

CHRISTCHURCH DISTRICT PLAN

PLAN CHANGE 14

HOUSING AND BUSINESS CHOICE

PLANNING OFFICER'S REPORT OF KIRK JOSEPH LIGHTBODY UNDER SECTION 42A OF THE RESOURCE MANAGEMENT ACT 1991

Intensification within Commercial and Industrial Zones outside the Central City

Lyttelton Building Height Qualifying Matter

Belfast Commercial Centre and Styx River Qualifying Matters

11 AUGUST 2023

TABLE OF CONTENTS

1	EXECUTIVE SUMMARY	1
2	INTRODUCTION	2
2.1	REPORTING OFFICER	2
2.2	THE PURPOSE AND SCOPE OF THIS REPORT	3
3	KEY ISSUES IN CONTENTION.....	6
4	PROCEDURAL MATTERS	6
4.1	PROCEDURAL MATTERS.....	6
5	BACKGROUND AND STATUTORY CONSIDERATIONS	7
5.1	THE RESOURCE MANAGEMENT ACT 1991	7
5.2	SECTION 32AA	8
5.3	TRADE COMPETITION	8
5.4	CHRISTCHURCH DISTRICT PLAN	9
5.5	CANTERBURY REGIONAL POLICY STATEMENT.....	9
6	PLAN CHANGE 14 – COMMERCIAL OUTSIDE THE CENTRAL CITY AND INDUSTRIAL ZONES	10
6.1	OVERVIEW	10
6.2	NATIONAL PLANNING STANDARDS ALIGNMENT WITH CHRISTCHURCH DISTRICT PLAN ZONES	10
6.3	NPS-UD POLICY 3 COMMENSURATE HEIGHT AND DENSITY WITHIN CENTRES	14
6.4	NPS-UD POLICY 3(C) AND 3(D) - HEIGHT AND DENSITY IN INDUSTRIAL AND MIXED USE ZONES	16
6.5	QUALIFYING MATTERS – LYTTTELTON CENTRE HEIGHT AND STYX RIVER.....	19
7	CONSIDERATION OF SUBMISSIONS AND FURTHER SUBMISSIONS	20
7.1	OVERVIEW OF SUBMISSIONS AND FURTHER SUBMISSIONS.....	20
7.2	OUT-OF-SCOPE SUBMISSIONS	20
7.3	REPORT STRUCTURE	27
8	ANALYSIS OF SUBMISSIONS AND FURTHER SUBMISSIONS.....	29
8.1	ISSUE 1 – ZONING OF CENTRES	29
8.2	ISSUE 2 – CLASSIFICATION OF TOWN AND LOCAL CENTRES IN TABLE 15.1	46
8.3	ISSUE 3 – HEIGHT AND DENSITY ENABLEMENT IN CENTRES.....	56
8.4	ISSUE 4 – OBJECTIVES AND POLICIES.....	62
8.5	ISSUE 5 – RULES.....	103
8.6	ISSUE 6 - REZONING REQUESTS – COMMERCIAL AND INDUSTRIAL	125
9	MINOR AND INCONSEQUENTIAL AMENDMENTS	127
10	CONCLUSIONS AND RECOMMENDATIONS	127
	APPENDIX 1 – TABLE OF REZONING REQUESTS	
	APPENDIX 2 – RELEVANT PROVISIONS OF THE REGIONAL POLICY STATEMENT, CHRISTCHURCH DISTRICT PLAN	
	APPENDIX 3 - TABLE OF SUBMISSIONS WITH RECOMMENDATIONS	
	APPENDIX 4 – PC14 - DISTRICT PLAN TEXT AMENDMENTS WITH RECOMMENDED CHANGES	
	APPENDIX 5 – PC14 – COMMERCIAL CENTRES – FLOORSPACE AND CLASSIFICATION	

APPENDIX 6 – PC14 – COMMERCIAL CENTRES – ACTIVITY STATUS ACROSS CENTRES

APPENDIX 7 – RESIDENTIAL DEVELOPOMENT CAPACITY IN TOWN AND LOCAL CENTRES

APPENDIX 8 - THEORETICAL BUSINESS LAND SUPPLY IN TOWN AND LOCAL CENTRES

APPENDIX 9 – MIXED USE REZONING PROPOSALS WITHIN WALKING CATCHMENTS OF CCZ AND TCZ

LIST OF ABBREVIATIONS

CDP	Christchurch District Plan
the plan change / PC14 / PPC14	Plan Change 14
CRPS	Canterbury Regional Policy Statement
NPS-UD	National Policy Statement on Urban Development
NPS FM	National Policy Statement on Freshwater Management
NPS	National Planning Standards
the Act/RMA	Resource Management Act
Housing Supply Amendment Act	Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021
MDRS	Medium Density Residential Standards
IHP	Independent Hearings Panel
ISSP	Intensification Streamlined Planning Process
GLFA	Gross Leaseable Floor Area
MCZ	Metropolitan Centre Zone
TCZ	Town Centre Zone
LCZ	Local Centre Zone
MUZ	Mixed Use Zone
IGZ	Industrial General Zone
IPI	Intensification Planning Instrument
MDZ	Medium Density Zone
HDZ	High Density Zone
KAC	Key Activity Centre

1 EXECUTIVE SUMMARY

1.1.1 I have been asked by the Council to prepare this report pursuant to section 42A of the Resource Management Act 1991 (**the Act/RMA**). This report considers the issues raised by submissions to Council initiated Plan Change 14 – Housing and Business Choice (**the plan change / PC14 / PPC14**) to the Christchurch District Plan (**CDP**) and makes recommendations in response to the issues that have emerged from these submissions, as they apply to:

- i. Commercial zones outside the Central City;
- ii. Industrial zones within a walkable distance of centres where a brownfield overlay is proposed;
- iii. Proposed Mixed-use zoning of areas within a walkable distance of the City Centre zone; and
- iv. Qualifying matters that apply to commercial zones only.

1.1.2 This report forms part of the Council's ongoing reporting obligations to consider the appropriateness of the proposed provisions; the benefits and costs of any policies, rules or other methods; and the issues raised in submissions on PC14.

1.1.3 The main issues raised by the submitters relevant to this s42A report are:

- i. Zoning of Commercial Centres.
- ii. Height and Density.
- iii. Objective, Policies and Rule frameworks in Commercial and Industrial Zones.
- iv. Commercial and Industrial Zone Intensification within walkable catchments of Centres.
- v. Rezoning requests.

1.1.4 This report addresses each of these key issues, as well as any other relevant issues raised in the submissions relating to Commercial zones outside the Central City (Town Centre Zone, Local Centre Zone, Neighbourhood Centre Zone, Mixed Use Zone, Large Format Retail Zone, Commercial Banks Peninsula Zone, Commercial Office); Industrial zones within a walkable distance of centres where a brownfield overlay is proposed; Proposed Mixed-use zoning of areas within a walkable distance of the City Centre zone; and Qualifying matters that apply to commercial zones only.

1.1.5 Having considered the notified PC14 material, the submissions and further submissions received, the findings of the Council's expert advisors and the additional information provided by the Council

since notification, I have evaluated the PC14 provisions relating to the commercial (outside the Central City) and industrial chapters and provided recommendations and conclusions in this report. The PC14 provisions with my recommended amendments are included in Appendix 4. These recommendations take into account all of the relevant matters raised in submissions and relevant statutory and non-statutory documents.

- 1.1.6 In accordance with the further evaluation undertaken under section 32AA of the RMA that has been included throughout this report, I consider that the provisions with recommended amendments are the most appropriate way to achieve the objectives of PC14 and the purpose of the RMA.

2 INTRODUCTION

2.1 REPORTING OFFICER

- 2.1.1 My full name is Kirk Joseph Lightbody. I am employed as a policy planner in the City Planning Team of the Christchurch City Council. I have been in this position since February 2022.
- 2.1.2 I hold a Bachelor of Resource and Environmental Planning (Hons) degree from Massey University. I am also an intermediate member of the New Zealand Planning Institute.
- 2.1.3 I have six years' experience in planning and resource management in New Zealand, having worked as a consents and policy planner for the Manawatu District Council prior to my current role at Christchurch City Council. My experience relevant to this hearing includes the preparation and notification of changes to the Manawatu District Plan, along with presenting planning evidence on behalf of Christchurch City Council concerning the application of the National Policy Statement – Urban Development 2020 (**NPS-UD**) and sub-regional growth in Greater Christchurch in the context of Private Plan Changes in Selwyn District and the Selwyn District Plan Review.
- 2.1.4 My role in preparing this report is that of an expert planner.
- 2.1.5 I was not the author of the Commercial s32 report but I have been involved in the preparation of Plan Change 14. In preparing this report, I have read and considered the Commercial s32 report. Except where I say otherwise in this report, I agree with the content and analysis set out in the Commercial s32 report. I rely on, and refer back to, that report, but do not intend to repeat its content in order to minimise duplication. The Commercial s32 report, and all other s32 reports including their appendices can be accessed from the Council's website: <https://ccc.govt.nz/the-council/plans-strategies-policies-and-bylaws/plans/christchurch-district-plan/changes-to-the-district-plan/proposed-changes-to-the-district-plan/pc14/>

2.1.6 I have been involved in the Christchurch City Council submission on plan change 14. In this report, I will not be considering or commenting on relief sought in the Council submission.

2.1.7 Although this is a Council-level process, I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and I agree to comply with it. I confirm I have considered all the material facts I am aware of that might alter or detract from the opinions that I express. I confirm this evidence is within my area of expertise, except where I state I am relying on the evidence of another person.

2.1.8 I confirm that, while I am employed by the Council, the Council has agreed to me providing this Section 42A report in accordance with the Code of Conduct.

2.2 THE PURPOSE AND SCOPE OF THIS REPORT

2.2.1 In response to the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (“**the Housing Supply Amendment Act**”), tier 1 territorial authorities were required to notify changes or variations to their district plans to incorporate the Medium Density Residential Standards (**MDRS**) and give effect to Policy 3 of the NPS-UD. PC14 is an Intensification Planning Instrument (IPI) under section 80E of the Resource Management Act 1991 (RMA).

2.2.2 As a tier 1 territorial authority the Council has established an Independent Hearings Panel (**IHP**) to hear submissions and make recommendations on PC14 using the Intensification Streamlined Planning Process (**ISPP**).

2.2.3 I have prepared this report in accordance with the ISPP and Section 42A of the RMA for the purpose of:

- *Assisting the IHP in considering and making their recommendations on the issues raised by submissions and further submissions on Christchurch's Intensification Planning Instrument – PC14 - by presenting the key themes and associated issues in relation to the Commercial and Industrial provisions of PC14 that require consideration by the IHP.*
- *identifying submissions related to the Commercial and Industrial provisions of PC14, provide submitters with information on how their submissions have been evaluated and make recommendations on the Commercial and Industrial provisions of PC14 and the submissions and further submissions received on it. Where I recommend substantive changes to the plan change provisions, I provide an assessment of those changes in terms of section 32AA of the RMA.*

2.2.4 The scope of this s42A report relates to Commercial and Industrial zoned sites across Christchurch outside of the Central City, and the following qualifying matters that are specific to the Town Centre and Commercial Banks Peninsula Zone:

- *Lyttelton Building Height QM,*
- *Belfast Community Centre and Styx River QM*

2.2.5 This s42A report: addresses the contextual, procedural and statutory considerations and instruments that are relevant to the commercial provisions which have been outlined in the section 42A 'Strategic Overview' report, and addressed in the following Section 32 reports insofar as they relate to:

- *Part 2 Qualifying Matters*
- *Part 4 Commercial*
- *discusses the relevant Christchurch District Plan Objectives and Policies as they relate specifically to the Commercial and Industrial Chapters outside the Central City, the Lyttelton Building Height QM and Belfast Commercial Centre and Styx River QM;*
- *discusses the PC14 provisions as they relate to the Commercial and Industrial Chapters outside the Central City;*
- *provides an overview, analysis and evaluation of submissions and further submissions received on the commercial and industrial provisions outside the Central City and the qualifying matters listed above; and provides conclusions and recommendations.*

2.2.6 In this s42A report I consider the issues raised and the relief sought in submissions and further submissions received by the Council in relation to the commercial and industrial zones along with relevant objectives, policies, rules, definitions as they apply to the chapters. I then make recommendations on whether to accept or reject each submission and further submission point along with conclusions and recommendations for changes to PC14 provisions or maps relating to the commercial and industrial provisions based on the assessment and evaluation contained in this report. Where appropriate, this report groups submission points that address the same provision or subject matter. A summary of my recommendations as to acceptance, acceptance in part or rejection of the submissions and further submissions is included throughout this report with detail provided in Appendix 3 – Table of Submissions with Recommendations.

2.2.7 As required by Section 32AA, a further evaluation of recommended changes (including reasonably practicable alternatives) to the amendments proposed in PC14 to the commercial and industrial chapters has been undertaken and has been included throughout this report.

2.2.8 This report is intended to be read in conjunction with the following reports, documents, assessments, expert evidence and other material which I have used or relied upon in support of the opinions expressed in this report:

- a. all statutory matters and instruments, background information and administrative matters pertaining to PC14 discussed in that report;

- b. the overview of the relevant Christchurch District Plan objectives and policies as they relate to the commercial and industrial chapters and the qualifying matters listed above as discussed in that report.
- c. the overview of PC14 in particular as it relates to the commercial and industrial chapters as discussed in that report; and
- d. S42A Report by Ms Sarah Oliver – Strategic Directions Chapter 3 and Qualifying Matters related to Strategic and City Infrastructure and Coastal Hazards.
- e. S42A Report by Mr Andrew Willis – Central City Heights
- f. S42A Report by Ms Holly Gardiner – Central City Commercial and Central City Mixed Use Zones
- g. S42A Report by Mr Ike Kleynbos – Residential
- h. S42A Report by Ms Ms Brittany Ratka – Industrial Interface Qualifying Matter

2.2.9 the advice and recommendations of the following experts, as set out in their statements of evidence:

- a. Nicola Williams (CCC) – Urban Design
- b. Tim Heath (Property Economics) – Economics
- c. Kirdan Lees (Sense Partners) – Demand model for business land

2.2.10 I have considered and assessed the following reports and documents in preparing this section 42A report:

- *the following section 32 Reports including all statutory matters and instruments, background information and administrative matters pertaining to PC14, in particular the commercial chapter discussed in that report and all other matters relevant to the commercial and industrial chapters discussed in those reports:*
 - o *Part 2 – Qualifying Matters; and*
 - o *Part 4 - Commercial*
- *submissions and further submissions related to Commercial and Industrial Zones outside the Central City;*
- *all other associated documentation related to PC14 prepared by the Council insofar as it relates to Commercial and Industrial zones outside the Central City.*

2.2.11 The discussion and recommendations included in this report are intended to assist the IHP and submitters on PC14. Any conclusion and recommendations made in this report are my own and are not binding upon the IHP or the Council in any way. The IHP may choose to accept or reject

any of the conclusions and recommendations in this report and may come to different conclusions and make different recommendations, based on the information and evidence provided to them by persons during the hearing.

3 KEY ISSUES IN CONTENTION

3.1.1 A number of submissions and further submissions were received on the provisions relating to Commercial and Industrial Zones outside the Central City and the Lyttelton Building Heights Qualifying Matter. (No submissions were received on the provisions of the Belfast Commercial Centre and Styx River Qualifying Matter)

3.1.2 I consider the following to be the key issues in contention raised by submissions and further submissions relating to the Commercial and Industrial Zones outside the Central City:

- *Zoning of commercial centres.*
- *Height and Density.*
- *Objective, policies and rule frameworks in Commercial and Industrial Zones*
- *Commercial and Industrial Zone intensification within walkable catchments of centres.*
- *Rezoning requests.*

3.1.3 I address each of these key issues in this report, as well as any other issues raised by submissions.

4 PROCEDURAL MATTERS

4.1 PROCEDURAL MATTERS

4.1.1 At the time of writing this report there has been a pre-hearing conference on 1 August 2023. There have not been any clause 8AA meetings or expert witness conferencing in relation to submissions on any commercial or industrial provisions.

4.1.2 It is noted that many submissions relate to matters that will be addressed in other s42A reports. Where a submission point is included in the summary tables for the Commercial and Industrial Zones outside the Central City but would be more suitable to assess under other reports, this has been noted in the relevant table. Likewise, if submission points have been addressed in the 'Strategic overview' s42A report, this has been noted.

5 BACKGROUND AND STATUTORY CONSIDERATIONS

5.1 THE RESOURCE MANAGEMENT ACT 1991

5.1.1 The 'Strategic Overview' section 42A report and the section 32 reports provide a detailed overview of the key RMA matters to be considered by PC14 and will not be repeated in detail here.

5.1.2 In summary, PC14 has been prepared in accordance with the RMA and in particular, the requirements of:

- *Section 74 Matters to be considered by territorial authority, and*
- *Section 75 Contents of district plans; and*
- *Section 76 District Rules.*

5.1.3 As discussed in the 'strategic overview' section 42A report and the section 32 reports the RMA-Enabling Housing Supply and Other Matters Amendment Act 2021 requires the Council to make changes to its operative district plan for the purposes of:

- *Incorporating Medium Density Residential Standards into all relevant residential zones (s77G(1));*
- *Implementing the urban intensification requirements of the NPS-UD (s77G(2)) and give effect to policy 3 in non-residential zones (s77N); and*
- *Including the objectives and policies in clause 6 to Schedule 3A of the RMA (s77G(5)).*

5.1.4 The required plan changes and variations must be undertaken using an Intensification Planning Instrument (IPI) in accordance with sections 80E to 80H of the RMA. Councils must use the Intensification Streamlined Planning Process (ISPP) set out in Part 6 of Schedule 1 of the RMA.

5.1.5 The primary focus of PC14 is to achieve the above requirements of the RMA as amended by the RMA-EHS.

5.1.6 As set out in the 'Strategic Overview' section 42A report and the part 2 and 4 section 32 reports there are a number of higher order planning documents and strategic plans that provide direction and guidance for the preparation and content of PC14. This report includes a comprehensive assessment of the PC14 Commercial and Industrial Zone provisions and qualifying matters outside the Central City in relation to these documents and plans and all statutory considerations in so far as they relate to the NPS-UD, CRPS and operative CDP.

5.2 SECTION 32AA

5.2.1 As noted above I have undertaken an evaluation of the recommended amendments to the commercial (outside the Central City) and industrial provisions since the initial section 32 evaluation(s) was/were undertaken in accordance with s32AA. Section 32AA states:

32AA Requirements for undertaking and publishing further evaluations

- (1) A further evaluation required under this Act—
 - (a) is required only for any changes that have been made to, or are proposed for, the proposal since the evaluation report for the proposal was completed (the **changes**); and
 - (b) must be undertaken in accordance with [section 32\(1\) to \(4\)](#); and
 - (c) must, despite paragraph (b) and [section 32\(1\)\(c\)](#), be undertaken at a level of detail that corresponds to the scale and significance of the changes; and
 - (d) must—
 - (i) be published in an evaluation report that is made available for public inspection at the same time as the approved proposal (in the case of a national policy statement or a New Zealand coastal policy statement or a national planning standard), or the decision on the proposal, is notified; or
 - (ii) be referred to in the decision-making record in sufficient detail to demonstrate that the further evaluation was undertaken in accordance with this section.
- (2) To avoid doubt, an evaluation report does not have to be prepared if a further evaluation is undertaken in accordance with subsection (1)(d)(ii).
- (3) In this section, **proposal** means a proposed statement, national planning standard, plan, or change for which a further evaluation must be undertaken under this Act.

Section 32AA: inserted, on 3 December 2013, for all purposes, by [section 70](#) of the Resource Management Amendment Act 2013 (2013 No 63).

Section 32AA(1)(d)(i): amended, on 19 April 2017, by [section 15\(1\)\(a\)](#) of the Resource Legislation Amendment Act 2017 (2017 No 15).

Section 32AA(1)(d)(i): amended, on 19 April 2017, by [section 15\(1\)\(b\)](#) of the Resource Legislation Amendment Act 2017 (2017 No 15).

Section 32AA(3): amended, on 19 April 2017, by [section 15\(2\)](#) of the Resource Legislation Amendment Act 2017 (2017 No 15).

5.2.2 The required section 32AA evaluations for changes I have proposed as a result of consideration of submissions are contained within the assessments provided in relation to submissions on the Commercial and Industrial Chapters. These evaluations are provided at the relevant sections of this s42A report, as required by s32AA(1)(d)(ii).

5.2.3 The Section 32AA evaluations contain a level of detail that corresponds to the scale and significance of the anticipated effects of the changes that have been made. Recommendations on editorial, minor, and consequential changes that improve the effectiveness of provisions without changing the policy approach are not re-evaluated. No re-evaluation has been undertaken if the amendments have not altered the policy approach.

5.2.4 For changes that represent a significant departure from the PC14 provisions as notified, I have undertaken the s32AA evaluation within the report in the same location as a recommendation.

5.3 TRADE COMPETITION

5.3.1 There are no known trade competition issues raised within the submissions.

5.4 CHRISTCHURCH DISTRICT PLAN

- 5.4.1 The relevant district plan provisions also need to be considered in preparing a plan change and considering any submissions on the change. The section 32 report 'Part 4 Commercial' contains an evaluation of PC14 including provisions concerning the Commercial and Industrial Chapters in section 5.¹ I agree with the assessment carried out in section 5 of the s32 report, except to the extent that I recommend changes.
- 5.4.2 The key theme arising from the s32 assessment that relates to my evidence is that commercial activity within Christchurch City is focused within a hierarchical network of centres. The hierarchy begins with the City Centre Zone at the top of the hierarchy through to Neighbourhood Centre Zones e.g. small parade of shops or corner dairies at the bottom. Primacy is given to the higher order centres ahead of lower order centres in the hierarchy, with the City Centre Zone having ultimate commercial primacy throughout the city. PC14 responds to these matters by reaffirming the centres-based hierarchy while implementing commensurate height and density as directed by the NPS-UD.
- 5.4.3 The brownfield objectives and policies outlined in Chapter 16 are also relevant to PC 14's intensification response, in the context of areas within a walkable distance of commercial centres. Relevant to these areas are Objective 16.2.2 (Brownfield Development), and Policies 16.2.2.1 (Brownfield site identification) and 16.2.2.2 (Brownfield redevelopment). To be classified as a brownfield site, the site needs to either be identified by an overlay or meet all of the stated criteria in Policy 16.2.2.1.

5.5 CANTERBURY REGIONAL POLICY STATEMENT

- 5.5.1 The Canterbury Regional Policy Statement (**CRPS**) is required to be given effect to when preparing a plan change and considering any submissions on the plan change. PC14's section 32 report 'Part 4 Commercial' contains an evaluation of the relevant matters of the CRPS, in particular, Chapter 6 as it relates to the recovery of Greater Christchurch.

¹<https://ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC14/Section-32/Plan-Change-14-HBC-NOTIFICATION-Section-32-Commercial-and-Industrial.pdf>

6 PLAN CHANGE 14 – COMMERCIAL OUTSIDE THE CENTRAL CITY AND INDUSTRIAL ZONES

6.1 OVERVIEW

6.1.1 The specific issues that this section 42A report seeks to address are related to giving effect to Policy 3 of the NPS-UD. In order to support understanding of how policy 3 is given effect to, the names of a number of the Commercial Zones of the Operative Christchurch District Plan are proposed to be changed to the nearest applicable zone described in the National Planning Standards consistent with clause 4 of the definition of “Well-functioning Urban Environment” in the NPS-UD. PC 14 proposes to enable greater heights in the commercial zones of Christchurch City and enable intensification in industrial zones within walkable catchments of city centre, town centre and local centres.

6.2 NATIONAL PLANNING STANDARDS ALIGNMENT WITH CHRISTCHURCH DISTRICT PLAN ZONES

6.2.1 PC 14 seeks to align the operative CDP zone framework with the nearest equivalent zone listed in the National Planning Standards in respect to residential and commercial zones. The CDP has four zones which relate to centres outside the Central City, being Commercial Core, Commercial Local, Commercial Large Format, and Commercial Banks Peninsula. Table 15.1 of the CDP identifies District Centres and Neighbourhood Centres that are zoned Commercial Core, which are located across the City.

6.2.2 For the purposes of considering the nearest equivalent zone described in the National Planning Standard, I consider it appropriate to break up the Commercial Core Zone according to the hierarchy defined in Policy 15.2.2.1 of the District Plan, namely the District Centres and Neighbourhood Centres identified in Table 15.1. Therefore, the ‘zones’ that need to be translated into the nearest equivalent zone are: District Centres, Neighbourhood Centres, Commercial Local, Commercial Large Format and Commercial Banks Peninsula. Council undertook this analysis in its Section 32 reporting and concluded the CDP’s nearest equivalent zoning to the National Planning Standards was as shown below in Table 1 (Refer to Appendix 2 of Part 4 (Commercial) to the s32 report)².

²<https://www.ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC14/Section-32-Appendices-1/Appendix-2-Commercial-Technical-Report-Centres-Approach-to-Alignment-with-National-Planning-Standards-FINAL.PDF>

Table 1 PC 14 Notified Nearest Equivalent District Plan Zones and National Planning Standards Zones

Christchurch District Plan Commercial Zones	National Planning Standard Zones
Commercial Core Zone – District Centre	Town Centre Zone
Commercial Core Zone – Neighbourhood Centre	Local Centre Zone
Commercial Local Zone	Neighbourhood Centre Zone
Commercial Large Format Centre Zone	Large Format Retail Zone
Commercial Banks Peninsula Zone	Commercial Local Zone (Lyttelton)

6.2.3 The alignment of District Centres to either a Town Centre Zone or Metropolitan Centre Zone is discussed in section 4.3 and 4.4 of Appendix 2 to the Commercial Section 32 report². I agree with the conclusions reached in the s32 report regarding the translation of CDP zones and centre descriptions to NPS zones as detailed above in Table 1. However, I disagree with the methods utilised in Appendix 2 for the determination of whether a Metropolitan Centre Zone is applicable in Christchurch City, In my opinion, the naming of commercial zones is a matter of comparison between the CDP description and NPS description, rather than detailed analysis of individual centres and the interpretation of sub-regional urban catchments that requires activities to serve a sub-regional catchment as provided in Appendix 2.

6.2.4 The CDP identifies District Centres in Policy 15.2.2.1, being Riccarton, Hornby, Papanui/Northlands, Shirley/Palms, Eastgate/Linwood, Belfast/Northwood and North Halswell (emerging). Table 15.1 of the CDP describes the centres as follows:

- *“Major retail destination for comparison and convenience shopping and a focal point for employment (including offices), community activities and community facilities (including libraries, meeting places), entertainment activities, food and beverage and visitor accommodation. Medium density housing is contemplated above ground floor level and around the centre and the centre is anchored by large retailers including department store(s) and supermarket(s). The centres serve the needs of a wide primary catchment extending over several suburb and are accessible by a range of modes of transport including multiple bus routes.”*

6.2.5 The National Planning Standard (NPS) zoning descriptions to choose from are:

- *Metropolitan Centre Zone - “Areas used predominantly for a broad range of commercial, community, recreational and residential activities. The zone is a focal point for sub-regional urban catchments.”*

-
- *Town Centre Zone – “Areas used predominantly for: in larger urban areas, a range of commercial, community, recreational and residential activities that service the needs of the immediate and neighbouring suburbs.”*

6.2.6 I consider the key differences between the two zoning descriptions above is that one requires a broad range of activities, while the other only requires a range, and the overall catchment of the centre zone, being sub-regional urban catchments for a Metropolitan Centre Zone (MCZ) and immediate and neighbouring suburbs for a Town Centre Zone (TCZ). The CDP describes District Centres as focal points for a range of activities, but also identifies that the centres service the needs of a catchment extending over several suburbs.

6.2.7 Unfortunately, ‘sub-regional urban catchment’ is not defined in the NPS or another National Policy Statement. The closest definition/description of a sub-regional urban catchment is found in Chapter 6 of the CRPS. The introductory text of Chapter 6 describes Greater Christchurch, being a sub-regional urban area, with the extent of Greater Christchurch being:

- *“the metropolitan urban area of Greater Christchurch and towns stretching from Lincoln, Prebbleton and Rolleston in the south to Kaiapoi, Rangiora and Woodend/Pegasus in the north and the rural areas between Rangiora, Rolleston and Lincoln. The geographic extent of Greater Christchurch, for the purposes of this chapter, is shown in Map A (page 6- 27). The Ashley River/Rakahuri lies to the north, the Waimakariri River cuts through the centre, the Port Hills and Selwyn River lie to the south and Pegasus Bay and Lyttelton Harbour/Whakaraupo are to the east. It excludes the area of Banks Peninsula as indicated in Map A. In Waimakariri District, Two Chain Road is the western boundary of the sub-region and in Selwyn District the western boundary follows Highfield and Station Roads (shown on Map A). It does not extend to the coastal waters adjoining this area.”*

6.2.8 In lieu of a definition or description to aid in framing a sub-regional urban catchment I adopt the spatial extents of Greater Christchurch as outlined in Map A of the CRPS (included below). In my opinion the reference to “several suburbs” in the description for a District Centre in Chapter 15.2.2.2 Table 15.1 does not constitute a Greater Christchurch catchment, and as such the nearest equivalent zoning for District Centres is a Town Centre Zone.

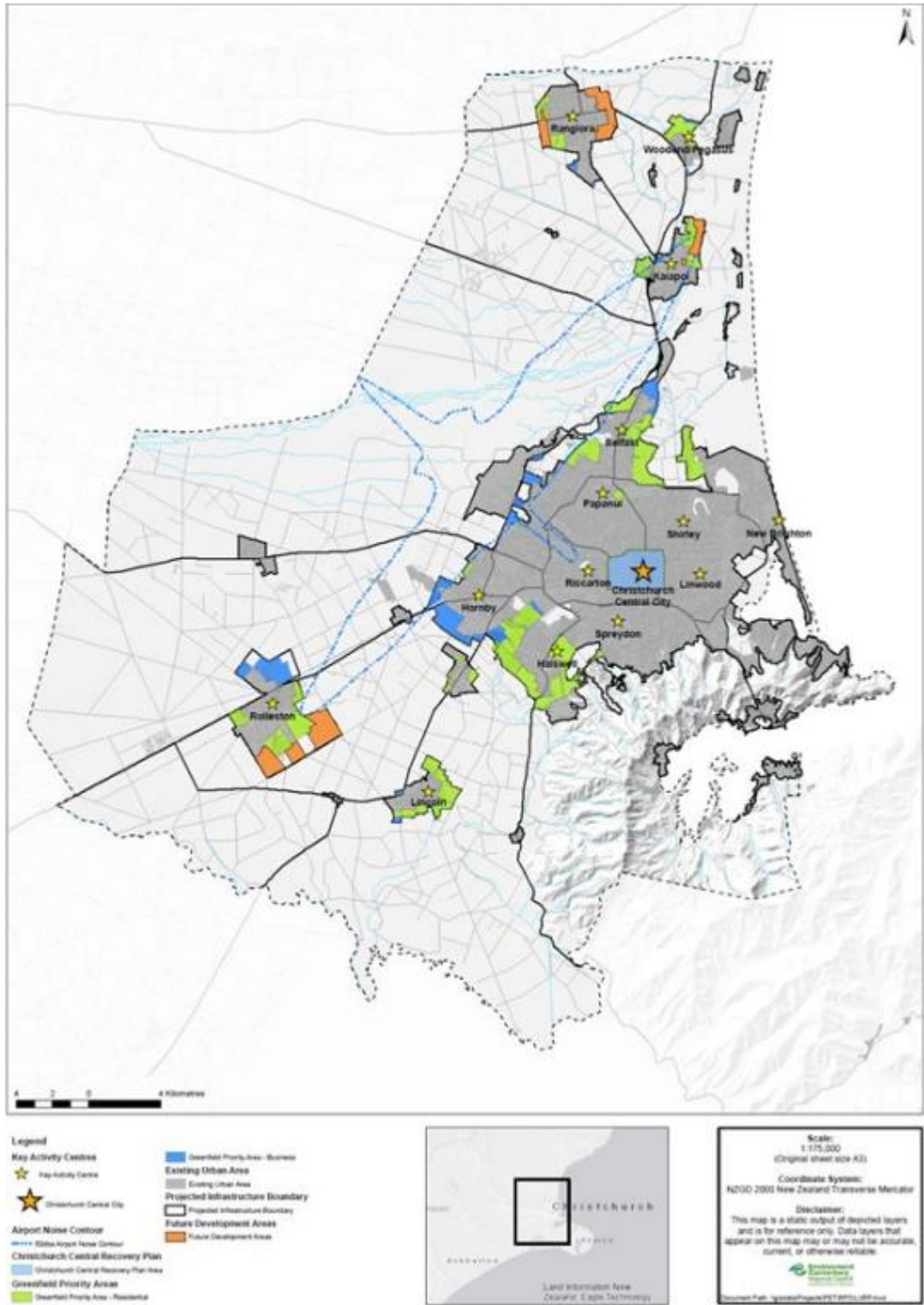


Figure 1 Map A - Spatial Extent of Greater Christchurch

6.2.9 Considering the alignment between Neighbourhood Centres and Local Centre Zones, it was noted in section 4.5.4 of Appendix 2 to the Commercial Section 32 that the range of activities anticipated is similar between the CDP and NPS. Appendix 2 noted that the target catchment between the descriptions is similar, being ‘immediately surrounding suburbs and in some cases, residents and visitors from a wider area’ in the CDP, and in the NPS Local Centres are described as ‘service the

needs of the residential catchment'. It was concluded that the nearest equivalent zone for Neighbourhood Centres was a Local Centre Zone. I agree with this conclusion as the intended scale, catchment and size of activities within the centre in the CDP and NPS are consistent. In my opinion the proposed zone name change to give effect to the NPS is the most appropriate way to achieve the purpose of the act.

6.2.10 There is clear alignment between CDP Local Centre Zone and NPS Neighbourhood Centre Zone, Table 15.1 describes Local Centres as "A small group of primarily convenience shops and, in some instances, community facilities." This aligns with the NPS Neighbourhood Centre Zone description of "areas used predominantly for small-scale commercial and community activities that service the needs of the immediate residential neighbourhood". It was concluded that the nearest equivalent zone for Local Centre Zone was the Neighbourhood Centre Zone, I agree with this conclusion as the intended scale, catchment size of activities located within the centre in the CDP and NPS are consistent. In my opinion the proposed zone name change to give effect to the NPS is the most appropriate way to achieve the purpose of the act.

6.2.11 The alignment between the descriptions of the CDP Commercial Retail Park Zone and NPS Large Format Retail Zone are very clear, the CDP description for Retail Park being "A standalone retail centre comprising stores with large footprints, yard based suppliers, trade suppliers including building improvement centres and other vehicle orientated activities". The NPS description for Large Format Retail Zone is "An area used predominately for commercial activities which require large floor or yard areas". In my opinion, it was appropriately concluded in Appendix 2 that the nearest equivalent zone for Commercial Retail Park Zone was the Large Format Retail Zone.

6.2.12 Banks Peninsula Commercial required a bespoke response to alignment as Banks Peninsula Centres such as Akaroa, Little River, and Diamond Harbour are located outside of the urban environment and as such fall outside the scope of PC14, while Lyttelton is located within the Christchurch City urban environment and within the scope of PC14. As such, Lyttelton is proposed to be considered a Local Centre in Table 15.1 with appropriate qualifying matters reducing the height of the centre compared to other Local Centres in Christchurch City. I agree with this classification as Lyttelton is a significant centre catering for entertainment, retail and food and beverage activities along with offices related to the Lyttelton Port. In my opinion the proposed zone name change to give effect to the NPS is the most appropriate way to achieve the purpose of the act.

6.3 NPS-UD POLICY 3 COMMENSURATE HEIGHT AND DENSITY WITHIN CENTRES

6.3.1 As noted in 6.1 above, PC 14 proposes to enable greater heights in the commercial centre zones of Christchurch City. This enablement is framed by the direction of Policy 3(d), being heights and density commensurate with the level of commercial activity and community services in a centre.

- 6.3.2 Council has determined that the classification framework within Table 15.1 of the CDP is the most appropriate planning framework to enable building height and densities are commensurate with the level of commercial activity and community services across the centres hierarchy, albeit with changes to the naming of zones. This approach to determining the commensurate aspect of Policy 3(d) is achieved in the first instance by identifying centres with a similar range and scale of commercial and community services offering and grouping them for a consistent height and density response. I do however make note in Appendix 6 the range of activities enabled in centres across the hierarchy, highlighting that the key difference between centre zone frameworks is the maximum permitted tenancy size for retail and office activities.
- 6.3.3 Once centres have been classified the commensurate height can be considered. Key considerations for the proposed heights are to ensure height and densities would still give primacy to the City Centre Zone and wider Central City Commercial Zones (CCMU,CCMUSF), while also being appropriate to the anticipated scale of the centre per the direction of the NPS-UD.

Residential Development Capacity in Town and Local Centres

- 6.3.4 While the centres of Christchurch City are zoned and principally utilised for commercial and retail activity, the centres are enabled to fulfill a mixed-use function with residential activity permitted above ground floor. The evaluation in Appendix 7 notes the potential theoretical supply of residential households above ground floor enabled by PC14 height and density provisions within centres. The appendix highlights that a significant amount of residential activity is enabled within centres by PC 14. In total the residential development capacity within centres arising from PC14 is 91,904 households accounting for qualifying matters (see Table 2 below).

Table 2 Residential Capacity within Centres

Centre	Residential Household Theoretical Development Capacity
Town Centre Zones (Excluding Belfast/Northwood)	68,720
Large Local Centres at 22m	14,688
Local Centres at 14m	8,496
Total Development Capacity	91,904

Business Capacity in Town and Local Centres

- 6.3.5 Utilising similar assumptions as the theoretical residential development in centres in appendix 7, I have evaluated the theoretical supply of business land in Town and Local Centres. For the purposes of this theoretical supply the height and density enabled in Town and Local Centres is purely

utilised for business purposes, not a mix of use as discussed in appendix 7. Appendix 8 discusses the assumptions behind the theoretical supply, Table 3 below shows the business land development capacity in centres.

Table 3 Theoretical Business Land Supply Across Town and Local Centres

Centre	PC 14 enabled commercial development capacity floorspace (Including above ground) converted to hectares	PC 14 additional enabled development capacity floorspace (including above ground) converted to hectares
Town Centre Zones (32m Large and 22m Town Centre)	656.8ha	198.4ha
Local Centres (22m Large and 14m Local Centre)	444.6ha	137ha
Total	1101.4ha	335.4ha

6.4 NPS-UD POLICY 3(C) AND 3(D) - HEIGHT AND DENSITY IN INDUSTRIAL AND MIXED USE ZONES

- 6.4.1 As noted in the Commercial s32, Policy 3 (c)(ii) and (d) of the NPS-UD do not just apply to commercial zones, but rather they apply to all zones around centres. This includes modifying heights/densities in industrial zones around centres unless a qualifying matter set out in policy 4 and clause 3.32 of the NPS-UD applies. Having regard to the significant quantum of industrial land and level of demand in the long term, there is the opportunity to rezone land within a walkable catchment to Mixed Use Zone and to apply brownfield overlays. The following explains the sufficiency of industrial land, having regard to the latest Business Capacity Assessment.
- 6.4.2 The following assessment of Vacant Industrial Land from the BCA demonstrates that there are 776 hectares of vacant industrial land across the city. This comprises land across the City of different zoning, reflecting the operative plan. The City also has two areas that are unzoned but are identified as Greenfield Priority Areas for Business in the CRPS. These areas total 50 hectares but are not zoned, nor serviced, so have been deemed not currently available for industrial development.

Table 4 Vacant Industrial Land by Zone in Christchurch City

Industrial / Specific Purpose	Vacant (part)	Vacant (whole)	Total (ha)
Industrial			
Commercial Mixed Use Zone	2	4	6
Industrial General	86	122	208
Industrial Heavy	160	197	357
Industrial Park	71	22	93
711 Johns Road GPA (future potential)			
Hawthornden and Russley Road GPA (future potential)			
Industrial Total	319	345	664
Specific Purpose			
Specific Purpose Airport (Development Precinct) Zone	96	16	112
Christchurch Total	415	361	776

6.4.3 In terms of demand with the competitiveness margin built in as per Clause 3.22 of the NPS-UD, the cumulative industrial land requirement across the city is estimated to be 13 hectares in the short term, extending to 15 hectares by 2031 and 26 hectares by 2051.

6.4.4 The demand for warehousing and logistics activity is projected to be significantly greater than heavy/general industrial use being 6ha in the short-term, 21ha by 2031 and 93ha by 2051.

Table 5 Total Industrial Demand for Christchurch City

Period	Short	Medium	Long
Industrial Land Requirement (ha)	12.68	15.14	26.43
Warehousing and Logistics Land Requirement (ha)	5.68	20.53	92.76
Total	18.4	35.7	119.2

6.4.5 The total demand for industrial land totals 119ha over the long-term including the competitiveness margin. This results in a long-term sufficiency of 543ha including industrial land that is currently not serviced by infrastructure. as shown below in Table 6.

Table 6 Sufficiency of Industrial land in Christchurch City

Christchurch City	Short Term Land Requirements	Medium Term Land Requirements	Long Term Land Requirements
Total Demand	18.4	35.7	119.2
Total Supply	778	778	778
Less land that is not serviced	277.22	114.10	114.10
Less land that is not suitable	0.96	0.96	0.96
Sufficiency	481.42	627.24	543.74

6.4.6 With the enablement of residential and/or mixed-use developments in industrial areas within a walkable distance of centres (by rezoning to Mixed Use or by application of a Brownfield overlay), I have considered how much of the total supply will be utilised for non-industrial uses in Industrial Zones across the city. In total the amount of Industrial Zone land enabled for brownfield redevelopment or rezoning to Mixed Use Zone by PC14 is approximately 165.3ha (Sydenham = 100ha, Lancaster =16ha, Papanui = 20.6ha, Hornby = 23.9, Woolston = 4.8ha).

6.4.7 Table 7 below presents an update to the figures in Table 6 if it is assumed that all of the land rezoned to Mixed Use or where a Brownfield overlay as proposed is utilised for residential or non-industrial uses. The following table outlines that a sufficiency of 315ha (short-term), 462ha (medium-term) and 378ha (long-term) exists.

Table 7 CCC Industrial Sufficiency with PC14 notified enablement

Christchurch City	Short Term Land Requirements	Medium Term Land Requirements	Long Term Land Requirements
Total Demand	18.4	35.7	119.2
Total Supply	778	778	778
Less land that is not serviced	277.22	114.10	114.10
Less land that is not suitable	0.96	0.96	0.96
Less Notified PC14 Brownfield Enabled Land	165	165	165
Sufficiency	315	462	378

6.4.8 I would note that the above evaluation is at a city-wide level and in some parts of the city, the sufficiency of industrial land may not be as great, having regard to demand at a local level. In this context, Council will continue to monitor the demand for industrial land and through strategic planning, consider whether there is a need for additional zoned land to support industrial, warehousing and logistics uses in some areas.

6.5 QUALIFYING MATTERS – LYTTELTON CENTRE HEIGHT AND STYX RIVER

Lyttelton Centre Heights

- 6.5.1 In Lyttelton it is recommended that the current height limit of 12m is retained rather than the 14m limit proposed in other Local Centre Zones. The commercial zone is recognised as having a distinct character and strong sense of place as a result of the built form (with associated heritage values), including scale. In addition and having regard to Lyttelton’s location on the steep, southern slopes of the Port Hills, the existing provisions include the 12m height limit and restricted discretionary activity status for non-compliance. The Part 2 – Qualifying Matters s32³ report discusses in greater detail the appropriateness of the qualifying matter. I adopt the s32 analysis and I consider the proposed qualifying matter is the most appropriate way to achieve the purpose of the Act and the objectives of the CDP in the Lyttelton centre context.

Styx River

- 6.5.2 The CDP currently requires lower building heights within the Belfast/Northwood commercial centre immediately adjacent to the Styx River. Large scale buildings could visually dominate and overshadow this unique area, impacting on its natural, recreational and cultural value. The RMA requires Council as a matter of national importance to provide for the preservation of the natural character of wetlands, lakes, rivers and their margins and to protect them from inappropriate use and development. Section 6 also requires Council to provide for the relationship of Māori and their culture and traditions with water and other taonga. The NPS FM requires prioritising first, the health and well-being of water bodies and freshwater ecosystems, second the health needs of people and third providing for social economic and cultural well-being of people and communities. The Part 2 – Qualifying Matters s32⁴ report discusses in greater detail the appropriateness of the qualifying matter. I adopt the s32 analysis and I consider the proposed qualifying matter to be the most appropriate way to achieve the purpose of the Act and the objectives of the CDP.

³<https://www.ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC14/Section-32/Plan-Change-14-HBC-NOTIFICATION-Section-32-Qualifying-Matters-Part-3-15-March.pdf> Pages 202-209 (Page 11 – 18 in document)

⁴<https://www.ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC14/Section-32/Plan-Change-14-HBC-NOTIFICATION-Section-32-Qualifying-Matters-Part-2.pdf> Pages 74-76 (Page 10- 12 in document)

7 CONSIDERATION OF SUBMISSIONS AND FURTHER SUBMISSIONS

7.1 OVERVIEW OF SUBMISSIONS AND FURTHER SUBMISSIONS

7.1.1 PC14 was notified on 17 March 2023, with submissions and further submissions closing on 12 May 2023 respectively. The Council received 983 submissions requesting 8,038 separate decisions.

7.1.2 For the summary of submissions relating to Commercial refer to Appendix 3.

7.2 OUT-OF-SCOPE SUBMISSIONS

7.2.1 In accordance with the established legal tests for determining whether submissions are within scope or not as set out in the 'Strategic Overview' section 42A report, this reporting has 39 submission points that I consider to be outside of scope. The section 42A report prepared by Ms Sarah Oliver provides a summary of her understanding of the principles to be applied in determining whether submission points are within scope of a plan change. I have read, and agree with that summary. To assist the Panel, I have identified submission points that I consider fall, or potentially fall, outside of scope in section 7.2.4 of this report.

7.2.2 Ms Oliver also discusses the recent Environment Court decision, *Waikanae Land Company v Heritage New Zealand Pouhere Taonga* [2023] NZEnvC 056 (**Waikanae**), which addresses the scope of local authorities' powers in notifying an Intensification Planning Instrument in accordance with section 80E of the RMA, and the potential implications for PC14. I have read, and agree with, that discussion. To assist the Panel to identify provisions potentially affected by *Waikanae*, I have provided in the table below a list of provisions (matters) I address in this report that impose additional controls or restrictions that affect status quo/pre-existing development rights (as per the Operative District Plan).

7.2.3 S77N sets out that territorial authorities are to give effect to Policy 3 in non-residential zones, policy 3 requires the intensification/enablement of heights and density within and adjoining centres (Policy 3(d)) and in a walking catchment of the CCZ (Policy 3(c)). As walking catchments nor adjoining centres have a metric value applied to them in the NPS-UD, I consider all requests for rezoning in a non-residential zone to be within scope. Where a submission relates to a provision or policy that is not consequential on height and density or is relevant to a site or zone outside of a walking catchment, I have noted those submission points as outside the scope of PC 14.

