

**BEFORE AN INDEPENDENT HEARINGS PANEL
IN CHRISTCHURCH**

TE MAHERE Ā-ROHE I TŪTOHUA MŌ TE TĀONE O ŌTAUTAHI

UNDER the Resource Management Act 1991 (the **RMA**)

AND

IN THE MATTER OF the hearing of submissions on Plan Change 14 (Housing and Business Choice) to the Christchurch District Plan

**SUPPLEMENTARY STATEMENT OF EVIDENCE OF ANDREW WILLIS ON
BEHALF OF THE CHRISTCHURCH CITY COUNCIL**

PLANNING – CENTRAL CITY ZONE

Dated: 13 December 2023

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EXECUTIVE SUMMARY

1. My name is **Andrew Willis**. I am a director of Planning Matters Limited.
2. I have prepared this supplementary statement of evidence in response to requests by the Independent Hearings Panel (**IHP**) to:
 - (a) advise what I considered to be relevant factors of a "well-functioning urban environment" (**WFUE**) when preparing my primary evidence;
 - (b) explain the evaluation of building heights in the city centre, particularly in relation to quantifying the benefits and disbenefits of intensification as a tool to identify a height limit above which benefits would not be "maximised".
3. In summary:
 - (a) When preparing my primary evidence, I considered that the matters contained in Policy 1 of the National Policy Statement on Urban Development (**NPS-UD**) are relevant factors of a well-functioning environment at a broad scale, and that the following were additional relevant factors of a WFUE: that a WFUE supports Christchurch's earthquake recovery and that urban design plays an important role in achieving a WFUE at a more detailed scale. In my opinion, well designed spaces support physical and mental health and well-being, which are desired outcomes and measures from a WFUE. I elaborate on these additional factors below;
 - (b) I consider that quantifying the benefits and disbenefits of intensification particularly as a tool to identify a height limit above which benefits would not be "maximised" would be very difficult to do and has not been done by the Council or its witnesses. Furthermore, the significant level of required assumptions would make the findings not very robust. Instead, the Council has relied on qualitative evidence and developed a threshold approach which enables the benefits and disbenefits of each tall building proposal to be assessed on its merits. This approach enables a more robust assessment, and in my opinion is the most appropriate approach to determine the benefits and disbenefits of intensification.

INTRODUCTION

4. My name is **Andrew Willis**. I am a director of Planning Matters Limited.
5. I prepared a statement of primary evidence on behalf of the Christchurch City Council (**Council**) dated 11 August 2023. My primary evidence addressed density and building heights, commercial distribution requirements, and qualifying matters for Victoria Street, Cathedral Square and Radio Communications, arising from the submissions and further submissions on Plan Change 14 to the Christchurch District Plan (the **District Plan; PC14**).
6. I have the qualifications and experience set out at paragraphs 18-20 of my primary evidence dated 11 August 2023.
7. I repeat the confirmation given in my primary evidence that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023, and that my evidence has been prepared in compliance with that Code.

SCOPE OF SUPPLEMENTARY EVIDENCE

8. This supplementary evidence addresses the following matters:
 - (a) what I considered to be the relevant factors of a WFUE when preparing my primary evidence;
 - (b) the evaluation of building heights in the city centre, particularly in relation to quantifying the benefits and disbenefits of intensification as a tool to identify a height limit above which benefits would not be "maximised".
9. I address each of these matters in turn.

WELL-FUNCTIONING URBAN ENVIRONMENTS

10. In my primary evidence at paragraphs 40 to 42 I set out what I considered to be a WFUE. I stated:
 40. *The NPS-UD sets out in Policy 1 factors that, as a minimum, contribute to a well-functioning urban environment. In summary, these include environments that have a variety of homes and sites for different business activities, good accessibility between homes, work, community and recreation spaces, limited adverse impacts on the competitive operation of land and development markets,*

reductions in greenhouse gas emissions and resilience to climate change.

