues of overlooking and loss of privacy for occupants both within and adjoining a site were identified. The Plan's objective and policy framework and rules recognise and require acceptable standards of amenity to be provided. However, the prescribed separation distances are proving inadequate in this respect, particularly between living room windows on adjoining sites. Amendments are recommended to the separation from neighbours rule. For more detail refer to rule 4.2.5 – 'Separation from neighbours – residential and other activities' within Attachment 1. Concerns have been identified about the provision of suitably sized and accessible indoor and outdoor living and storage space facilities. Proposed rule changes are also intend to address such issues.
42. Noise emanating from traffic can have a detrimental impact on residential amenity. It was considered whether it would be necessary to require minimum sound insulation for residential units which are more exposed to high levels of traffic noise. The acoustics report (which is appended to the Section 32 report) recommends a level of external sound insulation to be provided for habitable spaces in the L3 and L4 Zones within close proximity to collector and arterial roads. This recommendation is reflected within the proposed plan change.
- Buildings consistently sited at odd angles to the street and failing to address the street scene (inconsistent with traditional patterns of development).
 - Long bland building facades with limited detailing, variation and visual interest
 - Overly repetitive design and a lack of identity/individuality of individual residential units
 - Large projecting building overhangs which appear out of character with traditional depths of eaves and rendering a unbalanced appearance
43. A range of issues were found relating to the overall layout, design and appearance of buildings. Of general concern is the manner in which residential buildings address, or front the street. The long and narrow shape of many sites (especially in the L3 Zones) has often resulted in a 'sausage block' typology with residential units running side on to the boundary to nearly the full depth of the site. The cumulative effect of this type of development is a series of units which relate more to their side shared driveway than they do to the main street frontage. Development on these long, narrow and constrained sites can sometimes be achieved in a desirable manner and in fact some better examples were found during the site survey work. However, to generally achieve a higher standard of development more attention needs to be given to the siting, design and appearance of these developments. For instance, consideration needs to be given to how the facades of the buildings are visually articulated, whether there are sufficient breaks within the building form, and the location and extent of tree planting within and fronting the site. Improvements in such areas can be achieved by strengthening and amending the existing rules package (e.g. the tree planting and landscaping rule previously discussed). In respect of this issue and others raised above, an overall assessment of the design standard or quality is considered necessary to fully ascertain to what extent new development meets urban design principles. As discussed above such an urban design assessment would be triggered by the proposed urban design, appearance and amenity rule (refer wording of proposed rule 4.2.7 – 'Urban design, appearance and amenity – residential and other activities' within the attached proposed plan change text).

44. Under rule 4.2.7 a resource consent application would be required for developments of three or more residential units. The rule would also apply to one or two residential unit developments on sites less than 300 square metres and one to two unit developments that result in a residential floor area greater than 550 square metres. This is to ensure that applicants cannot circumvent the rule by arbitrarily dividing a six unit development into three lots of two unit developments on separate nominated 'sites'. It will also enable consideration of very large residential units. Proposals for buildings of over 40 square metres in size (to be used for other activities on a site) would also be subject to this rule. Accessory buildings, fences and walls associated with the above developments, alteration or additions are included within the scope of the rule. Applications under the above rule would be processed on a non-notified basis. It should be noted that the Council has the ability to override this clause within the Plan through consideration of special circumstances.
45. In considering applications under this rule the Council's discretion would be restricted to a set of assessment matters which set out the expectations for the urban design, appearance and amenity considerations of the development. The urban design assessment matters are contained within ten sub sections which together form a comprehensive set of assessment criteria. The overall impact of this assessment when combined with all other proposed changes is to provide a more comprehensive approach for considering and assessing urban design within the L3 and L4 Zones.

THE OPTIONS AND PREFERRED OPTION

46. A range of options were considered during the preparation of this proposed plan change. This includes options of doing nothing, the 'status quo', as well as various specific methods of amending the Plan provisions. The Section 32 assessment should be referred to for more detail in this regard. The do nothing option is not preferred as it has been demonstrated that the current regulatory framework with supporting design guides is not working. Consideration was given to updating the policies and amending the existing rules to a greater or lesser extent. Overall, a combination of changes to existing provisions and shifting to the inclusion of a more explicit assessment of urban design is considered to be a very effective way to achieve the desired outcomes.
47. It is also noted that in preparation for this proposed plan change, the various issues and options have been presented to the Council. This includes workshops on three occasions with the full Council and on six occasions with the Regulatory and Planning Committee.

PROCESSING OF COUNCIL INITIATED PLAN CHANGES

48. This is a Council initiated plan change and is subject to the provisions of the First Schedule of the RMA. If the Council decides to notify the plan change then it would be notified in accordance with the provisions of this Schedule. The proposed plan change and Section 32 would be made available for submissions and further submissions. Submitters would then have the right to present their submission at a public hearing. Whether or not a hearing is held the Council would need to notify its decision. A right of appeal to the Environment Court would be available, for any person who made a submission on the proposed plan change.

SUMMARY

49. The stimulus for the preparation of the plan change has been the significant level of concern raised in recent years about the design and appearance of multi-unit developments in the L3 and L4 Zones. The proposal has been prepared following consultation and subsequent research into ways in which the City Plan could be amended to strengthen the existing provisions and where necessary incorporate new rules and discretionary assessment over urban design matters. The proposed amendments provide the basis for achieving improved outcomes. Overall, the proposed change is considered to be the most appropriate in terms of efficiency and effectiveness in achieving the Plan's objectives. Sufficient consideration has been given to various options for pursuing the change. It is recommended that the proposed plan change is accepted in its entirety for public notification.