7.2.4 Following are considered to be out-of-scope submissions points:

Submission Number	Submitter	Submission Summary	Reason
118.3	Spreydon Lodge Limited	Amend Policy 15.2.2.2 'Comprehensive approach to development of the North Halswell and Belfast/ Northwood Key Activity Centres' to	PC14 is concerned with scale and density of

		<p>remove reference to main street at part15.2.2.2(b)(ii) as follows:</p> <p>b. Require development within the North Halswell Key Activity Centre to:ii. provide high quality public open spaces, a strong main street with a concentration of finergrain retailing, and strong linkages between key anchor stores;</p>	development, rather than activities.
811	RVA	<p>The RVA seeks that a new objective is inserted in the Commercial Zones objectives that provides for the housing and care needs of the ageing population.</p> <p><u>Objective 15.2.12 Ageing population</u> <u>Provide a diverse range of housing and care options that are suitable for the particular needs and characteristics of older persons such as retirement villages.</u></p> <p>Insert the following new policy: <u>New Policy – Housing in Commercial Zones</u> <u>Provide for retirement villages in commercial zones (other than the Commercial Office Zone, the Commercial Retail Park Zone and within the Lyttelton Port Influences Overlay Area in the Commercial Banks Peninsula Zone), and recognise that retirement villages can provide for higher densities than other forms of residential developments, because they provide for shared spaces, services and facilities, and enable affordability and the efficient provision of assisted living and care services.</u></p> <p><u>Advice Note: All other objectives and policies relevant to residential activity in commercial zones also apply to retirement villages.</u></p> <p>Insert the following new policy: <u>New Policy Role of density standards</u> <u>Enable the density standards to be utilised as a baseline for the assessment of the effects of developments other than in areas where the Plan provides location-specific density standards.</u></p> <p>Insert the following new policy: <u>New Policy Larger sites</u> <u>Recognise the intensification opportunities provided by larger sites within the Commercial Zones by providing for more efficient use of those sites.</u></p>	<p>PC 14 is to enable heights and density within walking catchments of centres, not the addition of new activities.</p> <p>Ultimately the objective and policy framework seeks to introduce an activity framework within the commercial chapter that enables retirement villages as a permitted activity.</p>
445.5	Alison Dockery	Oppose the concentration of high polluting industries in one area.	PC14 is concerned with scale and density of development, rather than activities.
904.3	880 Main North Road	A consequential amendment to Objective 16.2.2(a)(iv) is sought, so as to recognise the Brownfield Overlay at North Belfast and	The request may be considered outside of scope depending on

		'Provide for... the Brownfield Overlay at <i>North Belfast</i> ... for medium density residential activities' respectively	decisions on walking catchments around centres.
669.1	Edward Jolly	Seek amendment to Urban Design Certification Pathway and Mana Whenua engagement method to remove requirement from this rule and include "a new section of the plan... that... provide[s] this mechanism... [developed as a separate process by] CCC under its Te Tiriti o Waitangi obligations [with] Mana Whenua to a level negotiated between these parties whom jointly develop associated mechanisms within the plan."	The relief sought is not something PC14 can implement, rather this requires a joint approach outside the planning process.
297.17	Kate Z	That resource consent to be required for buildings greater than two stories and all subdivisions.	Potential Waikanae implications - Seeking changes to rules that impact on status quo (operative CDP development rights)
627.15	Plain and Simple Ltd	[New standards for] accessibility and environmentally responsible design, [such as]: Rain and grey water harvesting / recycling Composting incinerating toilets, alternative energy sources Green roofs Porous hardscaping	Potential Waikanae implications - Seeking changes to rules that impact on status quo (operative CDP development rights)
685.13	Canterbury / Westland Branch of Architectural Designers NZ	[Newbuilt form standard] to require buildings to calculate their lifetime carbon footprint and be required to not exceed a sinking lid maximum.	Potential Waikanae implications - Seeking changes to rules that impact on status quo (operative CDP development rights)
902.22	Waipuna Halswell-Hornby-Riccarton Community Board	[That the minimum setback is increased]	Potential Waikanae implications - Seeking changes to rules that impact on status quo (operative CDP development rights)
886.5	Helen Broughton	Supports proposed setback 15.4.2.4, but would like this to be increased.	Potential Waikanae implications - Seeking changes to rules that impact on status quo (operative CDP development rights)
308.3	Tony Pennell	[New built form standard to require] provision for future solar panel installation unless orientation north is impossible.	PC14 is concerned with scale and density of development, rather than activities.
260.4	Scentre (New Zealand) Limited	Office tenancies of any size in Metropolitan Centers (or the larger Town Centers) should be permitted activities. Opposes office activities over 500m2 being excluded as permitted activities as currently proposed in PC14.	PC14 is concerned with scale and density of development, rather than activities.
852.17	Christchurch International	Amend Rule 15.4.1.1 P21 as follows: Residential activity-Activity specific standard:	Potential Waikanae implications - Seeking changes to rules that

	Airport Limited (CIAL)	h. The activity shall not be located within the 50 dB Ldn Air Noise Contour or <u>the Airport Noise Influence Area</u> as shown on the planning maps.	impact on status quo (operative CDP development rights).
852.19	Christchurch International Airport Limited (CIAL)	Amend Rule 15.4.1.5 NC2 as follows: Sensitive activities within the 50 dB Ldn Air Noise Contour or <u>the Airport Noise Influence Area</u> as defined on the planning maps.	Potential Waikanae implications - Seeking changes to rules that impact on status quo (operative CDP development rights).
852.18	Christchurch International Airport Limited	Amend Rule 15.5.1.1 P21 as follows: Residential activity - Activity specific standard: g. The activity shall not be located within the 50dB Ldn Air Noise Contour or <u>the Airport noise Influence Area</u> as shown on the planning maps.	Potential Waikanae implications - Seeking changes to rules that impact on status quo (operative CDP development rights).
852.20	Christchurch International Airport Limited	Amend Rule 15.5.1.5 NC2 as follows: Sensitive activities within the 50 dB Ldn Air Noise Contour or <u>the Airport Noise Influence Area</u> as defined on the planning maps.	Potential Waikanae implications - Seeking changes to rules that impact on status quo (operative CDP development rights).
829.15	KiwiRail	Seeks amendment to rule 15.4.2.9, 15.5.2.9, 25.6.2.8, 15.6.2.8, 15.7.2.8, 15.8.2.8, 15.9.2.9, 15.10.2.8 to increase the rail corridor setback from 4 to 5m.	Potential Waikanae implications - Seeking changes to rules that impact on status quo (operative CDP development rights).
854.16	Orion New Zealand Limited	Add an additional clause to 15.4.15 NC3 a. and amend clause 'd' as follows: <u>iii within 3m of the outside over head conductor of any 11kV, 400V or 230V electricity distribution line.</u> d. Conductive fences within 5 metres of a National Grid transmission line support structure foundation, 66kV or 33kV, <u>11kv,400V or 230V</u> electricity distribution line support structure foundation.	PC 14 is to enable heights and density within walking catchments of centres, not the addition of new activities.
854.17	Orion New Zealand Limited	Add an additional clause to 15.5.1.5 NC3 a. and amend clause 'd' as follows: <u>iii within 3m of the outside over head conductor of any 11kV, 400V or 230V electricity distribution line.</u> d. Conductive fences within 5 metres of a National Grid transmission line support structure foundation, 66kV or 33kV, <u>11kv,400V or 230V</u> electricity distribution linesupport structure foundation.	PC 14 is to enable heights and density within walking catchments of centres, not the addition of new activities. Potential Waikanae implications - Seeking changes to rules that impact on status quo (operative CDP development rights)

854.18	Orion New Zealand Limited	<p>Add an additional clause to 15.6.1.5 NC3 a. and amend clause 'd' as follows:</p> <p><u>iii within 3m of the outside over head conductor of any 11kV, 400V or 230V electricity distribution line.</u></p> <p>d. Conductive Fences within 5 metres of a National Grid transmission line support structure foundation, 66kV or, 33kV, <u>11kv,400V or 230V</u> electricity distribution line support structure foundation.</p>	PC 14 is to enable heights and density within walking catchments of centres, not the addition of new activities. Potential Waikanae implications - Seeking changes to rules that impact on status quo (operative CDP development rights)
854	Orion New Zealand	<p>Industrial General Zone <u>Rule 16.4.1.5 on-complying activities</u> Add an additional clauses to 'NC1' and amend clause 'd' as follows:</p> <p><u>X Sensitive activities within 3m of the outside overhead conductor of any 11kV,400V or 230V electricity distribution line.</u></p> <p><u>d. Conductive</u> Fences within 5 metres of a 66kV National Grid transmission line support structure foundation or 5 metres of a 66kV electricity distribution support structure foundation or, 33kV, 11kv, 400V or 230V electricity distribution line support structure foundation.</p>	PC 14 is to enable heights and density within walking catchments of centres, not the addition of new activities. Potential Waikanae implications - Seeking changes to rules that impact on status quo (operative CDP development rights)
811	Retirement Villages Association	The RVA seeks that a new rule is inserted in the Town Centre Zone, Local Centre Zone, Neighbourhood Centre Zone, Mixed Use Zone that provides for retirement villages as permitted activities.	PC 14 is to enable heights and density within walking catchments of centres, not the addition of new activities.
811	Retirement Villages Association	The RVA seeks that a new rule is inserted in the Town Centre Zone, Local Centre Zone, Neighbourhood Centre Zone, Mixed Use Zone that provides for the construction of retirement villages as a restricted discretionary activity and to include a set of focused matters of discretion that are applicable to retirement villages.	PC 14 is to enable heights and density within walking catchments of centres, not the addition of new activities.
760.15	ChristchurchNZ	Amend P8 to insert a new activity specific standard: <u>a. Any service station in the Sydenham and Waltham Mixed Use Zones shall be located on a minor or major arterial road.</u>	PC 14 is to enable heights and density within walking catchments of centres, not the addition of new activities.
834.282	Kāinga Ora	2. Add additional activity rules enabling a suite of community activities i.e.rules 14.5.1.1 P5-P13, P20.	PC 14 is to enable heights and density within walking catchments of centres, not the addition of new activities.

118.4	Spreydon Lodge Limited	Delete Matters of Discretion Rule 15.1314.4.3.2(a)(i) 'Commercial layout' as it references the requirement to have a critical mass of activity centred upon the Main Street as follows:15.1314.4.3.2 Commercial layout a. The extent to which development: i. ensures a critical mass of activity is centred upon the open air Main Street including an appropriate balance of large format retail activity and concentration of finer grain commercial activities; ii. supports a retail mix (large format and finer grain retailing) which ensures the centre meets its roles as a District Town Centre and Key Activity Centre and meets the needs of the catchment population; and ii iii. functions operationally and visually as an integrated commercial entity	PC 14 is to enable heights and density within walking catchments of centres, not the addition of new activities.
118.5	Spreydon Lodge Limited	Delete Matters of Discretion Rule 15.1314.4.3.4(a)(i-iii) 'Transport' as it references the main street,public transport interchange and carparking area as follows:15.1314.4.3.4 Transporta) The extent to which development: i. provides for an easily accessible, readily visible public transport interchange located centrally within the commercial core of the Key Activity Centre;ii. provides car parking areas as shared spaces, available for shared use, which does not visually or physically dominate the area;i iii. provides for pedestrian priority within the retail core, particularly in respect to the open air mainstreet environment; ----	PC 14 is to enable heights and density within walking catchments of centres, not the addition of new activities.
883	Miles Premises	Rezone 400, 475 Memorial Avenue and 500, 520 and 540 Avonhead Road for urban development, with no restrictions relating to airport noise.	The request may be considered outside of scope depending on decisions on walking catchments around centres.
2	Greg Olive	Seeks to rezone Medium Density Residential Zone land at 419 Halswell Junction Road to Mixed Use Zone.	The request may be considered outside of scope depending on decisions on walking catchments around centres.
249.1	City Salvage	Re-zone the residential portion of 544 Tuam Street and the adjoining land at 102-104 Mathesons Road, to Local Centre.	The request may be considered outside of scope depending on decisions on walking catchments around centres.
386	Balmoral Limited	Rezone the sites at 336 and 340 Preston's Road and 427 and 435 Marshland Road Local Centre Zone (Preston's)	The request may be considered outside of scope depending on decisions on walking catchments around centres.

848	Peebles Group Limited	Amend the planning maps to rezone the properties at 468- 470 Cranford Street as LCZ	The request may be considered outside of scope depending on decisions on walking catchments around centres.
705.6	Foodstuffs	Amend zoning of Lot 1 DP51902 to Local Centre Zone at New World Lincoln Road (92, 94, 100 and 108 Lincoln Road)	The request may be considered outside of scope depending on decisions on walking catchments around centres.
705.10	Foodstuffs	Amend the zoning of Lot 10 DP 17997 and part of Lot 13 DP 17997 at New World Ilam to Local Centre Zone	The request may be considered outside of scope depending on decisions on walking catchments around centres.
915.1	25 KBR Limited	Rezoning approximately 7124m ² of land at 432 Sparks Road as Neighbourhood Centre Zone and any consequential amendments to the necessary to give effect to this submission.	The request may be considered outside of scope depending on decisions on walking catchments around centres.
690.1	Redwood Gardens Holding Limited	Rezoning Industrial Land at Wairakei Road to Commercial	The request may be considered outside of scope depending on decisions on walking catchments around centres.
821.3	Athena Enterprises Limited and Josephine Enterprises Limited	[Seeks that the] properties at 9, 9A and 9B Sheffield Crescent (the site) [be rezoned to a commercial zone].	The request may be considered outside of scope depending on decisions on walking catchments around centres.
691	Ross Clarke	Submitter 691 Ross Clarke has sought to rezone Rural Urban Fringe land at 370, 390 and 432 Johns Road, Harewood to Industrial General Zone.	The request may be considered outside of scope depending on decisions on walking catchments around centres.
749	Ryman Healthcare Limited	Rezoning the Town Centre Zone site to High Density Residential.	Potential Waikanae implications - Seeking a rezoning change that would reduce status quo permitted heights, going from Town Centre Zone to Residential.

7.3 REPORT STRUCTURE

7.3.1 The points made and decisions sought in submissions and further submissions can be grouped according to the issues raised, as set out in Table 1 below, and they will be considered in that order further below in this section 42A report.

Table 8 – Issues raised in submissions

Table 8 Issues raised in submissions

ISSUE	CONCERN / REQUEST
2. Zoning of centres	<ul style="list-style-type: none"> • Zoning of Riccarton, Papanui and Hornby – MCZ, TCZ, LCZ or NCZ? • Zoning of Church Corner, Merivale, Sydenham, Addington – TCZ or LCZ? • Zoning of St Albans – LCZ or NCZ
3. Centre classification in Table 15.1	<ul style="list-style-type: none"> • Unnecessarily complex framework for heights within Local Centres • What height and density is commensurate to level of commercial activity and community services?
4. Height and density enablement within Centres	<ul style="list-style-type: none"> • Requests for 53m in Riccarton, Papanui and Hornby compared to PC 14 notified heights of 22m. • Requests to lower height • Request to raise heights across the hierarchy
5. Objectives and policies	<ul style="list-style-type: none"> • Centres Hierarchy in Policy 15.2.2.1 • Residential above ground floor • Mixed Use Zone/Comprehensive Housing Precinct Framework • Urban form and design • Retirement Villages in Centres • Brownfield development in Industrial Zones
6. Rules	<ul style="list-style-type: none"> • Office Tenancy size limits in Centres • Christchurch International Airport – Residential/Sensitive Activity in Centres • Retirement Villages in Centres
7. Rezoning Requests	

7.3.2 Some submissions raise more than one matter, and these will be discussed under the relevant issue(s) in this report. I note that I have considered substantive commentary on primary submissions contained in further submissions as part of my consideration of the primary submissions to which they relate.

7.3.3 For each identified topic, the consideration of submissions has been undertaken in the following format:

- *Matters raised by submitters;*
- *Assessment;*
- *Summary of recommendations.*
- *Section 32AA evaluation where necessary.*

7.3.4 For ease of reference, all submission points considered under a particular issue, are listed in the heading of the relevant discussion. Following discussion and evaluation of the submissions and further submissions, the names of submitters and recommendations on their submissions within or at the end of the discussion, are typed in bold within this report. My recommendation on each submission are also shown in a table format in Appendix 3 – Table of Submissions with Recommendations, attached to this report. I note that due to the number of submission points, my evaluation of the submissions is generic only and may not contain specific recommendations on each submission point, but instead discusses the issues generally.

7.3.5 As a result of consideration of submissions, for the reasons discussed below I recommend some amendments to the District Plan. I have provided a consolidated ‘track changes’ versions of the Commercial and Industrial Chapters with my recommended amendments in response to submissions as Appendix 4.

7.3.6 Section 32 of the Act requires the Council to carry out an evaluation of PC14 to examine the extent to which relevant objectives are the most appropriate way to achieve the purpose of the Act, and whether, having regard to their efficiency and effectiveness, the related policies, rules, or other methods are the most appropriate for achieving the objectives.

7.3.7 All of the provisions proposed in PC14 have already been considered in terms of section 32 of the Act (**s32**). I have read, and where amendments to PC14 are recommended, I have specifically considered the obligations arising under section 32AA (**s32AA**)

7.3.8 The evaluation of submissions provided in this section 42A report should be read in conjunction with the summaries of submissions and further submissions, and the submissions themselves as well as the following appendices:

- *Appendix 1 – Rezoning Requests*
- *Appendix 2 – Relevant Provisions of the Regional Policy Statement and Christchurch District Plan*
- *Appendix 3 – Table of Submissions with Recommendations,*
- *Appendix 4 – District Plan track change amendments*
- *Appendix 5 – PC 14 Commercial Centres Hierarchy*
- *Appendix 6 – PC 14 Commercial Centres Enabled Activities*
- *Appendix 7 – Residential Development Capacity in Centres*
- *Appendix 8 – Business Development Capacity in Centres*

7.3.9 This report addresses all definitions that are specific to the Commercial outside of the Central City and Industrial provisions in PC14.

8 ANALYSIS OF SUBMISSIONS AND FURTHER SUBMISSIONS

8.1 ISSUE 1 – ZONING OF CENTRES

Riccarton, Papanui and Hornby – Centre Zoning

Sub. No.	Submitter name	Summary of relief sought	Recommendation
S855	Lendlease Limited	Amend Objective 15.2.2 to include reference to the "Metropolitan Centre Zone"	Accept in part
S104.1	Colin McGavin	That Papanui is zoned a [Local Centre instead of a Town Centre]	Accept in part
S156.1	Maureen McGavin	That Papanui is zoned a [Local Centre instead of a Town Centre]	Reject
188.2	Riccarton Bush – Kilmarnock Residential Association	That Riccarton be a Town Centre or Neighbourhood Centre, not a Large Town Centre.	Reject
260.1	Scentre (New Zealand) Limited	Riccarton should be recognized as a Metropolitan Centre in the District Plan to be in line with the NPS-UD as opposed to a Town Centre.	Reject
638.1	Central Riccarton Residents' Association Inc	That Riccarton is not classified as a Town Centre	Reject
686.1	Robyn Thomson	Riccarton Centre is reclassified to a local town centre	Reject
689.1	Canterbury Regional Council	Retain Centres as notified	Accept
834.239	Kāinga Ora	Introduce Metropolitan Centre Zones for Riccarton, Hornby, Papanui Northlands	Reject
876.2	Alan Ogle	Seek amendment to change Riccarton to a Town or Neighbourhood Centre, not a Large Town Centre	Reject
132.3	Tiffany Boyle	Revoke the idea of high rise housing buildings in Hornby and work to rebuild existing infrastructure to handle the current demand in the area.	Reject

188.26	Riccarton Bush – Kilmarnock Residents Association	That the extent of the Riccarton commercial zone is reduced, to end at Picton Ave	Reject
259.2	Ara Poutama Aotearoa	Retain the proposed Town Centre Zone for Winston Avenue Community Corrections, 16 Winston Avenue, Papanui.	Accept
679.8	Tony Dale	Because it is adjacent to the Christchurch CBD, Riccarton should not, as is proposed, be designated a large Town Centre. This will worsen the situation that allowed Riccarton to get to its current size in the first place - largely at the expense of the CBD.	Reject

- 8.1.1 Submitters Kāinga Ora (#834), Scentre (#260) and Lendlease (#855) have sought the introduction of a Metropolitan Centre Zone (MCZ) for the Riccarton, Papanui and Hornby commercial centres. Submitters, Riccarton Bush – Kilmarnock Residents Association(188), Alan Ogle (876), Robyn Thomson (686), Central Riccarton Residents' Association Inc (638), Colin McGavin (104), and Maureen McGavin (156) have sought the centres are zoned either a Local or Neighbourhood Centre. Submitters, Canterbury Regional Council (689) and Ara Poutama Aotearoa (259) have supported the zoning as notified.
- 8.1.2 As noted in Table 1 at paragraph 6.2.2 above, Council has aligned the CDP commercial centres to the nearest equivalent NPS zone as required. It is my view that the NPS aligned commercial zones proposed by PC 14 are the nearest equivalent zones to the CDP's operative Centres and Zones. As such the submitters requests are effectively rezoning requests.
- 8.1.3 The following assessment considers the settled planning framework of the CRPS, CDP and NPS-UD then considers which of the zones (MCZ, TCZ, LCZ, NCZ) is the most appropriate zoning for the centres of Riccarton, Papanui and Hornby in implementing the higher-order framework.
- 8.1.4 I consider the key outcomes sought by the objectives of the NPS-UD above are firstly to create well-functioning urban environments, ensure planning decisions support housing affordability, and also to enable more people to live in areas of employment or high demand. It follows in the NPS-UD policy framework that heights and densities are required to increase to give effect to the direction.
- 8.1.5 Policy 1 of the NPS-UD requires planning decisions to contribute to well-functioning urban environments. Policy 3 of the NPS-UD directs enablement of height and density within, and around, centres in tier 1 urban environments such as Christchurch City. Policy 3 directs that the district plan enable the greatest heights and density to be located within the City Centre Zone, where the benefits of intensification are to be maximised, followed by demand driven heights and density of urban form in MCZs of at least 6 storeys, with at least 6 storeys to be enabled within

walkable catchments of the City Centre Zone and MCZs, and heights and densities in and adjacent to TCZ, LCZ and NCZs that are commensurate to the level of commercial activity and community services in the centre.

8.1.6 Policy 6 is also of relevance to rezoning requests and outlines that “When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:

- A. *the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement*
- B. *that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:*
 - i. *may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and*
 - ii. *are not, of themselves, an adverse effect*
- C. *the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)*
- D. *any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity*
- E. *the likely current and future effects of climate change.”*

8.1.7 I consider the key directions coming from Policy 6 are that decision-makers are to have particular regard to the benefits of urban development which are consistent with well-functioning urban environments, and that changes in amenity in of themselves are not an adverse effect.

8.1.8 I consider the NPS-UD conveys the following themes; that planning decisions are to contribute to a well-functioning urban environment, that planning decisions are to have regard to the benefits of urban development, and that heights in centres are to reflect demand or be commensurate with the range of activities and services in each centre.

8.1.9 Turning to the CRPS, the key themes arising from the CRPS direction is firstly how a centres-based hierarchy is integral to managing commercial activity across Greater Christchurch and Christchurch City. The level of commercial activity in a centre is to reflect the function and role of the centre, as such larger centres have primacy over smaller centres, with commercial development that adversely affects the function and viability of the CCZ and Key Activity Centres (**KACs**) to be avoided. In addition, centres are anticipated to be mixed use environments that support residential development alongside commercial, and that the intensification is to be commensurate with a centre’s scale and function.

8.1.10 I consider that the CDP commercial zone frameworks gives effect to the CRPS, such that primacy is to be given to larger centres in the hierarchy. Any change in zoning of Riccarton, Papanui and Hornby needs to ensure that the zoning does not affect the function and viability of the City Centre zone or other KACs.

8.1.11 Overall, the planning framework of the NPS-UD, CRPS and CDP conveys the following:

- *A centres-based hierarchy in Christchurch City is integral to the urban form and commercial outcomes of the city.*
- *The function and viability of centres in the hierarchy is to be enhanced or maintained depending on a centre's role.*
- *All centres give primacy to the CCZ followed by KACs.*
- *The development and distribution of commercial activity will avoid significant adverse effects on the function and viability of centres.*
- *The importance of Christchurch International Airport and avoiding noise sensitive activities within its contour.*
- *Plan decisions contribute to a well-functioning urban environment.*
- *Plan decisions have regard to the benefits of urban development.*
- *Height and density are enabled in centres, either based on demand or commensurate to range of activities and services in each centre.*

8.1.12 Noting these themes, I evaluate the zoning frameworks of the MCZ, TCZ, LCZ and NCZ to recommend the most appropriate zone for Riccarton, Papanui and Hornby centres.

8.1.13 Considering what a MCZ may consist of in terms of a planning framework, Lendlease have sought amendments to the objectives and policies of Chapter 15 and a new zone rule framework in their submission to introduce an MCZ as outlined below. Kāinga Ora have also provided an entirely new chapter to consider within their submission. I consider these objectives, policy and rule frameworks as an alternative in the evaluation of the most appropriate zoning of Riccarton, Papanui and Hornby.

8.1.14 Lendlease propose to amend Objective 15.2.2 and Policy 15.2.2.1 of the CDP to introduce a MCZ, the changes sought to Objective 15.2.2 being:

- *15.2.2 a. Commercial activity is focussed within a network of centres (comprising the City Centre, **Metropolitan Centres**, Town Centres, Local Centres, Neighbourhood Centres, and Large Format Centres) to meet the wider community's and businesses' needs in a way and at a rate that:*
- *15.2.2 iiii. supports the function of the Metropolitan Centres as focal points for a broad range of commercial, community, recreational and residential activities, servicing the sub-regional needs of communities, businesses and residents;*

- 15.2.2 iii. supports the function of Town Centres as ~~major~~ focal points for commercial activities, entertainment activities, visitor accommodation, employment, transport and community activities that service the needs of the immediate and neighbouring suburbs, and Local Centres as a focal point for primarily small-scale commercial activities with a focus on convenience shopping, community activities and guest accommodation that service the needs of the residential catchment;
- 15.2.2 iv. gives primacy to the City Centre followed by Metropolitan Centres, Town Centres and Local Centres identified as Key Activity Centres;

8.1.15 The changes sought to Policy 15.2.2.1 – Role of Centres being:

- Add to Table 15.1 – Metropolitan Centres
- Metropolitan Centre Used predominantly for a broad range of commercial, community, recreational and residential activities and is a focal point for sub-regional urban catchments.
- Serves as a hub for commercial growth and development, community interaction, and high-frequency transportation services. These centres are second in scale and intensity only to the Central Business District.
- Plays a significant role in accommodating growth and intensification, providing for a diverse range of commercial, cultural, community, civic, leisure, high-density residential, and tourist activities.
- Is a suitable locations for commercial activities of all sizes. The extent of the centre is the Metropolitan Centre Zone.

8.1.16 Kāinga Ora (834) have provided an entirely new package of provisions that don't fit the existing structure of the CDP. The objectives of Kāinga Ora's requested MCZ are:

- "MCZ-O1 the zone is Christchurch's secondary, commercial, civic and community centres, and the zone accommodates a wide range of commercial, community, recreational and residential activity."
- MCZ-O2 The planned urban built environment of the Metropolitan Centre Zone is characterised by:
 1. A built form that is compact and reflects the high-density environment of the Metropolitan Centre;
 2. A built environment that is versatile, well designed and of high quality and contributes to attractive and safe public spaces; and;
 3. An urban environment that is an attractive place to live, work and visit."

8.1.17 The policies of the Kāinga Ora's MCZ are:

- "MCZ-P1 Appropriate activities

- *Enable activities that are compatible with the purpose of the Metropolitan Centre Zone.*

- *MCZ-P2 Location of residential activity Enable residential activity where:*
 - 1. It is located above ground floor; and*
 - 2. It provides for an ongoing active street frontage with a positive interface with the public space.*

- *MCZ-P3 Health and well-being for residential activity*
Ensure residential activity and residential units achieve a healthy urban built environment that provides for people’s amenity and well-being in respect of:
 - 1. Access to sunlight, daylight and outdoor living space; and*
 - 2. Privacy and site design.*

- *MCZ-P4 Other activities*
Provide for other activities within the Metropolitan Centre Zone where:
 - 1. Any significant adverse effects, can be avoided, remedied or mitigated; and*
 - 2. The activity is consistent with the planned urban built environment and purpose of the zone.*

- *MCZ-P5 Inappropriate activities*
Avoid activities that are incompatible with the purpose of the Metropolitan Centre Zone.

- *MCZ-P6 Small scale built development*
Enable repairs, alterations and additions to existing buildings and structures, and the erection of smaller-scale buildings and structures, that achieve the planned urban built environment for the Metropolitan Centre Zone.

- *MCZ-P7 Larger scale built development*
Provide for high-density development that achieves a quality built form, taking into consideration the following design objectives and the planned urban built environment of the zone.
 - 1. Buildings are well-designed and contribute to a high-quality vibrant public realm through visual interest and aesthetic coherence achieved through façade design, materials, and active edges;*
 - 2. Buildings abut the street edge and define and enclose the streets, and define the edges of open space;*

3. *Street corners are legible and enhanced through architectural treatment and form and maximised activity;*
 4. *Pedestrian amenity is maximised through good permeability and activation,
which contributes to safety and walkability;*
 5. *Servicing and parking are subservient to the built form to maximise an attractive and active pedestrian interface at the street edge;*
 6. *Servicing plant is integrated within the architectural design, to avoid an 'add on' appearance and ensure a well-designed top to buildings;*
 7. *Residential activity is provided with a high quality living environment, including access to privacy, outlook, and sun access;*
 8. *Development responds to the positive contextual elements (existing and potential) including neighbouring buildings, elements such as trees and crossing points in the street*
- *MCZ-P8 Public space interface*
Where located along an active street frontage identified on the planning maps, require development to provide a positive interface with the public space through:
 1. *Buildings that are built up to the front boundary of the site;*
 2. *Continuous active street frontages;*
 3. *Verandas or other forms of pedestrian shelter;*
 4. *Transparent glazing on the ground floor that allows visibility into and out of
commercial frontages and reflects whether it is a primary or secondary frontage;*
 5. *Obvious and highlighted public entrances; and*
 6. *Visually unobtrusive parking, storage and servicing areas, preferably within or to the rear of the building.*
 - *MCZ-P9 Car parking and parking lots*
Only allow for ground level car parking and parking lots where:
 1. *It is not located along a primary frontage identified on the planning maps;
and*
 2. *Any adverse effects on the amenity and quality of the streetscape and public
open spaces can be minimised."*

8.1.18 The additional objective and policies sought for the MCZ in my view achieve the same outcomes as PC14 as notified and the settled aspects of the CDP, the only additional outcome achieved

through the requested introduction of a MCZ is establishing a greater role and function for Riccarton, Papanui and Hornby than other KACs/notified TCZ centres.

- 8.1.19 Considering the centres hierarchy, the changes sought in my view are inconsistent with policy 6.3.1(8) of the CRPS, which specifically seeks to “avoid development that adversely affects the function and viability of, or public investment in, the Central City and Key Activity Centres”. Introducing a MCZ to some KACs, but not all, creates a rigid zoning restriction on the ability of other KACs/TCZs to fulfil their intended function, and demands that KACs give primacy to Riccarton, Papanui and Hornby.
- 8.1.20 Also to note when considering the appropriateness of introducing a MCZ, is the definition of a MCZ in the NPS and requirements of the NPS-UD. The definition of a MCZ in the NPS is “Areas used predominantly for a broad range of commercial, community, recreational and residential activities. The zone is a focal point for sub-regional urban catchments.” While the District Plan enables a broad range of activities consistent with limb 1 of the definition, the three centres do not serve a sub-regional catchment having regard to my interpretation of a sub-regional catchment as described in section 6.2.8.
- 8.1.21 The consequence of the three centres serving a sub-regional catchment is that they will have impacts on the function and primacy of the City Centre zone. This is a significant cost arising from the submitter’s proposal, with consequential effects on surrounding land. This impact is considered by Mr Heath in his economic evidence, where he outlines that as the height limit of a Large Town Centre approaches the height enablement in the City Centre, the marginal costs on the City Centre increase exponentially.
- 8.1.22 Policy 3(b) of the NPS-UD requires the MCZ to have at least 6 storeys within the centre, and Policy 3(c) requires at least 6 storeys within a walking catchment of the MCZ. I note that the PC14 notified height of 22m (6 storeys) (Refer to section 8.3 for recommended heights)) for within the centres is consistent with the minimum requirement of Policy 3(b) noting that the NPS-UD requires ‘at least 6 storeys’. In addition, I refer to evidence of Mr Kleynbos as it relates to the determination of walking catchments and heights within the surrounding residential zone.
- 8.1.23 The requirements of Policy 3(c) associated with the introduction of MCZ in Hornby, Papanui and Riccarton produce the following additional outcomes that in my opinion are relevant to the evaluation of appropriateness of zoning.
- 8.1.24 In Hornby, the introduction of a MCZ and associated Policy 3(c) response would prompt the enablement of greater heights and density in the walking catchment of the centre. The evidence of Ms Williams discusses the outcomes that intensification could have on Hornby in urban design terms. In sections 6.4.4 - 6.4.9 above I discuss the supply of industrial land in Christchurch City; and that due to the significant surplus of development capacity at a City-wide level, a low-density

business/industrial land qualifying matter is not appropriate. As such by introducing a MCZ to Hornby, Council would also be required to enable 6 storey development in the industrial zones adjoining the Hornby centre. I acknowledge the brownfield policy framework 16.2.2.2 enables brownfield redevelopment in the IGZ, but it also has criteria to not undermine the form and function of anticipated activities in the industrial zones that are not enabled for brownfield redevelopment, namely the IHZ. Overall, I consider that a zoning approach that provides further residential intensification in Hornby is consistent with the direction of the centres hierarchy, but question the appropriateness of achieving that through the blunt instrument of Policy 3(c) in IDZ and IHZ's that will give rise to reverse sensitivity for years to come. I also consider the significant surplus of residential intensification enabled in the District Plan to be of relevance.

- 8.1.25 In Riccarton the new extent of the Airport Noise Contour and associated 'avoid' direction in the CRPS and CDP for new noise-sensitive activities within the contour conflicts with the introduction of a MCZ. The new extent of the contour extends over a significant area of the PC14 proposed walking catchment and Riccarton centre itself. The evidence of Ms Oliver discusses the qualifying matter, underlying zoning and associated provisions.
- 8.1.26 In Appendix 6 I have documented the rules framework sought by Lendlease and Kāinga Ora if Riccarton, Papanui and Hornby are rezoned as MCZ alongside the recommended versions of TCZ, LCZ and NCZ. The appendix highlights the key differences between the MCZ (as sought by Lendlease and Kāinga Ora), TCZ, LCZ and NCZ (as sought by Council) zoning approaches is permitted height, office tenancy size and retail tenancy size. Considering height, the evidence of Mr Heath notes how greater height in Riccarton, Papanui and Hornby may undermine the redevelopment of the CCZ and ability for it to achieve its intended role, and the role of other centres in the hierarchy. Relying on Mr Heath's evidence I consider that the rezoning of Riccarton, Papanui and Hornby to a MCZ and associated 45m-53m of height as sought by submitters would undermine the realization of intensification in the CCZ and be inconsistent with CRPS and CDP direction to give primacy to the CCZ. Regarding office tenancy limits, I have assessed the merits of retaining the limits in section 8.5.7 of this report, recommending the rules are maintained as operative to give primacy to the CCZ.
- 8.1.27 Overall, the differences in rule provisions between a MCZ and TCZ is height and office tenancy limits. I consider the introduction of a new zone for Riccarton, Papanui and Hornby to be an inefficient planning framework when the same outcomes can be achieved within the TCZ. I note Objective 3.2.2 of the CDP that directs to minimize the number, extent and prescriptiveness of development controls, along with ensuring the plan is concise to ensure the District Plan is easy to understand and use.
- 8.1.28 I also note the introduction of a MCZ would create a new role/ function for Riccarton, Papanui and Hornby that would be inconsistent with both Objective 15.2.2 and CRPS Objective 6.2.5 and Policy 6.3.1(8) as it creates inconsistencies with the hierarchy of centres.

- 8.1.29 Having noted the framework of a proposed MCZ and additional costs that introduction of the zone would give rise, I consider the PC14 notified planning framework of Riccarton, Hornby and Papanui being zoned as TCZ to be more appropriate.
- 8.1.30 Objective 15.2.2 sets out the role of centres in the hierarchy. I consider the outcome sought by the objective is that the function of the TCZ is as a major focal point in Christchurch City for commercial activities, entertainment activities, guest accommodation, visitor accommodation, employment, transport and community activities. Also of note is policy 15.2.2.1 and Table 15.1 which supports the enhancement of TCZs while giving primacy to the CCZ. The rule framework associated with the TCZ enables a range of activities, with the only commercial restriction being a limit on the size of individual office tenancies, in addition residential intensification is permitted above ground floor. In the context of Riccarton, Hornby and Papanui, this framework recognises the centres role/function in the hierarchy as having primacy over other centres alongside other TCZs, excluding the CCZ, and the zone also enables residential intensification. This framework is consistent with the Chapter 6 of the CRPS, the strategic directions objectives of the CDP, and the direction of NPS-UD to contribute to a well-functioning urban environment.
- 8.1.31 With regard to the submissions seeking that Riccarton, Hornby and/or Papanui are Local centres, I would note that Local Centres are intended as a focal point for primarily small-scale commercial activities with a focus on convenience shopping, and community activities and guest accommodation in Objective 15.2.2. The NPS defines Local Centres as *“Areas used predominately for a range of commercial and community activities that service the needs of the residential catchment.”*
- 8.1.32 Local Centres have retail and office tenancy size limits and Policy 15.2.2.1 – Role of centres seeks to maintain the role of Local Centres and ensure they maintain primacy for KACs. Riccarton, Papanui and Hornby are already recognised as District Centres in the operative CDP and Key Activity Centres in the CRPS and I therefore consider a move down the centres hierarchy would not be the most efficient outcome in terms of the CRPS, CDP nor the NPS-UD, as such I consider the LCZ is not an appropriate zoning option for the centres.
- 8.1.33 In response to submissions seeking a NCZ, I conclude similarly that moving the three largest centres in the hierarchy down to the bottom of the hierarchy would not be the most appropriate zoning outcome. The Neighbourhood Centre zone is defined in the National Planning Standards as *“predominately for small-scale commercial and community activities that serve the needs of the immediate residential neighbourhood”*. This does not reflect the range of activities existing and provided for in each of the centres nor the catchments they serve.
- 8.1.34 In conclusion, I consider that the most appropriate zone for the centres of Riccarton, Papanui and Hornby is TCZ. As noted in Table 1 at 6.2.2, Council has aligned the CDP commercial centres to the nearest equivalent NPS zone. It is my view that the NPS aligned commercial zones proposed by PC

14 are the nearest equivalent zones to the CDP's operative Centre categories and zones. I rely on the evidence of Mr Heath in regard to the potential effects significant height increases in Riccarton, Papanui and Hornby could have on the CCZ and other KACs. I have considered the proposed effects the introduction of a MCZ would have on the centres hierarchy and in my opinion the introduction of the zone would be inconsistent with both CRPS and CDP, and give rise to distributional effects (costs) on the CCZ. I have also considered the proposed TCZ and requested MCZ planning frameworks and my opinion is both zones produce similar outcomes, with the only real area of contention being the heights proposed and requested. In my recommendations on height (discussed below in 8.3) I consider this issue and have balanced the objective of enabling height that is commensurate with the range of activities and services in the centres while maintaining the primacy of the CCZ. I consider the most appropriate zone to give effect to the RMA, NPS-UD, CRPS and CDP is a TCZ in Riccarton, Papanui and Hornby.

Recommendation

8.1.35 Reject the submissions and retain TCZ for Riccarton, Papanui and Hornby.

Town Centre Zoning of Church Corner, Sydenham, Merivale, Halswell, Addington and North West Belfast

Sub. No.	Submitter name	Summary of relief sought	Recommendation
834.239	Kāinga Ora	Amend role and function of Church Corner, Sydenham and Merivale from 'Local Centre (Large)' to 'Town Centre'.	Reject
74.2	Tony Rider	Support for Bush Inn's/Church Corner zoning as a Local Centre Zone and not Town Centre Zone.	Accept
678.7	Logan Clarke	Seeks the addition of a town centre zone along Lincoln road in Addington.	Reject
705.5	Foodstuffs	Retain Halswell Town Centre Zone as notified	Accept
917.2	Belfast Village Centre Limited	Amend the zoning of land at 751, 1/753 and 2/753 and 755 Main North Road from Future Urban Zone to Town Centre Zone	Reject
917.3	Belfast Village Centre Limited	Amend the zoning of land at 40B Johns Road (Lot 3 DP 540607 and Section 4 Survey Office Plan 533991) from Future Urban Zone to Town Centre Zone.	Reject

8.1.36 As noted in Table 1 at paragraph 6.2.2 above, Council has aligned the CDP commercial centres to the nearest equivalent NPS zone as required. It is my view that the NPS aligned commercial zones proposed by PC 14 are the nearest equivalent zones to the CDP's operative Centres and Zones. As such the submitters requests are effectively rezoning requests.

8.1.37 The following assessment considers the settled planning framework of the CRPS, CDP and NPS-UD then considers which of the zones, being TCZ or LCZ is the most appropriate zoning for the centres of Church Corner, Sydenham, Merivale, North Halswell, Addington and North West Belfast.

8.1.38 Regarding North West Belfast, the centre has been rezoned TCZ through mapping error. Throughout s32 it is not discussed as being rezoned TCZ, and in Appendix 2 of the Commercial s32 report it is considered an LCZ⁵. This is an oversight that will need to be corrected.

⁵<https://www.ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC14/Section-32-Appendices-1/Appendix-2-Commercial-Technical-Report-Centres-Approach-to-Alignment-with-National-Planning-Standards-FINAL.PDF> (Page 25 - 4.9.5)

8.1.39 I have discussed in Appendix 2 the relevant objectives and policies of the CRPS and CDP, the relevant objectives and policies of the NPS-UD are discussed above in section 8.1 and will only refer to specific provisions when necessary. I consider the key themes of the planning framework are:

- *-A centres based hierarchy in Christchurch City is integral to the urban form and commercial outcomes of the city.*
- *-The function and viability of centres in the hierarchy is to be enhanced or maintained depending on a centres role.*
- *-all centres give primacy to the CCZ followed by KACs.*
- *-The importance of Christchurch International Airport and avoiding sensitive activities within its contour.*
- *-plan decisions contribute to a well-functioning urban environment.*
- *-plan decisions have regard to the benefits of urban development.*
- *-height and density are enabled in centres, either based on demand or commensurate to scale of the centre.*

8.1.40 In evaluating the appropriateness of a TCZ or LCZ zoning for Church Corner, Sydenham, Merivale, Addington and Northwest Belfast, I consider first the objective and policy framework of TCZ and LCZ and how they are consistent with the CDP, and give effect to the framework of the CRPS and NPS-UD.

8.1.41 Objective 15.2.2 sets out the role of centres in the hierarchy. The objective outlines that that the function of the TCZ is to act as a major focal point in Christchurch City for commercial activities, entertainment activities, guest accommodation, visitor accommodation, employment, transport and community activities. Also of note is policy 15.2.2.1 and Table 15.1 which supports the enhancement of TCZs. The rule framework associated with the TCZ enables a wide range of activities, with the only commercial restriction being a limit on the size of individual office tenancies.

8.1.42 Local Centres are noted in in Objective 15.2.2 as a focal point for primarily small-scale commercial activities with a focus on convenience shopping, and community activities and guest accommodation. Local Centres have retail and office tenancy size limits and Policy 15.2.2.1 – Role of centres seeks to maintain the role of Local Centres and ensure they maintain primacy to KACs.

8.1.43 Considering the appropriateness of this framework to Church Corner, Sydenham, Merivale, North Halswell, Addington and North West Belfast, I note the TCZ zone framework provides for retail activities with no tenancy limit, which are currently not enabled in the LCZ. Referring back to the CRPS direction in Policies 6.3.1(8) and 6.3.6(3), the policies direct the CDP to reinforce the role of KACs and avoid development that adversely affects the function and viability of KACs.

8.1.44 In Appendix 6 I have documented the recommended rules frameworks for all the commercial zones, including TCZ, LCZ and NCZ. The appendix highlights the key differences between the TCZ

and LCZ zoning approaches is principally retail tenancy size. I note that the Large Local Centres being, Merivale, Church Corner and Sydenham have the same recommended heights as TCZ centres of Shirley, North Halswell, Linwood, and Belfast of 22m.

8.1.45 In considering the most appropriate zone package for the centres, I note that the key difference between TCZ and LCZ is that TCZ are anticipated to cater for large scale retail tenancies, while LCZs are not. This distinction is deliberate and reflects the direction of the CRPS and CDP to give primacy to KACs, and as such the rezoning would be inconsistent with the CRPS. I consider the most appropriate zone for Merivale, Church Corner, Sydenham, Addington and North West Belfast is LCZ, and North Halswell remains a TCZ as notified.

Recommendation

8.1.46 Merivale, Sydenham, Church Corner and Addington remain LCZ as proposed by PC 14. North West Belfast is rezoned a LCZ, and North Halswell remains a TCZ as notified.

Local Centre Zoning

Sub. No.	Submitter name	Summary of relief sought	Recommendation
S55.17	Tobias Meyer	Supports Addington as a Local Centre	Accept
S74.2	Tony Rider	Support for Bush Inn's/Church Corner zoning as a Local Centre Zone and not Town Centre Zone.	Accept
S740.6	Woolworths	Amend Table 15.1 to elevate the St Albans Centre from Neighbourhood to Local Centre (Small)	Reject
259.1	Ara Poutama Aotearoa	Retain the proposed Local Centre Zone for Rāwhiti Community Corrections, 296 Breezes Road, Aranui.	Accept
676.17	Jack Gibbons	Rezone all Neighborhood Center Zones (NCZ)'s larger than 3000sqm as Local Center Zone (LCZ).	Reject
725.4	Sophie Burt	Addington should be included as a Local Centre Zone	Accept
814	Carter Group	Retain the LCZ shown for the Avonhead Shopping Centre on the Withells/Merrin corner as notified.	Accept
439	Jeff Vesey	The Avonhead shops on the corner of Withells Road and Merrin Street should be rezoned Local Centre Zone and the surrounding area be subject to housing intensification rules as per other Local Centres such as Prestons in Burwood.	Accept

- 8.1.47 As noted in Table 1 at paragraph 6.2.2 above, Council has aligned the CDP commercial centres to the nearest equivalent NPS zone as required. It is my view that the NPS aligned commercial zones proposed by PC 14 are the nearest equivalent zones to the CDP's operative Centres and Zones.
- 8.1.48 The relief sought by Tobias Meyer (s55.17) and Tony Rider (s74.2) has been considered in the previous section and I do not repeat it here.
- 8.1.49 Woolworths (s740.6) seek the rezoning of St Albans Centre from NCZ to LCZ. The following assessment considers the settled planning framework of the CRPS, CDP and NPS-UD then considers which of the zone alternatives, being LCZ or NCZ is the most appropriate zoning for the St Albans.
- 8.1.50 Objective 15.2.2 outlines that the function of the LCZ is to act as a focal point for primarily small-scale commercial activities with a focus on convenience shopping, and community activities and guest accommodation; Also of note is policy 15.2.2.1 and Table 15.1 which supports the maintenance of LCZs. The rule framework associated with the LCZ enables a wide range of activities, with the only commercial restrictions being limits on the size of individual office and retail tenancies of 500 sq m.
- 8.1.51 NCZs are described in Table 15.1 as "A small group of primarily convenience shops and, in some instances, community facilities. Accessible by walking, cycling from the area served and on a bus route in some instances. Also includes standalone supermarkets serving the surrounding residential community." In Appendix 6 I have documented the recommended rules frameworks for all the commercial zones, reviewing the differences between LCZ and NCZ, the key difference I note is NCZs have restricted tenancy sizes to reflect the zone's place in the hierarchy. The provisions of the zone include that Supermarkets are restricted to 1000sqm Gross Leasable Floor Area (GLFA) as a permitted activity, retail and office activities are restricted to a maximum individual tenancy limit of 350sqm, and commercial services, gyms and food and beverage outlets are restricted to a maximum tenancy limit of 250sqm. The St Albans centre itself also has area-specific rules that enable larger tenancies than other NCZ. The maximum GLFA for non-residential activity within the centre is 3500sqm, and rules also enable single retail tenancies of up to 800sqm, and other individual tenancy of up to 450sqm.
- 8.1.52 Both NCZ and LCZ have the same recommended permitted heights of 14m, and the same residential above ground floor framework to enable residential intensification.
- 8.1.53 The key difference between LCZ and NCZ is that LCZ are anticipated to cater for large-scale tenancies while NCZs do not. This distinction is deliberate and reflects the direction of the CDP to give primacy to higher order centres in the hierarchy.
- 8.1.54 While the NCZ at St Albans enables larger tenancies specific to the centre, this was the outcome of a plan change that provided for a small local centre, comprising a supermarket and small shops serving the immediately surrounding community. Limits were introduced to ensure provision of

non-residential activities at a scale to service the ‘local neighbourhood’, but not to detract from the form and function of other centres. Having regard to the proximity of Edgeware and the City Centre, it is appropriate that the role/ function of the centre does not grow unimpeded such that it impacts on higher order centres in accordance with the policy framework.