41. *In his evidence Mr Ray also identifies matters that contribute to a well-functioning urban environment. Mr Ray identifies that how an urban place performs goes beyond just physical or quantitative elements (form) and is also determined by people's behaviour and needs within a particular place, the importance of placemaking and the need to consider a contextual approach as to what constitutes a well-functioning urban environment specific to Ōtautahi Christchurch. He considers that building form and building design directly impact the quality, vitality and enjoyment of the built environment for people occupying and using the city and that observing the principles of good urban design plays a significant role in the creation of well-functioning built urban environments. Mr Ray states that building height, and other specified building aspects, play a significant role in shaping the quality of the built environment and the degree to which it can be described as a well-functioning environment.*
42. *As stated later in my evidence, I consider that scale and density relativity (of the Central City relative to the remainder of the City), is important to support a well-functioning urban environment. The CCZ should have the greatest scale and density of development relative to other areas to support the increased investment in public transport, civic services and spaces and create the City's identity.*

11. I have since considered Mr Ray's supplementary evidence dated 13 December 2023 in which he has expanded upon the statements in his primary evidence as to what urban design factors he considered as contributing to a WFUE when he prepared his primary and rebuttal evidence. For clarity, these are:

- a) A human-scaled city with buildings and streets and spaces in excellent proportions, with a high-degree of building continuity to provide a sense of enclosure;
- b) Buildings that define space and create clearly articulated public streets and spaces;
- c) Well-designed streets that promote street-life and the use of active transport modes;
- d) A network of high-quality attractive public open spaces and routes;
- e) A high-degree of mixed use and diversity of uses, appealing to a broad cross-section of the population;

- f) Highly activated buildings especially at ground level to assist in providing an attractive and vibrant public realm;
 - g) Excellent architectural and landscape design quality throughout buildings and the public realm.
12. The above factors described by Mr Ray are consistent with what I had understood to be factors relevant to a WFUE when preparing my primary evidence, and I agree with those factors.
13. I was also cognisant of the Operative Plan provisions (which are deemed to meet the purpose of the Act), which articulate what is a WFUE and support the above identified matters. See for example:
- a) Objective 15.2.4 (Urban form, scale and design outcomes);
 - b) Policy 15.2.4.2 (Design of new development);
 - c) Objective 15.2.6 (Role of the Commercial Central City Business Zone);
 - d) Policy 15.2.6.1 (Diversity of activities and concentration of built development);
 - e) Policy 15.2.6.3 (Amenity);
 - f) Policy 15.2.6.5 (Pedestrian focus);
 - g) Objective 15.2.8 (Built form and amenity in the CCMUZ); and
 - h) Policy 15.2.8.2 (Amenity and effects).

QUANTIFYING THE BENEFITS AND DISBENEFITS OF INTENSIFICATION

14. The IHP requested that I explain the evaluation of building heights in the city centre, particularly in relation to quantifying the benefits and disbenefits of intensification as a tool to identify a height limit above which benefits would not be "maximised".
15. In his primary evidence (paragraph 62) Mr Heath identifies the disbenefits from decentralisation, which include the decline in centre function and amenity along with adverse effects on the roading network, public transport provision, resource productivities, land efficiencies, community facilities, productivity and centre infrastructure. He identifies agglomeration benefits

from increased density (paragraphs 67 to 69) including: increased specialisation; knowledge spillovers; competition; larger labour markets; and economies of scale. Mr Heath also touches on effects on community infrastructure (paragraph 73), transport efficiency (paragraph 79), and land use efficiency (paragraph 84) in relation to density.

16. In relation to central city height specifically, Mr Heath considers increased height supports growth, competitiveness, efficiency and agglomeration benefits (paragraphs 142 to 144). In paragraph 148 Mr Heath identifies some of the fundamental economic reasoning for supporting the notified 90m height limit. He considers a reduced height would lead to reduced city centre economic efficiency and productivity and long term economic costs relative to a 90m height limit. In paragraph 154 Mr Heath identifies the economic benefits associated with increasing height limits in commercial centres, particularly the city centre. These include: catalysing development; increasing the impetus for intensified re-development and consolidation; enhanced housing affordability; increased employment opportunities; more efficient land use and less land / green space uptake; more efficient infrastructure use; increased internalisation for retail spend; reduced transport costs and emissions; increased profile; higher levels of specialisation and productivity. He also identified the economic costs which include: increased congestion; increased crime; increased pollution / waste; increased noise; and increased vagrancy and transient populations.
17. While Mr Heath identifies the economic benefits and disbenefits of increased height, he does not quantify these, nor identify the point at which the disbenefits outweigh the benefits across the identified matters.
18. I note that for some factors, ever increasing height will not always result in ever increasing benefits. For example, while intensification can provide more commercial capacity, if capacity outstrips demand then nearby commercial sites may remain vacant for many years, which creates a disbenefit in that location over that period. In addition, while intensification usually benefits the efficient use of public infrastructure such as three waters, public transport, other roading infrastructure and greenspace, if they become 'overloaded' (for example through road congestion and levels of service not being achieved in respect of infrastructure generally) and are unable or too costly to be efficiently maintained or upgraded, increasing intensification may result in increasing disbenefits from that point. I am not

aware that these benefits and disbenefits have been quantitatively determined.