- 8.1.55 Having regard to the above, I consider the most appropriate zone framework to implement the objectives of the CDP for St Albans is a NCZ as notified.
- 8.1.56 I note the support of submitter Jeff Vesey for Avonhead to remain zoned a Local Centre Zone and accept the relief sought.
- 8.1.57 Regarding submitter 676.17, to rezone all NCZs greater than 3000sqm to LCZ, I note the submitter seeks residential intensification in centres. The LCZ and NCZ are recommended to share the same maximum permitted height of 14m and have the same framework for residential activities above ground floor. In this regard, the submitter’s relief of enabling residential intensification is achieved to the same extent, whether the centres are zoned LCZ or NCZ. The NCZ and LCZ commercial settings are however framed by the commercial hierarchy in Objective 15.2.2 and Policy 15.2.2.1. In my opinion, the most appropriate (and more efficient) way to implement the objectives of the CDP is to retain NCZs as notified.

Recommendation

- 8.1.58 Reject the submission points of 676, 740. Accept the submissions points of 439, 814 ,725 ,259, 55, 74, LCZ’s remain as notified.

Neighbourhood Centre Zoning

Sub. No.	Submitter name	Summary of relief sought	Recommendation
915.1	25 KBR Limited	Rezone approximately 7124m ² of land at 432 Sparks Road as Neighbourhood Centre Zone and any consequential amendments to the necessary to give effect to this submission.	Reject (Based on scope)

- 8.1.59 Submitter 25 KBR Limited (s915.1) has sought the rezoning of Future Urban Zone land at 432 Sparks Road to Neighbourhood Centre Zone.
- 8.1.60 Council has scope to consider requests for rezoning where sites are within the walkable catchment of a centre to give effect to policy 3(d) of the NPS-UD. In the context of the submission, it is outside the walkable catchment of the Halswell commercial centre in the notified plan change.

- 8.1.61 The site is 1km from the Halswell centre and I consider it is not reasonable to assume the walkable catchment could be extended to include the site, having regard to the walkable catchments assumed around the largest Town Centres. In any case, I have considered the merits below.
- 8.1.62 The submitter has provided a report (prepared to support a resource consent application of a specific proposal at a specific size), prepared by Property Economics, is that the proposal that was the subject of the resource consent would not give rise to retail distribution effects in Christchurch City's South West environment. It is relevant to note that this has not been prepared to support rezoning of the site, which would enable a greater floor area than set out in the assessment of the resource consent.
- 8.1.63 Notwithstanding this, the site is located on Sparks Road and is within a short walking distance of Halswell Road, where an existing local centre is located (Corner Sparks and Halswell Road). The rezoning of the subject land provides an opportunity for meeting the day-to-day needs of residents in the surrounding area, having regard to the significant growth experienced through greenfield subdivision.
- 8.1.64 The request is given further consideration in Appendix 1.

Recommendation

- 8.1.65 The request be declined.

8.2 ISSUE 2 – CLASSIFICATION OF TOWN AND LOCAL CENTRES IN TABLE 15.1

Approach to Classification

Sub. No.	Submitter name	Summary of relief sought	Recommendation
834.239	Kāinga Ora	Consolidate all Local Centres into a simple category i.e. delete the distinction between 'small' and 'medium'.	Accept
902.15	Waipuna Halswell-Hornby-Riccarton Community Board	That there be Town Centres, Local Centres and Neighbourhood Centres only and as such that Large Town Centre, Large Local Centre and Medium Local Centre be removed	Accept in part

- 8.2.1 Waipuna Halswell-Hornby-Riccarton Community Board (902.15), and Kāinga Ora (834.239) seek changes to the classification framework.

- 8.2.2 Waipuna Halswell-Hornby-Riccarton Community Board seek the removal of Large Town Centre, Large Local Centre and Medium Local Centre classifications, noting that the intensification associated with these classifications would destroy the character of areas.
- 8.2.3 Kāinga Ora seek the classification of 'Medium Local Centres' be deleted from Table 15.1, outlining that the centres hierarchy as it relates to Local Centres is unnecessarily complex. The submitter also outlines that the hierarchy needs to reflect both current condition and potential future state in the event enabled development occurs.
- 8.2.4 I agree with the submitters to an extent, having regard to Objective 3.3.2 of the District Plan that seeks to minimise the number, extent and prescriptiveness of development controls. While NPS-UD Policy 3(d) requires heights and density to be enabled commensurate with the range of activities and services, there is a risk of centres being defined to a level, where there are not significant differences. I consider the submissions are justified, and it contributes to increased complexity. I recommend a classification approach that removes Medium Local Centres from the classifications in Table 15.1. I do want to emphasise that the classification of centres does not necessarily change the activities enabled within the centres, but is reflected in the permitted heights that are required to be enabled under the NPS-UD.
- 8.2.5 The classification framework within Table 15.1 is required to enable building height and densities of urban form that is commensurate with the level of commercial activity and community services across the centres hierarchy, as anticipated by NPS-UD Policy 3(d). My approach to determining the commensurate aspect of Policy 3(d) is in the first instance to identify centres with similar commercial and community offering, both existing and enabled, grouping them based on resemblance of commercial and community activity, and then considering the height and density response at a group level.
- 8.2.6 The alternatives to this approach are either an individual centre-by-centre height and density response, or a standard height across all Local Centres. In my opinion both alternatives represent inefficient frameworks to achieve the intent of the NPS-UD, being the enablement and encouragement of intensification within centres. On a spectrum of approaches, the classification as proposed by PC14 sits in the middle between site specific and entirely generic height responses, and is in my view, the most appropriate approach. Classification enables a height and density response that implements the operative hierarchy of centres and also ensures the heights and densities are being enabled commensurate to the level of commercial activity and community services in these centres, giving effect to NPS-UD Policy 3(d).
- 8.2.7 I acknowledge that I have recommended a change towards generalisation by deleting 'Medium Local Centres' from Table 15.1. While I acknowledge the requirements of NPS-UD Policy 3(d) in terms of enabling greater height and density commensurate to commercial and community services, I note that intensification is encouraged across the hierarchy, which reflects the direction

of Objective 6.2.5 and Policy 6.3.7(2) of the CRPS and Objective 15.2.2(a)(i) of the CDP, and this needs to be balanced. I note Local Centres are not homogenous as they differ by size and activity within the centre.

8.2.8 While Policy 3(d) of the NPS-UD directs heights commensurate with the range of activities, it is my opinion that a consistent opportunity for intensification across the local centres hierarchy (excluding Large Local Centres which are significantly larger than other Local Centres) through consistent height provisions would contribute to a well-functioning urban environment as well as giving effect to the CRPS and CDP by continuing to enable a strategic network of strong centres that act as important commercial, community and residential locations for the benefit of the wider community. I consider the deletion of the 'Medium Local Centres' classification is the most appropriate, and efficient, way to achieve the objectives of the CDP, CRPS and NPS-UD.

8.2.9 In considering that some degree of classification of Town and Local Centres is required, I have deemed total commercial floor space in the first instance as an indicator of the level of commercial activity within a centre, considering vacant floor space where relevant. To assess the level of community services in a centre, I rely on the definition of community services in the NPS-UD, being community facilities, educational facilities and those commercial activities that serve the needs of the community. Refer to Appendix 5 for a table including centres, heights, GLFA, vacant zoned land and community services.

Recommendation

8.2.10 Accept in part and introduce the following classification framework into Table 15.1 and the Town Centre and Local Centre Zones.

Large Town Centre
Town Centre
Large Local Centre
Local Centre
Neighbourhood Centre

S32AA Evaluation

Benefits	Appropriateness in achieving the objectives/ higher order document directions
<p>Environmental: Contributes to a well-functioning urban environment by enabling both business and residential intensification across the centres hierarchy. Achieves an urban form that implements the strategic objectives of the plan, while minimising adverse impacts, in particular on the Central City.</p>	<p>Efficiency: Provides clarity and reduced complexity in the centres hierarchy as it relates to height. Provides a tailored approach that effectively implements NPS-UD Policy 3(d) in terms of enabling greater height and density commensurate to commercial and community services</p>
<p>Economic: Provides greater clarity on role and function of Local Centres and acknowledges that Centres are not homogenous but enables a consistent opportunity for intensification across the centres hierarchy. Protects the function of the Central City as the primary location for business and retail activity, followed by the Key Activity Centres identified in the CRPS. Enables a range of retail and office activity that supports local employment markets.</p>	<p>Effectiveness: The option enables intensification across the centres hierarchy which is consistent with the direction of the CRPS and CDP.</p>
<p>Social: Provides key focal points for community services, retail activity, hospitality, and appropriate locations for a range of business types and sizes.</p>	
<p>Cultural: Nil</p>	
<p>Costs</p>	
<p>Environmental: While additional development potential may be perceived by some as decreasing amenity, it will be viewed by others as a positive change. Increased development potential will place increased pressure on capacity for infrastructure (including wastewater and traffic), however this will be offset to an extent through the potential for increased development contributions to upgrade public infrastructure.</p>	
<p>Economic: Nil</p>	
<p>Social: Nil</p>	
<p>Cultural: Nil</p>	
<p>Risk of acting/not acting:</p>	

No information gaps have been identified that impact on the risk of acting or not acting in relation to the change proposed.

Recommendation:

This option is the most appropriate way to achieve the objectives of the CRPS, CDP and NPS-UD.

Large Town Centres

Sub. No.	Submitter name	Summary of relief sought	Recommendation
876	Alan Ogle	Seek amendment to change Riccarton to a Town or Neighbourhood Centre, not a Large Town Centre	Reject
638.1	Central Riccarton Residents Association	[That Riccarton is not classified as a Town Centre]	Reject
188.2	Riccarton Bush – Kilmarnock Residents Association	That Riccarton be a Town Centre or Neighbourhood Centre, not a Large Town Centre.	Reject
686.1	Robyn Thomson	Riccarton Centre is reclassified to a local town centre	Reject
679.8	Tony Dale	Because it is adjacent to the Christchurch CBD, Riccarton should not, as is proposed, be designated a large Town Centre. This will worsen the situation that allowed Riccarton to get to its current size in the first place - largely at the expense of the CBD	Reject
132.3	Tiffany Boyle	Revoke the idea of high rise housing buildings in Hornby and work to rebuild existing infrastructure to handle the current demand in the area	Reject
S104.1	Colin McGavin	That Papanui is zoned a [Local Centre instead of a Town Centre]	Reject
S156.1	Maureen McGavin	That Papanui is zoned a [Local Centre instead of a Town Centre]	Reject

- 8.2.11 PC14 as notified classified three town centres (Riccarton, Papanui and Hornby) for greater heights than other Town Centre Zones commensurate with the Riccarton, Papanui and Hornby’s commercial and community service offering.
- 8.2.12 The above submitters have requested that the three centres be considered differently and their relief proposes a range of classifications other than large local centre. The principal concern and rationale for opposing the classification of these centres is the adverse character and amenity effects arising from increased height. I rely on the expert evidence of Ms Williams to inform the controls that Council can implement into the District Plan to alleviate those potential adverse effects. Furthermore, NPS-UD Policy 6 requires that when making decisions affecting the urban environment, that decision-makers acknowledge that the planned urban form may give rise to changes to an area that may detract from amenity values appreciated by some and that they are not an adverse effect in themselves.
- 8.2.13 With regard to the level of commercial activity in the centres, Table 9 below demonstrates that Riccarton, Papanui and Hornby are significantly larger in commercial scale than the other Town Centres, Riccarton and Papanui in particular are double the size of Linwood, Shirley, and Belfast.

Table 9 PC 14 Notified Town Centres Classification

Classification	Centre	PC 14 Height	Commercial Floorspace
Large Town Centres	Riccarton	22	203,000sqm
	Papanui	22	125,000sqm (Pre Northlink)
	Hornby	22	79,000sqm
Town Centres	Linwood	20	60,000sqm
	Shirley	20	47,000sqm
	Belfast	20	47,000sqm
	North Halswell	20	25,000sqm retail max (180,000sqm total centre size)

- 8.2.14 Turning to the community services within or near vicinity of the centre, all the centres have supermarkets (which I consider to be a community service as defined by the NPS-UD because it is a commercial activity that serves the needs of the community, alongside other types of community services. In Riccarton, Rārākau:Riccarton Centre provides a civic facility. In Papanui, the Papanui Library, Papanui High School, and Graham Condon Recreation Centre are located within the centre.

In Hornby, Denton Park, Matatiki (Hornby's new pool and civic centre) and Hornby High School also adjoin or are in close proximity to the centre. Accordingly, I consider that each of these centres provide a range of community services.

- 8.2.15 Overall, I consider it appropriate for Riccarton, Papanui and Hornby to have a height and density response that is commensurate to the level of commercial and community services offering in the centre, which is greater in level of commercial activity and community services to the other Town Centre Zones in the hierarchy.

Recommendation

- 8.2.16 Reject the relief sought by the submitters.

Large Local Centres

Sub. No.	Submitter name	Summary of relief sought	Recommendation
131	John Edilson	Oppose the identification of Merivale as a large Local Centre, thereby allowing buildings of 6 levels high.	Reject
689.55	Canterbury Regional Council	[Retain Policy 15.2.2.1 as notified]	Accept in part
258.2	Stephen Bryant	Re-designate Merivale a Medium Town Centre.	Reject
814.181	Carter Group	Amend Table 15.1 to reclassify Avonhead as a Local Centre (large), rather than Local Centre (small)	Reject
673.2	Anne Ott	Seek amendment to reclassify Merivale from a Local Centre (large) to Local Centre (Medium) with associated impact on residential zoning.	Reject
823.147	The Catholic Diocese of Christchurch	Amend Table 15.1 to reclassify Avonhead as a Local Centre (large), rather than Local Centre (small).	Reject
725.4	Sophie Burt	Addington should be included in as a Large Local Centre	Reject
902.15	Waipuna Halswell-Hornby-Riccarton Community Board	Large Local Centre not apply at Church Corner	Reject
74.1	Tony Rider/Church Corner Residents Association	Amend Bush Inn's status in the Centres hierarchy to remain a neighbourhood/local centre	Accept

8.2.17 In response to submitters 258, 673, 131, 902, and 74, the notified Large Local Centres comprise the following centres, which range in size, having regard to the total commercial floor space: Merivale (27,000sqm), Ferrymead (29,000sqm), Sydenham (31,000sqm) and Church Corner (41,000sqm). Merivale as the smallest of the notified Large Local Centres still has nearly double the floorspace of the next largest local centre being Lyttelton at 15,000sqm (excluding New Brighton due to qualifying matters, discussed below). In terms of community services, the Large

Local Centres have a range of library, supermarkets, and educational facilities. In my opinion, it is appropriate that these centres are grouped together and have the same level of enablement in terms of height and density as they have a consistent level of commercial and community activity per the criteria of Policy 3(d).

- 8.2.18 Turning to the notified Medium Local Centres of Prestons, Barrington, New Brighton and Bishopdale, Kāinga Ora request that the classification of local centres be simplified by deleting the classification of 'Medium Local Centres'. I agree this is necessary in providing a distinguishable hierarchy, reflected in heights across centres. In doing so, Small Local Centres would be renamed to Local Centres, with Large Local Centres being distinguished by reference to 'large'.
- 8.2.19 The next question is do any of the notified Medium Local Centres have the level of commercial or community activity as the already identified Large Local Centres of Merivale, Ferrymead, Sydenham and Church Corner.
- 8.2.20 New Brighton is the largest of the notified Medium Local Centres with 23,000sqm of floor space and is a KAC identified in the CRPS. As noted in Appendix 5 to this s42A report, the centre has a similar scale of commercial floor space as the notified Large Local Centres, and in terms of community facilities has a large library, supermarket and recreational hot pools. It can therefore be concluded that the centre is similar to the identified Large Local Centres providing a similar level of commercial floor space and diversity of community services. However, the centre is subject to multiple natural hazard qualifying matters which are discussed in the s42A report of Ms Oliver. Balancing the commensurate commercial and community services alongside the qualifying matters impacting the residential catchments, I recommend that New Brighton is classified a Local Centre.
- 8.2.21 Prestons is the smallest of the four notified Medium Local Centres with only 7000sqm of commercial floor space. The centre also has a maximum gross leaseable floor area limit for retail activities of 12,000 sq m (rule 15.4.6.2.6, renumbered as 15.5.4.2.6 in notified PC14),. Non-compliance with this standard is a non-complying activity in rule 15.4.6.1.5(a) (renumbered as 15.5.4.1.5(a) in PC14). In my opinion Prestons does not have the same level of commercial or community activity as Large Local Centres, as such Preston is not of similar scale of the identified Large Local Centres. Accordingly, I recommend that the centre is classified as a Local Centre for height and density considerations.
- 8.2.22 Barrington/Spreydon is an identified KAC in the CRPS and has 14,000 sqm of commercial floorspace along with community facilities in the form of a supermarket and recreational facilities. While having less commercial floorspace than other centres, Barrington/Spreydon has no District Plan limitations on retail floorspace like other local centres. Encouraging intensification within the centre would also give effect to the direction of the CRPS to consolidate commercial and residential activities within KACs. However, the NPS-UD directs height and density commensurate to levels of commercial activity and community services, and Barrington is nearly half the size of the identified

Large Local Centres. Accordingly, I recommend the centre is classified as a Local Centre rather than Large Local Centre for height and density considerations.

8.2.23 Bishopdale holds 12,000sqm of commercial floorspace and community services in the form of a supermarket, library, recreation centre and recreational space. However, much like Barrington/Spreydon, Bishopdale is half the size of the identified Large Local Centres. Based on the level of commercial activity and community services in the centre I recommend that that the centre is classified as a Local Centre for height and density considerations.

8.2.24 The submission of Sophie Burt (725) has sought that Addington be classified as a Large Local Centre referring to the centre's proximity to the city centre and Hagley Park, the existing mix of uses and transport links including rail and road as reasons. While I acknowledge that Addington is centrally located and has potential for regeneration, the framework for this plan change is restricted to heights and density commensurate to the level of commercial activity and community services. Turning to resemblance and classification of the centre, Addington centre only has 9,000sqm of floorspace, and does not have a supermarket or associated civic or community services. Overall, I consider that Addington has a similar level of commercial activity and community services as other local centres and as such I recommend the centre is classified a Local Centre for height and density considerations.

8.2.25 The Catholic Diocese of Christchurch (823) and Carter Group (814) have sought that Avonhead Local Centre be classified as a Large Local Centre, referring to the planned intensification around the centre as rationale to enable greater heights in the centre. However, the majority of the Avonhead centre and its surrounding residential catchment to the north, north-west and east is under the 50 dBA LdN airport noise contour for Christchurch International Airport Contour (as notified), where intensification has been reduced to the operative land use heights and density through a qualifying matter which is discussed in more detail by the S42A of Ms Oliver. I also refer to the criteria within Policy 3(d) being that intensification is directed by the level of commercial and community activity within a centre. Avonhead centre has 5,400sqm of commercial floor space and no community services in the centre other than a supermarket. Overall, I recommend that Avonhead is classified as a Local Centre Zone as the level of commercial activity or community services within the centre is not comparable to the characteristics of other Large Local Centres which all have floorspace in excess of 20,000sqm in addition to a range of commercial services.

Recommendation

8.2.26 That the classifications in Table 15.1 for Large Local Centres remain as proposed.

Medium Local Centres

Sub. No.	Submitter name	Summary of relief sought	Recommendation
917.4	Belfast Village Centre Limited	Amend Table 15.1 to categorise North West Belfast as a 'medium' Local Centre rather than a 'small' Local Centre as notified	Reject
121.24	Cameron Matthews	Change Addington to a Medium Local Centre.	Reject
121.25	Cameron Matthews	Lyttleton should qualify as a Local Centre (Medium).	Reject
121.33	Cameron Matthews	Sumner should qualify as a Local Centre (Medium).	Reject
121.34	Cameron Matthews	Wigram should qualify as a Local Centre (Medium).	Reject

8.2.27 While I have recommended to remove the Medium Local Centre Classification I have also recommended an increase in height of Local Centres (previously described as 'Small') from 12m to 14m, with 14m being the same height as proposed in the notified version of PC14 for Medium Local Centres. So while I recommend rejecting the relief sought by these submitters regarding Table 15.1, I consider my recommendation still resolves the intent of their submission points by enabling the heights and densities associated with the notified Medium Local Centre Classification.

Recommendation

8.2.28 Reject the relief sought by the submission points.

8.3 ISSUE 3 – HEIGHT AND DENSITY ENABLEMENT IN CENTRES

Sub. No.	Submitter name	Summary of relief sought	Recommendation
26.3, 26.4, 26.5	Rosemary Fraser	Opposes change to height limits and having buildings 90m tall.	Reject
171.7, 171.8, 171.9	Paul McNoe	[Reduce permitted building height] That the permitted height limits within the <u>existing</u> District Plan (prior to PC14) are retained to the maximum extent possible	Reject

191.10, 191.11, 191.12	Logan Brunner	[Retain increased building height]	Reject
224.10, 224.11, 224.12, 224.13, 224.14, 224.15	Richard Ball	That the permitted height limits within the existing District Plan (prior to PC14) are retained to the maximum extent possible.	Reject
260.3	Scentre (New Zealand) Limited	Amend Rule 15.4.2.2 of PC14 to allow a maximum building height of 50m for Riccarton as opposed to the 22m proposed.	Reject
276.21, 276.22, 276.22, 276.24, 276.25	Steve Burns	Seek maximum height of 5 stories in Christchurch	Reject
297.18, 297.20, 297.22, 297.24, 297.26, 297.28	Kate Z	That resource consent to be required for buildings greater than two stories and all subdivisions.	Reject
337.5, 337.7, 337.9, 337.11, 337.13, 337.15	Anna Melling	That maximum heights be lowered to account for lower sun height further south.	Reject
338.6, 338.7, 338.8, 338.9	Kate Revell	Restrict building heights to a maximum of 22 metres.	Reject
339.6, 339.7, 339.8, 339.9	Chris Neame	Restrict maximum height for development to 22 metres	Reject
635.7	Suzi Chisholm	Support 6 to 10 storey residential buildings near commercial centres.	Accept

834.264, 834.280, 834.281	Kāinga Ora	Adopt Metropolitan Centre Zone and a height limit of 53m Amend Heights for Town Centres to 22m Amend Heights for Local Centre Medium to 20m Amend Heights for Local Centre Small to 14m Amend Heights for Neighbourhood Centre to 14m Amend Heights for Neighbourhood Centre in Central City to 32m	Accept in part
842.50	Fire and Emergency	Retain 15.4.2.2-Maximum building height as notified	Reject
842.52, 842.54	Fire and Emergency	Amend 15.5.2.2, 15.6.2.1 - Maximum building height as follows: <u>Advice note:</u> <u>1. See the permitted height exceptions contained within the definition of height</u> <u>2. Emergency service facilities, emergency services towers and communication poles are exempt from this rule.</u>	Reject
870.5, 870.6, 870.17	Susanne Antill	Oppose increased height limits of buildings.	Reject
886.6	Helen Broughton	Oppose changing the maximum height of commercial buildings from 20 to 22 metres for existing commercial buildings adjoining a residential zone.	Reject
893.5, 893.6, 893.7	Susanne and Janice Antill	Oppose increased height limits of buildings.	Reject
902.16, 902.17	Waipuna Halswell-Hornby-Riccarton Community Board	[That the permitted] building height [is reduced to no more than] 12 metres.	Reject

902.21	Waipuna Halswell- Hornby- Riccarton Community Board	[T]hat the maximum height of low rise commercial buildings by a residential sector be reduced to 14 metres. [A]t a minimum, [that] the height remain at the current level of 20 metres.	Reject
814.196	Carter Group	Supports Rule 15.5.2.2. Retain as notified.	Reject
823.162	The Catholic Diocese of Christchurch	Retain the amendments as proposed.	Reject
334.12	Luke Baker- Garters	Removal of all central city maximum building height overlays. [as it relates to NCZ in Central City]	Reject

- 8.3.1 The heights recommended for centres have been considered in relation to height limits proposed for the City Centre zone and residential zones, to contribute to a package that supports a well-functioning urban environment and enables intensification throughout Christchurch City. In the commercial zones outside of the Central City, the heights recommended have been framed by the level of commercial and community activities in the centre as discussed in section 8.2 above. The heights recommended follow a hierarchy based on scale as directed by the NPS-UD. The hierarchy begins with the City Centre Zone having the greatest heights enabled, through to Neighbourhood Centres having the lowest.
- 8.3.2 I have considered the submitters' requests for reducing heights or maintaining status quo heights in centres. However, I note that the NPS-UD must be given effect to and as such heights and density commensurate with the level of commercial and community activities are to be applied to the centres.
- 8.3.3 Kāinga Ora (834) have sought increases in height for all the classifications across the hierarchy which is shown below in Table 10, the highest of which in Riccarton, Papanui and Hornby centres being 53m. As noted throughout my s42A report, the CDP and CRPS objectives and policies encourage intensification within centres, but this is balanced against ensuring primacy is given to the CCZ and maintaining the function and role of other centres. The evidence of Mr Heath discusses the potential adverse economic effects that increased heights could have on the still recovering Central City, which I have covered in sections 8.1.1-8.1.33. While I note the potential adverse economic effects discussed by Mr Heath and the planning framework of the CDP and CRPS, I also consider a height and density response is required that is commensurate to the three largest town centres outside the Central City per the requirements of Policy 3(d) of the NPS-UD.

- 8.3.4 Overall, I consider that a maximum permitted height of 32m in Riccarton, Papanui and Hornby would achieve both intensification commensurate to the centres while not undermining the primacy of the City Centre Zone. Accordingly, I recommend rejecting the 53m height requested by Kāinga Ora (834), 50m height requested by Scentre (260), and 45m requested by Lendlease (855).
- 8.3.5 I rely on the evidence of Ms Williams in relation to potential urban design effects (noting that these are potential costs if not properly addressed) arising from the increased height, and recommend the built form standards contained in Appendix 4 to this report as the most appropriate way to mitigate any adverse effects that would arise from the increased heights in the Large Town Centres.
- 8.3.6 Kāinga Ora has also requested height increases for buildings in Town Centres, Large Local, Local, and Neighbourhood Centres, as set out in Table 10 below. I rely on the evidence of Ms Williams who is supportive of the request as this provides greater flexibility to develop more functional commercial ceiling heights. Overall, I agree with the heights sought by Kāinga Ora for the TCZ, LCZ and NCZ centres.

Table 10 PC14 Proposed Heights, Kāinga Ora Sought Heights and Recommended

Centre	Notified PC 14	Kāinga Ora Height Requested	Recommended
Large Town Centre (Riccarton, Papanui, Hornby)	22m	53m	32
Town Centre (Linwood, Shirley, Belfast, North Halswell)	20m	22m	22

Large Local (Church Corner, Merivale, Sydenham, Ferrymead)	20m	22m	22
Medium Local	14m	20m	Deleted
Small Local	12m	14m	14
Neighbourhood	12m	14m	14m

Recommendation

- 8.3.7 Accept in part the relief sought by Kāinga Ora, reject submissions 26, 171, 191, 224, 260, 276, 297, 337, 338, 339, 635, 834, 842, 842, 870, 886, 893, 902, 814, 823, 334.

S32AA Evaluation

Benefits	Appropriateness in achieving the objectives/ higher order document directions
<p>Environmental: Contributes to a well-functioning urban environment by enabling intensification across the centres hierarchy that is commensurate to the level of commercial activity and community services in centres.</p>	<p>Efficiency: Provides clarity and reduced complexity in the centres hierarchy as it relates to height by having only three heights across the centres hierarchy.</p> <p>Effectiveness: The option enables intensification, by way of increased heights, across the centres hierarchy which is consistent with the direction of the CRPS and CDP, and gives effect to the NPS-UD Policy 3(d) in terms of enabling greater height commensurate to commercial and community services.</p>
<p>Economic: Enables greater height in Riccarton, Papanui and Hornby that is commensurate to the level of commercial activity in the centres role, while maintaining the primacy of the CCZ. Increased development within centres will lead to positive agglomeration effects, enabling a wider and more vibrant range of businesses to be able to establish.</p>	

<p>Social: Enables centres to develop as key destinations for commercial, recreation and residential land use activities and result in well-functioning urban environments. Enabling higher heights, and potential for residential intensification closer to, and within centres, will enable better access to community and health services within the centres.</p>	
Cultural: Nil	
Costs	
<p>Environmental: Potential adverse effects on the amenity and character of adjoining residential zones, however, the adverse effects of height are proposed to managed to ensure solar access is maintained. Increased development potential will place increased pressure on capacity for infrastructure (including wastewater and traffic), however this will be offset to an extent through the potential for increased development contributions to upgrade public infrastructure, and will support public transport on key transport routes.</p>	
<p>Economic: Enables greater height in the largest centres. However, this reflects the nature of the hierarchy, in that the largest centres have primacy over smaller centres.</p>	
Social: Nil	
Cultural: Nil	
<p>Risk of acting/not acting: No information gaps have been identified that impact on the risk of acting or not acting in relation to the change proposed.</p>	
<p>Recommendation: This option is the most appropriate way to achieve the objectives of the CRPS, CDP and NPS-UD.</p>	

8.4 ISSUE 4 – OBJECTIVES AND POLICIES

Chapter 15 – COMMERCIAL

Commercial Objectives and Policies General

Sub. No.	Submitter name	Summary of relief sought	Recommendation
627.4	Plain and Simple Ltd	That the objectives within PC 14 are amended to explicitly include recognition of the role of housing in fostering social cohesion and a sense of community belonging.	Reject
814.180	Carter Group Limited	Seeks that a new and explicit policy is included in regard to anticipated building heights, consistent with NPS-UD policy 3	Reject
855.28	Lendlease Limited	Amend 15.1 Introduction to include reference to the "Metropolitan Centre Zone"	Reject

8.4.1 I have considered the request of Lendlease Limited (855.28) to introduce a MCZ in Sections 8.1.1 - 8.1.33, recommending the request be declined.

8.4.2 The request of Carter Group (814.180) is to introduce a new and explicit policy that outlines anticipated building heights consistent with NPS-UD Policy 3. Objective 15.2.4 as proposed seeks "a scale, form and design of development that is consistent with the role of a centre and its contribution to city form".

8.4.3 Policy 15.2.4.1(b) as proposed notes that development is to "reflect the context, character and the anticipated scale of the zone and centre's function" by:

- 15.2.4.1(b)(i) - *providing for the tallest buildings and greatest scale of development in the city centre to reinforce its primacy for Greater Christchurch and enable as much development capacity as possible to maximise the benefits of intensification;*
- 15.2.4.1(b)(ii) - *providing for building heights and densities within town, local and neighbourhood centres commensurate with their role and level of commercial and community activities;*

8.4.4 The Objective and policies above give effect to Policy 6.3.7(2) in the CRPS that directs that "intensification in urban areas of Greater Christchurch is to be focused around the Central City, Key Activity Centres and Neighbourhood Centres commensurate with their scale and function."

8.4.5 Overall, it is my view that policy 15.2.4.1(b)(i) and 15.2.4.1(b)(ii) give effect to policy 3 of the NPS-UD as sought by the submitter. The proposed Objective 15.2.4 and supporting policies direct the same policy outcomes sought by the NPS-UD, being to provide for the greatest intensification in city centres zones, followed by intensification commensurate with the scale of the centres. The

provisions as notified also give effect to the CRPS, which expresses in the reasons to Policy 6.3.7 that “To support a sustainable urban form, this intensification is ideally located around the Central City, Key Activity Centres and neighbourhood centres consistent with their scale and function”. In my opinion the proposed policies are the most appropriate way to achieve the objectives of the District Plan, The CRPS, the NPS-UD and ultimately the purpose of the RMA.

8.4.6 Regarding the request of Plain and Simple Ltd (627.4), I consider that the objectives of the Commercial chapter sufficiently cover the social impacts of the proposal, as this is a requirement for assessment in s32(2).

Recommendation

8.4.7 Reject the submission points.

Objective 15.2.2 - Centres-based framework for commercial activities

Sub. No.	Submitter name	Summary of relief sought	Recommendation
475.2	Rachel Sanders	We support Council’s plan to increase focus on the urban hubs	Accept
855.29	Lendlease	Amend Objective 15.2.2 to include reference to the “Metropolitan Centre Zone”	Reject

8.4.8 I have considered the request of Lendlease Limited (855.28) to introduce a MCZ in Sections 8.1.1 - 8.1.33, recommending the request be declined.

Recommendation

8.4.9 Reject the submission point of 855.29, Accept the submission point of submitter 475.2.

Policy 15.2.2.1 and Table 15.1 - Role of centres

Sub. No.	Submitter name	Summary of relief sought	Recommendation
689.55	Canterbury Regional Council	[Retain Policy 15.2.2.1 as notified]	Accept
705.15	Foodstuffs	Retain specific recognition of supermarket activity in Table 15.1	Accept
740.5	Woolworths	Support amendments to Table 15.1 of Policy 15.2.2.1 in so far as these reflect National Planning Standards nomenclature.	Accept
811.76	RVA	Amend Row B and C of Table 15.1 to refer to “at least medium” density housing being contemplated in Town Centres.	Accept
811.76	RVA	Amend Row B and C of Table 15.1 to delete the reference to “above ground floor level”.	Accept
855.30	Kāinga Ora	Retain “B. Town Centre: Key Activity Centre: Retain reference to ‘High Density Housing is contemplated ... and around larger local centres’.” “C. Local Centres: Retain reference to ‘High Density Housing is contemplated ... and around larger local centres’.”	Accept
881.25	Red Spur Limited	Amend 15.2.2.1 Policy – Role of centres Table 15.1 to exclude Redmund Spur from proposed Neighbourhood Centres	Reject

8.4.10 Submission points related to a centre’s place in the hierarchy have been discussed in section 8.2 of this report above. The following analysis will consider the appropriateness of the policy framework of 15.2.2.1 and Table 15.1. The majority of submitters have supported the proposed changes to Table 15.1, only two submitters seeking changes, being RVA and Red Spur Limited.

8.4.11 Regarding RVA’s request to require at least medium density residential development in Town Centres, the relevant Objective 15.2.2 outlines that among commercial consideration, centres are to support both intensification and a compact urban form.

- *“Objective 15.2.2 - Commercial activity is focussed within a network of centres to meet the wider community’s and businesses’ needs in a way and at a rate that:*
 - *i. supports intensification within centres;*
 - *vi. supports a compact and sustainable urban form that provides for the integration of commercial activity with guest accommodation, community activity, residential activity and recreation activity in locations accessible by a range of modes of transport;”*

8.4.12 RVA also seek an amendment Rows B and C of Table 15.1 to delete the reference to “above ground floor level”. This reflects an Environment Court Order from PC 5B, I recommend accepting this submission point.

8.4.13 Objective 15.2.2 above gives effect to Policy 6.3.7(2) of the CRPS, which directs that “intensification in urban areas of Greater Christchurch is to be focused around the Central City, Key Activity Centres and neighbourhood centres commensurate with their scale and function.” TCZ are anticipated to be the largest centres in the hierarchy, and intensification of at least medium density would be commensurate with their size and function.

8.4.14 The amendments sought to 15.2.2.1 to require greater intensification would be the most appropriate way to achieve the Objective 15.2.2 of the District Plan, Policy 6.3.7 of the CRPS, and ultimately the purpose of the RMA.

8.4.15 The request of Red Spur Limited (881.25) is to make a note in Table 15.1 that the proposed centre is greater than 3,000sqm through an exclusion. The Redmund Spur NCZ is restricted to 2,500sqm in Rule 15.6.1.1(P21) to maintain a function and scale consistent with a NCZ and the submitter has not sought any amendments to the NCZ chapter. The exclusion sought to Table 15.1 would not be consistent with the provisions of the NCZ nor be consistent with the intended role and function of the Centre as an NCZ. It is my opinion that proposed Table 15.1 would be the most appropriate way to achieve Objective 15.2.2 of the District Plan.

Recommendation

8.4.16 Accept in part the submission points of submitter 881, Accept the submission points of 855, 811, 751, 740, 705, 689.

Policy 15.2.2.2 - Comprehensive approach to development of the North Halswell and Belfast/ Northwood Key Activity Centres

Sub. No.	Submitter name	Summary of relief sought	Recommendation
118.3	Spreydon Lodge Limited	Amend Policy 15.2.2.2 'Comprehensive approach to development of the North Halswell and Belfast/ Northwood Key Activity Centres' to remove reference to main street at part 15.2.2.2(b)(ii) as follows: b. Require development within the North Halswell Key Activity Centre to: ii. provide high quality public open spaces, a strong main street with a concentration of finer grain retailing , and strong linkages between key anchor stores;	Reject
780.19	Josie Schroder	Amend Policy 15.2.2.2 to limit high trip generating activities, and to require the protection and provision of land for new pedestrian/cycle/green infrastructure/road links.	Reject

8.4.17 While PC14 proposes to increase the height and density of the North Halswell centre, the submission points are not consequential to the enablement of heights and density per Policy 3 of the NPS-UD, and as such the issue arises of whether the relief sought is within the scope of the IPI and PC 14. Regardless, I evaluate the merits of the proposed policy changes and whether they are the most appropriate way to achieve the objectives of the District Plan.

8.4.18 Spreydon Lodge (118) seek that aspects of Policy 15.2.2.2(ii) are deleted being, “provide high quality public open spaces, ~~a strong main street with a concentration of finer grain retailing~~, and strong linkages between key anchor stores”. The entire Policy 15.2.2.2 is outlined below, stating that development within the North Halswell Key Activity Centre is to:

- *“i. be developed to a scale that:*
- *A. protects the Central City’s CBD’s City Centre’s role as the region’s primary commercial area; and*
- *B. ensures the role of District Town Centres and Neighbourhood Local Centres within the city and commercial centres in Selwyn District is maintained.*

- *ii. provide high quality public open spaces, a strong main street with a concentration of finer grain retailing, and strong linkages between key anchor stores;*
- *iii. achieve a supply of both large and finer grain retail activity that provides for the long term needs of the population in the south west.”*

- 8.4.19 The policy is concerned with outcomes for the North Halswell KAC and is given effect to through the ODP and matters of discretion.
- 8.4.20 Policy 15.2.2.2 sits under Objective 15.2.2. I would not anticipate the objective to provide a level of detail that relates to the specific matter of a strong main street with concentration of finer grain retailing however, in broad terms, the policy implements Objective 15.2.2 (a)(viii) and 15.2.4.
- 8.4.21 Objective 15.2.2(a)(viii) outlines that commercial activity is to be located so as to enhance their vitality and amenity. Objective 15.2.4(a) anticipates a scale, form and design of development that is consistent with the role of a centre, and 15.2.4(a)(i) notes that centres contribute to an urban environment that is visually attractive, safe, easy to orientate, conveniently accessible and responds positively to anticipated local character context.
- 8.4.22 North Halswell is a KAC identified in the CRPS, Policy 6.3.2(2) of the CRPS directs the need for well-integrated business development that provide an appropriate form and pattern of use and development. Policy 15.2.2.2 therefore gives effect to policy 6.3.2(2).
- 8.4.23 The NPS-UD also directs that planning decisions contribute to well-functioning urban environments which includes Policy 1(c), to have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport.
- 8.4.24 Collectively I consider that the operative policy is the most appropriate policy method to achieve the objectives of the CDP, and give effect to the CRPS, NPS-UD and the purpose of the Act.
- 8.4.25 Josie Schroder (780) seeks amendments to Policy 15.2.2.2 to limit high trip generating activities and require the protection and provision of land for new pedestrian/cycle/green infrastructure/road links. The submitter refers to the policy for mixed use areas outside the central city, which is Policy 15.2.3.2. It appears as the submitter has made a number mistake in their submission as the content of their submission refers to the proposed Sydenham and Phillipstown mixed use areas. I will evaluate the submitters request under policy 15.2.3.2 instead.

Recommendation

- 8.4.26 The submission points are rejected.

Policy 15.2.2.5 – Banks Peninsula Commercial Centres

Sub. No.	Submitter name	Summary of relief sought	Recommendation
695.1	Te Hapū o Ngāti Wheke (Rāpaki) Rūnanga	Recognise Ngāi Tahu whānui development aspirations in Banks Peninsula.	Accept in part

8.4.27 Policy 15.2.2.5 is consistent with Objective 15.2.2 to direct commercial activities into a strategic network of centres that provide a commercial and community focal point for the wider community to achieve a well-functioning urban environment. I have reviewed the Mahaanui Iwi Management Plan and Ngāi Tahu 2025⁶ which outlines the development aspirations of Ngāi Tahu. At a high level, these cover the natural environment, tribal participation, culture and identity, development, education and investment. The commercial centres in Banks Peninsula, including Lyttelton (only centre in Banks Peninsula within scope of the plan change) contribute to some aspects of those matters by enabling a broad range of activities to encourage diversity of activity and services that meet the needs of the wider community.

Recommendation

8.4.28 I recommend the submission is accepted in part. I consider the policy and associated rules enable development consistent with Ngāi Tahu whānui's development aspirations. This will be considered further in consultation with Ngati Wheke following the filing of evidence.

Policy 15.2.2.7 – Residential Activity in Town and Local Centres

⁶ https://ngaitahu.iwi.nz/wp-content/uploads/2013/06/NgaiTahu_20251.pdf

Sub. No.	Submitter name	Summary of relief sought	Recommendation
571.30	James Harwood	High-density housing near the city and commercial centres supported.	Accept
834.240	Kāinga Ora	Amend Policy 15.2.2.7 as follows: Residential activity in Town, Local and <u>neighbourhood</u> centres	Accept
811	RVA	Retain Policy 15.2.2.7 (and associated Rule 15.14.2.2(f)) as amended by the Plan Change 5B appeal process.	Accept in part

8.4.29 Submitters Kāinga Ora (834) have sought the addition of Neighbourhood Centres to Policy 15.2.2.7. This would provide a policy framework for residential activity in Neighbourhood Centres. In my opinion the only risk with accepting the relief is the potential for an entire neighbourhood centre or the majority of it to become residential activity at ground floor level. I do however note that Policy 15.2.2.7 reduces that potential risk through 15.2.2.7(a).

- Residential activity in ~~district~~ town centres, ~~and neighbourhood~~ local centres **and neighbourhood centres** is encouraged above ground floor level, and is provided for at ground floor level where:
 - i. it can be demonstrated that there is sufficient capacity in the catchment of the centre to meet demand in the short, medium and long-term for commercial activities; and/or
 - ii. the building for the residential activity is designed and constructed to facilitate conversion to commercial use so as to not foreclose future options and for sites in Banks Peninsula, the residential activity contributes positively to the area's special historical character; or
 - iii. it can be demonstrated that the ground floor residential activity will not have a significant adverse effect on the commercial viability and function of a centre.

8.4.30 I am satisfied that the criteria in policy 15.2.2.7 ensures the function of a centre would not be compromised by ground floor residential development in a centre. The changes are considered appropriate in achieving the direction of Objective 15.2.2 and Policy 6.3.7(2) of the CRPS in 8.5.13 and 8.5.14 above, noting that the direction is to intensify and enable a range of activities in centres. Objective 3 of the NPS-UD also directs District Plans to enable more people to live in areas with employment opportunities.

8.4.31 Enabling residential on the ground floor of Neighbourhood Centres would still allow for future commercial activity per the criteria ii. of 15.2.2.7(a) and be consistent with Objective 15.2.2, the CRPS and NPS-UD. In my opinion the change to the policy would be the most appropriate way to

achieve the objective of the District Plan, the CRPS, the NPS-UD and ultimately the purpose of the RMA.

8.4.32 I recommend accepting the submissions of Kāinga Ora (834), James Harwood (571) and accept in part the submission of RVA (811)

Recommendation

8.4.33 Accept the relief sought by Kāinga Ora.

S32AA Evaluation

Benefits	Appropriateness in achieving the objectives/ higher order document directions
Environmental: Contributes to a well-functioning urban environment by enabling a variety of housing options and intensification that is well connected to employment and public transport opportunities across the City.	Efficiency: Provides clarity on requirements for resource consent for residential applications on ground floor in Neighbourhood Centres.
Economic: Enables flexibility of land use in Neighbourhood Centres when the relevant criteria are satisfied.	Effectiveness: The option enables a pathway intensification across the centres hierarchy which is consistent with the direction of the CRPS and CDP.
Social: Enables Neighbourhood Centres to be utilised for residential at ground floor which may increase their vitality and ability to function as mixed use locations.	
Cultural: Nil	
Costs	
Environmental: Nil	
Economic: May result in the take up of scarce retail ground floor space as residential, however I consider the criteria in Policy 15.2.2.7 will ensure that does not occur.	
Social: May result in the take up of scarce retail ground floor space as residential, which reduces the function and role of Neighbourhood Centres. however I consider the criteria in Policy 15.2.2.7 will ensure that does not occur.	
Cultural: Nil	
Risk of acting/not acting:	

No information gaps have been identified that impact on the risk of acting or not acting in relation to the change proposed.

Recommendation:

This option is recommended as it is considered to be the most appropriate way to achieve the objectives of the CDP, and give effect to the CRPS and NPS-UD.

Objective 15.2.3 Office parks and mixed use areas outside the central city

Sub. No.	Submitter name	Summary of relief sought	Recommendation
689.56	Canterbury Regional Council	[Retain Objective 15.2.3 as notified]	Accept in part
760.1	Christchurch NZ	Amend to insert the term "walkable" as follows: "Objective 15.2.3 – mixed use zones located close to the City Centre Zone transition into high density walkable residential neighbourhoods that contribute to an improved diversity of housing type, tenure and affordability and support a reduction in greenhouse gas emissions"	Accept in part
814.182	Carter Group	Support Objective 15.2.3. Retain as notified.	Accept in part
823.148	The Catholic Diocese of Christchurch	Support Objective 15.2.3 as notified	Accept in part
834.241	Kāinga Ora	Amend the objective as follows: 15.1.1 Objective - Office parks and mixed use areas outside the central city (except the Central City Mixed Use and Central City Mixed Use(South) Zones) . <u>a.</u> Recognise the existing nature, scale and extent of commercial activity within the Commercial Office and Commercial Mixed Use Zones, but avoid the expansion of existing, or the development of new office parks and/or mixed use areas . <u>b.</u> Mixed use zones located within a 15min walking distance of close to the City Centre Zone transition into high density residential neighbourhoods that contribute to an improved diversity of housing type, tenure and affordability and support a reduction in greenhouse gas emissions .	Accept in part
811	RVA	Retain Objective 15.2.3 as notified.	Accept

- 8.4.34 Submitters Kāinga Ora and ChristchurchNZ have sought changes to Objective 15.2.3, while Carter Group, The Catholic Diocese of Christchurch, RVA, and Canterbury Regional Council support the objective as notified. ChristchurchNZ seek the addition of ‘walkable’ to the objective, and Kāinga Ora seek to change the title of the objective, add a 15 minute walking distance qualifier to the objective, and remove reference to greenhouse gas emissions. The following evaluation will consider whether the proposed objective with the changes sought by the submitters is the most appropriate way to achieve the purpose of the RMA.
- 8.4.35 Evaluating the submission point of ChristchurchNZ, the addition of high density ‘walkable’ residential neighbourhoods to Objective 15.2.3(b) would be consistent with the consolidated urban form sought by the CRPS and contribute to a well-functioning urban environment as defined in Policy 1(c) of the NPS-UD to have good accessibility for all people between a range of activities. I consider the addition of ‘walkable’ to the objective would be the most appropriate way to achieve the purpose of the act.
- 8.4.36 With regard to the submission points of Kāinga Ora, the proposed amendment to the title of the objective is noted as a request to increase clarity, however, the Central City is defined in Chapter 2 as that part of the city contained within Bealey, Fitzgerald, Moorhouse, Deans and Harper Avenues. It is my opinion that this is a well understood spatial area to members of the public and the District Plan’s readability is important for professionals and lay people alike. ‘Outside the central city’ is clearer to members of the public than references to individual zones.
- 8.4.37 Kāinga Ora also seek the introduction of “within a 15 min walking distance” rather than the notified words “close to”. In my opinion this is a prescriptive amount of detail for an objective. However, I do appreciate that clarity could be improved and propose reference to “within a walking catchment” rather than “close to”. The proposed changes include a transition of the Mixed Use Zone on Mandeville Street to a high density residential neighbourhood and thus included in the comprehensive housing precinct. I therefore recommend the objective is amended to:
- *“Mixed use zones located **within a walking catchment** to the City Centre Zone and **Town Centre Zone** transition into high density residential neighbourhoods...”*
- 8.4.38 I consider my recommended changes would be the most appropriate way to give effect to the NPS-UD, CRPS and achieve the purpose of the Act. It is also noted that as notified, policy 15.2.3.2 defines what ‘within a walking catchment’ means, being a 15 min walking distance ((15.2.3.2(b)), I recommended changes to Policy 15.2.3.2 in section 8.4.43 – 8.4.58 of this report to give effect to the recommended Objective 15.2.3.
- 8.4.39 Kāinga Ora also seek the deletion of reference to supporting a reduction in greenhouse gas emissions, however this directly responds to Objective 8 and Policy 1 of the NPS-UD that note:

- *Objective 8 - New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change.*
- *Policy 1(e) - support reductions in greenhouse gas emissions.*

8.4.40 I consider it appropriate to include in Objective 15.2.3 reference to supporting reductions in greenhouse gas emissions as it is consistent with the NPS-UD direction to contribute to well-functioning urban environments.

8.4.41 I recommend the submission points from Kāinga Ora be rejected. I consider the notified objective with the addition of 'walkable' to (a) and 'within a walking catchment' and 'Town Centre Zone' to (b) would be the most appropriate way to achieve the purpose of the act.

Recommendation

8.4.42 Accept in part the points of Kāinga Ora, ChristchurchNZ, Carter Group, The Catholic Diocese of Christchurch, RVA, and Canterbury Regional Council.

S32AA Evaluation

Benefits	Appropriateness in achieving the objectives/ higher order document directions
<p>Environmental:</p> <p>Contributes to a well-functioning urban environment by enabling a variety of housing types.</p> <p>Reduces greenhouse gas emissions by providing higher density development in close location to employment centres.</p>	<p>Efficiency:</p> <p>Enables the area to have consistent height with the adjoining High Density Residential Zone. Provides a tailored approach that effectively implements NPS-UD Policy 3(d) in terms of enabling greater height and density commensurate to commercial and community services.</p> <p>Effectiveness:</p> <p>Enables Mixed Use Zones within a walking catchment of Riccarton Town Centre to transition to high density residential and also maintains their current activities while they transition.</p>
<p>Economic:</p> <p>Enables greater choice of activity for Mixed Use Zones in walking catchment of Riccarton Town Centre, and offsets any household shortfall caused by the Airport Noise Contour restrictions on intensification in other parts of the city.</p>	
<p>Social: Nil</p>	
<p>Cultural: Nil</p>	

Costs	
Environmental: May result in reverse sensitivity while the area transitions from Mixed Use to High Density Residential	
Economic: May result in reverse sensitivity while the area transitions from Mixed Use to High Density Residential that may impact the productivity of existing businesses in the zone.	
Social: Nil	
Cultural: Nil	
Risk of acting/not acting: No information gaps have been identified that impact on the risk of acting or not acting in relation to the change proposed.	
Recommendation: This option is recommended as it is considered to be the most appropriate way to achieve the objectives of the CDP and give effect to the CRPS and NPS-UD.	

Policy 15.2.3.2 Mixed Use Areas outside the central city

Sub. No.	Submitter name	Summary of relief sought	Recommendation
689.56	Canterbury Regional Council	[Retain Policy as notified]	Accept in part

760.2	ChristchurchNZ	<p>Amend as follows:...</p> <p>(b) Support mixed use zones located within a 15minute walking distance of the City Centre Zone to transition into high quality <u>walkable</u> residential neighbourhoods by:.....</p> <p>(iv) encouraging...</p> <p>(v) <u>limiting new high trip generating activities</u>;and_</p> <p><u>(vi) promoting a network of safe, convenient and attractive pedestrian and cycle connections within the zone and to adjoining neighbourhoods.</u></p>	Accept in part
814.183	Carter Group	Support Policy 15.2.3.2. Retain as notified.	Accept in part
823.149	The Catholic Diocese of Christchurch	Support Policy 15.2.3.2 as notified	Accept in part
780.19	Josie Schroder	Amend Policy 15.2.2.2 to limit high trip generating activities, and to require the protection and provision of land for new pedestrian/cycle/green infrastructure/road links.	Reject

834.242	Kāinga Ora	<p>Amend as follows:</p> <p>(a) 15.2.3.2 Policy – Mixed use areas outside the central city <u>(except the Central City Mixed Use and Central City Mixed Use(South) Zones)</u> a. Recognise the existing nature, scale and extent of retail activities and offices <u>in mixed use zones outside the central city in Addington, New Brighton, off Mandeville Street and adjoining Blenheim Road,</u> while limiting their future growth and development to ensure commercial activity in the City is focussed within the network of commercial centres.</p> <p><u>b. Support mixed use zones at Sydenham, Addington, off Mandeville Street, and Philipstown located within a 15 minute walking distance of the City Centre Zone,</u> to transition into high <u>good</u> quality residential neighbourhoods by:</p> <p>ii. ensuring that the location, form and layout of residential development supports the objective of reducing greenhouse gas emissions and provides for greater housing diversity including alternative housing models;</p> <p>iii. requiring developments to achieve a <u>high good</u> standard of on-site residential amenity to offset and improve the current low amenity industrial environment and mitigate potential conflicts between uses;</p> <p>iv. <u>encourage small-scale building conversions to residential use where they support sustainable re-</u></p>	Accept in part
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		<p>use and provide <u>high good</u> quality living space. and contribute to the visual interest of the area.</p> <p>Delete c and d.</p>	
811	RVA	<p>The RVA seeks to amend Policy 15.2.3.2 as follows to remove provisions that have the potential to refine / limit the intensification provisions of the Enabling Housing Act:</p> <p>Policy 15.2.3.2</p> <p>a. ...</p> <p>b. Support mixed use zones located within a 15 minute walking distance of the City Centre Zone, to transition into high quality residential neighbourhoods by:</p> <p>i. ...</p> <p>ii. ...</p> <p>iii. <u>Encouraging</u> developments to achieve a high standard of on-site residential amenity to offset and improve the current low amenity industrial environment and mitigate potential conflicts between uses;</p>	Reject
248	Annex Developments	<p>add a new clause to proposed policy 15.2.3.2 as follows:</p> <p><u>e. To encourage the redevelopment of areas located within a Brownfield Overlay on the planning maps to allow a mix of commercial and residential activities.</u></p>	Reject

- 8.4.43 Submitters ChristchurchNZ (760) and Josie Schroder (780) seek changes to Policy 15.2.3.2 to include policies limiting new high trip generating activities and promoting pedestrian and cycle connectivity within the zone. In introducing a policy that seeks a restriction on new high trip generating activities I refer to the *Waikanae* case and the potential limitations of an Intensification Planning Instrument reducing pre-existing development enablement.
- 8.4.44 In considering the appropriateness of the sought change, proposed Objective 15.2.3(b) directs that Mixed Use Zones within walking catchments transition to high density residential neighbourhoods, and Objective 15.2.3(a) recognizes the existing nature, scale and extent of commercial activity within Mixed Use Zone. Commercial activity within the Mixed Use Zone includes office activities which are captured by Rule 7.4.10 of the Transport Chapter and requires resource consent for high trip generating activities. Introducing the change would require an associated built form rule and in my opinion, this would be inconsistent with Objective 3.3.2 to reduce prescriptiveness in the District Plan when rules on this matter already exist in 7.4.10. The alternative would be to amend rule 7.4.10 but limiting high trip generating activities beyond the status quo would also not be appropriate in the context of Objective 3.3.2 and could be achieved by alternative methods. In my opinion the additions to policy 15.2.3.2 seeking to limit high trip generating activities within the Mixed Use Zone would not be the most appropriate way to achieve the objectives of the zone and further evaluation of alternatives would be required to be satisfied that it would not impinge on the status quo.
- 8.4.45 ChristchurchNZ also seek the introduction of “promoting a network of safe, convenient and attractive pedestrian and cycle connections within the zone and to adjoining neighbourhoods” to Policy 15.2.3.2 (b). In evaluating the appropriateness of this change, proposed Objective 15.2.3 directs “Mixed use zones located close to the City Centre Zone transition into high density residential neighbourhoods that contribute to an improved diversity of housing type, tenure and affordability and support a reduction in greenhouse gas emissions.” Policy 6.3.2(3) of the CRPS directs “the provision of efficient and safe high quality, barrier free, multimodal connections within a development, to surrounding areas, and to local facilities and services, with emphasis at a local level placed on walking, cycling and public transport as more sustainable forms of transport”. The NPS-UD in Policy 1(c) considers accessibility as an aspect contributing to a well-functioning urban environment.
- 8.4.46 Overall I consider the additions to Policy 15.2.3.2(b) regarding “promoting a network of safe, convenient and attractive pedestrian and cycle connections within the zone and to adjoining neighbourhoods” would be most appropriate way to achieve the objectives of the zone, the CRPS and the NPS-UD.
- 8.4.47 Submitters Kāinga Ora seek to change the title of the policy, the extent of Mixed Use Zone, removal of references to greenhouse gas emissions, to the reference to ‘high’ quality of development being replaced with ‘good’, and deleting policy 15.2.3.2(c) and 15.2.3.2(d).

- 8.4.48 With regard to the title of the policy, I have evaluated this change above in 8.5.37, recommending that the request be rejected, for the same reasons I recommend that this submission point regarding policy 15.2.3.2(b) would not be the most appropriate way to achieve the objective 15.2.3 and higher order direction.
- 8.4.49 Within the context of Policy 15.2.3.2(a) and 15.2.3.2(b), the submission from Kāinga Ora seeks that Sydenham, Addington, Mandeville Street (Riccarton), and Phillipstown are specifically referred to as transitioning to high density neighbourhoods rather than the notified wording '15 minute walking distance of the CCZ'.
- 8.4.50 Sydenham and Phillipstown are located within the walkable catchment of the CCZ and as such are required by NPS-UD policy 3(c) to be enabled to at least 6 stories. However, Mandeville Street (Riccarton) and Addington Mixed Use Zones are not within a 15 minute walking catchment of the CCZ.
- 8.4.51 The recommended version of Objective 15.2.3 outlines that Mixed Use Zones within a walking catchment of City Centre Zone and Town Centre Zone are to transition to high density residential. The commercial centre in Addington is a Local Centre and discussed above in 8.2 is not a centre warranting a commensurate height and density response any greater than other local centres. I therefore recommend accepting in part the request of Kāinga Ora, rather than utilizing a '15 min walking distance' qualifier. I acknowledge that identifying locales would provide clarity, but I only consider Sydenham, Phillipstown and Mandeville Street appropriate for identification due to the framing of the recommended Objective 15.2.3. It is my opinion that the proposed policy reference to the individual Mixed Use Zone areas gives effect to the 'within a walking catchment to City Centre Zone and Town Centre' reference in Objective 15.2.3 and is the most appropriate way to achieve Objective 15.2.3.
- 8.4.52 With regard to the relief sought by Kāinga Ora to remove reference to greenhouse gas emissions, as I have noted in sections 8.4.39 and 8.4.40 I consider it appropriate to retain reference to greenhouse gas emissions in the policy framework as it gives direct effect to policy 1 of the NPS-UD. I consider that at a minimum, achieving the urban form of a high density residential neighbourhood would reduce greenhouse gas emissions. The notified policy with reference to greenhouse gas emissions is the most appropriate way to achieve objective 15.2.3.
- 8.4.53 Regarding the request to delete notified Policies 15.2.3.2(c) and 15.2.3.2(d), the policies seek to ensure mid-block connections in Sydenham and Lancaster Park. I rely on the evidence of Ms Williams that discusses the importance of mid-block connections in achieving the outcomes of Objective 15.2.3. I do acknowledge that the avoid direction in the policies and subsequent Non-Complying activity status is a blunt tool and does not necessarily encourage nor support high density residential development on the sites subject to the control. However, I consider a mechanism of some variety needs to be implemented to ensure the transition to high density

residential neighbourhoods is achieved. I recommend the following change to Policy 15.2.3.2(c) which in my opinion will encourage the transition to high density residential while not unnecessarily prohibiting development within sites identified in Appendix 15.15.12 and 15.15.13.

- *Avoid Restrict Comprehensive Residential Development of sites ~~within the Comprehensive Housing Precinct~~ that are identified in Appendix 15.15.12 and 15.15.13 unless to ensure the relevant shared pedestrian/cycleway, greenway or road connection is provided.*

8.4.54 I accept in part the submission point of Kāinga Ora, in my opinion the recommended policy 15.2.3.2(c) and notified 15.2.3.2(d) would be the most appropriate way to achieve Objective 15.2.3

8.4.55 The removal of 'high' is also sought throughout 15.2.3.2(b) related to the standard/quality of development in the Mixed Use Zone. 'High' is sought to be replaced by 'good'. The evidence of Ms Williams explains that in her opinion 'high' is a more appropriate threshold than 'good' for the comprehensive housing precinct within the Mixed Use Zones. In her opinion three key factors make up a high-quality environment, being privacy, access to sunlight for most of the year and a communal open space. Ms Williams also outlines that as household density increases so must the quality of onsite amenity. Considering the planning framework, CRPS Policy 6.3.2 directs that business and residential development is to give effect to the principles of good urban design contained in the NZ Urban Design Protocol 2005, in contrast Objective 3.3.8 (3.3.7 operative) of the CDP directs a high-quality urban environment at strategic level. Within the CDP both 'high' and 'good' urban design are outlined as an outcome. Objective 14.2.5 (operative 14.2.4) of the residential zone directs "high quality, sustainable, residential neighbourhood which are well designed to reflect the planned urban character and the Ngāi Tahu heritage of Ōtautahi", in contrast objective 16.2.2 of the industrial zone directs to enable brownfield redevelopment, and the associated policy 16.2.2.2(c)(iii) outlines brownfield redevelopment proposals are to achieve good quality urban design. In my opinion, the intent of the zone plays a part in determining the appropriate level of urban design required. Residential zones are intended to provide pleasant living environments for people, meanwhile industrial zones, while enabling brownfield redevelopment are still intended to provide for industrial activities and their adverse effects, as is outlined in objective 16.2.3(a) of the chapter.

8.4.56 Evaluating the most appropriate way to achieve the objectives and the purpose of the Act, I note that Mixed Use Zones within a walkable catchment of the CCZ and TCZs are intended to transition to high density residential, this differs from other commercial or industrial zones which while enabling of residential activity, still maintain the purpose of their zone as business zones and are appropriately designed to manage those associated effects. In my opinion 'high' quality rather than 'good' quality would be a more appropriate qualifier in the comprehensive housing precinct Mixed Use Zone areas, giving weight to the intended transition to residential rather than a mixed activity outcome enabled elsewhere in the city.

- 8.4.57 The submission point of Annex Developments seeking a new clause e) with reference to the brownfield overlay is recommended to be rejected. The application of the brownfield overlay to the Tannery site is a result of a mapping error, the Tannery site being zoned Mixed Use in the notified plan change, which enables residential development and recognizes existing commercial activity.
- 8.4.58 With regard to that part of the same block zoned Industrial and where a brownfield overlay applies, brownfield redevelopment is enabled in the Industrial Chapter as a discretionary activity in 16.4.1.4, with associated policy pathway in 16.2.2.2. In the context of that part of the block zoned industrial, it would not be appropriate to amend Policy 15.2.3.2, having regard to the existing policy framework in chapter 16. I recommend the most appropriate way to achieve the objectives of the commercial chapter is to reject the request for a similar brownfield overlay policy framework.
- 8.4.59 Following consideration of submissions, I also recommend to reinstate operative Policy 15.2.3.2(a) so it reads “Recognise the existing nature, scale and extent of retail activities and offices ***in Addington, New Brighton, off Mandeville Street and adjoining Blenheim Road***, while limiting their future growth and development to ensure commercial activity in the City is focused within the network of commercial centres.” PC 14 as notified resulted in no policy framework for Mixed use zones beyond a walkable catchment, such as Addington, Blenheim Road, New Brighton and Mandeville Street, I consider the operative policy 15.2.3.2(a) the most appropriate way to achieve the objectives of the CDP.

Recommendations

- 8.4.60 Accept in part the submission points of ChristchurchNZ and Kāinga Ora.

S32AA Evaluation

Benefits	Appropriateness in achieving the objectives/ higher order document directions
Environmental: Contributes to a well-functioning urban environment by enabling a variety of housing types. Achieves an urban form that implements the strategic objectives of the plan, while minimising adverse impacts, in particular on the Central City Economic:	Efficiency: Enables the site to have consistent height with the adjoining High Density Residential Zone. Effectiveness:

<p>Enables greater choice of activity for Mixed Use Zones in walking catchment of Riccarton Town Centre, and Phillipstown within a walking catchment of the CCZ, while still enabling industrial activity.</p> <p>Enables a range of residential, retail and office activity that supports local employment markets.</p>	<p>Enables Mixed Use Zones within a walking catchment of Riccarton Town Centre to transition to high density residential and also maintain their current activities while they transition. The option is the most appropriate for implementing Objective 15.2.3 as recommended to be amended.</p>
<p>Social: Nil</p>	
<p>Cultural: Nil</p>	
<p>Costs</p>	
<p>Environmental:</p> <p>May result in reverse sensitivity while the area transitions from Mixed Use to High Density Residential</p>	
<p>Economic:</p> <p>May result in reverse sensitivity Will result in reverse sensitivity while the area transitions from Mixed Use to High Density Residential that may impact the productivity of existing businesses in the zone.</p>	
<p>Social: Nil</p>	
<p>Cultural: Nil</p>	
<p>Risk of acting/not acting:</p> <p>No information gaps have been identified that impact on the risk of acting or not acting in relation to the change proposed</p>	
<p>Recommendation:</p> <p>This option is recommended as it is considered to be the most appropriate way to achieve the objectives of the CRPS, CDP and NPS-UD.</p>	

Objective 15.2.4– Urban Form, Scale and Design Outcomes

Sub. No.	Submitter name	Summary of relief sought	Recommendation
212.16	The Fuel Companies - BP Oil, Z Energy and Mobil Oil	Retain as notified	Accept in part
689.58	Canterbury Regional Council	[Retain Objective as notified]	Accept in part
760.3	ChristchurchNZ	Retain as notified.	Accept in part
780.20	Josie Schroder	Retain Objective 15.2.4 as notified.	Accept in part
814.184	Carter Group	Amend clause (a)(iv) and (vi) as follows: iv. manages adverse effects (<u>including reverse sensitivity effects</u>) on the <u>site and surrounding environment</u> , including effects that contribute to climate change ; and... vi. <u>Promotes a zoning and development framework that sSupports a reduction in greenhouse gas emissions.</u>	Accept
823.150	The Catholic Diocese of Christchurch	Amend clause (a)(iv) and (vi) as follows: iv. manages adverse effects (<u>including reverse sensitivity effects</u>) on the <u>site and surrounding environment</u> , including effects that contribute to climate change ; and... vi. <u>Promotes a zoning and development framework that sSupports a reduction in greenhouse gas emissions.</u>	Accept
834.243	Kāinga Ora	Retain the objective as notified.	Accept in part
842.49	Fire and Emergency	Retain 15.2.4-Objective - Urban form, scale and design outcomes as notified.	Accept in part
855.31	Lendlease Limited	Amend Objective 15.2.4 to include reference to the "Metropolitan Centre Zone".	Reject

811	RVA	<p><i>Amend Objective 15.2.4 to recognise that environments change and develop over time:</i></p> <p>15.2.4 Objective – Urban form, scale and design outcomes</p> <p>a. A scale, form and design of development that is consistent with the role of a centre and its contribution to city form, and the intended built form outcomes for mixed use zones, and which:</p> <p>i. ...</p> <p>ii. contributes to an urban environment that is visually attractive, safe, easy to orientate, conveniently accessible, and responds positively to anticipated local character and context, <u>recognising that urban environments develop and change over time;</u></p> <p>iii. recognises the functional and operational requirements of activities and the anticipated <u>and changing</u> built form;</p>	Accept
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8.4.61 Submitters Carter Group (814) and The Catholic Diocese of Christchurch (823) seek amendments to Objective 15.2.4, deleting reference to ‘effects that contribute to climate change’ in 15.2.4(iv) and the addition of ‘**promotes a zoning and development framework that**’ supports a reduction in greenhouse gas emissions to 15.2.4(vi). Evaluating whether these changes are the most appropriate way to give effect to the purpose of the act and higher order documents, the NPS-UD in Objective 8 outlines that urban environments are resilient to the current and future effects of climate change, in addition to supporting reductions in greenhouse gas emissions. Section 7(e) of the RMA states that in achieving the purpose of the act to have particular regard to the effects of climate change.

8.4.62 I note that adverse effects contributing to climate change at a site are difficult to assess and set a rule framework for. However at a minimum I still consider it appropriate to consider the effects that contribute to climate change at an area level and that the appropriate stage in the process to consider these effects is a zone change or through preparation of an ODP rather than introducing it into the policy framework for consenting. I also note that the objective seeks a ‘scale, form and design of development’ which in my opinion relate to built form outcomes rather than the appropriateness of an activity or alleviating adverse effects through zoning approaches. Balancing the reality of the effects-based rule frameworks alongside s7 of the act, it is my view that the most appropriate way to achieve the purpose of the act is to delete “including effects that contribute to climate change” from objective 15.2.4(a)(iv) and add climate change consideration to Objective 15.2.4(a)(vi).

- 8.4.63 The other relief to consider is the addition of **'promotes a zoning and development framework that** supports a reduction in greenhouse gas emissions to 15.2.4(vi). As noted above, objective 8 of the NPS-UD directs the reduction in greenhouse gas emissions, which is best achieved in an RMA process through encouraging a consolidated urban form. I agree with the submitter that this would be the most appropriate way to achieve the purpose of the act. In addition I recommend that positive climate change effects are also considered in Objective 15.2.4(a)(vi), being: **'promotes a zoning and development framework that** supports a reduction in greenhouse gas emissions and **adverse climate change effects.'**
- 8.4.64 With regard to the submission point of RVA (811) to add "**recognising that urban environments develop and change over time**" to 15.2.4(a)(ii), I agree with the submitter that the change would be the most appropriate way to achieve the purpose of the act as they reflect policy 6(b) of the NPS-UD.
- 8.4.65 I have considered the request of Lendlease Limited (855.28) to introduce a MCZ in Sections 8.1.1 - 8.1.33 recommending the request be declined, for the same reasons I recommended rejecting the request in terms of Objective 15.2.4.

Recommendations

- 8.4.66 Accept in part the relief sought by Carter Group (814) and The Catholic Diocese of Christchurch (823), accept the relief sought by RVA(811), and reject the submission point of Lendlease (855).

S32AA Evaluation

Benefits	Appropriateness in achieving the objectives/ higher order document directions
Environmental: Contributes to a well-functioning urban environment by ensuring climate change and greenhouse gases are considered and contribute to achieving a consolidated urban form.	Efficiency: Enables the consideration of greenhouse gases and climate change effects.
Economic: Nil	Effectiveness:
Social: Recognises in the planning framework that the environment changes over time.	Achieves s7 and the purpose of the RMA by having particular regard to climate change effects, and NPS-UD Objective 8 seeks that urban environments support reductions in

Cultural: Nil	greenhouse gas emissions, and notes that a reduction in greenhouse gases contributes to a well-functioning urban environment in Policy 1.
Costs	
Environmental: Nil	
Economic: Nil	
Social: Nil	
Cultural: Nil	
Risk of acting/not acting:	
Quantification of the effects of development on climate change has not been undertaken, however it is noted that higher density development close to employment centres will reduce travel times and support uptake in public transport, both of which reduce the use of fossil fuels and have a positive impact on reducing reliance on fossil fuels.	
Recommendation:	
This option is recommended as it is considered to be the most appropriate way to achieve the objectives of the CRPS, CDP and NPS-UD.	

Policy 15.2.4.1 (b)(ii) and (b)(iv)

Sub. No.	Submitter name	Summary of relief sought	Recommendation
705.16	Foodstuffs	Amend one or all of 15.2.4 associated policies to recognise that supermarkets may be located in and around centres, but have operational and functional requirements which limit their scale, form of development (to less than that anticipated)	Reject
689.59	Canterbury Regional Council	[Retain Policy as notified]	Accept
760.4	ChristchurchNZ	Retain b. as notified	Accept
780.21	Josie Schroder	Retain Policy 15.2.4.1 as notified.	Accept
814.185	Carter Group	Delete the amendments to clause (a) of Policy 15.2.4.1. Adopt the amendments to clause (b) of the policy.	Accept

823.151	The Catholic Diocese of Christchurch	Delete the amendments to clause (a) of the policy. Adopt the amendments to clause (b) of the policy.	Accept
834.244	Kāinga Ora	Amend Clause (b) as follows: b. The scale and form of development in <u>other commercial</u> centres shall: i. reflect the context, character and the anticipated scale of the zone and centre’s function by: ii. providing for the tallest buildings and greatest scale of development in the city centre to reinforce its primacy for Greater Christchurch and enable as much development capacity as possible to maximise the benefits of intensification; Retain the remaining parts of clause (b) as notified.	Accept
855.32	Lendlease Limited	Amend Policy 15.2.4.1(b) to reference the “Metropolitan Centre Zone”	Reject

8.4.67 The aspects of this policy under clause (a) are covered in the s42A reporting of Mr Willis and Ms Gardiner who address the provisions for the Central City. The relief sought by Lendlease to introduce a MCZ has been addressed in Sections 8.2.1-8.2.46 consider the relief for introduction of a MCZ and I recommend the request in respect of Policy 15.2.4.1 be declined for the same reasons. The other submission points support the proposed PC 14 changes to the policy as they relate to commercial centres and mixed use zones outside the Central City and as such I accept those submission points.

8.4.68 Regarding the submission point of Foodstuffs, I consider Policy 15.2.4.2(b), which outlines to “Recognise the scale, form and design of the existing anticipated built form within a site and the immediately surrounding area and the functional and operational requirements of activities”, along with the permitted status of supermarkets within centres, enables the operational and functional requirements which they seek.

Recommendation

8.4.69 Retain the aspects of the policy that relate to centres and the mixed use zone.

Policy 15.2.4.2 Design of new development

Sub. No.	Submitter name	Summary of relief sought	Recommendation
689.60	Canterbury Regional Council	[Retain Policy as notified]	Accept in part
212.17	The Fuel Companies - BP Oil, Z Energy and Mobil Oil (joint submission)	Retain as notified	Accept in part

740.8	Woolworths	<p>Amend Policy 15.2.4.2(a)</p> <p>a. Require new development to be well designed and laid out by:</p> <p>viii. achieving a visually attractive setting when viewed from the street and other public spaces, that embodies a human scale and fine grain, while managing effects on adjoining environments; and...</p> <p>x. increasing the prominence of buildings on street corners;</p> <p>xi. ensuring that the design of development mitigates the potential for adverse effects such as heat islands, heat reflection or refraction through glazing, and wind related effects;</p> <p>xii. ensuring that the upper floors (including roof form and associated mechanical plant) are well modulated and articulated to provide visual interest to the building when viewed from beyond the Central City or from adjacent buildings above; and</p>	Accept in part
760.5	ChristchurchNZ	Retain as notified	Accept in part
780.22	Josie Schroder	Retain Policy 15.2.4.2 as notified.	Accept in part
814.186	Carter Group	<p>Amend Policy 15.2.4.2 clause (a) as follows:</p> <p>a. Require new development to be well-designed and laid out by:...</p> <p>viii. achieving a visually appealing attractive setting when viewed from the street and other public spaces, that embodies a human scale and fine grain, while managing effects on adjoining environments;</p> <p>[delete proposed clauses x-xv.]</p> <p>Retain the balance of the policy and amendments as proposed.</p>	Accept in part

823.152	The Catholic Diocese of Christchurch	Amend Policy 15.2.4.2 clause (a) as follows: a. Require new development to be well-designed and laid out by: viii. achieving a visually appealing attractive setting when viewed from the street and other public spaces, that embodies a human scale and fine grain , while managing effects on adjoining environments; [delete proposed clauses x-xv.] Retain the balance of the policy and amendments as proposed.	Accept in part
834.245	Kāinga Ora	Delete all inclusions introduced and retain existing Operative Plan Policy 15.2.4.2.	Reject
811	RVA	The RVA seeks to amend Policy 15.2.4.2 to reflect the NPS-UD and to remove provisions that unduly restrict the development of a diversity of housing typologies, including retirement villages.	Reject

8.4.70 The s42A reporting of Mr Willis and Ms Gardiner address the provisions for the Central City. The policies in contention that are specific to my area of reporting are:

- **15.2.4.2(a)(i)** - *encouraging pedestrian activity and amenity along streets and in adjoining public spaces, to a degree that is appropriate to the location and function of the road street or space, and in Mixed Use Zones, to recognise and support the transition to pedestrian-friendly street environments;*
- *15.2.4.2(a)(xiv) - recognising that mixed use zones are in transition and require a high quality of residential development to be achieved to mitigate and offset the industrial nature and potential conflicts between uses within the zone; and*
- *15.2.4.2(a)(xv) - for larger scale developments in Mixed Use Zones, provide for future access lanes, greenways and mid-block pedestrian connections, that will contribute to a finer grain block structure that supports walking.*

8.4.71 Submitters, Kāinga Ora, The Catholic Diocese of Christchurch, Carter Group, and RVA seek Policies 15.2.4.2(a)(i), 15.2.4.2(a)(xiv) and 15.2.4.2(a)(xv) to be deleted.

8.4.72 Policy 15.2.4.2(a)(i) implements Objective 15.2.3, which anticipates that mixed use zones transition into high density residential neighbourhoods that support a reduction in greenhouse gas emissions, and Objective 15.2.4, which directs a scale, form and design of development that is consistent with the intended built form outcomes for mixed use zones. The intended outcome for

mixed use zones is a transition towards high density residential activity. The evidence of Ms Williams considers it appropriate when enabling high density residential built form to also support pedestrian active travel. I note the CRPS and NPS-UD provide direction on this matter also. Policy 6.3.2(3) of the CRPS seeks provision of efficient and safe high-quality, barrier free, multimodal connections within a development, to surrounding areas, and to local facilities and services, with emphasis at a local level placed on walking. Policy 1(c) of the NPS-UD also notes that accessibility for all people by way of active transport contributes to achieving a well-functioning urban environment. Considering the above and that Policy 15.2.4.2(a)(i) seeks to support the transition of Mixed Use Zones to pedestrian-friendly street environments, my view is that the notified policy is the most appropriate way to achieve the objectives of the CDP, CRPS and NPS-UD.

8.4.73 In terms of Policy 15.2.4.2(a)(xiv) which seeks to ensure a high quality of development is achieved, I have considered the relief of submitters to delete the clause and implications of changing ‘high’ to ‘good’ quality urban design. Sections 8.4.55 – 8.4.56 of this s42A report address this and my view is consistent in terms of policy 15.2.4.2(a)(xiv) that high-quality is appropriate and would be the most appropriate way to give effect to the objective.

8.4.74 Policy 15.2.4.2(a)(xv) implements Objective 15.2.4, which directs a scale, form and design of development that is consistent with the intended built form outcomes for mixed use zones. The intended outcome for mixed use zones is a transition towards high density residential as stated in Objective 15.2.3. However, Policy 15.2.4.1(b)(iv) also outlines that for comprehensive residential development in the Mixed Use Zone, a high density scale of development is sought that contributes to a perimeter block urban form. In order to achieve a perimeter block urban form, the evidence of Ms Williams discusses the importance of breaking up the large blocks in Sydenham and Lancaster Park and which will contribute to achieving the outcome sought by Objective 15.2.3. In this regard, I consider that that the notified policy is the most appropriate way to achieve the objectives of the CDP, CRPS and NPS-UD.

Recommendation

8.4.75 Policies, 15.2.4.2(a)(i), 15.2.4.2(a)(xiv) and 15.2.4.2(a)(xv) are retained as notified.

Policy 15.2.4.6 Strategic Infrastructure

Sub. No.	Submitter name	Summary of relief sought	Recommendation
834.246	Kāinga Ora	Amend policy 15.2.4.6 [to delete "within the 50 dB Ldn Air Noise Contour"].	Reject

8.4.76 This policy was established through PC 5B, I am not aware of any evidence that this policy is no longer appropriate. The policy also relates to the Airport Noise Contour qualifying matter which is proposed through PC 14.

Recommendations

8.4.77 Reject the submission.

New Commercial Objectives and Policy Sought

Sub. No.	Submitter name	Summary of relief sought	Recommendation
811	RVA	<p>The RVA seeks that a new objective is inserted in the Commercial Zones objectives that provides for the housing and care needs of the ageing population.</p> <p><u>Objective 15.2.12 Ageing population</u></p> <p><u>Provide a diverse range of housing and care options that are suitable for the particular needs and characteristics of older persons such as retirement villages.</u></p> <p>Insert the following new policy:</p>	Reject

		<p><u>New Policy – Housing in Commercial Zones</u></p> <p><u>Provide for retirement villages in commercial zones (other than the Commercial Office Zone, the Commercial Retail Park Zone and within the Lyttelton Port Influences Overlay Area in the Commercial Banks Peninsula Zone), and recognise that retirement villages can provide for higher densities than other forms of residential developments, because they provide for shared spaces, services and facilities, and enable affordability and the efficient provision of assisted living and care services.</u></p> <p><u>Advice Note: All other objectives and policies relevant to residential activity in commercial zones also apply to retirement villages.</u></p> <p>Insert the following new policy:</p> <p><u>New Policy Role of density standards</u></p> <p><u>Enable the density standards to be utilised as a baseline for the assessment of the effects of developments other than in areas where the Plan provides location-specific density standards.</u></p> <p>Insert the following new policy:</p> <p><u>New Policy Larger sites</u></p> <p><u>Recognise the intensification opportunities provided by larger sites within the Commercial Zones by providing for more efficient use of those sites.</u></p>	
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8.4.78 In evaluating the requests of RVA to include new objectives and policies within the Commercial Chapter, I highlight the scope of PC 14 is to enable heights and density within walking catchments of centres, not the addition of new activities. Ultimately the objective and policy framework seeks to introduce an activity framework within the commercial chapter that enables retirement villages as a permitted activity.

8.4.79 Regardless of scope, by enabling retirement villages in commercial centres the key consideration in my opinion is the potential effect this has on space for commercial activities, in particular on

ground floor activities within centres. Locations for new commercial activity are limited due to the direction of the CRPS and CDP (Objective 3.3.11(b) (operative 3.3.10(b)) that require commercial activity to be focused primarily within existing commercial centres rather than in residential or other zones. As such a scarcity of commercial land exists within the city, and this is a deliberate direction to facilitate a strategic network of strong commercial centres that act as important commercial and community focal points for the benefit of the wider community.

8.4.80 Unlike residential or office development retail development is predominantly only undertaken at ground floor level, further reducing its locational flexibility and strengthening the case for protection of ground floor space for commercial activities. However, CDP Policy 15.2.2.7 provides a pathway for residential activity at ground floor level in certain circumstances, such as where the ground floor residential will not have a significant adverse effect on the commercial viability and function of a centre and it can be demonstrated that there is sufficient capacity in the catchment of the centre to meet demand for commercial activities.

8.4.81 I highlight that residential activity is enabled above ground floor throughout commercial centres and there is a policy pathway that enables ground floor residential in certain circumstances, in addition to the widespread enablement of residential activity in residential zones across the city. In balancing the scarcity and importance of commercial ground floor land in achieving a well-functioning urban environment alongside enabling a variety of homes, I consider that the proposed PC 14 objectives and policies would be the most appropriate way to give effect to the purpose of the act and the Objectives and Policies of the CRPS and NPS-UD.

Recommendation

8.4.82 Reject the submission points.

Chapter 16 – INDUSTRIAL

Industrial General

Sub. No.	Submitter name	Summary of relief sought	Recommendation
445.5	Alison Dockery	Oppose the concentration of high polluting industries in one area.	Reject
481.4	Cindy Gibb	Limit the height of any building in Christchurch to a maximum of 4 storeys.	Reject

8.4.83 With regard to the relief sought by Alison Dockery (submitter 445), Objective 16.2.3 outlines that “Adverse effects of industrial activities and development on the environment are managed to

support the anticipated outcome for the zone while recognising that sites adjoining an industrial zone will not have the same level of amenity anticipated by the Plan as other areas with the same zoning.” The objective notes that industrial activities produce adverse effects on the environment and that the anticipated outcome of the zone is to provide an area for activities of an industrial nature. It is my opinion that industrial activities concentrating in any one spatial area (as opposed to be dispersed through other areas with a mix of uses) is a more appropriate way to achieve the objective of the CDP and purpose of the RMA.

8.4.84 With regard to the request of Cindy Gibb (submitter 481), the industrial General zone permits buildings of 15 m within 20 m of a residential zone under 16.4.2.1(a). Beyond this, there is no height limit in the industrial zone. The recent decision on Waikanae by the Environment Court raises potential issues of scope with the submitters request, as by decreasing building heights to 12-14m, there is an impact on the status quo i.e. operative CDP development rights. Regardless of the scope of the request, I consider the relief sought is the not most appropriate way to achieve the objectives of the CDP as the permitted height is consistent with the functional needs of industrial zones.

Recommendation

8.4.85 Reject the submission points

Objective 16.2.2 Brownfield redevelopment

Sub. No.	Submitter name	Summary of relief sought	Recommendation
904.3	880 Main North Road	A consequential amendment to Objective 16.2.2(a)(iv) is sought, so as to recognise the Brownfield Overlay at North Belfast and ‘Provide for... the Brownfield Overlay at <i>North Belfast</i> ... for medium density residential activities’ respectively	Reject
689.71	Canterbury Regional Council	[Retain Objective 16.2.2 as notified]	Accept

8.4.86 Submitter 880 Main North Road seeks a brownfield overlay be applied to an area of land in North Belfast. The site is currently bare land that is not utilised for urban purposes but is zoned Industrial General. I note that I have assessed the merits of rezoning the site in section 8.6/Appendix 1, noting the purpose of PC 14 in section 8.6.1 and considering that the request may be outside of scope depending on decisions on walking catchments.

8.4.87 In the first instance, Brownfield is defined in the CRPS and CDP as abandoned or underutilised business land, or land no longer required by a requiring authority for a designated purpose. In this circumstance the land is entirely un-utilised and is currently agriculturally grazed, being a greenfield site.

8.4.88 Objective 3.3.8 (Operative 3.3.8) seeks a well-integrated pattern of development and infrastructure, a consolidated urban form, and a high-quality urban environment in Christchurch that 3.3.8(a)(iv) increases the housing development opportunities in the urban area through suitable brownfield areas; and 3.3.8(a)(vi) identifies opportunities for, and supports, the redevelopment of brownfield sites for residential, business or mixed use activities. Objective 16.2.2 states “The recovery and economic growth of the Christchurch District is provided for by enabling residential, mixed-use or commercial redevelopment of appropriate brownfield sites”.

8.4.89 The CDP objectives give effect to CRPS Policy 6.3.8, which seeks the following outcome:

- *“To encourage and provide for the recovery and regeneration of existing brownfield areas through new comprehensive residential, mixed-use or business developments, provided such activities will ensure the safe and efficient functioning of the transport network and will not have significant adverse distributional or urban form effects on the Central City, Key Activity Centres and neighbourhood centres, or give rise to significant reverse sensitivity effects”*

8.4.90 The outcome sought in the objective is that brownfield redevelopment is supported and encouraged, however the land in question is currently not under-utilised or abandoned industrial land, nor is the land located within a walking catchment of a centre. In my opinion the most appropriate way to achieve the purpose of the Act, while giving effect to the higher order documents, is the notified objective.

Recommendation

8.4.91 Reject the submission point of 880 Main North Road (904), accept the submission point of Canterbury Regional Council (689).

Policy 16.2.2.2 Brownfield redevelopment

Sub. No.	Submitter name	Summary of relief sought	Recommendation
242.14	Property Council New Zealand	Support the proposed amendments that seek to introduce Brownfield Overlay in the Industrial General Zone for land close to identified commercial centres that enables residential and mixed-use development.	Accept
663.2	Williams Corporation Limited	Seeks amendments to Policy 16.2.2.2(c)(i) to read as “any redevelopment will not give rise to significant reverse sensitivity effects on existing industrial activities	Accept
689.72	Canterbury Regional Council	[Retain 16.2.2.2 Policy as notified]	Accept in part
904.2	880 Main North Road Limited	Amend policy 16.2.2.2(b) to recognise an additional Brownfield Development site at 874-880 Main Road, North Belfast.	Reject

8.4.92 Submitter William Corporation Limited (663.2) seek amendments to Policy 16.2.2.2(c)(i) to change the criteria regarding reverse sensitivity effects.

8.4.93 Policy 16.2.2.2(c)(i) outlines that “any redevelopment will not give rise to reverse sensitivity effects on existing industrial activities, or other effects, that may hinder or constrain the establishment or ongoing operation or development of industrial activities and strategic infrastructure”.

8.4.94 This contrasts with CRPS Policy 6.3.8 which enables brownfield redeveloped provided the redevelopment “will ensure the safe and efficient functioning of the transport network and will not have significant adverse distributional or urban form effects on the Central City, Key Activity Centres and Neighbourhood Centres, or give rise to significant reverse sensitivity effects”.

8.4.95 Specifically to brownfield redevelopment, CRPS Policy 6.3.8 sets out that brownfield redevelopment should be encouraged and provided for where, amongst other things, “significant” reverse sensitivity effects do not arise. However, Objectives 5.2.1 and 6.2.1 and Policy 6.3.5 provide general direction for the Canterbury Region to avoid, remedy or mitigate adverse effects on regionally significant infrastructure and to ensure that its operation, use and development and upgrading is not adversely affected, and to avoid conflicts between all incompatible activities.

8.2.22

- 8.4.96 In my opinion, the requirements of the CRPS with regard to effects on strategic infrastructure (including reverse sensitivity effects) and avoiding conflicts between incompatible activities (in a brownfield context) are given effect to through District Plan Objective 3.3.12(b), which requires adverse reverse sensitivity effects on strategic infrastructure to be avoided, and Policies 16.2.2.1(a)(iii) and 16.2.2.2(b)(i) of the District Plan which require a brownfield site not to be surrounded by industrial activities, and that a redevelopment proposal will not give rise to any level of reverse sensitivity effects, including on strategic infrastructure. The CRPS direction is also reflected in Policy 16.2.3.2, which sets the overall direction for management of adverse effects in industrial zones, including reverse sensitivity effects (without qualification). However, it is noted that while Policy 16.2.3.2 does not include a threshold for adverse reverse sensitivity effects, this does not preclude one from being included for certain activities where there is higher order support for this (i.e., in the case of brownfield redevelopment through CRPS Policy 6.3.8).
- 8.4.97 Further, Policy 6.3.6 of the CRPS that relates to business land development also requires reverse sensitivity effects and conflicts between incompatible activities to be identified and avoided or mitigated against. However, my opinion is that this policy applies to solely commercial or industrial activities, rather than brownfield redevelopment, and hence the higher benchmark for reverse sensitivity effects. Given the above analysis, it is clear that there are competing demands between in the CRPS with regard to the management of adverse reverse sensitivity effects and brownfield redevelopment that need to be balanced. However, in any case, it is clear from the CRPS framework that any level of adverse effects on strategic infrastructure as a result of brownfield redevelopment should not arise.
- 8.4.98 I recommend that the relief sought can be accepted and clause (b)(i) amended so that brownfield redevelopment should not give rise to significant reverse sensitivity effects on surrounding industrial activities, but continue to not have any level of adverse effects on strategic infrastructure. I do note however, that brownfield redevelopment can occur across the IGZ all over the city through Policy 16.2.2.1. The scope of IPI in non-commercial zones is defined by S77N being to give effect to NPS-UD Policy 3 within walking catchments, depending on the panel's decisions on the extent of walking catchments there may need to be a qualifier introduced to the policy reflecting the spatial scope of PC 14.
- 8.4.99 Regarding the submission of 880 Main North Road Limited (904.2), I consider that the land in question is currently not underutilised or abandoned industrial land, nor is the land located within a walking catchment of a centre . As such the most appropriate way to achieve the objective is the notified policy.

Recommendation

8.4.100 Accept the submission points of William Corporation Limited (663), Property Council New Zealand (242), accept in part the submission point of Canterbury Regional Council (689), and reject the submission point of 880 Main North Road Limited (904).

S32AA Evaluation

Benefits	Appropriateness in achieving the objectives/ higher order document directions
<p>Environmental:</p> <p>Contributes to a well-functioning urban environment by enabling a variety of housing types.</p>	<p>Efficiency: Enables clearer policy pathway for brownfield redevelopment and removes the need to justify that the redevelopment will not cause any reverse sensitivity effects. The significant reverse sensitivity criterion would be consistent with the brownfield policy of the CRPS.</p> <p>Effectiveness: Enables industrial brownfield sites to transition to residential in accordance with the direction of the CRPS.</p>
<p>Economic:</p> <p>Enables greater choice of activity for industrial zones and brownfield overlays in walkable catchments.</p>	
<p>Social: Nil</p>	
<p>Cultural: Nil</p>	
<p>Costs</p>	
<p>Environmental:</p> <p>May result in reverse sensitivity effects while the brownfield overlays transition from industrial activities to residential. However, the criteria in 16.2.2.1 and 16.2.2.2. will mitigate any potential adverse effects.</p>	
<p>Economic: Nil</p>	
<p>Social: Nil</p>	
<p>Cultural: Nil</p>	
<p>Risk of acting/not acting:</p> <p>No information gaps have been identified that impact on the risk of acting or not acting in relation to the change proposed.</p>	

Recommendation:

This option is recommended as it is the most appropriate way to achieve the objectives of the CRPS, CDP and NPS-UD.