19. I also note that while agglomeration benefits such as higher levels of specialisation and productivity could occur from taller buildings, these can also occur in low rise buildings such as the two-storey EPIC building (76/106 Manchester Street) where there is an agglomeration of entrepreneurs, collaborators and innovators.¹ There are significant benefits from this agglomeration but it is within only a low-rise building. Likewise, if all the business in a 90m tall building did not collaborate with each other, then the agglomeration benefits from co-location may not accrue to the same extent in this intensified setting. I also understand that agglomeration benefits are stronger in larger floor plate buildings (such as EPIC) than smaller floor plate buildings, which are common in taller buildings.
20. I note that benefits and disbenefits can be calculated differently depending on your reference point. For example, while it could be argued that New Regent Street building heights (and heritage restrictions) create some disbenefits for individual building owners (a micro perspective), there are also likely significant benefits to wider Christchurch (a macro perspective) from this significant tourist attraction considered to be one of the top 8 'must do summer experiences' for Christchurch.²
21. The Council has identified that height limits over 45m in Cathedral Square could cause adverse impacts, or disbenefits on this important open space as a result of shading, thereby lowering amenity values and reducing the Square's ability to provide an inviting, high quality civic space which encourages socialisation and dwell time.³ However, I note that intensification done well could also increase visitor numbers and vibrancy where these buildings front onto the Square, thereby potentially increasing the benefits of greater intensification. In my opinion, while the extent of shading can be determined, it would be very difficult to quantify the full range of benefits and disbenefits of tall buildings in Cathedral Square.
22. Likewise for the 45m height limit along Victoria Street, the Council determined that this would support the legibility of the city centre, providing an appropriate transition in terms of urban form between the rest of the city

¹ <https://epicinnovation.co.nz/>

² <https://www.christchurchnz.com/explore/seasonal-guides/summer/bucket-list-experiences>

³ Plan Change 14 Section 32: Lower height Limits: Victoria Street & Cathedral Square – Qualifying Matters 2022

centre and the surrounding uses and their respective built form provisions, whilst determining that the 'lost' development capacity resulting from the 45m height limit was not significant⁴. However, the benefits and disbenefits of this approach were not quantified in the Council's assessment and I consider this would be very difficult to do.

23. In his primary evidence Mr Ray has identified disbenefits that can occur from poorly designed tall buildings (paragraph 44) and in my opinion these disbenefits can increase with greater building scale. I think it would be very difficult to quantify these disbenefits, and I note that each building would need to be assessed on its merits with reference to its proposed location. Mr Ray has not undertaken this exercise.
24. I have reviewed the Council's supporting documentation and I have not seen an assessment that quantifies the benefits and disbenefits of intensification at a centre city scale, nor one that then translates this to guide decision making on a height limit that would maximise the benefits of intensification. In my view this would be very difficult to do given my above observations. I also consider that the results could change over time as land and capital costs, supply and demand evolved. In addition, the central city sits within the context of Christchurch, so benefit and disbenefit calculations would also need to be cognisant of the impacts of intensification in the city centre on activities outside the city centre. I consider that to undertake this exercise would require very significant assumptions across a range of factors that would undermine the robustness of the exercise.
25. In conclusion, I consider that quantifying the benefits and disbenefits of intensification particularly as a tool to identify a height limit above which benefits would not be "maximised" would be very difficult to do and has not been done by the Council or its witnesses. To accurately evaluate the costs and benefits from both a micro and macro perspective would involve very complex development scenario modelling, comparative analysis and evaluation of multiple factors. In the absence of quantitative evidence, the Council has relied on qualitative evidence, assessing benefits and costs at a relatively high level, and developed a threshold approach which enables the benefits and disbenefits of each tall building proposal to be assessed

⁴ Ibid

on its merits. In my opinion this approach enables a more robust assessment and is the most appropriate approach to undertake to determine the benefits and disbenefits of intensification.

Andrew Willis
13 December 2023