8.5 ISSUE 5 – RULES***Commercial Chapter***

Sub. No.	Submitter name	Summary of relief sought	Recommendation
367.10	John Bennett	Require all developments to be assessed by a professionally qualified urban design panel.	Reject
810.16	Regulus Property Investments Limited	[Remove any Qualifying Matters and provisions that do not support] the intensification of urban form to provide for additional development capacity	Reject
810.9	Regulus Property Investments Limited	[Retain provisions that] support the intensification of urban form to provide for additional development capacity, particularly near the city and commercial centres	Reject
812.14	James Barbour	[Remove any Qualifying Matters and provisions that do not support] the intensification of urban form to provide for additional development capacity	Reject
812.5	James Barbour	[Retain provisions that] support the intensification of urban form to provide for additional development capacity, particularly near the city and commercial centres	Reject

253.3	Geordie Shaw	[That P21.i. the minimum glazing standard allows more flexibility in achieving the intent of the policies]	Reject
834.257	Kāinga Ora	Delete all City Spine Transport Corridor activity rules from the suite of commercial zones.	Reject
669.1	Edward Jolly	Seek amendment to Urban Design Certification Pathway and Mana Whenua engagement method to remove requirement from this rule and include "a new section of the plan... that... provide[s] this mechanism... [developed as a separate process by] CCC under its Te Tiriti o Waitangi obligations [with] Mana Whenua to a level negotiated between these parties whom jointly develop associated mechanisms within the plan."	Reject
834.262	Kāinga Ora	Delete erroneous reference to Local Centre in 15.4.2.1(a)(ii)	Accept
886.5	Helen Broughton	Supports proposed setback 15.4.2.4, but would like this to be increased.	Reject
902.22	Waipuna Halswell-Hornby-Riccarton Community Board	[That the minimum setback is increased]	Reject
63.51	Kathleen Crisley	Retain provisions in relation to recession planes in final plan decision.	Reject
881.26	Red Spur Ltd	Supports Redmund Spur Neighbourhood Centre subject to retention of Rule 15.6.1.1. P21 and for clarity change reference in a. from 'local centres' to 'neighbourhood centres'	Accept
814.194	Carter Group	Retain the status quo in respect of Rule 15.5.1.1 P21.	Accept
814.195	Carter Group	Retain the status quo in respect of Rule 15.5.1.3 RD1.	Accept
823.161	The Catholic Diocese of Christchurch	Retain the status quo in respect of Rule 15.5.1.3 RD1.	Accept
697.1	Kate Askew	[S]eek[s] changes to Rule 15.5.2.4 relating to building setback from a Residential zone. [S]eek amendments to this rule so that a new clause b is added requiring a 5m setback from the internal boundary with a Residential Heritage Area.	Reject

814.197	Carter Group	Supports Rule 15.5.2.5. Retain as notified.	Accept
823.163	The Catholic Diocese of Christchurch	Retain the amendments as proposed.	Accept
697.2	Kate Askew	Requested change to [Rule] 15.5.2.7, where... A landscape strip with a minimum width of 3m shall be planted along all boundaries with a residential heritage area and shall include trees that will grow to a minimum height of 6 to 8 metres	Reject
685.13	Canterbury / Westland Branch of Architectural Designers NZ	[Newbuilt form standard] to require buildings to calculate their lifetime carbon footprint and be required to not exceed a sinking lid maximum.	Reject
627.15	Plain and Simple Ltd	[New standards for] accessibility and environmentally responsible design, [such as]: Rain and grey water harvesting / recycling Composting incinerating toilets, alternative energy sources Green roofs Porous hardscaping	Reject
308.3	Tony Pennell	[New built form standard to require] provision for future solar panel installation unless orientation north is impossible.	Reject
705	Foodstuffs	Amend Rule 15.4.1.1 (P2) to include supermarkets as a permitted activity in the Town Centre Zone, and consequential changes to Rules 15.4.1.1 and 15.4.1.4. Amend Rule 15.4.1.1 (P3) to exclude the words "supermarket and"	Accept

8.5.1 Regarding the submitter requests (627 Plain and Simple Ltd; 685 Canterbury Westland Branch of Architectural Designers of New Zealand; 886 Helen Broughton; 907 Halswell Hornby Riccarton Community Board; 308 Tony Pennell) seeking changes to rules that impact on status quo (operative CDP development rights), the recent decision on *Waikanae* by the Environment Court raises potential issues of scope with the submitters requests where the requests impose additional controls or restrictions that affect status quo/pre-existing development rights.

8.5.2 Evaluating the requests of submitters, 308, 627 and 685 that seek amendments to include rules related to carbon footprints, rain harvesting, composting toilets and alternative energy sources, I consider the requested amendments difficult to quantify and set appropriate standards in an

effects framework as required by the RMA. Objective 15.2.4 as recommended (following accepting relief from Carter Group and Catholic Diocese of Christchurch) seeks to promote a zoning framework that supports a reduction in greenhouse gas emissions rather than through built form provisions. I therefore consider the most appropriate way to achieve the objectives of the CDP are to reject the amendments sought.

- 8.5.3 Regarding submitters 886, 902, 697 seeking greater setbacks from residential zones, I note proposed ‘outlook at boundary with a residential zone’ built form standard (15.4.2.4, 15.5.2.5, 15.6.2.4) across the commercial centres requires a setback of 6m (North Boundary), 7m (Eastern and Western Boundary) and 8m (Southern Boundary) from residential zones when the building is greater than 12m, this setback at a minimum is double the operative setback of 3m. I consider this provision is the most appropriate way to achieve the enablement of height while mitigating any potential adverse effects on adjoining residential zones.
- 8.5.4 Regarding submitter 705 (Foodstuffs), I note that the description of the Town Centre Zone in Table 15.1 specifically recognises that supermarkets anchor town centres. The deletion of supermarkets as a permitted activity is therefore an oversight. I consider the most appropriate way to achieve the objectives of the CDP is to accept the relief sought by Foodstuffs.

Recommendation

- 8.5.5 Objective 15.2.5(a) of the CDP Commercial Chapter, outlines “a range of commercial activities, community activities, cultural activities, residential activities and guest visitor accommodation are supported in the Central City to enhance its viability, vitality and the efficiency of resources, while encouraging activities in specific areas by,” defining the City Centre Zone as the ‘focus of retail and office activities’ ((15.2.5(a)(i)) and limiting ‘the extent to which retail activity and offices occur outside the City Centre Zone’ (15.2.5(a)(ii). Objective 15.2.6 defines the role of the City Centre Zone as the principal commercial centre for Christchurch District.
- 8.5.6 Accept the changes requested from Kāinga Ora.

Office Tenancy Limits

Sub. No.	Submitter name	Summary of relief sought	Recommendation
260.4	Scentre (New Zealand) Limited	Office tenancies of any size in Metropolitan Centers (or the larger Town Centers) should be permitted activities. Opposes office activities over 500m2 being excluded as permitted activities as currently proposed in PC14.	Reject

- 8.5.7 Scentre has sought office tenancy limits be removed from rules for the Town Centre Zone, the submitter considers that the provisions restricting office activities in centres to 500sqm per site

does not align with the increased intensification required under the NPS-UD. I acknowledge that the NPS-UD encourages the intensification of commercial centres, however, the terms of policy 3(d) are height and density rather than being on a change of activity. Despite the potential for this submission to be considered outside of scope, I provide the following assessment of merits and how the operative provisions give effect to relevant documents.

- 8.5.8 By way of background, the office tenancy limit provisions that are sought to be removed were introduced in the Christchurch Replacement District Plan. The provisions were considered as the most effective and efficient mechanism to direct the intended role and function of centres and limit the potential adverse effects of dispersed large scale office activity on the regenerating Central City. Overall, tenancy limits were intended to focus demand for offices accommodating larger tenancies in the most appropriate location, being the Central City. The operative provision does not prohibit office activity in centres outside the Central City, rather it enables a scale of office activity appropriate to the function of the centre in the city's commercial hierarchy.
- 8.5.9 Scentre convey in their submission that the existing and future role of the Riccarton centre justifies permitted activity status for offices of any size. While I note the next logical place in the centres hierarchy to accommodate office space is Town Centres, the City Centre Zone will be able to provide for long term growth as sought by Commercial Objective 15.1.1.
- 8.5.10 The planning framework addresses the following matters as it relates to office distribution throughout the city.
- 8.5.11 The objectives above give effect to the CRPS, which provides direction on the matter of primacy of the central city. Objective 6.2.2 (3) has an outcome of "reinforcing the role of Christchurch central business district within the Greater Christchurch area as identified in the Christchurch Central Recovery Plan". In achieving that, Policy 6.3.1 of the CRPS seeks to "avoid development that adversely affects the function and viability of, or public investment in the Central City and Key Activity centre". Policy 6.3.6(3) of chapter 6 is also relevant and "reinforces the role of the Central City, as the City's primary commercial centre, and that of Key Activity Centres".
- 8.5.12 The policy framework referenced above provides two directions; firstly that the Central City is the primary commercial centre, and secondly, that adverse effects on the function of the Central City and KACs are avoided.
- 8.5.13 The economic evidence of Mr Heath has commented on the key role tenancies greater than 500sqm play in the recovery of the City Centre Zone and the potential business dislocation effects that could arise from removing the office tenancy size rule.
- 8.5.14 Overall, direction in the policy framework of the CDP, CRPS and NPS-UD provide that the City Centre Zone is the primary commercial centre in the District, and the evidence of Mr Heath notes the adverse effects that enabling unlimited office tenancy sizes in centres could cause. Applying

those directions to the submitter’s request to delete the operative office tenancy size limit in centres, I find that maintaining the operative provision would be the most appropriate way to give effect to the Objectives of the CDP.

Recommendation

8.5.15 Retain Rule 15.4.1.1 P11 as notified.

Christchurch International Airport

Sub. No.	Submitter name	Summary of relief sought	Recommendation
852.17	Christchurch International Airport Limited (CIAL)	Amend Rule 15.4.1.1 P21 as follows: Residential activity-Activity specific standard: h. The activity shall not be located within the 50 dB Ldn Air Noise Contour or <u>the Airport Noise Influence Area</u> as shown on the planning maps.	Accept
852.19	Christchurch International Airport Limited (CIAL)	Amend Rule 15.4.1.5 NC2 as follows: Sensitive activities within the 50 dB Ldn Air Noise Contour or <u>the Airport Noise Influence Area</u> as defined on the planning maps.	Accept
852.18	Christchurch International Airport Limited	Amend Rule 15.5.1.1 P21 as follows: Residential activity - Activity specific standard: g. The activity shall not be located within the 50dB Ldn Air Noise Contour or <u>the Airport noise Influence Area</u> as shown on the planning maps.	Accept
852.20	Christchurch International Airport Limited	Amend Rule 15.5.1.5 NC2 as follows: Sensitive activities within the 50 dB Ldn Air Noise Contour or <u>the Airport Noise Influence Area</u> as defined on the planning maps.	Accept

8.5.16 With regard to the relief sought by Christchurch International Airport, I note the recent decision on Waikanae by the Environment Court raises potential issues of scope with the submitters request, as by extending the contour and changing the activity status of residential activity in new areas affected from permitted to non-complying, there is an impact on status quo (operative CDP development rights). The implementation of an IPI in non-residential zones is also outlined in s77N, being limited to Policy 3 and to enable heights and density. Regardless of the scope of the request the evidence of Ms Oliver considers the merits of the request and whether the relief sought is the most appropriate way to achieve the objectives of the CDP, concluding that the relief sought is the most appropriate way to achieve the objectives.

Recommendation

8.5.17 Accept the relief sought by the submitter if deemed within scope.

KiwiRail

Sub. No.	Submitter name	Summary of relief sought	Further submissions	Recommendation
829.15	KiwiRail	Seeks amendment to rule 15.4.2.9, 15.5.2.9, 25.6.2.8, 15.6.2.8, 15.7.2.8, 15.8.2.8, 15.9.2.9, 15.10.2.8 to increase the rail corridor setback from 4 to 5m.		Reject

8.5.18 With regard to the relief sought by KiwiRail seeking a change to the rail setback, the recent decision on *Waikanae* by the Environment Court raises potential issues of scope with the submitter's request, as by increasing building setbacks from 4m to 5m, there is an impact on the status quo (operative CDP development rights). The implementation of an IPI in non-residential zones is also outlined in s77N, being limited to Policy 3 and to enable heights and density. Regardless of the scope of the request the evidence of Ms Oliver considers the merits of the request and whether the relief sought is the most appropriate way to achieve the objectives of the CDP, concluding that the relief sought is not the most appropriate way to achieve the objectives.

Recommendation

8.5.19 Reject the request.

Orion

Sub. No.	Submitter name	Summary of relief sought	Recommendation
854.16	Orion New Zealand Limited	Add an additional clause to 15.4.15 NC3 a. and amend clause 'd' as follows: <u>iii within 3m of the outside over head conductor of any 11kV, 400V or 230V electricity distribution line.</u> d. Conductive fences within 5 metres of a National Grid transmission line support structure foundation, 66kV or 33kV, <u>11kV, 400V or 230V</u> electricity distribution line support structure foundation.	Reject

854.17	Orion New Zealand Limited	<p>Add an additional clause to 15.5.1.5 NC3 a. and amend clause 'd' as follows:</p> <p><u>iii within 3m of the outside over head conductor of any 11kV, 400V or 230V electricity distribution line.</u></p> <p>d. Conductive Fences within 5 metres of a National Grid transmission line support structure foundation, 66kV or 33kV, <u>11kV, 400V or 230V</u> electricity distribution line support structure foundation.</p>	Reject
854.18	Orion New Zealand Limited	<p>Add an additional clause to 15.6.1.5 NC3 a. and amend clause 'd' as follows:</p> <p><u>iii within 3m of the outside over head conductor of any 11kV, 400V or 230V electricity distribution line.</u></p> <p>d. Conductive Fences within 5 metres of a National Grid transmission line support structure foundation, 66kV or 33kV, <u>11kV, 400V or 230V</u> electricity distribution line support structure foundation.</p>	Reject
854	Orion New Zealand	<p>Industrial General Zone <u>Rule 16.4.1.5 on-complying activities</u> Add an additional clauses to 'NC1' and amend clause 'd' as follows:</p> <p><u>X Sensitive activities within 3m of the outside overhead conductor of any 11kV, 400V or 230V electricity distribution line.</u></p> <p>d. Conductive Fences within 5 metres of a 66kV National Grid transmission line support structure foundation or 5 metres of a 66kV electricity distribution support structure foundation or, 33kV, 11kV, 400V or 230V electricity distribution line support structure foundation.</p>	Reject

8.5.20 With regard to the relief sought by Orion for a change to the setback from electricity distribution facilities, the recent decision on *Waikanae* by the Environment Court raises potential issues of scope with the submitters request, as by adding additional criteria to the non-complying rule framework in commercial zones, there is an impact on the status quo (operative CDP development rights). The implementation of an IPI in non-residential zones is also outlined in s77N, being Policy 3 and to enable heights and density. Regardless of the scope of the request the evidence of Ms Oliver considers the merits of the request and whether the relief sought is the most appropriate way to achieve the objectives of the CDP, concluding that the relief sought is not the most appropriate way to achieve the objectives.

Recommendation

8.5.21 Reject the submission points

Fire and Emergency

Sub. No.	Submitter name	Summary of relief sought	Further submissions	Recommendation
842.51	Fire and Emergency	Retain 15.4.2.8-Water supply for fire fighting as notified.		Accept
842.54	Fire and Emergency	Retain 15.5.2.8-Water supply for fire fighting as notified.		Accept
842.55	Fire and Emergency	Retain 15.6.2.7-Water supply for fire fighting as notified.		Accept

8.5.22 Note the support for provisions from Fire and Emergency

Recommendation

8.5.23 Accept the notified provisions.

Retirement Villages Association (RVA)

Sub. No.	Submitter name	Summary of relief sought	Recommendation
811	Retirement Villages Association	The RVA seeks that a new rule is inserted in the Town Centre Zone, Local Centre Zone, Neighbourhood Centre Zone that provides for retirement villages as permitted activities.	Reject
811	Retirement Villages Association	The RVA seeks that a new rule is inserted in the Town Centre Zone, Local Centre Zone, Neighbourhood Centre Zone that provides for the construction of retirement villages as a restricted discretionary activity and to include a set of focused matters of discretion that are applicable to retirement villages.	Reject

8.5.24 I have considered the appropriateness of RVA's requests in sections 8.4.73 – 8.4.76, I consider the rules sought are not the most appropriate way to achieve the objectives of the CDP, CRPS or NPS-UD.

Recommendation

8.5.25 Reject the relief sought

Mixed Use Zone

Sub. No.	Submitter name	Summary of relief sought	Recommendation
811	Retirement Villages Association	The RVA seeks that a new rule is inserted in the Mixed Use Zone that provides for retirement villages as permitted activities.	Reject
811	Retirement Villages Association	The RVA seeks that a new rule is inserted in the Mixed Use Zone that provides for the construction of retirement villages as a restricted discretionary activity and to include a set of focused matters of discretion that are applicable to retirement villages.	Reject
760.14	ChristchurchNZ	Amend P4, P5, P6, and P7 to insert a new activity-specific standard: <u>(a) Car parking shall be limited to 1 space per 150sqm.</u>	Reject
760.15	ChristchurchNZ	Amend P8 to insert a new activity specific standard: <u>a. Any service station in the Sydenham and Waltham Mixed Use Zones shall be located on a minor or major arterial road.</u>	Reject
760.17	ChristchurchNZ	Amend RD3 to read: “The Council’s discretion shall be limited to the following matters:a. Residential design principles – 15.14.1b. Comprehensive residential activity in the Mixed Use Zone – 15.14.3.40 (a) <u>(iv) (ii) and (v) (iii)</u> ”	Accept
760.18	ChristchurchNZ	Amend NC3 to read: “Any Comprehensive Residential Activity within the Comprehensive Housing Precinct for sites identified in Appendix 15.15.12 and 15.15.13 <u>as allocation for required pedestrian/cycle, road or greenway connections, unless the desired street to street connection/s have been provided</u> ”	Accept in Part

760.19	ChristchurchNZ	<p>Amend the following:</p> <ul style="list-style-type: none"> • Advice note: “The following built form standards also apply to comprehensive residential development: refer to Appendix 15.15.13 for the bulk and location diagram representing these standards”. <u>Note: refer to Appendix 15.15.14 for the bulk and location diagram representing some of these standards.</u> • d: All shared pedestrian access ways within and through a site shall have a minimum width of 3 metres including planting. The width for pedestrian access shall be clear of any fencing, storage or servicing, except security gates, where necessary. • g: “Buildings front a street, <u>greenway or other publicly accessible space and public open space</u> shall include at least 20% glazing on each floor of the building” • h: “Apartments adjacent to the street <u>or greenway</u> shall be provided including: i. to a minimum of 4 storeys in height; or ii. to a minimum of 3 storeys for sites located on the south side of the street. • j: <u>(i)</u> Enclosed and lockable cycle storage <u>for residents</u> shall be provided at a minimum rate of 1 space per bedroom, <u>located at grade within a fully enclosed and lockable storage facility integrated within the building and is accessed via a shared pedestrian access from the street or a shared path within a greenway; located adjacent to the communal open space</u> <u>ii)</u> For every 5 residential units, <u>1 cycle park with a charging</u> 	
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		<p><u>point shall be provided within the cycle storage facility that can accommodate a cargo bike; and (iii) 1 cycle park per 10 residential units shall be provided for visitors to the site, accessed from a shared pedestrian access and located adjacent to the communal open space. Visitor cycle parking shall also comply with rules 7.5.2(a)(ii) to (viii) and (x).</u></p> <p>l: “The maximum onsite car parking to residential unit ratio shall be 0.1 across the Comprehensive Residential Development. Car parking onsite shall only be provided for in the following circumstances: (i) A maximum of two car parking spaces for a residential car share scheme across the Comprehensive Residential Development; (ii) A maximum of one space per accessible residential unit</p>	
760.34	ChristchurchNZ	Amend P27 g. to read: “The outlook space shall not extend over an outlook space or outdoor living space required by another residential unit, <u>on the same floor</u> ”	Accept
760.35	ChristchurchNZ	Amend P27 i. to read: “Any outdoor living space or outdoor service space shall not be used for car parking, <u>cycleparking</u> or access”.	Reject
762.32	New Zealand Institute of Architects Canterbury Branch	[T]hat the minimum site size for comprehensive residential development is to be reduced to 1500m ² or at most 1800m ² .	Accept in part
834.282	Kāinga Ora	<p>1. Amend P27 to delete clause (b) relating to the Comprehensive Housing Precinct.</p> <p>2. Add additional activity rules enabling a suite of community activities i.e.rules 14.5.1.1 P5-P13, P20.</p>	Reject

834.283	Kāinga Ora	<p>Maximum building height a. The maximum height of any building shall be 15 metres, unless specified below.</p> <p>b. The maximum height of any Comprehensive Residential Development located within the Comprehensive Housing Precinct (shown on the planning maps) shall be 21 22metres, for buildings located adjacent to the street, or 12 metres for buildings located at the rear of the site.</p>	Accept in part
834.284	Kāinga Ora	P27 Delete all existing provisions and provide a suite of workable and clear rules that encourage and enable large scale redevelopment	Reject
834.288	Kāinga Ora	Remove statutory impediments in Appendix 15.15.12 – Sydenham and Appendix 15.15.13 requiring ‘Greenways ‘and ‘Shared Pedestrian / Cycleways’ and seek to facilitate through more appropriate means – such as negotiated purchase.	Reject
842.65	Fire and Emergency	<p>Amend 15.10.2.9-Minimum standards for Comprehensive Residential Development as follows:</p> <p>a. All shared pedestrian access ways within and through a site shall:</p> <p>i. have a minimum width of A. 3 metres, on a straight accessway including excluding planting. B. 6.2 metres on a curved or cornered accessway C. 4.5m space to position the ladder and perform operational tasks.</p> <p>ii. The width for pedestrian access shall be clear of any fencing, storage or servicing, except security gates, where necessary.</p> <p>iii. provide wayfinding for different properties on a development are clear in day and night.</p>	Accept

852.22	Christchurch International Airport Limited (CIAL)	Amend Rule 15.10.1.1 P27 by inserting a new activity standard as follows: <u>f. The activity shall not be located within the 50 dB Ldn Air Noise Contour or the Airport Noise Influence Area as shown on the planning maps.</u>	Accept
852.23	Christchurch International Airport Limited (CIAL)	Amend Rule 15.10.1.5 NC1 as follows: NC1 Any residential activity not meeting Rule 15.10.1.1 P27 (e) <u>or (f)</u>	Accept

8.5.26 The scope of PC14 is the enablement of height and density in the Mixed Use Zones within a walking catchment of, or adjacent to, centres as per Policy 3(c) and 3(d) of the NPS-UD.

8.5.27 Objective 15.2.3, as recommended, has established those areas located within a walking catchment of CCZ and TCZ are to transition to high density residential neighbourhoods. Recommended Policy 15.2.3.2 outlines that the identified areas for transition to residential are Sydenham, Phillipstown and Mandeville Street. The following recommendations would therefore only apply to the walkable catchment, not the entirety of the Mixed Use Zone.

8.5.28 Regarding the submission points of CIAL(852), I note the discussion in 8.5.16 of this report, that Ms Oliver considers the merits of the request and whether the relief sought is the most appropriate way to achieve the objectives of the CDP, concluding that the relief sought is the most appropriate way to achieve the objectives.

8.5.29 I consider the request of RVA (811) to introduce an objective and policy framework into the plan that enables retirement villages in commercial zones in sections 8.4.78 – 8.4.81 of this report. Mixed Use Zone residential development within walking catchments is to follow the comprehensive residential development provisions in Rule 15.10.2.9 which directly respond to the current industrial nature of the area and transition that will occur towards high density residential development. Balancing the request of RVA for consistent plan provisions across zones against the reality of managing industrial and residential reverse sensitivity as the areas transition, I consider the most appropriate way to manage those effects is the proposed provisions in 15.10.2.9.

8.5.30 Fire and Emergency (842) seek additions to the minimum widths for pedestrian access ways within comprehensive residential development. In my opinion these additions other than the request to include a ‘provide wayfinding provision’ are consistent with Objective 3.3.13, which seeks “provision for, comprehensive emergency services throughout the city, including for their necessary access to properties” and is thus the most appropriate way to achieve the objectives of the zone. I consider the request to include a rule provision to ‘provide wayfinding’ subjective and not appropriate to include as a built form standard.

- 8.5.31 New Zealand Institute of Architects Canterbury Branch (762) seek that the minimum site size for comprehensive residential development is reduced to 1500m² or at most 1800m². The evidence of Ms Williams considers that key built form standards that enable a perimeter block urban form include a minimum site width of 24m, maximum front building depth of 18m with no side boundaries and a communal open space with solar access. In her opinion a minimum site size of 1800m² will still be able to achieve these outcomes while enabling more sites to be redeveloped for comprehensive housing. I consider the relief sought by New Zealand Institute of Architects Canterbury Branch is the most appropriate way to achieve the objectives of the zone.
- 8.5.32 ChristchurchNZ seek amendments to the Mixed Use Zone to improve clarity and I agree with these changes where they are consistent with the Objective and Policy framework of the zone, and PC14 to enable heights and density within a walking catchment. Those changes being:
- *Amend RD3 to read: “The Council’s discretion shall be limited to the following matters: a. Residential design principles – 15.14.1b. Comprehensive residential activity in the Mixed Use Zone – 15.14.3.40 (a) **(iv) (ii)** and **(v) (iii)***
 - *Advice note: “The following built form standards also apply to comprehensive residential development: refer to Appendix 15.15.13 for the bulk and location diagram representing these standards”. **Note: refer to Appendix 15.15.14 for the bulk and location diagram representing some of these standards.***
- 8.5.33 With regard to the changes sought to cycle parking requirements, I rely on the planning evidence of Ms Piper as it relates to the transport chapter, I recommend rejecting the relief being introduced to the Mixed Use Zone. It is my view that this approach is consistent with Objective 3.3.2 which seeks to reduce the prescriptiveness and number of development controls within the CDP. If the provisions were accepted, I consider they are most appropriately located in chapter 7.
- 8.5.34 With regard to the submission points of Kāinga Ora to provide a suite of workable and clear rules that encourage and enable large scale redevelopment, and to increase the permitted height in the comprehensive housing precinct from 21m to 22m, I have considered these requests and note that Policy 3(c) and 3(d) of the NPS-UD refer to enabling height and density within walking catchments (a minimum of 6 storeys in walking catchments of the CCZ), not necessarily enabling residential rezoning or large scale redevelopment, in my opinion these aspects relate to Policy 1 and contributing to a well-functioning urban environment.
- 8.5.35 Within the walking catchment area of the CCZ, the operative IGZ permits an unlimited building height and also includes an enabling policy pathway for brownfield redevelopment through Policy 15.2.2.2 of the Industrial Chapter, highlighting that Council is already achieving the NPS-UD policy 3(c) direction through the operative CDP. As such, rather than enabling height, the PC14 comprehensive housing precinct provisions seek to give effect to Policy 1 by contributing to a well-functioning urban environment. The provisions give effect to Policy 1 by enabling a full transition

of the area to residential activity while still enabling the heights and density directed by the NPS-UD. This contrasts with the operative IGZ provisions which enable an outcome of sporadic residential activity throughout the industrial environment by applicants demonstrating they address Policy 16.2.2.2. I refer to the urban design evidence of Ms Williams which discusses how the provisions would enable a perimeter block urban form, a high-quality living environment outcome and thus a well-functioning urban environment.

- 8.5.36 Regarding the relief sought by Kāinga Ora, I consider the height increase from 21m to 22m would be consistent with the Large Local Centre height in Sydenham, and adjoining High Density Residential heights in the Phillipstown and Mandeville Street contexts. I consider the height increase would be the most appropriate way to achieve the relevant objectives and policies of the mixed use zone which seek to enable a transition of industrial areas to high density residential.
- 8.5.37 I consider the recommended provisions to be the most appropriate way to achieve the objectives and policies of the CDP and NPS-UD.

Recommendation

- 8.5.38 Accept in Part the submission points of Kāinga Ora, ChristchurchNZ, accept the submission point of Fire and Emergency.

S32AA Evaluation

Benefits	Appropriateness in achieving the objectives/ higher order document directions
<p>Environmental:</p> <p>Contributes to a well-functioning urban environment by enabling a variety of housing types.</p> <p>Provides clarity within provisions as it relates to outlook space, site sizes, emergency egress and consistent height between adjoining commercial and high density residential zones.</p>	<p>Efficiency:</p> <p>Provides clarity within provisions as it relates to outlook space, site sizes, emergency egress and consistent height between adjoining commercial and high density residential zones.</p> <p>Effectiveness:</p> <p>Enables a well-functioning urban environment and high-quality residential environment to come to fruition which is consistent with the objective and policy framework.</p>
<p>Economic:</p> <p>Enables transition to high density residential activity while still allowing industrial activity to continue.</p>	
<p>Social: Nil</p>	

Cultural: Nil	
Costs	
Environmental: Nil	
Economic: Nil	
Social: Nil	
Cultural: Nil	
Risk of acting/not acting:	
No information gaps have been identified that impact on the risk of acting or not acting in relation to the changes proposed.	
Recommendation:	
This option is recommended as it is the most appropriate way to achieve the objectives of the CRPS, CDP and NPS-UD.	

Matters of Discretion in Chapter 15 – TCZ, LCZ, NCZ, MUZ

Sub. No.	Submitter name	Summary of relief sought	Recommendation
118.4	Spreydon Lodge Limited	<p>Delete Matters of Discretion Rule 15.1314.4.3.2(a)(i) 'Commercial layout' as it references the requirement to have a critical mass of activity centred upon the Main Street as follows:15.1314.4.3.2 Commercial layout</p> <p>a. The extent to which development:</p> <p>i. ensures a critical mass of activity is centred upon the open air Main Street including an appropriate balance of large format retail activity and concentration of finer grain commercial activities; ii. supports a retail mix (large format and finer grain retailing) which ensures the centre meets its role as a District Town Centre and Key Activity Centre and meets the needs of the catchment population; and ii</p> <p>iii. functions operationally and visually as an integrated commercial entity</p>	Reject
118.5	Spreydon Lodge Limited	<p>Delete Matters of Discretion Rule 15.1314.4.3.4(a)(i-iii) 'Transport' as it references the main street,public transport interchange and carparking area as follows:15.1314.4.3.4 Transporta) The extent to which development:</p> <p>i. provides for an easily accessible, readily visible public transport interchange located centrally within the commercial core of the Key Activity Centre;ii. provides car parking areas as shared spaces, available for shared use, which does not visually or physically dominate the area;i</p> <p>iii. provides for pedestrian priority within the retail core, particularly in respect to the open air mainstreet environment;</p>	Reject

118.6	Spreydon Lodge Limited	Delete Matters of Discretion Rule 15.1314.4.3.5 'Civic Square' as it refers to the civic square as illustrated within the ODP for North Halswell.15.1314.4.3.5 Civic Square a. The extent to which development: connects the civic square and the Main Street, both visually and physically; provides for a civic square of a sufficient size to allow for a range of community activities, events and interaction; and provides a high quality civic square laid out and designed in a manner that achieves a high quality and safe, open space environment.	Reject
760.23	ChristchurchNZ	Amend (i)(O) to read: The extent to which alternative forms of housing models and/or a range Amend (i)(P) to read: "The extent to which accessible residential units including apartments , are provided....	Accept
829.21	KiwiRail	Seeks amendment to the Matter of Discretion 15.14.3.10 to include assessment of providing for the safe and efficient operation of the rail network.	Reject
834.287	Kāinga Ora	Delete all existing provisions and provide a suite of workable and clear rules that encourage and enable large scale redevelopment.	Reject

8.5.39 With regard to the relief of Spreydon Lodge, I have discussed in section 8.4.18 – 8.4.21 that I recommend the policy framework associated with North Halswell be retained as per the operative District Plan. My view of the relief to delete the matters of discretion is consistent and I consider the notified provisions are the most appropriate way to achieve the objective 15.2.2 and 15.2.4 of the commercial chapter and implement 15.2.2.2.

8.5.40 ChristchurchNZ seek amendments to the provisions for the Mixed Use Zone to improve clarity and I agree with these changes where they are consistent with Objective 15.2.3, 15.2.4 and Policies 15.2.3.2, 15.2.4.1, and 15.2.4.2, and PC14 to enable heights and density within a walking catchment. It is also consistent with Objective 3.3.2 that seeks clarity of provisions.

8.5.41 The relief of KiwiRail, seeking amendments to the matters of discretion may be outside of scope of PC14 due to the implications of the *Waikanae* Environment Court decision. On the merits, I refer to the evidence of Ms Oliver which recommends amendments to railway setbacks be rejected.

Recommendation

8.5.42 Accept the submission points of ChristchurchNZ and reject the submission points of Spreydon Lodge, Kāinga Ora and KiwiRail.

S32AA Evaluation

8.5.43 I consider the amendments of ChristchurchNZ are minor and consequential changes that improve the effectiveness of provisions without changing the policy approach and as such are not re-evaluated in 32AA terms.

Industrial General Zone, Industrial Heavy Zone, and Industrial Park Zone

Sub. No.	Submitter name	Summary of relief sought	Recommendation
854	Orion New Zealand	<p>Industrial General Zone</p> <p><u>Rule 16.4.1.5 on-complying activities</u></p> <p>Add an additional clauses to 'NC1' and amend clause 'd' as follows:</p> <p><u>X Sensitive activities within 3m of the outside overhead conductor of any 11kV,400V or 230V electricity distribution line.</u></p> <p><u>d. Conductive F</u>fences within 5 metres of a66kV National Grid transmission line supportstructure foundation or 5 metres of a 66kVelectricity distribution support structurefoundation or, 33kV, 11kv, 400V or 230Velectricity distribution line support structurefoundation.</p>	Reject
308	Tony Pennell	[New built form standard to require] provision for future solar panel installation unless orientation north is impossible.	Reject
685	Canterbury / Westland Branch of Architectural Designers NZ	[Newbuilt form standard] to require buildings to calculate their lifetime carbon footprint and be required to not exceed a sinking lid maximum.	Reject
224	Richard Ball	That the permitted height limits within the existing District Plan (prior to PC14) are retained to the maximum extent possible.	Reject
737	Christian Jordan	Seeks a height restriction of 8m for 20m along a residential boundary.	Reject
63	Kathleen Crisley	Retain provisions in relation to recession planes in final plan decision.	Reject
737	Christian Jordan	Seeks that the recession plane that applies to the industrial side of any industrial/residential boundary should comply with residential zone recession planes.	Reject
737	Christian Jordan	Seeks that where any industrial building is located within 10m of a residential boundary a landscaping strip with trees and planting at least 3m wide should be included on the industrial site.	Reject

- 8.5.44 With regard to the requests seeking changes to rules that impact on the status quo (operative CDP development rights), the recent decision on Waikanae by the Environment Court raises potential issues of scope. Also, except where industrial zones are within a walkable catchment of, or adjacent to, centres, provisions for industrial zones are outside the scope of Plan Change 14 and are being considered through a separate plan change. I also refer to the evidence of Ms Brittany Ratka who deals with effects of intensification on industrial activities in the context of the residential zone.
- 8.5.45 Regardless of the scope of these requests I consider the requests in the context of the policy framework and whether the relief sought is the most appropriate way to achieve the objectives of the CDP.
- 8.5.46 Submitters 737 (Christian Jordan) and 224 (Richard Ball) seeks amendments to landscaping rules, and height restrictions in industrial zones in proximity to residential activity. I note that within the Industrial Zones of the CDP that height has not been proposed to increase in PC14, I also note the relevant objectives of the industrial zone, in particular Objective 16.2.3(a) and policy 16.2.3.2(b).
- *Objective 16.2.3(a) - Adverse effects of industrial activities and development on the environment are managed to support the anticipated outcome for the zone while recognising that sites adjoining an industrial zone will not have the same level of amenity anticipated by the Plan as other areas with the same zoning.*
 - *Policy 16.2.3.2(b) - Effects of industrial activities are managed in a way that the level of residential amenity (including health, safety, and privacy of residents) adjoining an industrial zone is not adversely affected while recognising that it may be of a lower level than other residential areas.*
- 8.5.47 The objective and policy provide that industrial zones are anticipated for industrial activities which due to their nature will produce adverse effects, and that the interface will not have the same level amenity as anticipated elsewhere in industrial zones. In this context and without changes to the objective and policy, I consider the operative rules in 16.4.2.3, 16.4.2.4 and 16.4.2.6 are the most appropriate way to achieve the objective of the CDP. However, further consideration is required of the relief as part of a separate plan change including input from technical experts.
- 8.5.48 Regarding the submission points of submitters 308 (Tony Pennell) and 685 (Canterbury / Westland Branch of Architectural Designers NZ) I do not consider new built form standards requiring solar panel installation and calculation of the lifetime carbon footprint to be appropriate for industrial zones in isolation of broader consideration of these matters across the City. The requirements would add costs to development which need to be considered against the benefits and I am not satisfied that the costs would be outweighed by the benefits without further analysis. I also consider that the relief is not consequential on the enablement of heights and density.
- 8.5.49 The amendments Orion seek to add additional requirements to non-complying Rule 16.4.1.5 are potentially affected by the implications of the *Waikanae* Environment Court decision. In terms of

the merits of the requested amendments, I consider it appropriate in giving effect to Objective 15.2.2 (a)(ix) and implementing Policy 15.2.4.6, which is to “Provide for the effective development, operation, maintenance and upgrade of strategic infrastructure and avoid adverse effects of development on strategic infrastructure”.

Recommendation

8.5.50 Reject the submission points of 308, 685, 224, 737, accept in part the submission point of Orion if within scope of the IPI.

8.6 ISSUE 6 - REZONING REQUESTS – COMMERCIAL AND INDUSTRIAL

Sub. No.	Submitter name	Summary of relief sought	Recommendation
690.1	Redwood Gardens Holding Limited	Rezone Industrial Land at Wairakei Road to Commercial	Reject
821.3	Athena Enterprises Limited and Josephine Enterprises Limited	[Seeks that the] properties at 9, 9A and 9B Sheffield Crescent (the site) [be rezoned to a commercial zone].	Reject
915.1	25 KBR Limited	Rezone approximately 7124m ² of land at 432 Sparks Road as Neighbourhood Centre Zone and any consequential amendments to the necessary to give effect to this submission.	Reject
705.1	Foodstuffs	Rezone 304 Stanmore Road Local Centre Zone	Accept
705.10	Foodstuffs	Amend the zoning of Lot 10 DP 17997 and part of Lot 13 DP 17997 at New World Ilam to Local Centre Zone	Reject
705.3	Foodstuffs	Amend planning maps to rezone Section 2SO 552969 and Lot 2 DP2586 to Local Centre Zone at Pak'n Save Wainoni (186 and 204 Breezes Road and 172, 174, 178 and 182 Wainoni Road)	Reject
705.6	Foodstuffs	Amend zoning of Lot 1 DP51902 to Local Centre Zone at New World Lincoln Road (92, 94, 100 and 108 Lincoln Road)	Reject

705.7	Foodstuffs	Head Office: Amend to rezone Lot 2 DP 14400 (159 Main North Rd), part of Lot 1 DP 14400 and accessway on Lot 7 DP14400 to IG. This reflects the recent PC5 decision. Pak'n Save: Amend to rezone Lot 5 DP3753, Lot 1 DP76152 and Part Lot 1 DP 21207 to Local Centre Zone to reflect the consented and intended use as a PAK'nSAVE	Accept in part
848	Peebles Group Limited	Amend the planning maps to rezone the properties at 468- 470 Cranford Street as LCZ	Reject
386	Balmoral Limited	Rezone the sites at 336 and 340 Preston's Road and 427 and 435 Marshland Road Local Centre Zone (Prestons)	Reject
249.1	City Salvage	Re-zone the residential portion of 544 Tuam Street and the adjoining land at 102-104 Mathesons Road, to Local Centre.	Reject
2	Greg Olive	Seeks to rezone Medium Density Residential Zone land at 419 Halswell Junction Road to Mixed Use Zone.	Reject
883	Miles Premises	Rezone 400, 475 Memorial Avenue and 500, 520 and 540 Avonhead Road for urban development, with no restrictions relating to airport noise.	Reject
917	Belfast Village Centre Limited	Seek amendments to the extent of Commercial zoning at the NorthWest Belfast centre.	Reject
849	Entropy MMX Limited	Submitter 849 Entropy MMX Limited has sought the rezoning of Rural Urban Fringe land at 142-144 Winters Road, Mairehau to Industrial General, Medium Density Residential or Residential Suburban Zone	Reject
904	880 Main North Road	Seeks that a Brownfield Overlay be applied to the site.	Reject
823	The Catholic Diocese of Christchurch	Apply Brownfield overlay to 2 Lydia Street	Accept

691	Ross Clarke	Submitter 691 Ross Clarke has sought to rezone Rural Urban Fringe zoned land at 370, 390 and 432 Johns Road, Harewood to Industrial General Zone.	Reject
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8.6.1 I note the purpose of PC14 is to give effect to Policy 3 of the NPS-UD which includes enabling various heights and densities within at least a walking catchment of, or adjacent to, various centres. The evidence of Mr Kleybos identifies the walking catchment of centres as being 1200m from the CCZ, 800m from a Large TCZ, 600m from TCZ, 400m from a Large LCZ, and 200m from a well-serviced LCZ. Therefore, where rezoning requests are not located within a walking catchment of, or adjacent to, centres, the submission points do not fit the proposed intensification of PC14 and are potentially outside the scope of an IPI as described in s77N for non-residential zones. Regardless of scope implications, I evaluate the merits of requests outside a walking catchment at a high level below in Appendix 1.

9 MINOR AND INCONSEQUENTIAL AMENDMENTS

- 9.1.1 Pursuant to Schedule 1, clause 16 (2) of the RMA, a local authority may make an amendment, without using the process in this schedule, to its proposed plan to alter any information, where such an alteration is of minor effect, or may correct any minor errors.
- 9.1.2 Any minor and inconsequential amendments relevant to Commercial and Industrial provisions will be listed in the appropriate sections of this s42A report.
- 9.1.3 The recommended amendments are set out in the tracked changes versions of the applicable chapters, which are provided at Appendix 4.

10 CONCLUSIONS AND RECOMMENDATIONS

- 10.1.1 Having considered all of the submissions and reviewed all relevant instruments and statutory matters, I am satisfied that the Plan Change 14 Commercial outside the Central City and Industrial Zone provisions, with the amendments I am suggesting, will:
- a. result in amended objectives that better achieve the purpose of the RMA;
 - b. result in amended policies that better achieves the operative and proposed objectives;
 - c. result in amended rules that better implement the operative and proposed policies;
 - d. give effect to relevant higher order documents, in particular the CRPS AND NPS-UD;
 - e. give regard to Mahaanui Iwi Management Plan and Ngāi Tahu 2025;

- f. more appropriately achieve the District Plan objectives and better meet the purpose of the Act than the current Plan provisions.

10.1.2 For the reasons set out in the Section 32AA evaluations included throughout this report, I consider that the proposed objectives and provisions, with the recommended amendments, will be the most appropriate means to:

10.1.3 Achieve the purpose of the Resource Management Act 1991 (**RMA**) where it is necessary to revert to Part 2 and otherwise give effect to higher order planning documents, in respect to the proposed objectives, and

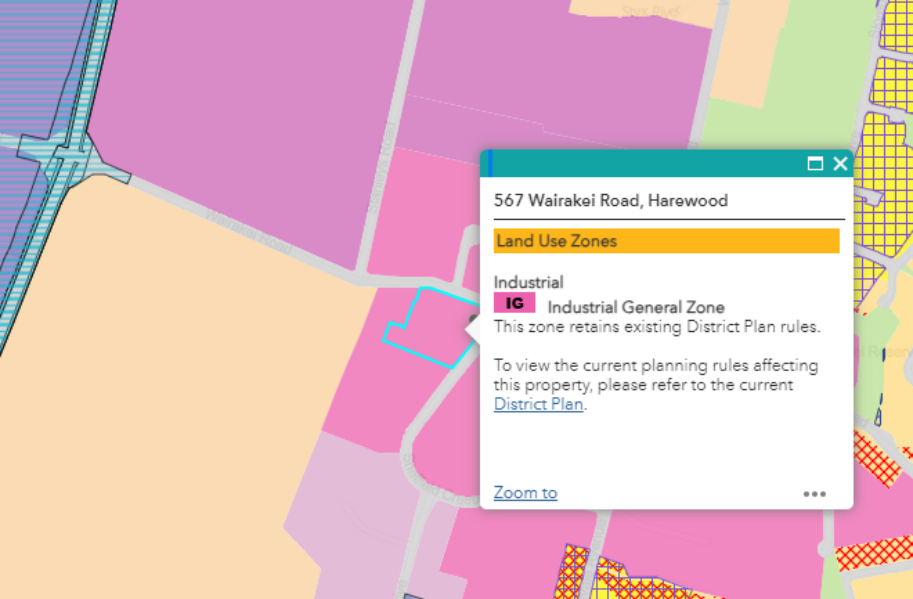
10.1.4 Achieve the relevant objectives of the PDP, in respect to the proposed provisions.

10.1.5 I recommend therefore that:

- a. Plan Change 14 be approved with modifications as set out in the attached Appendix 4; and
- b. Submissions on the Plan Change be accepted or rejected as set out in Appendix 3 to this report.

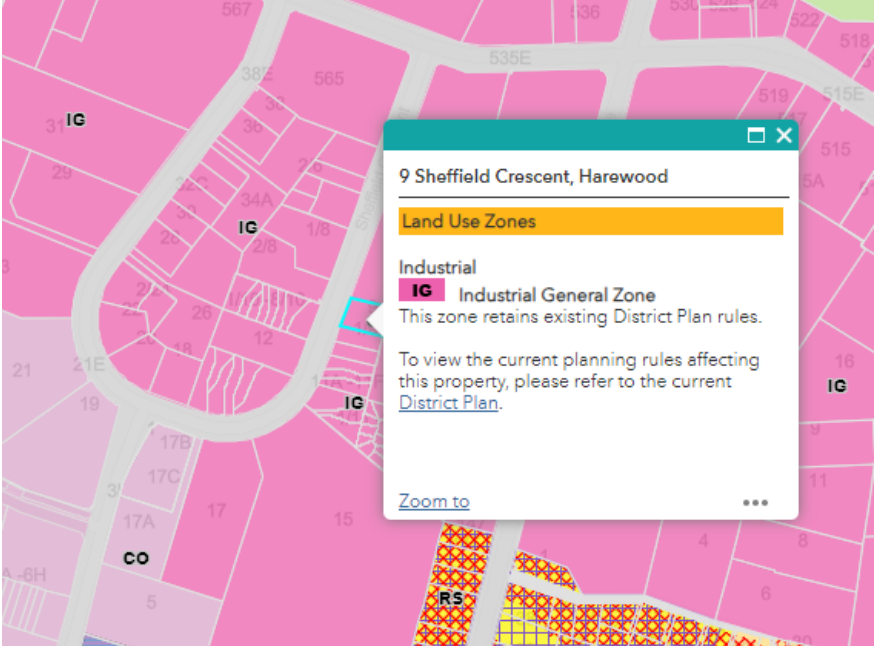
APPENDIX 1 – TABLE OF REZONING REQUESTS

1. 690

Submission	690, Redwood Gardens Holding Limited
Address	567 Wairakei Road, Harewood
	Lot 2 Deposited Plan 490373
	
Operative Zoning	Industrial General Zone
Notified Zoning	Industrial General Zone
Relief Sought (Zoning / Change Sought)	Seeks that the zoning is changed to commercial zoning for the site and surrounding sites.
Recommendation: Accept/ Reject/ Amend	Reject (based on scope)
Reasons for Recommendation	<p>Submitter 690 Redwood Gardens Holding Limited has sought the rezoning of Industrial General land at 567 Wairakei Road, Harewood to commercial zoning.</p> <p>Referring to 8.6.1, which outlines the scope of the IPI for non-residential zones, the site is outside a walking catchment and is thus outside of scope.</p> <p>With regard to the merits of the request, the key outcomes sought in the CDP (Objective 15.2.2), and CRPS (Objective 6.2.6(3)) are that commercial activity is to be focused within centres, and any expansion of commercial activity outside centres is to not give rise to significant adverse distributional and urban form effects (Objective 3.3.10).</p> <p>The potential commercial distributional effects arising from the rezoning of the sites to commercial are not included in the submission.</p> <p>The site is surrounded by industrial zoned sites and the rezoning of the site would effectively create a new commercial centre that may impact on other</p>

	<p>centres and there is not evidence to justify in the context of the framework established in the District Plan.</p> <p>While the site has commercial activities and buildings on it and there is a mix of activities in the industrial zone, the recognition of existing commercial activities by way of spot-zoning is not considered appropriate as it would result in an incoherent pattern of zoning, reducing certainty of where activities are anticipated and presenting a risk of reverse sensitivity effects for existing industrial uses in the area, noting the car repair businesses nearby. It would also be inconsistent with the objective for commercial activities to be focused in centres.</p> <p>It is my opinion based on the information provided and how that information aligns with the objectives and policies of the CDP and CRPS that rezoning the sites commercial would not be the most appropriate way to achieve the objectives and policies of the CDP and CRPS.</p>
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2. 821

Submission	821, Athena Enterprises Limited and Josephine Enterprises Limited
Address	9, 9A and 9B Sheffield Crescent, Harewood
	Lot 5 DP 62637, Unit A Deposited Plan 66465, Unit B Deposited Plan 66465
	
Operative Zoning	Industrial General Zone
Notified Zoning	Industrial General Zone
Relief Sought (Zoning / Change Sought)	Seeks that the site zoning is changed to a commercial zone.

Recommendation: Accept/ Reject/ Amend	Reject (based on scope)
Reasons for Recommendation	<p>Submitter 821 Athena Enterprises Limited and Josephine Enterprises Limited has sought the rezoning of Industrial General land at 9A and 9B Sheffield Crescent, Harewood to commercial zoning. Referring to 8.6.1, which outlines the scope of the IPI for non-residential zones, the site is outside a walking catchment and is thus outside of scope.</p> <p>With regard to the merits of the request, the key outcomes sought by the CDP (Objective 15.2.2), and CRPS (Objective 6.2.6(3)) are that commercial activity is to be focused within centres, and any expansion of commercial activity outside centres is to not give rise to significant adverse distributional and urban form effects (Objective 3.3.10).</p> <p>The potential commercial distributional effects arising from the rezoning of the sites to commercial are not included in the submission.</p> <p>The site is surrounded by industrial zoned sites and the rezoning of the site would effectively create a new commercial centre that may impact on other centres and there is not evidence to justify in the context of the framework established in the District Plan.</p> <p>While the site has commercial activities and buildings on it, the recognition of existing commercial activities by way of spot-zoning is not considered appropriate as it would result in an incoherent pattern of zoning, reducing certainty of where activities are anticipated and presenting a risk of reverse sensitivity effects for existing industrial uses in the area, noting the car repair businesses nearby. It would also be inconsistent with the objective for commercial activities to be focused in centres.</p> <p>It is my opinion based on the information provided and how that information aligns with the objectives and policies of the CDP and CRPS that rezoning the sites to be commercial would not be the most appropriate way to achieve the objectives and policies of the CDP and CRPS.</p>


3. 848

Submission	848, Peebles Group Limited
Address	468-470 Cranford Street, Christchurch

	
Operative Zoning	Rural Urban Fringe Zone
Notified Zoning	Rural Urban Fringe Zone
Relief Sought (Zoning / Change Sought)	Local Centre Zone
Recommendation: Accept/ Reject/ Amend	Reject (based on scope)
Reasons for Recommendation	<p>Submitter 848 Peebles Group Limited has sought the rezoning of Rural Urban Fringe land at 468-470 Cranford Street to Local Centre Zone. Referring to 8.6.1, which outlines the scope of the IPI for non-residential zones, the site is outside a walking catchment and is thus outside of scope.</p> <p>With regard to the merits of the request, the key outcomes sought in the CDP (Objective 15.2.2), and CRPS (Objective 6.2.6(3)) are that commercial activity is to be focused within centres, and any expansion of commercial activity outside centres is to not give rise to significant adverse distributional and urban form effects (Objective 3.3.10).</p> <p>Policy 15.2.2.4 provides policy direction in the consideration of proposals for the outward expansion of a centre and can assist in determining the appropriateness of the expansion sought.</p> <p>Policy 15.2.2.4 reinforces objective 15.2.2 by seeking to ensure an expanded centre remains commensurate with a centre’s role while not having significant adverse effects including distributional effects.</p> <p>The potential commercial distribution effects arising from the rezoning of the sites to commercial are not included in the submission.</p>

	<p>Policy 15.2.2.4 also requires consideration of whether the proposal is integrated with the provision of infrastructure, that adverse effects are managed at the interface with adjoining zones and the centre is coherent in its form. These matters have not be addressed by the submitter.</p> <p>Any expansion is also to be response to growth in the surrounding catchment. Intensification of the existing residential zoned land in the immediate surrounds is enabled by the proposed rezoning of land to High Density Residential and Medium Density Residential, particularly to the north west ad west. However, the High Density Residential zoning proposed is a response to Policy 3 of the NPS UD and enables intensification around the Papanui Key Activity Centre.</p> <p>The expansion of this centre in close proximity to Northlands Mall may give rise to adverse effects on the function of the KAC. The submitter may provide economic evidence regarding this issue.</p> <p>It is my opinion based on the provided information and how that information aligns with the objectives and policies of the CDP and CRPS that rezoning the sites commercial would not be the most appropriate way to achieve the objectives and policies of the CDP and CRPS.</p>
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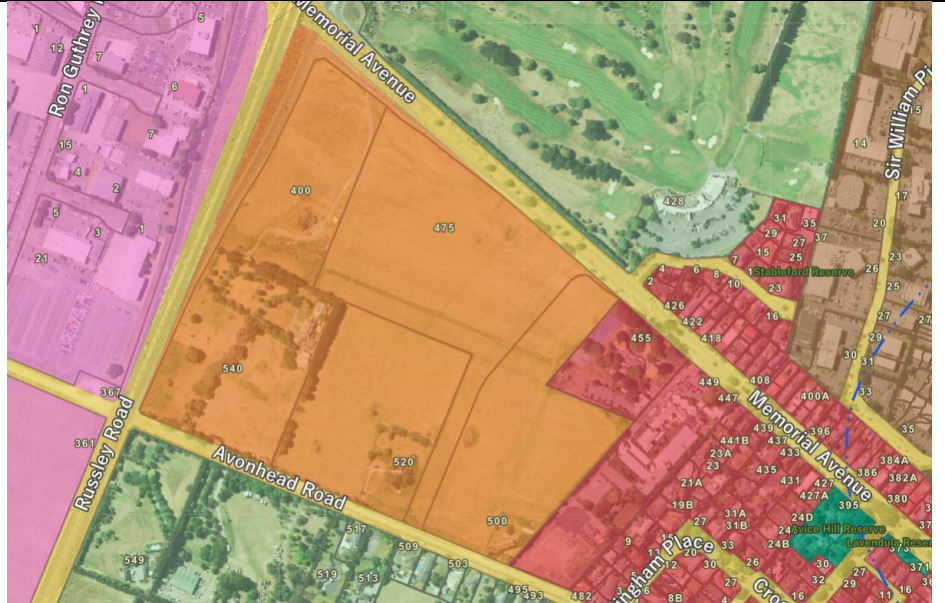
4. 849

Submission	849, Entropy MMX Limited
Address	142-144 Winters Road, Mairehau
	
Operative Zoning	Rural Urban Fringe Zone
Notified Zoning	Rural Urban Fringe Zone

Relief Sought (Zoning / Change Sought)	Industrial General, Medium Density Residential Zone or Residential Suburban Zone.
Recommendation: Accept/ Reject/ Amend	Reject (based on scope)
Reasons for Recommendation	<p>Submitter 849 Entropy MMX Limited has sought the rezoning of Rural Urban Fringe land at 142-144 Winters Road, Mairehau to Industrial General, Medium Density Residential or Residential Suburban Zone. In terms of the industrial aspect and referring to 8.6.1, which outlines the scope of the IPI for non-residential zones, the site is outside a walking catchment and is thus outside of scope.</p> <p>With regard to the merits of the relief sought, there is not a demonstrated shortfall in the capacity for industrial activities and Council's most recent Business Capacity Assessment prepared under the NPS UD shows there is a significant over-supply of industrial land at a city-wide level. While this is at a macro-level, there is not any evidence at a local level provided by the applicant.</p> <p>In terms of location, the site benefits from close proximity to the strategic road network. While the immediately surrounding land is zoned rural, it is noted that there are residential properties on Winters Road including the eastern end where access is available to the state highway. The rezoning of the subject land to industrial could give rise to effects on amenity associated with heavy vehicle movements. The suitability of the road network to accommodate heavy vehicles would also need to be assessed to be satisfied that the proposed rezoning is appropriate (amongst other technical assessments).</p> <p>Having regard to the information provided in the submission, I do not consider the rezoning appropriate for the reasons described above.</p>

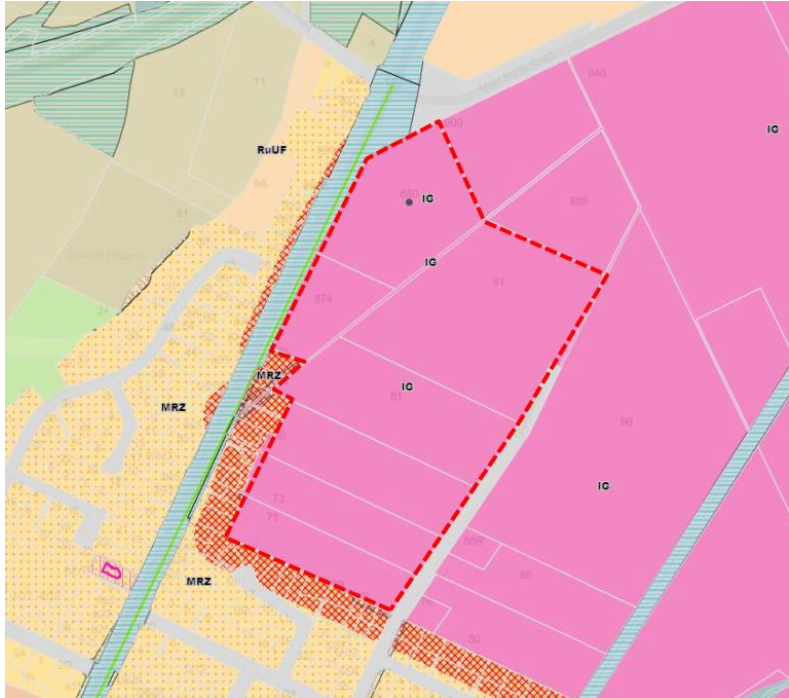
5. 883

Submission	883, Miles Premises Ltd
Address	400 [Russley Road], 475 Memorial Avenue and 500, 520 and 540 Avonhead Road

	
Operative Zoning	Industrial Park Zone
Notified Zoning	Industrial Park Zone
Relief Sought (Zoning / Change Sought)	<p>Rezone to allow the full range of business and related activities (industrial, office, accommodation, health, community, entertainment, recreation etc) and/or rezone in full or part Future Urban Zone or Medium Density Residential, in all cases with no restrictions in activity type or standards due to airport noise effects.</p>
Recommendation: Accept/ Reject/ Amend	<p>Reject (based on scope)</p>
Reasons for Recommendation	<p>Submitter 883 Miles Premises Ltd has sought the rezoning of Industrial Park Zoned land at 400 [Russley Road], 475 Memorial Avenue and 500, 520 and 540 Avonhead Road to commercial or residential zoning. Referring to 8.6.1, which outlines the scope of the IPI for non-residential zones, the site is outside a walking catchment and is thus outside the scope of PC14</p> <p>Putting aside the issue of scope, I consider here the appropriateness of the rezoning to commercial.</p> <p>The key outcomes sought in the CDP (Objective 15.2.2), and CRPS (Objective 6.2.6(3)) that commercial activity is to be focused within centres, and any expansion of commercial activity outside centres is to not give rise to significant adverse distributional and urban form effects (Objective 3.3.10).</p> <p>The potential commercial distributional effects arising from the rezoning of the sites to commercial are not included in the submission.</p> <p>With regard to urban form effects, the site sought for rezoning is significant in the context of the surrounds. At approx. 21 ha, the area sought for rezoning is larger than the North Halswell Key Activity Centre and would therefore have the effect of creating a new centre.</p> <p>A number of the business and related activities that the submission seeks provision for are currently provided for in the Industrial Park zone, including</p>

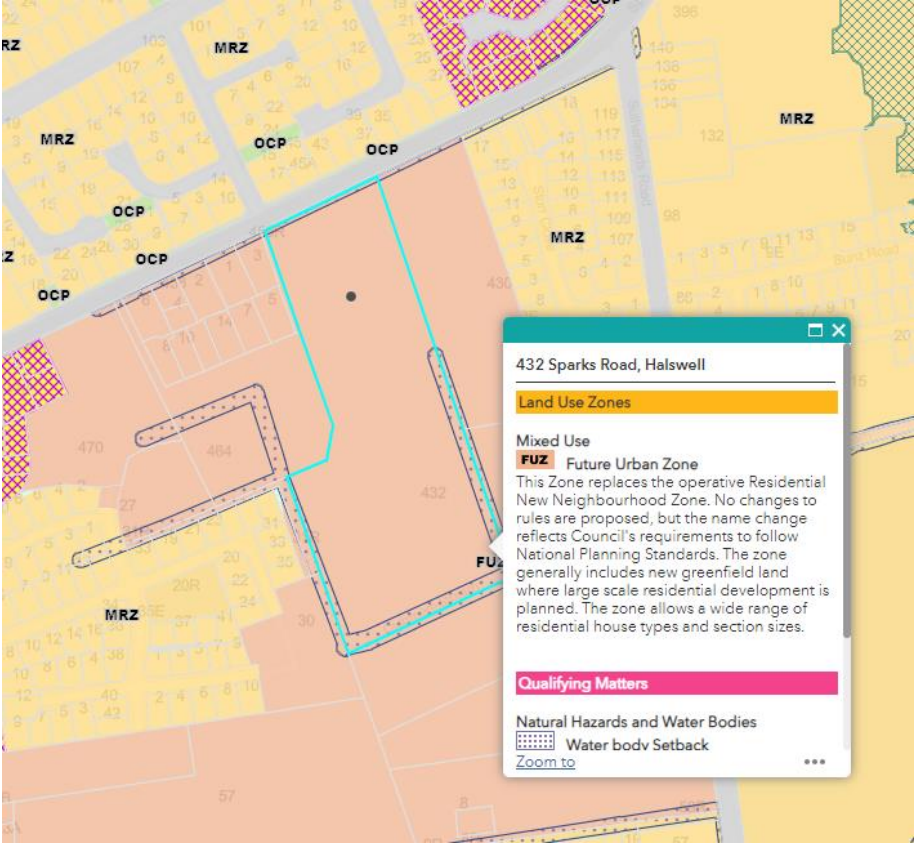
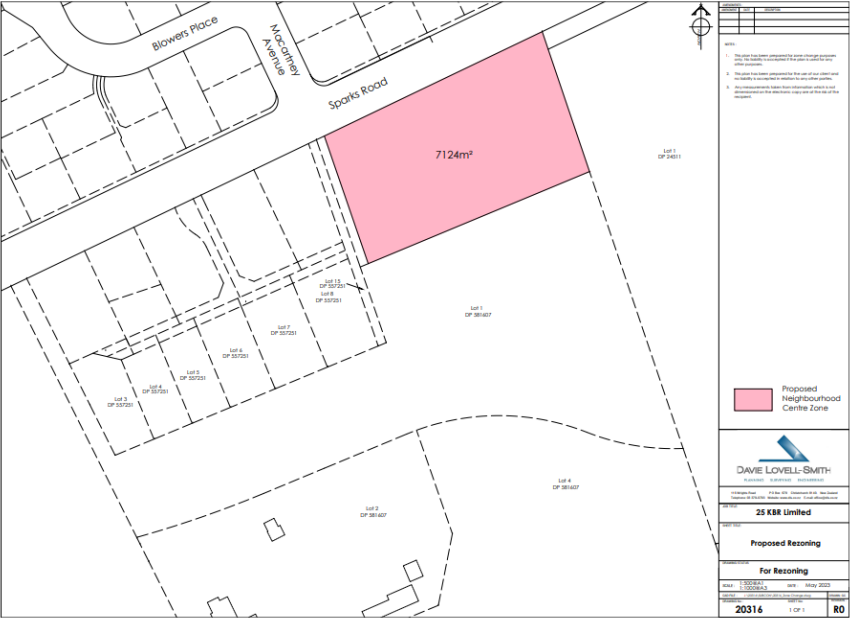
	<p>industrial, office (ancillary), accommodation, health and other community activities). To extend this to a full range of retail, office, entertainment and recreational activities will draw demand away from the locations anticipated for such activities.</p> <p>The location of the site is in close proximity to Spitfire Square, a commercial area at the airport less than 500m away, and also in proximity to Avonhead Mall to the south (approx. 1.5 km). Having regard to the distribution of centres in proximity to the site, there is a risk that the development of the subject land for commercial activities could draw demand away from existing centres, reducing the ability for those centres to perform their intended role. This would be inconsistent with Objective 15.2.2 of the District Plan.</p> <p>The change of zoning to commercial could also displace demand for land zoned Industrial Park in a location with a high profile that may otherwise be attractive to businesses.</p> <p>It is my opinion based on the information provided and how that information aligns with the objectives and policies of the CDP and CRPS that rezoning the sites to enable commercial activities would not be the most appropriate way to achieve the objectives and policies of the CDP and CRPS.</p>
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6.
904

Submission	904, 880 Main North Road Limited
Address	<p>874-880 Main North Road</p> 
Operative Zoning	Industrial General Zone
Notified Zoning	Industrial General Zone

Relief Sought (Zoning / Change Sought)	Seeks that a Brownfield Overlay be applied to the site.
Recommendation: Accept/ Reject/ Amend	Reject (based on scope)
Reasons for Recommendation	<p>Submitter 904 Main North Road Limited has sought the addition of a Brownfield Overlay to land at 874-880 Main North Road. Referring to 8.6.1, which outlines the scope of the IPI for non-residential zones, the site is outside a walking catchment and is thus outside the scope of PC 14.</p> <p>I have considered the appropriateness of applying a brownfield overlay to a site that has been identified as a greenfield priority area on Map A of the CRPS. To give effect to the CRPS, the site was rezoned from rural to industrial during the District Plan Review in 2016 and it has not been developed previously to my knowledge. Its most recent use being for grazing/ rural activities.</p> <p>The submission refers to the challenges of industrial development of the site with reference to “various reasons”. It is not apparent what constraints have impeded the development but it is assumed to be a lack of demand and other constraints.</p> <p>While brownfield redevelopment is supported and encouraged in the planning framework of the CRPS and CDP , the District Plan defines “Brownfield” as “abandoned or underutilised commercial or industrial land, or land no longer required by a requiring authority for a designated purpose.” The site in question is currently farmland, is yet to be utilised and thus is not deemed to be a Brownfield site.</p> <p>The site adjoins Main North Road and is surrounded to the south, east and north east by industrial zoned land as part of a larger greenfield area. Without consideration of the wider block, east to the railway line, the introduction of a brownfield overlay for the site could impact on the function of the wider block (bound by Main North Road in the west and railway line in the east) as being for primarily industrial activities, in giving effect to policy 6.2.6 (1) of the CRPS.</p> <p>It is considered appropriate that the extent of the area considered for residential development is revisited and alternative methods are considered i.e. zoning outside Plan Change 14.</p> <p>For the reasons described above, I do not consider it appropriate to apply a brownfield overlay to the subject land.</p>


7. 915

Submission	915, 25 KBR Limited
Address	432 Sparks Road, Halswell
	Lot 1 DP 581607
	
	
Operative Zoning	Residential New Neighbourhood Zone

Notified Zoning	Future Urban Zone
Relief Sought (Zoning / Change Sought)	Rezone approximately 7,124m ² of 432 Sparks Road as Neighbourhood Centre Zone, and retain the Future Urban Zone over the residential portion of 432 Spark Road.
Recommendation: Accept/ Reject/ Amend	Reject (based on scope)
Reasons for Recommendation	<p>Submitter 915 25 KBR Limited has sought that part of the site at 432 Sparks Road is rezoned from Future Urban Zone to Neighbourhood Centre Zone.</p> <p>The submitters evidence states that the site is intended to be developed for commercial purposes more commensurate with the Neighbourhood Centre Zone. However, referring to 8.6.1, which outlines the scope of the IPI for non-residential zones, the site is outside a walking catchment.</p> <p>The site is 1km from the Halswell centre and I consider it is not reasonable to assume the walkable catchment could be extended to include the site, having regard to the walkable catchments assumed around the largest Town Centres. In any case, I have considered the merits below.</p> <p>The key outcomes sought in the CDP (Objective 15.2.2), and CRPS (Objective 6.2.6(3)) are that commercial activity is to be focused within centres, and any expansion of commercial activity outside centres is to not give rise to significant adverse distributional and urban form effects (Objective 3.3.10).</p> <p>The site is located on Sparks Road and is within a short walking distance of Halswell Road, where an existing neighbourhood centre is located (Corner Sparks and Halswell Road).</p> <p>The effects arising from the rezoning of the site to commercial have been assessed in a report accompanying the submission, prepared by Property Economics, which supports a proposed convenience centre at 432 Sparks Road from an economic perspective. Their report states <i>“The proposed centre GFA of 2,250 sqm and the proposed extent of land uses are considered an appropriate scale that would not undermine the market and future growth of the existing centres under the context of RMA”</i>. In the absence of alternative economic advice, I rely on that evidence.</p> <p>I note that the report prepared by Property Economics was for a resource consent application for a specific proposal rather than to support the zoning request. In this context, I would add that the area sought for rezoning could support a greater amount of floorspace than has been assessed by Property Economics (2,250 sqm of the site which is 7,124m², being 31% of the site, assuming the floorspace is all at ground floor). Consideration may need to be given to a floorspace limit to manage the potential effects.</p> <p>The rezoning of the subject land provides an opportunity for meeting the day to day needs of residents in the surrounding area, having regard to the significant growth experienced through greenfield subdivision.</p>

	It is my opinion based on the provided information and how that information aligns with the objectives and policies of the CDP and CRPS that rezoning the sites commercial would be appropriate if deemed within a walking catchment.
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8. 386

Submission	386, Balmoral Limited
Further Submissions	Submission # and Name
Address	336 and 340 Preston's Road and 427 and 435 Marshland Road, Marshland
	
Operative Zoning	Rural Urban Fringe Zone
Notified Zoning	Rural Urban Fringe Zone
Relief Sought (Zoning / Change Sought)	Rezoning the sites at 336 and 340 Prestons Road and 427 and 435 Marshland Road as Local Centre Zone
Recommendation: Accept/ Reject/ Amend	Reject
Reasons for Recommendation	<p>Submitter 386 Balmoral Limited has sought rezoning of the subject land to become a Local Centre zone.</p> <p>The subject land is outside the urban area and greenfield priority areas defined on Map A of the CRPS. The rezoning to enable commercial activities would therefore not give effect to Objective 6.2.1 of the CRPS, which is to "Avoid(s) urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS". Objective 3.3.7(a)(iii) of the CDP similarly outlines that urban activities are</p>

only provided for within the existing urban areas or areas identified in Map A.

Policy 8 of the NPS UD requires Council to be responsive to plan changes that would add significantly to development capacity and contribute to a well-functioning urban environment, even if unanticipated by planning documents. The submission does not demonstrate that the rezoning would contribute significantly to capacity or a well-functioning urban environment.

The key outcomes sought in the CDP (Objective 15.2.2), and CRPS (Objective 6.2.6(3)) are that commercial activity is to be focused within centres, and any expansion of commercial activity outside centres is to not give rise to significant adverse distributional and urban form effects (Objective 3.3.10).

The subject land is directly opposite the Local Centre zone of Prestons, being across Marshland Road on the same intersection. The rezoning sought by this submission could therefore be considered as an extension of the Prestons centre.

Policy 15.2.2.4 provides policy direction for consideration of proposals for the outward expansion of a centre and can assist in determining the appropriateness of the expansion sought. This reinforces objective 15.2.2 by seeking to ensure the expanded centre remains commensurate with the centre's role while not having significant adverse effects including distributional effects on the wider hierarchy.

The potential commercial distribution effects arising from the rezoning of the sites to commercial are not included in the submission and the submitter may provide this when evidence is filed.


Policy 15.2.2.4 also requires consideration of whether the proposal is integrated with the provision of infrastructure, that adverse effects are managed at the interface with adjoining zones and the centre is coherent in its form. The submission notes the direct interfaces and states that the proposed provisions for the LCZ address that interface and ensure on-going maintenance of rural amenity.

Any expansion is also to be response to growth in the surrounding catchment. While land to the east, known as Prestons, is to be rezoned to MRZ and enables intensification, the Prestons area is also subject to a qualifying matter restricting development due to the vacuum wastewater system. It is therefore not clear of the demand that supports the rezoning of the subject land.

The subject land is a relatively short distance from the Homebase Large Format Centre and the Shirley Key Activity Centre (Palms). Without a demonstrated demand and consideration of the distributional effects of the proposed rezoning, there is a risk of impacting on the two centres to the south. The extent of the area zoned Large Format at Homebase has recently been extended to QEII Drive as the outcome of a private plan change with

	<p>limitations on retail activities to support recovery of the Palms. The proposed rezoning should therefore be considered in this context.</p> <p>The submission refers to the existing activities on the site including a medical centre, pre-school and church and the rezoning is sought to allow for their continued development or re-development. The recognition of existing activities does not in itself warrant the rezoning of the subject land to commercial, which enables a wide range of activities including retail and office activities.</p> <p>On the basis of the preceding analysis, I do not consider the rezoning to be appropriate in the context of the CDP and CRPS.</p>
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9. 249

Submission	249, City Salvage
Address	544 Tuam Street, 100-104 Mathesons Road, Phillipstown
	
Operative Zoning	Residential Medium Density Zone, Commercial Local Zone
Notified Zoning	Medium Density Residential Zone, Neighbourhood Centre Zone
Relief Sought (Zoning / Change Sought)	Rezone site to Neighbourhood Centre Zone
Recommendation: Accept/ Reject/ Amend	Reject (based on scope)
Reasons for Recommendation	Submitter 249 City Salvage has sought rezoning of Residential Medium Density Zoned land at 544 Tuam Street, 100-104 Mathesons Road, Phillipstown to Neighbourhood Centre Zone. However, referring to 8.6.1,

which outlines the scope of the IPI for non-residential zones, the site is outside a walking catchment and is thus outside of scope.

The key messages conveyed in the CDP (Objective 15.2.2), and CRPS (Objective 6.2.6(3)) are that commercial activity is to be focused within centres, and any expansion of commercial activity outside centres is to not give rise to significant adverse distributional and urban form effects (Objective 3.3.10).

The subject land is directly adjoining an existing commercial centre on the corner of Tuam Street and Mathesons Road. The rezoning sought by this submission could therefore be considered as an extension of the Neighbourhood centre.

Policy 15.2.2.4 provides policy direction for consideration of proposals for the outward expansion of a centre and can assist in determining the appropriateness of the expansion sought. This reinforces objective 15.2.2 by seeking to ensure the expanded centre remains commensurate with the centre's role while not having significant adverse effects including distributional effects on the wider hierarchy.

The potential commercial distribution effects arising from the rezoning of the sites to commercial are not included in the submission and the submitter may provide this when evidence is filed.

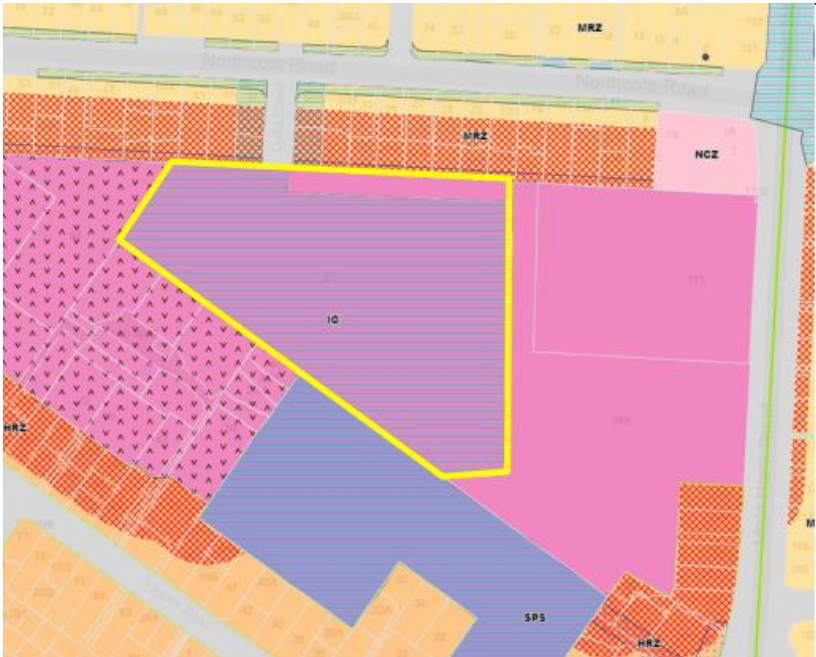
With regard to the centre's role, the extension of the existing Neighbourhood zone by 2,29m² would increase its capacity with the total zoned area being 8,093 m². While this is constrained by the location of the Pumphouse building that is heritage listed, there is the potential for effects on centres in the vicinity. The site is near to the Linwood KAC and Central City with Neighbourhood centres in proximity on Ferry Road and the corner of Stanmore Road and Worcester Street.

Policy 15.2.2.4 also requires consideration of whether the proposal is integrated with the provision of infrastructure, that adverse effects are managed at the interface with adjoining zones and the centre is coherent in its form. The centre would still be coherent in shape with the rezoning, and the submission notes the existing rules for the commercial zone will provide appropriate protection for adjoining residential properties. I agree with this.

Any expansion is also to be response to growth in the surrounding catchment. The land in the surrounding area is zoned RMD and there will therefore be additional demand for floorspace. However, as noted above, the question is the extent to which this impacts on other centres.

Until there is additional information available, I recommend the request for rezoning is rejected.

10. 823 – 2 Lydia Street

Submission	823, The Catholic Diocese of Christchurch
Address	2 Lydia Street
	
Operative Zoning	Industrial General Zone
Notified Zoning	Industrial General Zone
Relief Sought (Zoning / Change Sought)	Apply Brownfield overlay to 2 Lydia Street
Recommendation: Accept/ Reject/ Amend	Accept
Reasons for Recommendation	<p>The Catholic Diocese of Christchurch seek a Brownfield Overlay is applied to 2 Lydia Street, being land currently zoned Industrial General and subject to a designation for a proposed school, being a new campus for Marion College. The site is within a walkable catchment of Papanui TCZ.</p> <p>The site has been under-utilised for industrial activities and would therefore fit within the definition of Brownfield in the District Plan, being <i>“abandoned or underutilised commercial or industrial land, or land no longer required by a requiring authority for a designated purpose.”</i></p> <p>In the context of Policy 16.2.2.1 that defines criteria for the definition of a brownfield site, the land is previously used industrial land (policy 16.2.2.1 (a)(1) that is under-utilised (Policy 16.2.2.1(a)(ii)).</p> <p>In the context of Policy 16.2.21(a)(iv) that the redevelopment should not adversely affect the supply of land to meet anticipated supply needs of industrial activities. Council’s most recent Business Capacity Assessment prepared under the NPS UD shows there is a significant over-supply of industrial land at a city-wide level. This is at a macro-level and there is not</p>

any evidence at a local level provided by the applicant. This may be provided when submitter's evidence is filed.

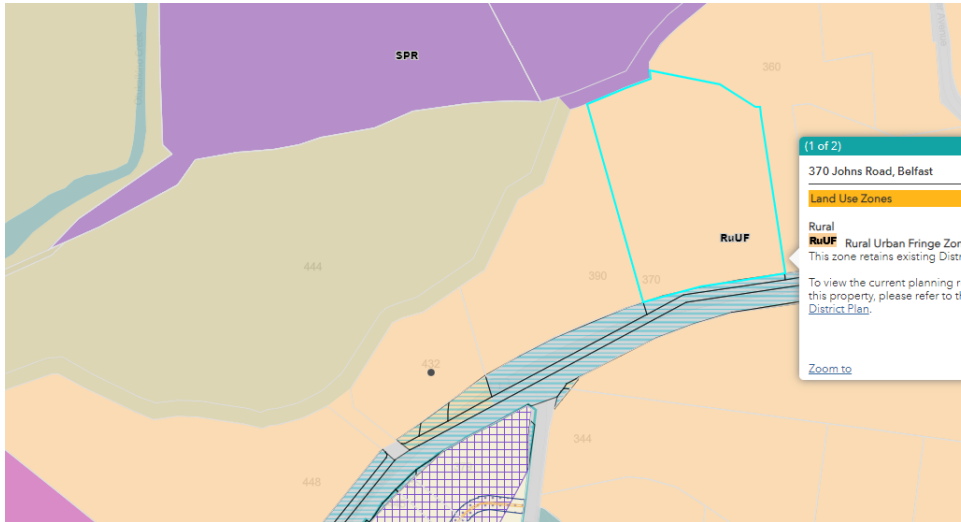
The last criteria (v) under policy 16.2.2.1 is that the location is not surrounded by industrial activities and/or will not erode the anticipated outcomes for an industrial area. The site itself is being developed for a school and the land directly to the east is being developed for a new Pak n'Save supermarket. To the south east is the head office of Foodstuffs, comprising offices. It can therefore be concluded that the land to the east is not used for industrial activities and is not anticipated to be.

The industrial zoned land to the west and south-west of the subject land is used for a range of light industrial activities and other uses incl. garage, automotive repair, fitness, furniture shops and towing services (amongst other uses). It is accessed off Vagues Road rather than Lydia Street and with existing rules to manage the interface, it is my conclusion that it will not be adversely affected by the subject land being identified by way of a brownfield overlay.

The Brownfield Overlay would enable the site to be developed for residential activities as a Restricted Discretionary Activity, the relevant policy considerations being in Policy 16.2.2.2 of the Industrial Chapter.

I consider the relief sought is the accords with Objective 16.2.2 and policy 16.2.2.1, while also giving effect to Policy 6.3.8 of the CRPS, which anticipates that regeneration of existing brownfield areas is encouraged. On this basis, I recommend the relief is accepted. Notwithstanding this, I consider the zoning of the area requires a review in a more comprehensive manner, having regard to the surrounding land uses.

11. 691

Submission	691, Ross Clarke
Address	<p>370, 390 & 432 Johns Road, Harewood</p> 
Operative Zoning	Rural Urban Fringe Zone
Notified Zoning	Rural Urban Fringe Zone
Relief Sought (Zoning / Change Sought)	Industrial General Zone
Recommendation: Accept/Reject/Amend	Reject
Reasons for Recommendation	<p>Submitter 691 Ross Clarke has sought to rezone Rural Urban Fringe zoned land at 370, 390 and 432 Johns Road, Harewood to Industrial General Zone. referring to 8.6.1, which outlines the scope of the IPI for non-residential zones, the site is outside a walking catchment and is thus outside of scope.</p> <p>The subject land is outside the urban area and greenfield priority areas defined on Map A of the CRPS. The rezoning to enable industrial activities would therefore not give effect to Objective 6.2.1 of the CRPS, which is to “Avoid(s) urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS”. Objective 3.3.7(a)(iii) of the CDP similarly outlines that urban activities are only provided for within the existing urban areas or areas identified in Map A.</p> <p>Policy 8 of the NPS UD requires Council to be responsive to plan changes that would add significantly to development capacity and contribute to a well-functioning urban environment, even if unanticipated by planning documents. The submission does not demonstrate that the rezoning would contribute significantly to capacity or a well-functioning urban environment.</p> <p>There is not a demonstrated shortfall in the capacity for industrial activities and Council’s most recent Business Capacity Assessment prepared under the NPS UD shows there is a significant over-supply of industrial land at a city-wide level. It</p>

is noted from the submission that the submitter has recently undertaken an economic assessment of available land with the conclusion that there is likely to be a shortage of suitable/ available land. Following the filing of evidence, the report and any additional information will be sought from the applicant.

In terms of location, the site benefits from close proximity to the strategic road network, directly adjoining Johns Road. However, access and the capacity of the network to safely accommodate traffic movements associated with the site's development would need to be assessed to be satisfied that the proposed rezoning is appropriate (amongst other technical assessments).

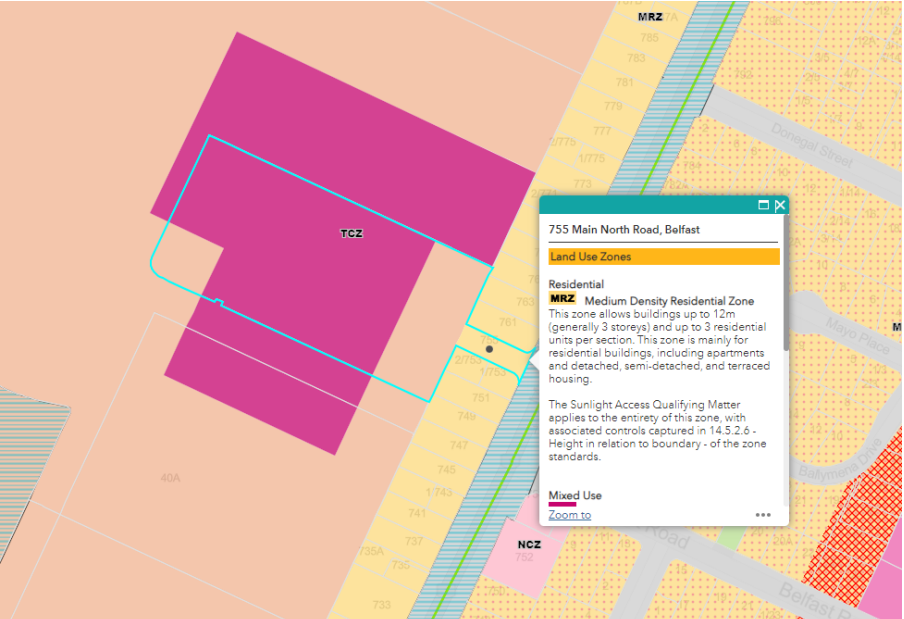
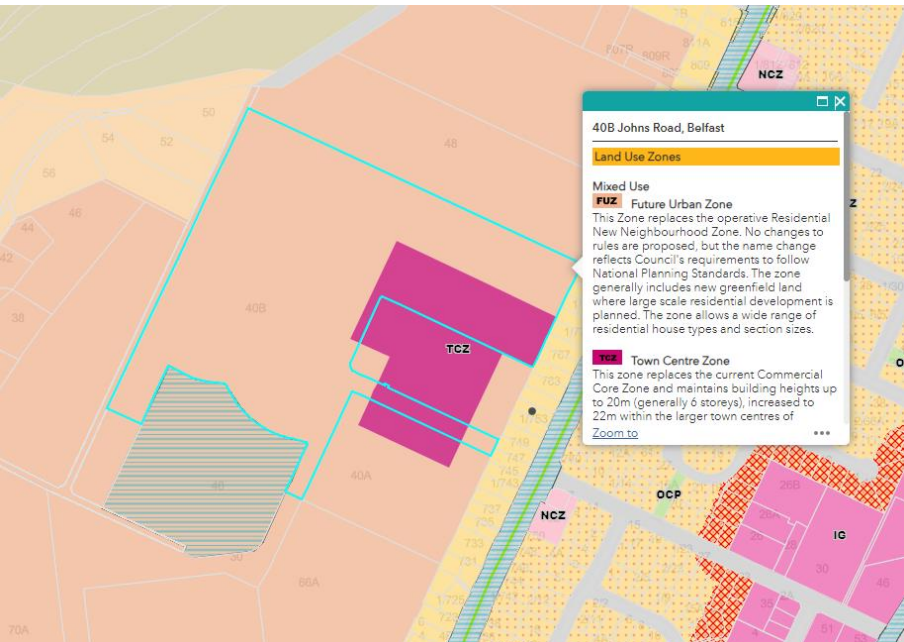
Having regard to the information provided in the submission, I do not consider the rezoning appropriate for the reasons described above and without additional information to consider the merits.

12. 2

Submission	2, Greg Olive
Address	419 Halswell Junction Road, Halswell
Operative Zoning	Residential New Neighbourhood Zone and Residential Suburban Zone
Notified Zoning	Medium Density Residential Zone
Relief Sought (Zoning / Change Sought)	Mixed Use Zone
Recommendation: Accept/ Reject/ Amend	Reject

<p>Reasons for Recommendation</p>	<p>Submitter 2 Greg Olive has sought the rezoning of land at 419 Halswell Junction Road from MRZ to Mixed Use. Referring to 8.6.1, which outlines the scope of the IPI for non-residential zones, the site is outside a walking catchment and is thus outside of scope.</p> <p>With regard to the merits, Objective 15.2.3 (a) is to <i>“Recognise the existing nature, scale and extent of commercial activity within the Commercial Office and Mixed Use Zones...”</i>. The site is currently used for residential activity and it is understood the rezoning is sought as an alternative to enable the establishment of structures as a buffer to the adjoining residential lots.</p> <p>The Mixed use zone enables a range of activities including industrial, entertainment, recreation, community activities (including education, health care, spiritual) and residential amongst other activities. A number of these activities and their associated employment can generate vehicle trips and while rules enable an assessment of high-trip generating activities, the appropriateness of the location for these activities should be considered as part of the request for rezoning.</p> <p>The site is within 400m of the end of the Orange line and therefore within walking distance of a bus route. It is also in close proximity to the southern motorway and there is a potential for reliance on private vehicle to access the site.</p> <p>The land to the west is zoned rural and land to the south east has been developed for housing since the earthquakes of 2010-11. Therefore, the opportunities for intensification of land use in close proximity are limited and the catchment for activities/ services on the site may therefore be wider, drawing people from further afield.</p> <p>In terms of the uses enabled, there is not evidence of a shortfall to justify land being zoned Mixed-use, particularly in terms of industrial land supply.</p> <p>Having regard to the information provided in the submission, I do not consider the rezoning appropriate for the reasons described above. The alternative is the consideration of bespoke rules for the site to enable structures for the purpose of mitigating noise or a consenting process.</p>
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13. 917

Submission	917, Belfast Village Centre Limited
Address	751 (Lot 24 DP 20313), 1/753 and 2/753 (Lot 23 DP 20313) and 755 Main North Road (Lot 2 DP 540607)
	
	40B Johns Road (Lot 3 DP 540607) and Section 4 Survey Office Plan 533991)
	
Operative Zoning	751, 1/753 and 2/753 Main North Road: Residential Suburban Zone
	755 Main North Road: Residential Suburban Zone, Commercial Core Zone, Residential New Neighbourhood Zone

	40B Johns Road: Commercial Core Zone, Residential New Neighbourhood Zone
Notified Zoning	751, 1/753 and 2/753 Main North Road: Medium Density Residential Zone 755 Main North Road: Medium Density Residential Zone, Town Centre Zone and Future Urban Zone 40B Johns Road: Future Urban Zone, Town Centre Zone
Relief Sought (Zoning / Change Sought)	Amend the zoning of land at 755 Main North Road from Future Urban Zone to Town Centre zone. Amend the zoning of land at 751, 1/753 and 2/753 and 755 Main North Road from Medium Density Residential Zone to Town Centre Zone. Amend the zoning of land at 40B Johns Road from Future Urban Zone to Town Centre Zone.
Recommendation: Accept/ Reject/ Amend	Accept in part – change planning maps to be consistent with PC 5B Environment Court Consent Order.
Reasons for Recommendation	<p>Submitter 917 Belfast Village Centre Limited has sought to rezone all of the above-mentioned sites to Town Centre Zone, being an extension of the zoning . The rezoning request would add 1ha to the commercial zoning of the centre.</p> <p>I note the site is incorrectly zoned Town Centre Zone and should have been zoned as Local Centre zone consistent with Policy 15.2.2.1, Table 15.1 and the PC 14 s32. Also as noted on page 8 of the submission, the changes decided through Plan Change 5B have not carried over to PC 14 and this is an oversight, noting a Consent Order was issued by the Environment Court on 1 February 2023 prior to notification of Plan Change 14 on 17 March 2023.</p> <p>With regard to scope, section 8.6.1 of my s42A refers to S77N of the Resource Management (Enabling Housing Supply and other matters) Amendment Act that Council may amend non-residential zones when giving effect to Policy 3, Policy 3(d) directs that heights and density are enabled, commensurate with the level of commercial activity in a centre. Mr Kleynbos in his evidence considers North West Belfast is a ‘well-serviced’ Local Centre and thus has proposed a height limit of 14m by way of a precinct around the centre. I note the Local Centre Zone also permits 14m, and as such the heights and density regardless of residential or commercial zoning will achieve the direction of Policy 3(d) to enable heights and density that are commensurate to the level of commercial activity and community services.</p> <p>The following evaluation considers the appropriateness of the relief for extending the commercial zoning of the North West Belfast centre beyond that decided through Plan Change 5.</p> <p>Objective 15.2.2 anticipates commercial activity being focussed in centres in a way and at a rate that supports the function of Town Centres as a major focal point (clause (ii)), gives primacy to Key Activity Centres (clause (iv)) and that is</p>

consistent with the role of each centre as defined in Policy 15.2.2.1 (Clause v). This gives effect to the CRPS.

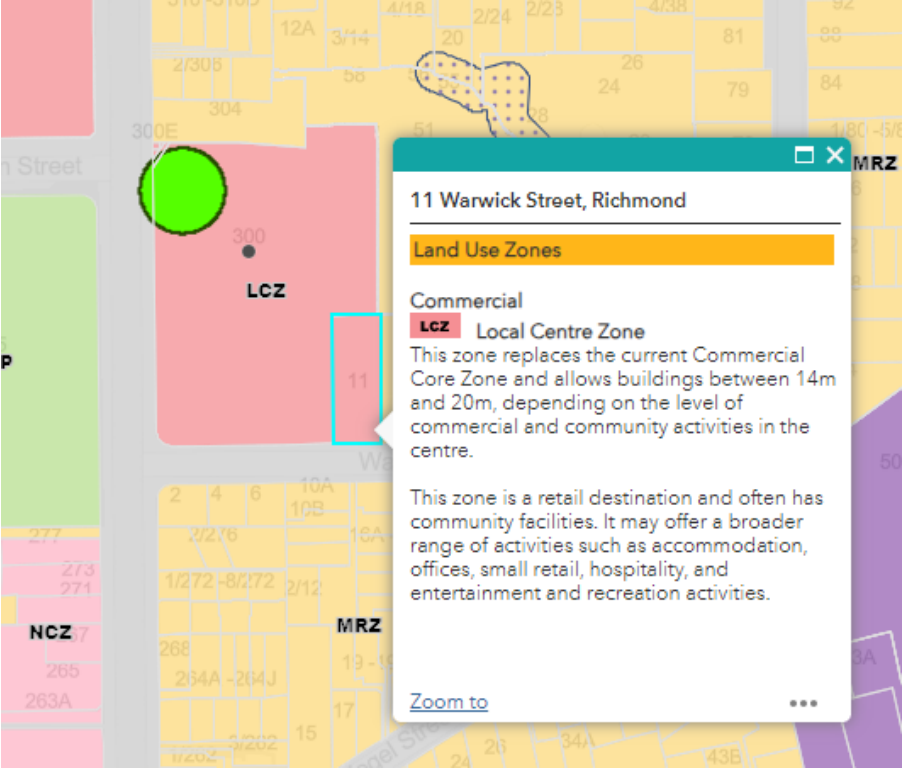
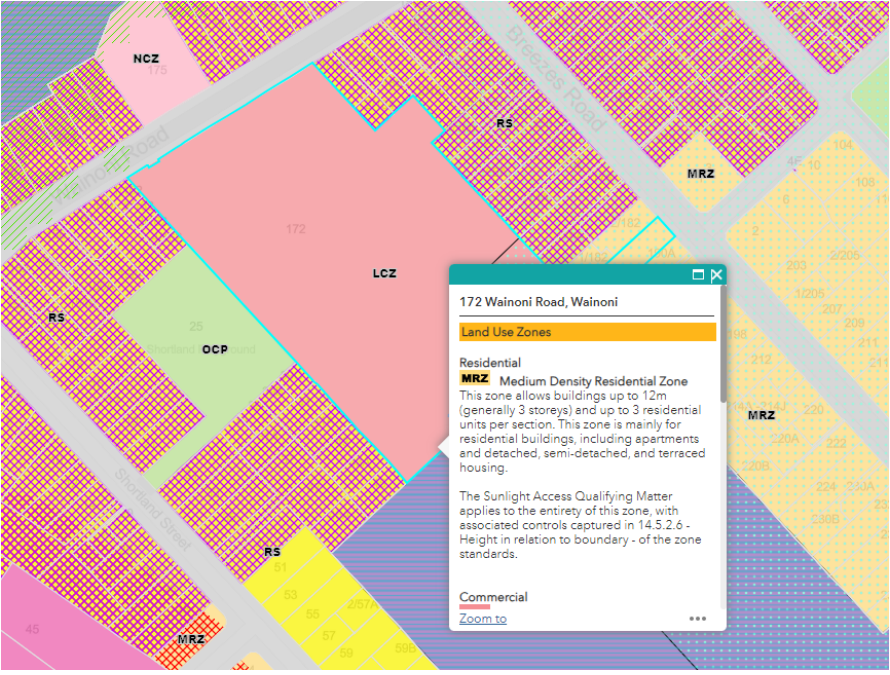
The intended role of North West Belfast centre is that of a Local Centre, and a key consideration is the potential for the North West Belfast centre to develop to a level greater than anticipated for a Local Centre. There is the potential for negative impacts on the Northwood/ Belfast centre, which is a kilometre to the south and is identified as a KAC.

In my opinion, extending the North West Belfast centre without a comprehensive analysis of distributional and urban form effects on the Northwood KAC does not demonstrate or address objectives of the District Plan and CRPS. Furthermore, the role and function of centres in Belfast needs an integrated and comprehensive review that considers the future role and function of North West Belfast alongside a review of the role of the Northwood KAC and future zoning of the Ryman land to residential.

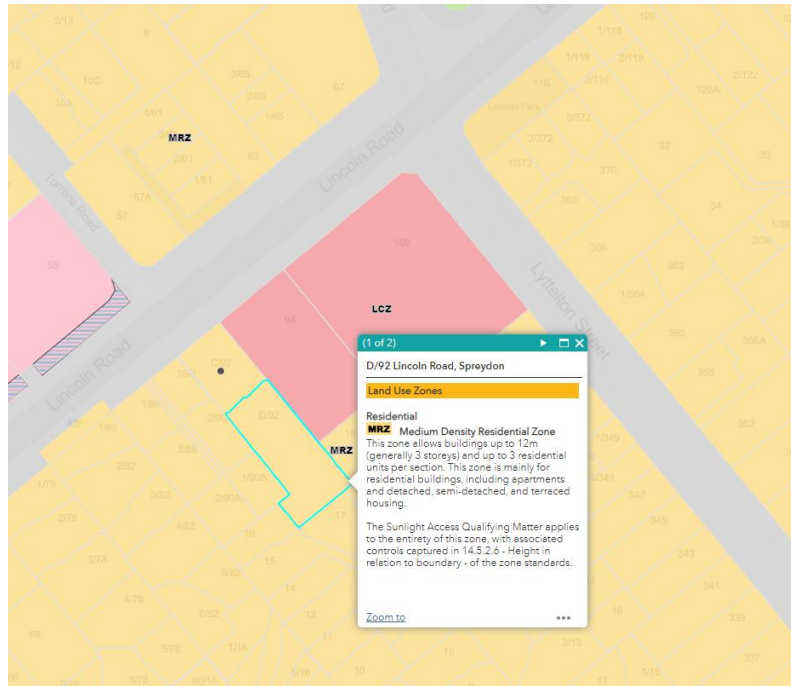
I also note that PC 14 does not require rezoning of land to commercial to achieve heights and density consistent with the direction of the NPS UD.

I consider the most appropriate way to achieve the purpose of the Act and objectives of CDP, CRPS and NPS UD is to maintain the extent of the North West Belfast Centre, consistent with the decision on plan change 5B.

14. 705 – Foodstuffs

Submission	705, Foodstuffs
Address	New World Stanmore: 300 Stanmore Road, 9 and 11 Warwick Street, 304 Stanmore Road
	 <p>11 Warwick Street, Richmond</p> <p>Land Use Zones</p> <p>Commercial</p> <p>LCZ Local Centre Zone</p> <p>This zone replaces the current Commercial Core Zone and allows buildings between 14m and 20m, depending on the level of commercial and community activities in the centre.</p> <p>This zone is a retail destination and often has community facilities. It may offer a broader range of activities such as accommodation, offices, small retail, hospitality, and entertainment and recreation activities.</p> <p>Zoom to</p>
	PAK'nSAVE Wainoni: 186 and 204 Breezes Road and 172, 174, 178 and 182 Wainoni Road
	 <p>172 Wainoni Road, Wainoni</p> <p>Land Use Zones</p> <p>Residential</p> <p>MRZ Medium Density Residential Zone</p> <p>This zone allows buildings up to 12m (generally 3 storeys) and up to 3 residential units per section. This zone is mainly for residential buildings, including apartments and detached, semi-detached, and terraced housing.</p> <p>The Sunlight Access Qualifying Matter applies to the entirety of this zone, with associated controls captured in 14.5.2.6 - Height in relation to boundary - of the zone standards.</p> <p>Commercial</p> <p>Zoom to</p>

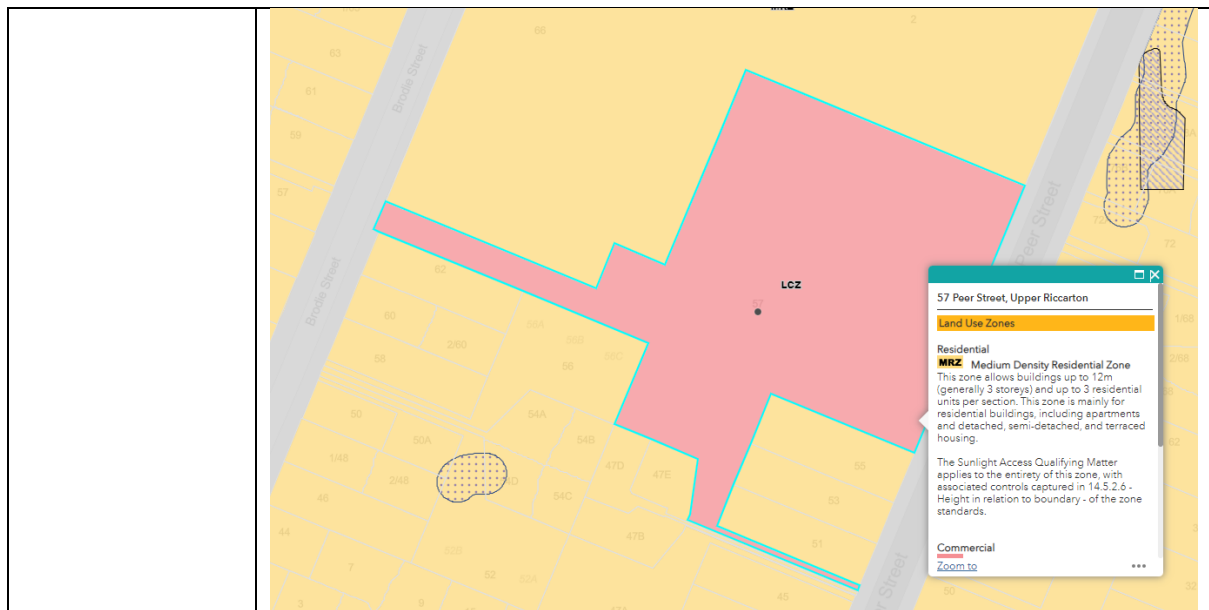
New World Lincoln Road: 92, 94, 100 and 108 Lincoln Road



Head Office and PAK'nSAVE Papanui: 159, 165 and 171 Main North Road and 3, 5, 7 and 9 Northcote Road



New World Ilam: 55 and 57 Peer Street



Operative Zoning	<p>New World Stanmore:</p> <p>300 Stanmore Road and 11 Warwick Street: Commercial Core Zone</p> <p>304 Stanmore Road: Residential Medium Density Zone</p> <p>PAK'nSAVE Wainoni: Commercial Core Zone and Residential Suburban Zone</p> <p>New World Lincoln Road: Commercial Core Zone (94 and 108 Lincoln Road) and Residential Suburban Zone (92 Lincoln Road)</p> <p>Head Office: 159 Main North Road – Residential Suburban Zone, 165 Main North Road – Industrial General Zone</p> <p>PAK'nSAVE Papanui: 7 Northcote Road – Commercial Local Zone, 9 Northcote Road – Residential Suburban Zone</p> <p>New World Ilam: 55 Peer Street – Residential Suburban Zone, 57 Peer Street – Commercial Core Zone</p>
Notified Zoning	<p>New World Stanmore: 300 Stanmore Road and 11 Warwick Street: Local Centre Zone, 304 Stanmore Road: Medium Density Residential</p> <p>PAK'nSAVE Wainoni: Medium Density Residential, Local Centre Zone</p> <p>New World Lincoln Road: Local Centre Zone and Medium Density Residential Zone</p> <p>Head Office: 159 Main North Road – High Density Residential Zone, 165 Main North Road - Industrial General Zone</p> <p>PAK'nSAVE Papanui: 9 Northcote Road – Medium Density Residential Zone, 3, 5, 7 Northcote Road – Neighbourhood Centre Zone, 165 Main North Road - Industrial General Zone</p>

	<p>New World Ilam: 55 Peer Street – Medium Density Residential Zone, 57 Peer Street – Local Centre Zone</p>
<p>Relief Sought (Zoning / Change Sought)</p>	<p>New World Stanmore: Amend to rezone the entire site (304 Stanmore Road) to Local Centre Zone.</p> <p>PAK'nSAVE Wainoni: Amend to rezone Section 2 SO 552969 and Lot 2 DP 2586 to Local Centre Zone.</p> <p>New World Lincoln Road: Amend to rezone Lot 1 DP 51902 to Local Centre Zone.</p> <p>Head office: Amend to rezone Lot 2 DP 14400 (159 Main North Rd), part of Lot 1 DP 14400 and accessway on Lot 7 DP14400 to Industrial General Zone.</p> <p>PAK'nSAVE Papanui: Amend to rezone 9, 3, 5, 7 Northcote Road and Part Lot 1 DP 21207 to Local Centre Zone; and amend the centre to Local Centre from Neighbourhood Centre in Table 15.1</p> <p>New World Ilam: Rezone 55 Peer Street to Local Centre Zone.</p>
<p>Recommendation : Accept/ Reject/ Amend</p>	<p>Accept the request as it relates to New World Stanmore, Head office/Papanui</p> <p>Reject the request as it relates to Pak n' Save Papanui</p> <p>Reject the request as it relates to Pak n' Save Wainoni, New World Lincoln Road, New World Ilam (based on scope)</p>
<p>Reasons for Recommendation</p>	<p>With regard to the scope of the plan change, PAK'nSAVE Wainoni, New World Lincoln Road, and New World Ilam are outside walking catchments and are thus outside the scope of PC 14. Paragraph 8.6.1 of my evidence outlines the scope of the IPI for non-residential zones.</p> <p>New World Stanmore</p> <p>With regard to the request to rezone the land at 304 Stanmore Road to Local Centre Zone, the vacant site adjoins the existing supermarket with housing to the immediate north. The rezoning of 897 m2 of land to commercial is unlikely to change the function of the centre, nor impact on other centres. It would also enable any future extension with existing rules managing the interface with the adjoining residential zone.</p> <p>On this basis, I consider an extension of the Local Centre Zone to be appropriate in achieving Objective 15.2.2 of the District Plan.</p> <p>Pak n' Save Wainoni</p> <p>The site that the supermarket building is on (Sec 2 SO 552969) includes an access leg to Breezes Road with an established access for those visiting the supermarket. Reflecting the width of the access (15m), it is unlikely to be developed in the future for commercial activities and would therefore not impact on the coherence of the residential activities along Breezes Road any more than the current activity. However, to manage the potential effects of the rezoning, it is recommended that a rule is introduced that limits the use of</p>

the access for this purpose only. On this basis, I recommend the rezoning is accepted.

With regard to Lot 2 DP25816 (204 Breezes Road), the site appears to be vacant with no consent for development. The majority of the site is proposed to be zoned as Local Centre zone except the access leg, which is MRZ. It adjoins the supermarket site to the north and any development of 204 Breezes Road for commercial activity is anticipated to be integrated with the balance of the commercial zone. Notwithstanding this, the access leg is only 6m in width and like the access to the supermarket site, it is unlikely to be developed for commercial use beyond providing access. I therefore recommend the rezoning is also accepted.

New World Lincoln Road

The submission seeks that the site described as Lot 1 DP 51902 (92 Lincoln Road) is rezoned Local Centre zone, consistent with the balance of the site as defined in the submission. A resource consent exists for development of a supermarket on the site and this includes Lot 1 DP51902. A 2 year extension was granted on the consent, which now lapses in November 2024. While there is uncertainty of whether the consent will be implemented, the inclusion of Lot 1 DP 51902 as part of the commercial zone is not anticipated to change the role and function of the centre. There is not anticipated to be effects of enabling commercial activity on other centres that have not otherwise been considered through the consenting process. It is therefore considered appropriate that the site is treated as a whole and the zoning of 92 Lincoln Road is accepted.

Head office/Papanui

The submitter seeks to rezone 159 Main North Road from High Density Residential Zone to Industrial General Zone to better reflect the current activities on site (car parking). This is consistent with the decision on Plan Change 5 and I therefore recommend this correction is made.

Pak n' Save Papanui

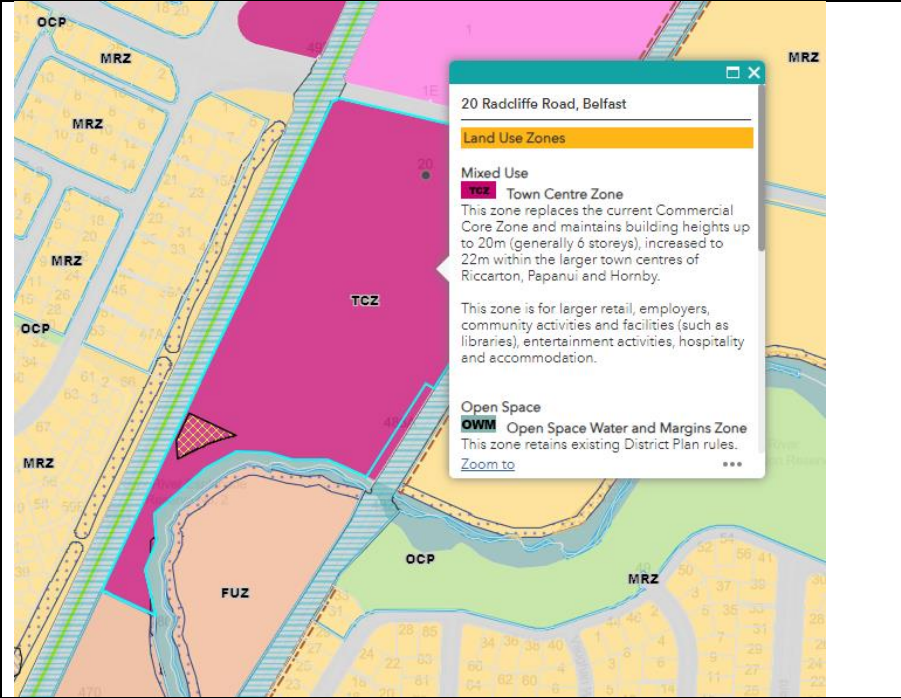
Foodstuffs has sought the site of the proposed Pak n' Save Papanui is rezoned from Medium Density Residential, Industrial General Zone and Neighbourhood Centre Zone to a Local Centre Zone. Those parts of the site zoned Industrial General and Neighbourhood Centre are within a walking catchment of the Papanui Large Town Centre.

With regard to the scope of the plan change, this is limited to enabling height and density commensurate to the centre rather than rezoning of land. I also note the principles of *Waikanae* which, if upheld, would not allow Council to take away pre-existing development rights in PC14. The Industrial General Zone permits unlimited height, except within 20m of a residential zone unlike the Local Centre zone which permits buildings up to 14m in height.

	<p>Notwithstanding the issues in respect of scope, resource consent for a supermarket has been issued and is currently being implemented at 171 Main North Road. While there is a change in use of the site, the change in zoning sought to Local Centre opens up the ability for development and use of the site for a range of activities. In doing so, there is a need to consider the effects of the change on centres in the immediate surrounds, noting the short distance to the Papanui Key Activity Centre and Cranford Retail Park on Cranford Street. Without consideration of the distributional effects of the proposed rezoning, there is an unknown risk of impacts on the function/ role of these centres.</p> <p>Objective 15.2.2 anticipates commercial activity being focussed in centres in a way and at a rate that supports the function of Town Centres as a major focal point (clause (ii)), gives primacy to Key Activity Centres (clause (iv)) and that is consistent with the role of each centre as defined in Policy 15.2.2.1 (Clause v). This gives effect to the CRPS.</p> <p>Until further information on the effects of the rezoning is provided, I am unable to recommend the commercial zoning of the site.</p> <p>New World Ilam</p> <p>55 Peer Street is sought for rezoning by Foodstuffs, the submission noting that it “would better reflect the activities and future activities for the site”. The site appears to be used for residential activity at the current time and there has been no consent granted for use of the site for commercial activity. While rezoning the site in a similar manner to 304 Stanmore Road would enable expansion of the supermarket and associated car parking, the site of the supermarket (57 Peer Street) has an access leg to the south of 51 Peer Street. Between this access leg and 55 Peer Street, there are two residential zoned properties, being 51 and 53 Peer Street. There is a potential effect on the anticipated amenity for these properties of rezoning 55 Peer Street to commercial, particularly if the access leg to the south of 51 Peer Street had an increase in vehicle movements as access to the supermarket. I will discuss this further with Foodstuffs and consider the request further before the hearing.</p>
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15. 749

Submission	749, Ryman Healthcare Limited
Address	20 Radcliffe Road, Belfast

	
Operative Zoning	Commercial Core Zone
Notified Zoning	Town Centre Zone
Relief Sought (Zoning / Change Sought)	Rezone the site to High Density Residential.
Recommendation: Accept/ Reject/ Amend	Reject (based on scope)
Reasons for Recommendation	<p>Ryman Healthcare seek the Belfast (Northwood) TCZ is rezoned to High Density Zone.</p> <p>The scope of an IPI is restricted to incorporating MDRS or giving effect to Policy 3, being the enablement of height and density within and adjoining centres. I consider the request to rezone land from commercial to residential would be outside the scope of the IPI on this basis.</p> <p>The operative CDP enables buildings up to 20m in District Centres, and PC 14 as notified proposed 22m for TCZ's. The tests of Waikanae, if upheld, do not allow Council to take away development rights, the level of development enabled for MDZ would be less than TCZ and operative District Centre provisions.</p> <p>With regard to the merits of the request, the site has resource consent and is being developed for a retirement village. While the zoning of TCZ enables a wide range of activities, including residential, the intent of the zoning is to enable the site to serve the residential catchment as a focal point for commercial and community activities. As the function and role of the proposed centre is compromised, I consider a residential zoning to be appropriate. It reflects the current and anticipated use of the site.</p> <p>While the Belfast/Northwood centre is identified as a KAC and TCZ, Council's s32 evaluation has deemed the commensurate residential response around the centre is a MDZ precinct with building heights of</p>

	14m. HDZ is not a considered an appropriate response having regard to the level of commercial activity at Northwood.
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APPENDIX 2 – RELEVANT PROVISIONS OF THE REGIONAL POLICY STATEMENT,
CHRISTCHURCH DISTRICT PLAN

Canterbury Regional Policy Statement

CRPS Objective 6.2.2

1. *aiming to achieve the following targets for intensification as a proportion of overall growth through the period of recovery:*
 - a. *35% averaged over the period between 2013 and 2016*
 - b. *45% averaged over the period between 2016 to 2021*
 - c. *55% averaged over the period between 2022 and 2028;*
2. *providing higher density living environments including mixed use developments and a greater range of housing types, particularly in and around the Central City, in and around Key Activity Centres, and larger neighbourhood centres, and in greenfield priority areas, Future Development Areas and brownfield sites;*
3. reinforcing the role of the Christchurch central business district within the Greater Christchurch area as identified in the Christchurch Central Recovery Plan;

CRPS Objective 6.2.5

“These centres will be high quality, support a diversity of business opportunities including appropriate mixed-use development, and incorporate good urban design principles. The development and distribution of commercial activity will avoid significant adverse effects on the function and viability of these centres.”

CRPS Objective 6.2.6

1. *The greenfield priority areas for business in Christchurch City provide primarily for the accommodation of new industrial activities;*
2. *Except where identified for brownfield redevelopment, areas used for existing industrial activities are to be used primarily for that purpose, rather than as a location for new commercial activities;*
3. *New commercial activities are primarily directed to the Central City, Key Activity Centres, and neighbourhood centres;*
4. *A range of other business activities are provided for in appropriate locations; and*
5. *Business development adopts appropriate urban design qualities in order to retain business, attract investment and provide for healthy working environments.”*

Policy 6.3.1(8) to “avoid development that adversely affects the function and viability of, or public investment in, the Central City and Key Activity Centres”,

Policy 6.3.6 - Business land outlines that (underlining is my emphasis) “To ensure that provision, recovery and rebuilding of business land in Greater Christchurch maximises business retention, attracts investment, and provides for healthy working environments, business activities are to be provided for in a manner which:

1. *Promotes the utilisation and redevelopment of existing business land, and provides sufficient additional greenfield priority area land for business land through to 2028 as provided for in Map A;*
2. *Recognises demand arising from the relocation of business activities as a result of earth quake damaged land and buildings;*
3. *Reinforces the role of the Central City, as the city’s primary commercial centre, and that of the Key Activity Centres;*
4. *Recognises that new commercial activities are primarily to be directed to the Central City, Key Activity Centres and neighbourhood centres where these activities reflect and support the function and role of those centres; or in circumstances where locating out of centre, will not give rise to significant adverse distributional or urban form effects;*
5. *Recognises that new greenfield priority areas for business in Christchurch City are primarily for industrial activities, and that commercial use in these areas is restricted;*
6. *Recognises that existing business zones provide for a range of business activities depending on:*
 - *i. the desired amenity of the business areas and their surrounds; and*
 - *ii. the potential for significant distributional or urban form effects on other centres from new commercial activity.*
7. *Utilises existing infrastructure availability, capacity and quality;*
8. *Ensures reverse sensitivity effects and conflicts between incompatible activities are identified and avoided or mitigated against;*
9. *Ensures close proximity to labour supply, major transport hubs and passenger transport networks;*
10. *Encourages self-sufficiency of employment and business activities within communities across Greater Christchurch;*
11. *Promotes, where appropriate, development of mixed-use opportunities, within Key Activity Centres provided reverse sensitivity issues can be appropriately managed; and*
12. *Incorporates good urban design principles appropriate to the context of the development.”*

Policy 6.3.7(2) outlines that “in relation to residential development opportunities in Greater Christchurch:

“2. Intensification in urban areas of Greater Christchurch is to be focused around the Central City, Key Activity Centres and neighbourhood centres commensurate with their scale and function, core public transport routes, mixed-use areas, and on suitable brownfield land.”

Christchurch District Plan

Proposed Objective 3.3.7 defines a well-functioning urban environment in Christchurch City terms, outlining:

“A distinctive, legible urban form and strong sense of place, expressed through contrasting building clusters within the cityscape articulated by the:

Pre-eminence of the city centre built form, supported by enabling the highest buildings;

Clustering, scale and massing of development in and around commercial centres, commensurate with the role of the centre and the extent of commercial and community services provided, where

The largest scale and density of development, outside of the city centre, is provided within and around town centres, and lessening scale for centres lower in the hierarchy; and

Lower heights and design controls for development located in more sensitive environments;”

Objective 3.3.8 (Operative 3.3.7) directs that the CDP achieves:

“A well-integrated pattern of development and infrastructure, a consolidated urban form, and a high quality urban environment that:

iv. Increases the housing development opportunities in the urban area to meet the intensification targets specified in the Canterbury Regional Policy Statement, Chapter 6, Objective 6.2.2 (1); particularly:

A. in and around the Central City, Key Activity Centres (as identified in the Canterbury Regional Policy Statement), Town Centre, and larger Local neighbourhood centres, and nodes of core public transport routes; and

B. in those parts of Residential Greenfield Priority Areas identified in Canterbury Regional Policy Statement Chapter 6, Map A; and

C. in suitable brownfield areas; and

v. Maintains and enhances the Central City, Key Activity Centres, Town centres, and Local centres as community focal points”

Objective 3.3.11 (Operative 3.3.10) outlines “the critical importance of centres for people and the economy is recognised in a framework that primarily directs commercial activity into centres, consistent with their respective roles; and any commercial activities proposing to locate outside these centres will not give rise to significant adverse distributional or urban form effects.”

Commercial Chapter

Objective 15.2.2, being:

“Commercial activity is focussed within a network of centres (comprising the ~~Central City CBD City Centre, Town Centres, Local Centres, District Centres,~~ Neighbourhood Centres, ~~Local Centres~~ and Large Format Centres) to meet the wider community’s and businesses’ needs in a way and at a rate that:

- a. *supports intensification within centres;*
- b. *enables the efficient use and continued viability of the physical resources of commercial centres and promotes their success and vitality, reflecting their critical importance to the local economy;*
- c. *supports the function of ~~District~~ **Town Centres** as major focal points for commercial activities, entertainment activities, guest accommodation, visitor accommodation, employment, transport and community activities, and ~~Neighbourhood~~ **Local Centres** as a focal point for primarily small-scale commercial activities with a focus on convenience shopping, and community activities and guest accommodation;*
- d. *gives primacy to the ~~Central City CBD, City Centre~~ followed by **Town Centres** ~~District Centres~~ and ~~Neighbourhood~~ Local Centres identified as Key Activity Centres;*
- e. *is consistent with the role of each centre as defined in 15.2.2.1 Policy – Role of centres Table 15.1;*
- f. *supports a compact and sustainable urban form that provides for the integration of commercial activity with guest accommodation, community activity, residential activity and recreation activity in locations accessible by a range of modes of transport;*
- g. *supports the recovery of centres that sustained significant damage or significant population loss from their catchment, including the ~~Central City CBD, City Centre,~~ Linwood, and ~~Neighbourhood~~ Local Centres subject to 15.2.4.3 Policy Suburban centre master plans;*
- h. *enhances their vitality and amenity and provides for a range of activities and community facilities;*
- i. *manages adverse effects on the transport network and public and private infrastructure;*
- j. *is efficiently serviced by infrastructure and is integrated with the delivery of infrastructure; and*
- k. *recognises the values of, and manages adverse effects on, sites of Ngāi Tahu cultural significance identified in Appendix 9.5.6 and natural waterways (including waipuna).*

Policy 15.2.2.1 follows outlining the role of centres:

“Recognise and manage commercial centres as the focal points for the community and business through intensification within centres that reflects their functions and catchment sizes, and in accordance with a framework that:

- a. gives primacy to, and supports, the recovery of the ~~CBD~~ **City Centre**, followed by Key Activity Centres, by managing the size of all centres and the range and scale of activities that locate within them;
- b. supports and enhances the role of ~~District Centres~~ **Town Centres**; and
- c. maintains the role of ~~Neighbourhood Centres~~, Local Centres, Neighbourhood Centres and Large Format Centres.

APPENDIX 3 - TABLE OF SUBMISSIONS WITH RECOMMENDATIONS

Sub. No.	Submitter name	Summary of relief sought	Recommendation
118.3	Spreydon Lodge Limited	Amend Policy 15.2.2.2 'Comprehensive approach to development of the North Halswell and Belfast/ Northwood Key Activity Centres' to remove reference to main street at part15.2.2.2(b)(ii) as follows: b. Require development within the North Halswell Key Activity Centre to:ii. provide high quality public open spaces, a strong main street with a concentration of finergrain retailing, and strong linkages between key anchor stores;	Reject
Issue 1 – Zoning of Centres – Riccarton, Papanui and Hornby			
855	Lendlease Limited	Amend Objective 15.2.2 to include reference to the "Metropolitan Centre Zone"	Reject
104.1	Colin McGavin	That Papanui is zoned a [Local Centre instead of a Town Centre]	Accept in part
156.1	Maureen McGavin	That Papanui is zoned a [Local Centre instead of a Town Centre]	Reject
188.2	Riccarton Bush – Kilmarnock Residential Association	That Riccarton be a Town Centre or Neighbourhood Centre, not a Large Town Centre.	Reject
260.1	Scentre (New Zealand) Limited	Riccarton should be recognized as a Metropolitan Centre in the District Plan to be in line with the NPS-UD as opposed to a Town Centre.	Reject
638.1	Central Riccarton Residents' Association Inc	That Riccarton is not classified as a Town Centre	Reject
686.1	Robyn Thomson	Riccarton Centre is reclassified to a local town centre	Reject
689.1	Canterbury Regional Council	Retain Centres as notified	Accept
834.239	Kāinga Ora	Introduce Metropolitan Centre Zones for Riccarton, Hornby, Papanui Northlands	Reject
876.2	Alan Ogle	Seek amendment to change Riccarton to a Town or Neighbourhood Centre, not a Large Town Centre	Reject
132.3	Tiffany Boyle	Revoke the idea of high rise housing buildings in Hornby and work to rebuild existing infrastructure to handle the current demand in the area.	Reject
188.26	Riccarton Bush – Kilmarnock Residents Association	That the extent of the Riccarton commercial zone is reduced, to end at Picton Ave	Reject ⁹¹

259.2	Ara Poutama Aotearoa	Retain the proposed Town Centre Zone for Winston Avenue Community Corrections, 16 Winston Avenue, Papanui.	Accept
679.8	Tony Dale	Because it is adjacent to the Christchurch CBD, Riccarton should not, as is proposed, be designated a large Town Centre. This will worsen the situation that allowed Riccarton to get to its current size in the first place - largely at the expense of the CBD.	Reject
Issue 1 – Zoning of Centres - Town Centre Zoning of Church Corner, Sydenham, Merivale, Halswell, Addington and North West Belfast			
834.239	Kāinga Ora	Amend role and function of Church Corner, Sydenham and Merivale from 'Local Centre (Large)' to 'Town Centre'.	Reject
74.2	Tony Rider	Support for Bush Inn's/Church Corner zoning as a Local Centre Zone and not Town Centre Zone.	Accept
678.7	Logan Clarke	Seeks the addition of a town centre zone along Lincoln road in Addington.	Reject
705.5	Foodstuffs	Retain Halswell Town Centre Zone as notified	Accept
917.2	Belfast Village Centre Limited	Amend the zoning of land at 751, 1/753 and 2/753 and 755 Main North Road from Future Urban Zone to Town Centre Zone	Reject
917.3	Belfast Village Centre Limited	Amend the zoning of land at 40B Johns Road (Lot 3 DP 540607 and Section 4 Survey Office Plan 533991) from Future Urban Zone to Town Centre Zone.	Reject
Issue 1 – Zoning of Centres – Local Centre Zoning			
55.17	Tobias Meyer	Supports Addington as a Local Centre	Accept
74.2	Tony Rider	Support for Bush Inn's/Church Corner zoning as a Local Centre Zone and not Town Centre Zone.	Accept
740.6	Woolworths	Amend Table 15.1 to elevate the St Albans Centre from Neighbourhood to Local Centre (Small)	Reject
259.1	Ara Poutama Aotearoa	Retain the proposed Local Centre Zone for Rāwhiti Community Corrections, 296 Breezes Road, Aranui.	Accept
676.17	Jack Gibbons	Rezone all Neighborhood Center Zones (NCZ)'s larger than 3000sqm as Local Center Zone (LCZ).	Reject
725.4	Sophie Burt	Addington should be included as a Local Centre Zone	Accept
814	Carter Group	Retain the LCZ shown for the Avonhead Shopping Centre on the Withells/Merrin corner as notified.	Accept
439	Jeff Vesey	The Avonhead shops on the corner of Withells Road and Merrin Street should be rezoned Local Centre Zone and the surrounding area be subject to housing intensification rules as per other Local Centres such as Prestons in Burwood.	Accept in part
Issue 2 – Classification of Centres in Table 15.1 – Approach to Classification			
834.239	Kāinga Ora	Consolidate all Local Centres into a simple category i.e. delete the distinction between 'small' and 'medium'.	Accept
902.15	Waipuna Halswell-Hornby-Riccarton Community Board	That there be Town Centres, Local Centres and Neighbourhood Centres only and as such that Large Town Centre, Large Local Centre and Medium Local Centre be removed	Accept in part
Issue 2 – Classification of Centres in Table 15.1 – Large Town Centres			
876	Alan Ogle	Seek amendment to change Riccarton to a Town or Neighbourhood Centre, not a Large Town Centre	Reject
188.2	Riccarton Bush – Kilmarnock	That Riccarton be a Town Centre or Neighbourhood Centre, not a Large Town Centre.	Reject

	Residents Association		
686.1	Robyn Thomson	Riccarton Centre is reclassified to a local town centre	Reject
679.8	Tony Dale	Because it is adjacent to the Christchurch CBD, Riccarton should not, as is proposed, be designated a large Town Centre. This will worsen the situation that allowed Riccarton to get to its current size in the first place - largely at the expense of the CBD	Reject
132.3	Tiffany Boyle	Revoke the idea of high rise housing buildings in Hornby and work to rebuild existing infrastructure to handle the current demand in the area	Reject
104.1	Colin McGavin	That Papanui is zoned a [Local Centre instead of a Town Centre]	Reject
156.1	Maureen McGavin	That Papanui is zoned a [Local Centre instead of a Town Centre]	Reject
Issue 2 - Classification of Centres in Table 15.1 – Large Local Centres			
131	John Edilson	Oppose the identification of Merivale as a large Local Centre	Reject
689.55	Canterbury Regional Council	[Retain Policy 15.2.2.1 as notified]	Accept in part
258.2	Stephen Bryant	Re-designate Merivale a Medium Town Centre.	Reject
814.181	Carter Group	Amend Table 15.1 to reclassify Avonhead as a Local Centre (large), rather than Local Centre (small)	Reject
673.2	Anne Ott	Seek amendment to reclassify Merivale from a Local Centre (large) to Local Centre (Medium) with associated impact on residential zoning.	Reject
823.147	The Catholic Diocese of Christchurch	Amend Table 15.1 to reclassify Avonhead as a Local Centre (large), rather than Local Centre (small).	Reject
902.15	Waipuna Halswell-Hornby-Riccarton Community Board	Large Local Centre not apply at Church Corner	Reject
725.4	Sophie Burt	Addington should be included in as a Large Local Centre	Reject
74.1	Tony Rider/Church Corner Residents Association	Amend Bush Inn's status in the Centres hierarchy to remain a neighbourhood/local centre	Accept
Issue 2 - Classification of Centres in Table 15.1 – Medium Local Centres			
917.4	Belfast Village Centre Limited	Amend Table 15.1 to categorise North West Belfast as a 'medium' Local Centre rather than a 'small' Local Centre as notified	Reject
121.24	Cameron Matthews	Change Addington to a Medium Local Centre.	Reject

121.25	Cameron Matthews	Lyttleton should qualify as a Local Centre (Medium).	Reject
121.33	Cameron Matthews	Sumner should qualify as a Local Centre (Medium).	Reject
121.34	Cameron Matthews	Wigram should qualify as a Local Centre (Medium).	Reject
Issue 3 – Heights Height and density enablement in Centres			
26.3, 26.4, 26.5	Rosemary Fraser	Opposes change to height limits and having buildings 90m tall.	Reject
171.7, 171.8, 171.9	Paul McNoe	[Reduce permitted building height] That the permitted height limits within the <u>existing</u> District Plan (prior to PC14) are retained to the maximum extent possible	Reject
191.10, 191.11, 191.12	Logan Brunner	[Retain increased building height]	Reject
224.10, 224.11, 224.12, 224.13, 224.14, 224.15	Richard Ball	That the permitted height limits within the existing District Plan (prior to PC14) are retained to the maximum extent possible.	Reject
260.3	Scentre (New Zealand) Limited	Amend Rule 15.4.2.2 of PC14 to allow a maximum building height of 50m for Riccarton as opposed to the 22m proposed.	Reject
276.21, 276.22, 276.22, 276.24, 276.25	Steve Burns	Seek maximum height of 5 stories in Christchurch	Reject
297.18, 297.20, 297.22, 297.24, 297.26, 297.28	Kate Z	That resource consent to be required for buildings greater than two stories and all subdivisions.	Reject

337.5, 337.7, 337.9, 337.11, 337.13, 337.15	Anna Melling	That maximum heights be lowered to account for lower sun height further south.	Reject
338.6, 338.7, 338.8, 338.9	Kate Revell	Restrict building heights to a maximum of 22 metres.	Reject
339.6, 339.7, 339.8, 339.9	Chris Neame	Restrict maximum height for development to 22 metres	Reject
635.7	Suzi Chisholm	Support 6 to 10 storey residential buildings near commercial centres.	
834.264, 834.280, 834.281	Kāinga Ora	Adopt Metropolitan Centre Zone and 53m Amend Heights for Town Centres 22m Amend Heights for Local Centre Medium to 20m Amend Heights for Local Centre Small to 14m Amend Heights for Neighbourhood Centre to 14m Amend Heights for Neighbourhood Centre in Central City to 32m	Accept in part
842.50	Fire and Emergency	Retain 15.4.2.2-Maximum building height as notified	Reject
842.52, 842.54	Fire and Emergency	Amend 15.5.2.2, 15.6.2.1 - Maximum building height as follows: <u>Advice note:</u> <u>1. See the permitted height exceptions contained within the definition of height</u> <u>2. Emergency service facilities, emergency services towers and communication poles are exempt from this rule.</u>	Reject
870.5, 870.6, 870.17	Susanne Antill	Oppose increased height limits of buildings.	Reject
886.6	Helen Broughton	Oppose changing the maximum height of commercial buildings from 20 to 22 metres for existing commercial buildings adjoining a residential zone.	Reject
893.5, 893.6, 893.7	Susanne and Janice Antill	Oppose increased height limits of buildings.	Reject

APPENDIX 8

902.16, 902.17	Waipuna Halswell-Hornby-Riccarton Community Board	[That the permitted] building height [is reduced to no more than] 12 metres.	Reject
902.21	Waipuna Halswell-Hornby-Riccarton Community Board	[T]hat the maximum height of low rise commercial buildings by a residential sector be reduced to 14 metres. [A]t a minimum, [that] the height remain at the current level of 20 metres.	Reject
814.196	Carter Group	Supports Rule 15.5.2.2. Retain as notified.	Reject
823.162	The Catholic Diocese of Christchurch	Retain the amendments as proposed.	Reject
334.12	Luke Baker-Garters	Removal of all central city maximum building height overlays. [as it relates to NCZ in Central City]	Reject
ISSUE 4 – Chapter 15 – Commercial Objectives and Policies			
627.4	Plain and Simple Ltd	That the objectives within PC 14 are amended to explicitly include recognition of the role of housing in fostering social cohesion and a sense of community belonging.	Reject
814.180	Carter Group Limited	Seeks that a new and explicit policy is included in regard to anticipated building heights, consistent with NPS-UD policy 3	Reject
855.28	Lendlease Limited	Amend 15.1 Introduction to include reference to the “Metropolitan Centre Zone”	Reject
ISSUE 4 – Chapter 15 – Objective 15.2.2 - Centres-based framework for commercial activities			
475.2	Rachel Sanders	We support Council’s plan to increase focus on the urban hubs	Accept
855.29	Lendlease	Amend Objective 15.2.2 to include reference to the “Metropolitan Centre Zone”	Reject
ISSUE 4 – Chapter 15 – Policy 15.2.2.1 and Table 15.1 - Role of centres			
689.55	Canterbury Regional Council	[Retain Policy 15.2.2.1 as notified]	Accept
705.15	Foodstuffs	Retain specific recognition of supermarket activity in Table 15.1	Accept
740.5	Woolworths	Support amendments to Table 15.1 of Policy 15.2.2.1 in so far as these reflect National Planning Standards nomenclature.	Accept
811.76	RVA	Amend Row B and C of Table 15.1 to refer to “at least medium” density housing being contemplated in Town Centres.	Accept
811.76	RVA	Amend Row B and C of Table 15.1 to delete the reference to “above ground floor level”.	Accept
855.30	Kāinga Ora	Retain “B. Town Centre: Key Activity Centre: Retain reference to ‘High Density Housing is contemplated ... and around larger local centres.’” “C. Local Centres: Retain reference to ‘High Density Housing is contemplated ... and around larger local centres.’”	Accept
881.25	Red Spur Limited	Amend 15.2.2.1 Policy – Role of centres Table 15.1 to exclude Redmund Spur from proposed Neighbourhood Centres	Reject
ISSUE 4 – Chapter 15 – Policy 15.2.2.2 - Comprehensive approach to development of the North Halswell and Belfast/ Northwood Key Activity Centres			

118.3	Spreydon Lodge Limited	Amend Policy 15.2.2.2 'Comprehensive approach to development of the North Halswell and Belfast/ Northwood Key Activity Centres' to remove reference to main street at part15.2.2.2(b)(ii) as follows: b. Require development within the North Halswell Key Activity Centre to:ii. provide high quality public open spaces, a strong main street with a concentration of finergrain retailing, and strong linkages between key anchor stores;	Reject
780.19	Josie Schroder	Amend Policy 15.2.2.2 to limit high trip generating activities, and to require the protection and provision of land for new pedestrian/cycle/green infrastructure/road links.	Reject
ISSUE 4 – Chapter 15 – Policy 15.2.2.5 – Banks Peninsula Commercial Centres			
695.1	Te Hapū o Ngāti Wheke (Rāpaki) Rūnanga	Recognise Ngāi Tahu whānui development aspirations in Banks Peninsula.	Accept in part
ISSUE 4 – Chapter 15 - Policy 15.2.2.7 – Residential Activity in Town and Local Centres			
571.30	James Harwood	High-density housing near the city and commercial centres supported.	Accept in part
834.240	Kāinga Ora	Amend Policy 15.2.2.7 as follows: Residential activity in Town, Local and neighbourhood centres	Accept
811	RVA	Retain Policy 15.2.2.7 (and associated Rule 15.14.2.2(f)) as amended by the Plan Change 5B appeal process.	Accept
ISSUE 4 – Chapter 15 - Objective 15.2.3 Office parks and mixed use areas outside the central city			
689.56	Canterbury Regional Council	[Retain Objective 15.2.3 as notified]	Accept in part
760.1	ChristchurchNZ	Amend to insert the term "walkable" as follows: "Objective 15.2.3 – mixed use zones located close to the City Centre Zone transition into high density walkable residential neighbourhoods that contribute to an improved diversity of housing type, tenure and affordability and support a reduction in greenhouse gasemissions"	Accept in part
814.182	Carter Group	Support Objective 15.2.3. Retain as notified.	Accept in part
823.148	The Catholic Diocese of Christchurch	Support Objective 15.2.3 as notified	Accept in part
834.241	Kāinga Ora	Amend the objective as follows: 15.1.1 Objective - Office parks and mixed use areas outside the central city (except the Central City Mixed Use and Central City Mixed Use(South) Zones) . a. Recognise the existing nature, scale and extent of commercial activity within the Commercial Office and Commercial Mixed Use Zones, but avoid the expansion of existing, or the development of new office parks and/or mixed use areas . b. Mixed use zones located within a 15min walking distance of close to the City Centre Zone transition into high density residential neighbourhoods that contribute to an improved diversity of housing type, tenure and affordability and support a reduction in greenhouse gasemissions .	Accept in part
811	RVA	Retain Objective 15.2.3 as notified.	Accept
ISSUE 4 – Chapter 15 - Policy 15.2.3.2 Mixed Use Areas outside the central city			

689.56	Canterbury Regional Council	[Retain Policy 15.2.3.2 as notified]	Accept in part
760.2	ChristchurchNZ	Amend as follows: (b) Support mixed use zones located within a 15minute walking distance of the City Centre Zone to transition into high quality walkable residential neighbourhoods by:..... (iv) encourage ing ... (v) limiting new high trip generating activities ;and_ (vi) promoting a network of safe, convenient and attractive pedestrian and cycle connections within the zone and to adjoining neighbourhoods.	Accept in part
814.183	Carter Group	Support Policy 15.2.3.2. Retain as notified.	Accept in part
823.149	The Catholic Diocese of Christchurch	Support Policy 15.2.3.2 as notified	Accept in part
780.19	Josie Schroder	Amend Policy 15.2.2.2 to limit high trip generating activities, and to require the protection and provision of land for new pedestrian/cycle/green infrastructure/road links.	Reject
834.242	Kāinga Ora	Amend as follows: (a) 15.2.3.2 Policy – Mixed use areas outside the central city (except the Central City Mixed Use and Central City Mixed Use(South) Zones) a. Recognise the existing nature, scale and extent of retail activities and offices in mixed use zones outside the central city in Addington, New Brighton, off Mandeville Street and adjoining Blenheim Road , while limiting their future growth and development to ensure commercial activity in the City is focussed within the network of commercial centres. b. Support mixed use zones at Sydenham, Addington, off Mandeville Street, and Philipstown located within a 15 minute walking distance of the City Centre Zone , to transition into high good quality residential neighbourhoods by: ii. ensuring that the location, form and layout of residential development supports the objective of reducing greenhouse gas emissions and provides for greater housing diversity including alternative housing models; iii. requiring developments to achieve a high good standard of on-site residential amenity to offset and improve the current low amenity industrial environment and mitigate potential conflicts between uses; iv. encourage small-scale building conversions to residential use where they support sustainable re-use and provide high good quality living space. and contribute to the visual interest of the area. Delete c and d.	Accept in part
811	RVA	The RVA seeks to amend Policy 15.2.3.2 as follows to remove provisions that have the potential to refine / limit the intensification provisions of the Enabling Housing Act: Policy 15.2.3.2 a. ...	Reject

		b. Support mixed use zones located within a 15 minute walking distance of the City Centre Zone, to transition into high quality residential neighbourhoods by: i. ... ii. ... iii. Encouraging developments to achieve a high standard of on-site residential amenity to offset and improve the current low amenity industrial environment and mitigate potential conflicts between uses;	
248	Annex Developments	add a new clause to proposed policy 15.2.3.2 as follows: <u>e. To encourage the redevelopment of areas located within a Brownfield Overlay on the planning maps to allow a mix of commercial and residential activities.</u>	Reject
Objective 15.2.4– Urban Form, Scale and Design Outcomes			
212.16	The Fuel Companies - BP Oil, Z Energy and Mobil Oil	Retain as notified	Accept in part
689.58	Canterbury Regional Council	[Retain Objective as notified]	Accept in part
760.3	ChristchurchNZ	Retain as notified.	Accept in part
780.20	Josie Schroder	Retain Objective 15.2.4 as notified.	Accept in part
814.184	Carter Group	Amend clause (a)(iv) and (vi) as follows: iv. manages adverse effects (<u>including reverse sensitivity effects</u>) on the <u>site and surrounding environment, including effects that contribute to climate change</u> ; and... vi. Promotes a zoning and development framework that <u>Supports a reduction in greenhouse gas emissions.</u>	Accept
823.150	The Catholic Diocese of Christchurch	Amend clause (a)(iv) and (vi) as follows: iv. manages adverse effects (<u>including reverse sensitivity effects</u>) on the <u>site and surrounding environment, including effects that contribute to climate change</u> ; and... vi. Promotes a zoning and development framework that <u>Supports a reduction in greenhouse gas emissions.</u>	Accept
834.243	Kāinga Ora	Retain the objective as notified.	Accept in part
842.49	Fire and Emergency	Retain 15.2.4-Objective - Urban form, scale and design outcomes as notified.	Accept in part
855.31	Lendlease Limited	Amend Objective 15.2.4 to include reference to the“Metropolitan Centre Zone”.	Reject

811	RVA	<p><i>Amend Objective 15.2.4 to recognise that environments change and develop over time:</i></p> <p>15.2.4 Objective – Urban form, scale and design outcomes</p> <p>a. A scale, form and design of development that is consistent with the role of a centre and its contribution to city form, and the intended built form outcomes for mixed use zones, and which:</p> <p>i. ...</p> <p>ii. contributes to an urban environment that is visually attractive, safe, easy to orientate, conveniently accessible, and responds positively to anticipated local character and context, <u>recognising that urban environments develop and change over time;</u></p> <p>iii. recognises the functional and operational requirements of activities and the anticipated <u>and changing</u> built form;</p>	Reject
ISSUE 4 – Chapter 15 - Policy 15.2.4.1 (b)(ii) and (b)(iv)			
705.16	Foodstuffs	Amend one or all of 15.2.4 associated policies to recognise that supermarkets may be located in and around centres, but have operational and functional requirements which limit their scale, form of development (to less than that anticipated)	Reject
689.59	Canterbury Regional Council	[Retain 15.2.4.1 Policy as notified]	Accept
760.4	ChristchurchNZ	Retain b. as notified	Accept
780.21	Josie Schroder	Retain Policy 15.2.4.1 as notified.	Accept
814.185	Carter Group	Delete the amendments to clause (a) of Policy 15.2.4.1. Adopt the amendments to clause (b) of the policy.	Accept as it relates to (b)
823.151	The Catholic Diocese of Christchurch	Delete the amendments to clause (a) of the policy. Adopt the amendments to clause (b) of the policy.	Accept as it relates to (b)
834.244	Kāinga Ora	<p>Amend Clause (b) as follows:</p> <p>b. The scale and form of development in <u>other commercial</u> centres shall: i. reflect the context, character and the anticipated scale of the zone and centre’s function by: ii. providing for the tallest buildings and greatest scale of development in the city centre to reinforce its primacy for Greater Christchurch and enable as much development capacity as possible to maximise the benefits of intensification;</p> <p>Retain the remaining parts of clause (b) as notified.</p>	Accept as it relates to (b)
855.32	Lendlease Limited	Amend Policy 15.2.4.1(b) to reference the “Metropolitan Centre Zone”	Reject
ISSUE 4 – Chapter 15 - Policy 15.2.4.2 Design of new development			
689.60	Canterbury Regional Council	[Retain Policy as notified]	Accept in part
212.17	The Fuel Companies - BP Oil, Z Energy and	Retain as notified	Accept in part

	Mobil Oil (joint submission)		
740.8	Woolworths	Amend Policy 15.2.4.2(a) a. Require new development to be well designed and laid out by: viii. achieving a visually attractive setting when viewed from the street and other public spaces, that embodies a human scale and fine grain , while managing effects on adjoining environments; and... x. increasing the prominence of buildings on street corners; xi. ensuring that the design of development mitigates the potential for adverse effects such as heat islands, heat reflection or refraction through glazing, and wind related effects; xii. ensuring that the upper floors (including roof form and associated mechanical plant) are well modulated and articulated to provide visual interest to the building when viewed from beyond the Central City or from adjacent buildings above; and	Accept in part
760.5	ChristchurchNZ	Retain as notified	Accept in part
780.22	Josie Schroder	Retain Policy 15.2.4.2 as notified.	Accept in part
814.186	Carter Group	Amend Policy 15.2.4.2 clause (a) as follows: a. Require new development to be well-designed and laid out by:... viii. achieving a visually <u>appealing attractive</u> setting when viewed from the street and other public spaces, that embodies a human scale and fine grain , while managing effects on adjoining environments; [delete proposed clauses x-xv.] Retain the balance of the policy and amendments as proposed.	Accept in part
823.152	The Catholic Diocese of Christchurch	Amend Policy 15.2.4.2 clause (a) as follows: a. Require new development to be well-designed and laid out by:... viii. achieving a visually <u>appealing attractive</u> setting when viewed from the street and other public spaces, that embodies a human scale and fine grain , while managing effects on adjoining environments; [delete proposed clauses x-xv.] Retain the balance of the policy and amendments as proposed.	Accept in part
834.245	Kāinga Ora	Delete all inclusions introduced and retain existing Operative Plan Policy 15.2.4.2.	Reject
811	RVA	The RVA seeks to amend Policy 15.2.4.2 to reflect the NPS-UD and to remove provisions that unduly restrict the development of a diversity of housing typologies, including retirement villages.	Reject
689.60	Canterbury Regional Council	[Retain Policy as notified]	Accept in part
212.17	The Fuel Companies - BP Oil, Z Energy and	Retain as notified	Accept in part

	Mobil Oil (joint submission)		
740.8	Woolworths	Amend Policy 15.2.4.2(a) a. Require new development to be well designed and laid out by: viii. achieving a visually attractive setting when viewed from the street and other public spaces, that embodies a human scale and fine grain , while managing effects on adjoining environments; and... x. increasing the prominence of buildings on street corners; xi. ensuring that the design of development mitigates the potential for adverse effects such as heat islands, heat reflection or refraction through glazing, and wind related effects; xii. ensuring that the upper floors (including roof form and associated mechanical plant) are well modulated and articulated to provide visual interest to the building when viewed from beyond the Central City or from adjacent buildings above; and	Accept in part
760.5	ChristchurchNZ	Retain as notified	Accept in part
780.22	Josie Schroder	Retain Policy 15.2.4.2 as notified.	Accept in part
814.186	Carter Group	Amend Policy 15.2.4.2 clause (a) as follows: a. Require new development to be well-designed and laid out by:... viii. achieving a visually appealing attractive setting when viewed from the street and other public spaces, that embodies a human scale and fine grain , while managing effects on adjoining environments; [delete proposed clauses x-xv.] Retain the balance of the policy and amendments as proposed.	Accept in part
823.152	The Catholic Diocese of Christchurch	Amend Policy 15.2.4.2 clause (a) as follows: a. Require new development to be well-designed and laid out by:... viii. achieving a visually appealing attractive setting when viewed from the street and other public spaces, that embodies a human scale and fine grain , while managing effects on adjoining environments; [delete proposed clauses x-xv.] Retain the balance of the policy and amendments as proposed.	Accept in part
834.245	Kāinga Ora	Delete all inclusions introduced and retain existing Operative Plan Policy 15.2.4.2.	Reject
811	RVA	The RVA seeks to amend Policy 15.2.4.2 to reflect the NPS-UD and to remove provisions that unduly restrict the development of a diversity of housing typologies, including retirement villages.	Reject
ISSUE 4 – Chapter 15 - Policy 15.2.4.6 Strategic Infrastructure			
834.246	Kāinga Ora	Amend policy 15.2.4.6 [to delete "within the 50 dB Ldn Air Noise Contour"].	Reject
ISSUE 4 – Chapter 15 - New Commercial Objectives and Policy Sought			
811	RVA	The RVA seeks that a new objective is inserted in the Commercial Zones objectives that provides for the housing and care needs of the ageing population. Objective 15.2.12 Ageing population	Reject

		<p><u>Provide a diverse range of housing and care options that are suitable for the particular needs and characteristics of older persons such as retirement villages.</u> Insert the following new policy: <u>New Policy – Housing in Commercial Zones</u> <u>Provide for retirement villages in commercial zones (other than the Commercial Office Zone, the Commercial Retail Park Zone and within the Lyttelton Port Influences Overlay Area in the Commercial Banks Peninsula Zone), and recognise that retirement villages can provide for higher densities than other forms of residential developments, because they provide for shared spaces, services and facilities, and enable affordability and the efficient provision of assisted living and care services.</u> <u>Advice Note: All other objectives and policies relevant to residential activity in commercial zones also apply to retirement villages.</u> Insert the following new policy: <u>New Policy Role of density standards</u> <u>Enable the density standards to be utilised as a baseline for the assessment of the effects of developments other than in areas where the Plan provides location-specific density standards.</u> Insert the following new policy: <u>New Policy Larger sites</u> <u>Recognise the intensification opportunities provided by larger sites within the Commercial Zones by providing for more efficient use of those sites.</u></p>	
ISSUE 4 – Chapter 16 - Industrial General			
445.5	Alison Dockery	Oppose the concentration of high polluting industries in one area.	Reject
481.4	Cindy Gibb	Limit the height of any building in Christchurch to a maximum of 4 storeys.	Reject
ISSUE 4 – Chapter 16 - Objective 16.2.2 Brownfield redevelopment			
904.3	880 Main North Road	A consequential amendment to Objective 16.2.2(a)(iv) is sought, so as to recognise the Brownfield Overlay at North Belfast and ‘Provide for... the Brownfield Overlay at <i>North Belfast</i> ... for medium density residential activities’ respectively	Reject
689.71	Canterbury Regional Council	[Retain Objective 16.2.2 as notified]	Reject
ISSUE 4 – Chapter 16 - Policy 16.2.2.2 Brownfield redevelopment			
242.14	Property Council New Zealand	Support the proposed amendments that seek to introduce Brownfield Overlay in the Industrial General Zone for land close to identified commercial centres that enables residential and mixed-use development.	Accept
663.2	Williams Corporation Limited	Seeks amendments to Policy 16.2.2.2(i) to read as “any redevelopment will not give rise to <u>significant</u> reverse sensitivity effects on existing industrial activities	Reject
689.72	Environment Canterbury	[Retain Policy 16.2.2.2 as notified]	Accept

904.2	880 Main North Road Limited	Amend policy 16.2.2.2(b) to recognise an additional Brownfield Development site at 874-880 Main Road, North Belfast.	Reject
Issue 5 – Rules – Commercial Chapter			
367.10	John Bennett	Require all developments to be assessed by a professionally qualified urban design panel.	Reject
810.16	Regulus Property Investments Limited	[Remove any Qualifying Matters and provisions that do not support] the intensification of urban form to provide for additional development capacity	Reject
810.9	Regulus Property Investments Limited	[Retain provisions that] support the intensification of urban form to provide for additional development capacity, particularly near the city and commercial centres	Reject
812.14	James Barbour	[Remove any Qualifying Matters and provisions that do not support] the intensification of urban form to provide for additional development capacity	Reject
812.5	James Barbour	[Retain provisions that] support the intensification of urban form to provide for additional development capacity, particularly near the city and commercial centres	Reject
253.3	Geordie Shaw	[That P21.i. the minimum glazing standard allows more flexibility in achieving the intent of the policies]	Reject
834.257	Kāinga Ora	Delete all City Spine Transport Corridor activity rules from the suite of commercial zones.	Reject
669.1	Edward Jolly	Seek amendment to Urban Design Certification Pathway and Mana Whenua engagement method to remove requirement from this rule and include "a new section of the plan... that... provide[s] this mechanism... [developed as a separate process by] CCC under its Te Tiriti o Waitangi obligations [with] Mana Whenua to a level negotiated between these parties whom jointly develop associated mechanisms within the plan."	Reject
834.262	Kāinga Ora	Delete erroneous reference to Local Centre in 15.4.2.1(a)(ii)	Accept
886.5	Helen Broughton	Supports proposed setback 15.4.2.4, but would like this to be increased.	Reject
902.22	Waipuna Halswell-Hornby-Riccarton Community Board	[That the minimum setback is increased]	Reject
63.51	Kathleen Crisley	Retain provisions in relation to recession planes in final plan decision.	Reject
881.26	Red Spur Ltd	Supports Redmund Spur Neighbourhood Centre subject to retention of Rule 15.6.1.1. P21 and for clarity change reference in a. from 'local centres' to 'neighbourhood centres'	Accept
814.194	Carter Group	Retain the status quo in respect of Rule 15.5.1.1 P21.	Accept
814.195	Carter Group	Retain the status quo in respect of Rule 15.5.1.3 RD1.	Accept
823.161	The Catholic Diocese of Christchurch	Retain the status quo in respect of Rule 15.5.1.3 RD1.	Accept
697.1	Kate Askew	[S]eek[s] changes to Rule 15.5.2.4 relating to building setback from a Residential zone. [S]eek amendments to this rule so that a new clause b is added requiring a 5m setback from the internal boundary with a Residential Heritage Area.	Reject

814.197	Carter Group	Supports Rule 15.5.2.5. Retain as notified.	Accept
823.163	The Catholic Diocese of Christchurch	Retain the amendments as proposed.	Accept
697.2	Kate Askew	Requested change to [Rule] 15.5.2.7, where... A landscape strip with a minimum width of 3m shall be planted along all boundaries with a residential heritage area and shall include trees that will grow to a minimum height of 6 to 8 metres	Reject
685.13	Canterbury / Westland Branch of Architectural Designers NZ	[Newbuilt form standard] to require buildings to calculate their lifetime carbon footprint and be required to not exceed a sinking lid maximum.	Reject
627.15	Plain and Simple Ltd	[New standards for] accessibility and environmentally responsible design, [such as]: Rain and grey water harvesting / recycling Composting incinerating toilets, alternative energy sources Green roofs Porous hardscaping	Reject
308.3	Tony Pennell	[New built form standard to require] provision for future solar panel installation unless orientation north is impossible.	Reject
705	Foodstuffs	Amend Rule 15.4.1.1 (P2) to include supermarkets as a permitted activity in the Town Centre Zone, and consequential changes to Rules 15.4.1.1 and 15.4.1.4. Amend Rule 15.4.1.1 (P3) to exclude the words "supermarket and"	Accept
260.4	Scentre (New Zealand) Limited	Office tenancies of any size in Metropolitan Centres (or the larger Town Centers) should be permitted activities. Opposes office activities over 500m2 being excluded as permitted activities as currently proposed in PC14.	Reject
852.17	Christchurch International Airport Limited (CIAL)	Amend Rule 15.4.1.1 P21 as follows: Residential activity-Activity specific standard: h. The activity shall not be located within the 50 dB Ldn Air Noise Contour or the Airport Noise Influence Area as shown on the planning maps.	Accept
852.19	Christchurch International Airport Limited (CIAL)	Amend Rule 15.4.1.5 NC2 as follows: Sensitive activities within the 50 dB Ldn Air Noise Contour or the Airport Noise Influence Area as defined on the planning maps.	Accept
852.18	Christchurch International Airport Limited	Amend Rule 15.5.1.1 P21 as follows: Residential activity - Activity specific standard: g. The activity shall not be located within the 50dB Ldn Air Noise Contour or the Airport noise Influence Area as shown on the planning maps.	Accept

852.20	Christchurch International Airport Limited	Amend Rule 15.5.1.5 NC2 as follows: Sensitive activities within the 50 dB Ldn Air Noise Contour or the Airport Noise Influence Area as defined on the planning maps.	Accept
829.15	KiwiRail	Seeks amendment to rule 15.4.2.9, 15.5.2.9, 25.6.2.8, 15.6.2.8, 15.7.2.8, 15.8.2.8, 15.9.2.9, 15.10.2.8 to increase the rail corridor setback from 4 to 5m.	Reject
854.16	Orion New Zealand Limited	Add an additional clause to 15.4.15 NC3 a. and amend clause 'd' as follows: <u>iii within 3m of the outside over head conductor of any 11kV, 400V or 230V electricity distribution line.</u> d. Conductive Fences within 5 metres of a National Grid transmission line support structure foundation, 66kV or 33kV, <u>11kV,400V or 230V</u> electricity distribution line support structure foundation.	Reject
854.17	Orion New Zealand Limited	Add an additional clause to 15.5.1.5 NC3 a. and amend clause 'd' as follows: <u>iii within 3m of the outside over head conductor of any 11kV, 400V or 230V electricity distribution line.</u> d. Conductive Fences within 5 metres of a National Grid transmission line support structure foundation, 66kV or 33kV, <u>11kV,400V or 230V</u> electricity distribution linesupport structure foundation.	Reject
854.18	Orion New Zealand Limited	Add an additional clause to 15.6.1.5 NC3 a. and amend clause 'd' as follows: <u>iii within 3m of the outside over head conductor of any 11kV, 400V or 230V electricity distribution line.</u> d. Conductive Fences within 5 metres of a National Grid transmission line support structure foundation, 66kV or 33kV, <u>11kV,400V or 230V</u> electricity distribution line support structure foundation.	Reject
854.16	Orion New Zealand Limited	Add an additional clause to 15.4.15 NC3 a. and amend clause 'd' as follows: <u>iii within 3m of the outside over head conductor of any 11kV, 400V or 230V electricity distribution line.</u> d. Conductive Fences within 5 metres of a National Grid transmission line support structure foundation, 66kV or 33kV, <u>11kV,400V or 230V</u> electricity distribution line support structure foundation.	Reject
842.51	Fire and Emergency	Retain 15.4.2.8-Water supply for fire fighting as notified.	Accept
842.54	Fire and Emergency	Retain 15.5.2.8-Water supply for fire fighting as notified.	Accept

842.55	Fire and Emergency	Retain 15.6.2.7-Water supply for fire fighting as notified.	Accept
811	Retirement Villages Association	The RVA seeks that a new rule is inserted in the Town Centre Zone, Local Centre Zone, Neighbourhood Centre Zone that provides for retirement villages as permitted activities.	Reject
811	Retirement Villages Association	The RVA seeks that a new rule is inserted in the Town Centre Zone, Local Centre Zone, Neighbourhood Centre Zone that provides for the construction of retirement villages as a restricted discretionary activity and to include a set of focused matters of discretion that are applicable to retirement villages.	Reject
Issue 5 – Rules – Commercial Chapter – Mixed Use Zone			
811	Retirement Villages Association	The RVA seeks that a new rule is inserted in the Mixed Use Zone that provides for retirement villages as permitted activities.	
811	Retirement Villages Association	The RVA seeks that a new rule is inserted in the Mixed Use Zone that provides for the construction of retirement villages as a restricted discretionary activity and to include a set of focused matters of discretion that are applicable to retirement villages.	
760.14	ChristchurchNZ	Amend P4, P5, P6, and P7 to insert a new activity-specific standard: <u>(a) Car parking shall be limited to 1space per150sgm.</u>	Reject
760.15	ChristchurchNZ	Amend P8 to insert a new activity specific standard: <u>a. Any service station in the Sydenham and Waltham Mixed Use Zones shall be located on a minor or major arterial road.</u>	Reject
760.17	ChristchurchNZ	Amend RD3 to read: “The Council’s discretion shall be limited to the following matters:a. Residential design principles – 15.14.1b. Comprehensive residential activity in the Mixed Use Zone – 15.14.3.40 (a) <u>(iv) (ii) and (v) (iii)</u> ”	Accept
760.18	ChristchurchNZ	Amend NC3 to read: “Any Comprehensive Residential Activity within the Comprehensive Housing Precinct for sites identified in Appendix 15.15.12 and 15.15.13 <u>as allocation for required pedestrian/cycle, road or greenway connections, unless the desired street to street connection/s have been provided</u> ”	Accept in Part
760.19	ChristchurchNZ	Amend the following: <ol style="list-style-type: none"> 1 Advice note: “The following built form standards also apply to comprehensive residential development: <u>refer to Appendix 15.15.13 for the bulk and location diagram representing these standards</u>”. <u>Note: refer to Appendix 15.15.14 for the bulk and location diagram representing some of these standards.</u> 2 d: All shared pedestrian access <u>ways</u> within and through a site shall have a minimum width of 3 metres including planting. The width for pedestrian access shall be clear of any fencing, storage or servicing, except security gates, where necessary. 3 g: “Buildings front a street, <u>greenway or other publicly accessible space and public open space</u> shall include at least 20% glazing on each floor of the building” 4 h: “Apartments adjacent to the street <u>or greenway</u> shall be provided including: i. to a minimum of 4 storeys in height; or ii. to a minimum of 3 storeys for sites located on the south side of the street. 	Accept in Part

		<p>5 j: (i) Enclosed and lockable cycle storage for residents shall be provided at a minimum rate of 1 space per bedroom, located at grade within a fully enclosed and lockable storage facility integrated within the building and is accessed via a shared pedestrian access from the street or a shared path within a greenway; located adjacent to the communal open space ii) For every 5 residential units, 1 cycle park with a charging point shall be provided within the cycle storage facility that can accommodate a cargo bike; and (iii) 1 cycle park per 10 residential units shall be provided for visitors to the site, accessed from a shared pedestrian access and located adjacent to the communal open space. Visitor cycle parking shall also comply with rules 7.5.2(a)(ii) to (viii) and (x).</p> <p>l: “The maximum onsite car parking to residential unit ratio shall be 0.1 across the Comprehensive Residential Development. Car parking onsite shall only be provided for in the following circumstances: (i) A maximum of two car parking spaces for a residential car share scheme across the Comprehensive Residential Development; (ii) A maximum of one space per accessible residential unit</p>	
760.34	ChristchurchNZ	Amend P27 g. to read: “The outlook space shall not extend over an outlook space or outdoor living space required by another residential unit, on the same floor ”	Accept
760.35	ChristchurchNZ	Amend P27 i. to read: “Any outdoor living space or outdoor service space shall not be used for car parking, cycleparking or access”.	Accept
762.32	New Zealand Institute of Architects Canterbury Branch	[T]hat the minimum site size for comprehensive residential development is to be reduced to 1500m ² or at most 1800m ² .	Accept in part
834.282	Kāinga Ora	1. Amend P27 to delete clause (b) relating to the Comprehensive Housing Precinct. 2. Add additional activity rules enabling a suite of community activities i.e.rules 14.5.1.1 P5-P13, P20.	Reject
834.283	Kāinga Ora	Maximum building height a. The maximum height of any building shall be 15 metres, unless specified below. b. The maximum height of any Comprehensive Residential Development located within the Comprehensive Housing Precinct (shown on the planning maps) shall be 21 22metres, for buildings located adjacent to the street, or 12 metres for buildings located at the rear of the site.	Accept in part
834.284	Kāinga Ora	P27 Delete all existing provisions and provide a suite of workable and clear rules that encourage and enable large scale redevelopment	Reject
834.288	Kāinga Ora	Remove statutory impediments in Appendix 15.15.12 – Sydenham and Appendix 15.15.13 requiring ‘Greenways ‘and ‘Shared Pedestrian / Cycleways’ and seek to facilitate through more appropriate means – such as negotiated purchase.	Reject
842.65	Fire and Emergency	Amend 15.10.2.9-Minimum standards for Comprehensive Residential Development as follows: a. All shared pedestrian access ways within and through a site shall: i. have a minimum width of A. 3 metres on a straight accessway including excluding planting. B. 6.2 metres on a curved or cornered accessway C. 4.5m space to position the ladder and perform operational tasks. ii. The width for pedestrian access shall be clear of any fencing, storage or servicing, except security gates, where necessary.	Accept in part

		iii. provide wayfinding for different properties on a development are clear in day and night.	
852.22	Christchurch International Airport Limited (CIAL)	Amend Rule 15.10.1.1 P27 by inserting a new activity standard as follows: f. The activity shall not be located within the 50 dB Ldn Air Noise Contour or the Airport Noise Influence Area as shown on the planning maps.	Accept
852.23	Christchurch International Airport Limited (CIAL)	Amend Rule 15.10.1.5 NC1 as follows: NC1 Any residential activity not meeting Rule 15.10.1.1 P27 (e) or (f)	Accept
Issue 5 – Rules – Commercial Chapter –Matters of Discretion in Chapter 15 – TCZ, LCZ, NCZ, MUZ			
118.4	Spreydon Lodge Limited	Delete Matters of Discretion Rule 15.1314.4.3.2(a)(i) ‘Commercial layout’ as it references the requirement to have a critical mass of activity centred upon the Main Street as follows:15.1314.4.3.2 Commercial layout a. The extent to which development: i. ensures a critical mass of activity is centred upon the open air Main Street including an appropriate balance of large format retail activity and concentration of finer grain commercial activities; ii. supports a retail mix (large format and finer grain retailing) which ensures the centre meets its role as a District Town Centre and Key Activity Centre and meets the needs of the catchment population; and iii. functions operationally and visually as an integrated commercial entity	Reject
118.5	Spreydon Lodge Limited	Delete Matters of Discretion Rule 15.1314.4.3.4(a)(i-iii) ‘Transport’ as it references the main street,public transport interchange and carparking area as follows:15.1314.4.3.4 Transporta) The extent to which development: i. provides for an easily accessible, readily visible public transport interchange located centrally within the commercial core of the Key Activity Centre; ii. provides car parking areas as shared spaces, available for shared use, which does not visually or physically dominate the area; iii. provides for pedestrian priority within the retail core, particularly in respect to the open air mainstreet environment;	Reject
118.6	Spreydon Lodge Limited	Delete Matters of Discretion Rule 15.1314.4.3.5 ‘Civic Square’ as it refers to the civic square as illustrated within the ODP for North Halswell.15.1314.4.3.5 Civic Squarea. The extent to which development:i. connects the civic square and the Main Street, both visually and physically;ii. provides for a civic square of a sufficient size to allow for a range of community activities, events and interaction; andiii. provides a high quality civic square laid out and designed in a manner that achieves a high qualityand safe, open space environment.	Reject
760.23	ChristchurchNZ	Amend (i)(O) to read: The extent to which <u>alternative forms of housing models</u> and/or a range Amend (i)(P) to read: “The extent to which <u>accessible residential units including apartments</u> , are provided....	Accept
829.21	KiwiRail	Seeks amendment to the Matter of Discretion 15.14.3.10 to include assessment of providing for the safe and efficient operation of the rail network.	Accept in part
834.287	Kāinga Ora	Delete all existing provisions and provide a suite of workable and clear rules that encourage and enable large scale redevelopment.	Reject
Issue 5 – Rules – Industrial Chapter			

854	Orion New Zealand	Industrial General Zone <u>Rule 16.4.1.5 on-complying activities</u> Add an additional clauses to 'NC1' and amend clause 'd' as follows: X Sensitive activities within 3m of the outside overhead conductor of any 11kV,400V or 230V electricity distribution line. d. Conductive fences within 5 metres of a 66kV National Grid transmission line support structure foundation or 5 metres of a 66kV electricity distribution support structure foundation or, 33kV, 11kV, 400V or 230V electricity distribution line support structure foundation.	Reject
308	Tony Pennell	[New built form standard to require] provision for future solar panel installation unless orientation north is impossible.	Reject
685	Canterbury / Westland Branch of Architectural Designers NZ	[New built form standard] to require buildings to calculate their lifetime carbon footprint and be required to not exceed a sinking lid maximum.	Reject
224	Richard Ball	That the permitted height limits within the existing District Plan (prior to PC14) are retained to the maximum extent possible.	Reject
737	Christian Jordan	Seeks a height restriction of 8m for 20m along a residential boundary.	Reject
63	Kathleen Crisley	Retain provisions in relation to recession planes in final plan decision.	Reject
737	Christian Jordan	Seeks that the recession plane that applies to the industrial side of any industrial/residential boundary should comply with residential zone recession planes.	Reject
737	Christian Jordan	Seeks that where any industrial building is located within 10m of a residential boundary a landscaping strip with trees and planting at least 3m wide should be included on the industrial site.	Reject
ISSUE 6 – REZONING REQUESTS			
690.1	Redwood Gardens Holding Limited	Rezone Industrial Land at Wairakei Road to Commercial	Reject
821.3	Athena Enterprises Limited and Josephine Enterprises Limited	[Seeks that the] properties at 9, 9A and 9B Sheffield Crescent (the site) [be rezoned to a commercial zone].	Reject
915.1	25 KBR Limited	Rezone approximately 7124m ² of land at 432 Sparks Road as Neighbourhood Centre Zone and any consequential amendments to the necessary to give effect to this submission.	Accept if within scope
705.1	Foodstuffs	Rezone 304 Stanmore Road Local Centre Zone	Accept
705.10	Foodstuffs	Amend the zoning of Lot 10 DP 17997 and part of Lot 13 DP 17997 at New World Ilam to Local Centre Zone	Reject

APPENDIX 8

705.3	Foodstuffs	Amend planning maps to rezone Section 2SO 552969 and Lot 2 DP2586 to Local Centre Zone at Pak'n Save Wainoni (186 and 204 Breezes Road and 172, 174, 178 and 182 Wainoni Road)	Reject
705.6	Foodstuffs	Amend zoning of Lot 1 DP51902 to Local Centre Zone at New World Lincoln Road (92, 94, 100 and 108 Lincoln Road)	Reject
705.7	Foodstuffs	Pak'n Save Papanui: Head office: Amend to rezone Lot 2 DP 14400 (159 Main North Rd), part of Lot 1 DP 14400 and accessway on Lot 7 DP14400 to Industrial General Zone. Amend to rezone Lot 5 DP3753, Lot 1 DP76152 and Part Lot 1 DP 21207 to Local Centre Zone to reflect the consented and intended use as a PAK'nSAVE	Accept in part
848	Peebles Group Limited	Amend the planning maps to rezone the properties at 468- 470 Cranford Street as LCZ	Reject
386	Balmoral Limited	Rezone the sites at 336 and 340 Preston's Road and 427 and 435 Marshland Road Local Centre Zone (Prestons)	Reject
249.1	City Salvage	Re-zone the residential portion of 544 Tuam Street and the adjoining land at 102-104 Mathesons Road, to Local Centre.	Reject
2	Greg Olive	Seeks to rezone Medium Density Residential Zone land at 419 Halswell Junction Road to Mixed Use Zone.	Reject
883	Miles Premises	Rezone 400, 475 Memorial Avenue and 500, 520 and 540 Avonhead Road for urban development, with no restrictions relating to airport noise.	Reject
917	Belfast Village Centre Limited	Seek amendments to the extent of Commercial zoning at the NorthWest Belfast centre.	Reject
849	Entropy MMX Limited	Seeks the rezoning of Rural Urban Fringe land at 142-144 Winters Road, Mairehau to Industrial General, Medium Density Residential or Residential Suburban Zone.	Reject
823	The Catholic Diocese of Christchurch	Seeks 2 Lydia Street is included as a Brownfield Overlay	Accept

APPENDIX 4 – PC14 - DISTRICT PLAN TEXT AMENDMENTS WITH RECOMMENDED CHANGES

As a result of consideration of submissions, some amendments to the District Plan provisions are recommended. For the purposes of these amendments, the District Plan text is shown as normal text. Amendments proposed by the Plan Change as notified are shown as **bold underlined** or ~~**bold strikethrough**~~ text.

Any text recommended to be added, following consideration of submissions, is shown as **bold underlined text in red** and that to be deleted as ~~**bold strikethrough in red**~~.

Text in **green** font identifies existing terms defined in Chapter 2 – Definitions. Text in **blue and underlined** shows links to other provisions in the e-plan or to external documents. These have pop-ups and hyperlinks, respectively, in the on-line Christchurch District Plan. Where a term is defined in the newly added bold text, it will show as **green underlined** text in bold.

CHAPTER 15 – COMMERCIAL

Chapter 15 has been attached in its complete form including the changes recommended by Ms Gardiner and Mr Willis.

CHAPTER 16 – INDUSTRIAL

16.2.2.2 Policy – Brownfield redevelopment

- a. ~~Support~~ **Provide for** the redevelopment of **greenfield sites identified by a brownfield overlay at Waterloo Business Park and the Tannery** ~~or identified in accordance with Policy 16.2.2.1~~ for **residential activities**, ~~or mixed use activities~~ ~~or including a limited quantum of commercial activities~~ **where:-**
 - i. **Commercial activities are of a scale and/or type that do not have significant adverse distributional or urban form effects on the Central City and commercial centres; and**
 - ii. **Industrial activities remain the predominant use in the same geographic area zoned industrial.**
- b. **Provide for the redevelopment of greenfield sites identified within the Brownfield Overlay at Hornby, Papanui, Cranford and Woolston (excludes the Tannery), for medium density residential activities.**
- c. ~~b. Brownfield regeneration redevelopment~~ proposals ~~as provided for in sub-clause a. and b. above~~ shall **also** ensure that:
 - i. any ~~residential or mixed use re~~development will not give rise to **significant reverse sensitivity** effects on existing industrial activities, or other effects, ~~including reverse sensitivity~~, that may hinder or constrain the establishment or ongoing operation or development of industrial activities and **strategic infrastructure**;

- ii. the safety and efficiency of the current and future **transport system** is not significantly adversely affected;
- iii. **good quality urban design and** an appropriate level of residential amenity **can will** be achieved on the site;
- iv. the site enhances connectivity to public transport routes, commercial and community services, and open space where appropriate;
- v. any **contaminated land** is managed in accordance with national and regional standards;
- vi. the redevelopment maintains the strategic role of **the Central City and commercial centres** as the focal points for commercial and other activities, and the efficient and effective use of land and/or community and **transport infrastructure** investment in centres; **and**
- vii. **any the** environmental and cultural values **of waterways** within or **adjoining** the site are recognised and provided for in any redevelopment;
- viii. **the development is comprehensively planned;**
- ix. **the effects of natural hazards are managed in accordance with the framework in Chapter 5;**
- x. **the principles of crime prevention through environmental design are incorporated into the development; and**
- xi. **the design of the development mitigates the effects of noise from traffic, railway activity, and other sources where necessary to protect residential amenity.**

(Plan Change 5C Council Decision)

APPENDIX 5 – PC14 – COMMERCIAL CENTRES – FLOORSPACE AND CLASSIFICATION

Classification/Zone	Centre	Operative District Plan	PC 14 Height	Kāinga Ora requested Height	Commercial Floorspace	Zoned Commercial Land	Community Facility	Recommended Height
Large Town Centres	Riccarton	20	22	53	203,000sqm	15.5ha	Yes	32
	Papanui	20	22	53	125,000sqm (Pre Northlink)	32.6ha	Yes	32
	Hornby	20	22	53	79,000sqm	20.5ha	Yes	32
Town Centres	Linwood	20	20	22	60,000sqm	9.2ha	Yes	22
	Shirley	20	20	22	47,000sqm	9.6ha	Yes	22
	Belfast	20	20	22	47,000sqm	18ha	Yes	22
	North Halswell	20	20	22	25,000sqm retail max (180,000sqm total centre size)	16.6ha		22
Classification	Centre	Operative District Plan	PC 14 Height	Kāinga Ora requested Height	Commercial Floorspace		Community Facility	Recommended Height
Large Local Centres	Merivale	12	20	22	27,000sqm	6.1ha	Supermarket	22
	Sydenham	12	20	22	31,000sqm	6.5ha	No	22
	Church Corner	12	20	22	41,000sqm	8.5ha	Library + Supermarket	22
	Ferrymead	12	20	20	30,000sqm	9.2ha	Supermarket	14
	New Brighton	12	14	14	24,000sqm	5ha	Library + Supermarket	14
Local Centres	Barrington	12	14	20	14,000sqm	4.3ha	Supermarket	14
	Prestons	12	14	20	7,000sqm (12k max)	10.7ha	Supermarket	14
	Bishopdale	12	14	20	12,000sqm	6.3ha	Library + Supermarket	14
	Lyttleton	12	12	14	15,000sqm	3.6ha	Supermarket	12
	Wigram	12	12	14	11,560sqm	4.9ha	Supermarket	14

	Woolston	12	12	14	12,000sqm	3.2ha	Supermarket	14
	Avonhead	12	12	14	5,000sqm	1.2ha	Supermarket	14
	Addington	12	12	14	9,000sqm	2.6ha		14
	Sydenham South	12	12	14	11,500sqm	3.6ha		14
	Cranford	12	12	14	9,500sqm	1.6ha		14
	Edgeware	12	12	14	8,500sqm	1.9ha		14
	Halswell	12	12	14	6,000sqm	3.2ha	Supermarket, Library	14
	Aranui	12	12	14	585sqm	1.1ha		14
	Beckenham	12	12	14	5,856sqm	1.6ha		14
	Colombo/Beaumont	12	12	14	5,088sqm	1.6ha	Supermarket	14
	Cranford	12	12	14	9,484sqm	1.6ha		
	Edgeware	12	12	14	8,131sqm	1.9ha	Supermarket	14
	Fendalton	12	12	14	4,268sqm	1.3ha	Supermarket	14
	Ilam/Clyde	12	12	14	5,335sqm	1.6ha		14
	North West Belfast	12	12	14	Emerging	3.2ha	Supermarket	14
	Parklands	12	12	14	864sqm	1.3ha	Supermarket, Library	14
	Redcliffs	12	12	14	3,195sqm	0.8ha		14
	Richmond	12	12	14	2,912sqm	2.2ha	Supermarket	14
	St Martins	12	12	14	5,783sqm	1.7ha	Supermarket	14
	Linwood Village	12	12	14	3,636sqm	1.4ha		14
	Sumner	12	12	14	4,381sqm	2ha	Supermarket	14
	Wairakei - Greers	12	12	14	2,876sqm	1.2ha		14
	Hilmorton	12	12	14	5,050sqm	1.2ha		
Yaldhurst	12	12	12	Emerging			14	
Neighbourhood Centre	Neighbourhood	8	12	14		XX		14

APPENDIX 6 – PC14 – COMMERCIAL CENTRES – ACTIVITY STATUS ACROSS CENTRES

Activity	MCZ	TCZ	LCZ	NCZ
Retail	Unlimited	Unlimited	500sqm max tenancy size	350sqm max tenancy size outside Central City 250sqm max tenancy size within Central City
Trade Supplier				250sqm max tenancy size
Second-Hand Goods Outlet				250sqm max tenancy size
Commercial Services				250sqm max tenancy size
Entertainment Activity			Within a KAC	
Recreation Activity			Within a KAC	
Food and Beverage outlet				250sqm max tenancy size inside the Central City
Gymnasium				250sqm max tenancy size
Office	Unlimited	500sqm max tenancy size	500sqm max tenancy size	350sqm max tenancy size outside the Central City 250sqm max tenancy size inside the Central City
Visitor Accommodation				
Community Facility				250sqm max tenancy size in the Central City
Health Care Facility				300sqm max tenancy size in the Central City
Education Activity				250sqm max tenancy size in the Central City
Preschool				250sqm max tenancy size in the Central City
Care Facility				250sqm max tenancy size in the Central City
Spiritual Activity				250sqm max tenancy size in the Central City
Public artwork				
Public transport Facility				
Residential Activity above ground floor				
Emergency service facilities				Outside the Central City
Parking Lot				
High technology industrial activity				

APPENDIX 8

Supermarket				1000sqm max tenancy outside the Central City
Large Format Retail Activity				
Customary harvesting				
Conservation activity				
Social Housing Complex				
Community corrections activity				
Industrial Activity				
Primary Production				
Retirement Village				
Drive through services				Outside the Central City
Service Station				Outside the Central City
Yard Based Supplier				250sqm max tenancy size
Parking Building				
Sensitive Activities within QM (Airport Contour or National Grid)				

APPENDIX 7 – RESIDENTIAL DEVELOPMENT CAPACITY IN TOWN AND LOCAL CENTRES

10.1.6 While the centres of Christchurch City are zoned and principally utilised for commercial and retail activity, the centres are enabled to fulfill a mixed-use function with residential activity permitted above ground floor. The following notes the potential theoretical supply of residential households above ground floor enabled by PC14 height and density provisions within centres.

10.1.7 Assumptions for determining supply are based on 500sqm sites, retail activity of 500sqm on ground floor, office activity of 500sqm on the first floor, and residential activity on the second floor and above, the permitted baseline in 15.4.1.1 (P21) of 60sqm for two bedroom residential units has been utilized to evaluate how much potential households supply is in centres, I have also removed 120sqm per floor (two residential units) for hallways, elevators and other utilities. The total two bedroom units per floor is assumed to be six as shown in Table 11 below.

Table 11 Assumptions for Town Centres Residential Supply

Assumptions based on Permitted Standards in Town Centres						
500sqm Sites assumed across the centre (Refer to paragraph below table)						
500sqm Office Space First Floor						
500sqm Retail Ground Floor						
Permitted Baseline of 2 bedrooms units @60sqm = 8 units per floor.						
Removal of two units (120sqm) for hallways, elevators, and utilities. = 6 units per floor						
Height	6 storey (22m)	8 storey (28m)	10 Storey (32m)	12 storey (38)	14 storey (42)	16 storey (48)
Total Units	24	36	48	60	72	84

10.1.8 Applying those assumptions to centres I have divided the total hectares of a centre into 500sqm sites, I note this is theoretical with a range of site sizes existing in centres, but it reflects the enablement for mixed use development across a centre. Table 12 notes the potential number of sites in Town Centres at 500sqm excluding areas subject to qualifying matters. Shirley has significantly less sites due to the Vacuum Sewer Qualifying Matter.

Table 12 Number of Sites in Commercial Centres

Town Centres	Total Hectares of Commercial Core (ha)	Total sites at 500sqm
Papanui	21.6	432

Riccarton	15	300
Hornby	13	260
Shirley	1	20
North Halswell	16.6	332
Belfast	18	360
Linwood	9.2	184

10.1.9 Based on the assumed number of units per 500sqm site, the total theoretical development capacity for households in Town Centres is as follows.

Table 13 Two bedroom residential unit Development Capacity in Town Centres

Town Centres	Households					
	6 storey (22m)	8 storey (28m)	10 Storey (32m)	12 storey (38)	14 storey (42)	16 storey (48)
Papanui	10368	15552	20736	25920	31104	36288
Riccarton	7200	10800	14400	18000	21600	25200
Hornby	6240	9360	12480	15600	18720	21840
Total Development Capacity in 'Large Town Centres'	23808	35712	47616	59520	71424	83328
Shirley	480	720	960	1200	1440	1680
North Halswell	7968	11952	15936	19920	23904	27888
Belfast	8640	12960	17280	21600	25920	30240
Linwood	4416	6624	8832	11040	13248	15456
Total Theoretical Development Capacity in 'Town Centres'	21504	32256	43008	53760	64512	75264
Total Theoretical Development Capacity in Large Town Centres and Town Centres, excluding Belfast	36672	55008	73344	91680	110016	128352

10.1.10 Table 13 highlights that significant residential development capacity is enabled within centres, Belfast has been excluded from the development capacity as the viability and role of the centre is uncertain due to the development of a retirement village on the land previously identified for a town centre, zoned Commercial Core.

10.1.11 The following Table 14 shows theoretical development capacity in Town Centres if the PC14 recommended heights are accepted, being 32m for Large Town Centres and 22m in Town Centres.

Table 14 Recommended Heights PC14 Development Capacity

Town Centres	Households	
	6 Story (22m)	10 Story (32m)
Papanui		20736
Riccarton		14000
Hornby		12480
Shirley	480	
North Halswell	7968	
Belfast	8640	
Linwood	4416	
Total Recommended Development Capacity (excluding Belfast, Riccarton above 22m)	68,720	

10.1.12 The total of 68,720 households within the Town Centres highlights the mixed use potential within centres and the overall enablement of PC14.

Local Centres Development Capacity

10.1.13 It follows that the development capacity of Large Local Centres is based on the same assumptions as detailed below in Table 11 above but with different heights, ranging from 3 story to 10 story.

Table 15 Assumptions for Local Centres

Assumptions based on Permitted Standards in Local Centres
500sqm Sites assumed across the centre (Refer to paragraph below table)
500sqm Office Space First Floor

500sqm Retail Ground Floor					
Permitted Baseline of 2 bedroom units @60sqm = 8 units per floor.					
Removal of two units (120sqm) for hallways, elevators, and utilities. = 6 units per floor					
Height	3 storey (12/14m)	4 storey (16/17m)	6 Storey (22m)	8 storey (28m)	10 storey (32)
Total Units	6	12	24	36	48

10.1.14 Applying the same method as detailed above in Table 15, the following theoretical development capacity is enabled in Local Centres. The Large Local Centres have had 8 and 10 story scenarios applied to them for context to the panel of what could be achieved if greater heights were enabled.

Table 16 Residential Development Capacity with Local Centres

Local Centres	Households				
	3 storey (12/14m)	4 storey (16/17m)	6 Storey (22m)	8 storey (28m)	10 storey (32)
Merivale	720	1440	2880	4320	5760
Church Corner	1020	2040	4080	6120	8160
Sydenham	1560	3120	6240	9360	12480
Ferrymead	1152	2304	4608	6912	9216
Development Capacity across recommended Large Local Centres	3672	7344	14688	22032	29376
New Brighton	780	1560	3120		
Bishopdale	756	1512	3024		
Prestons	1284	2568	5136		
Barrington	1560	3120	6240		
Sydenham (Brougham and Milton)	432	864	1728		
Aranui	132	264	528		
Woolston	384	768	1536		
Wigram	588	1176	2352		

Hilmorton	144	288	576		
Wairakei/Greers	144	288	576		
Sumner	240	480	960		
Stanmore/Linwood Village	168	336	672		
St Martins	204	408	816		
Richmond	264	528	1056		
Redcliffs	96	192	384		
Parklands	156	312	624		
NorthWest Belfast	192	384	768		
Ilam-Clyde	192	384	768		
Halswell	384	768	1536		
Fendalton	156	456	912		
Edgware	228	456	912		
Cranford	192	384	768		
Colombo/Beaumont	144	288	576		
Beckenham	192	384	768		
Avonhead	144	288	576		
Addington	312	624	1248		
Theoretical Development Capacity Across recommended 'Local Centres' Total	8496	16392	32784	22032	29376

10.1.15 The following Table 17 reflects the theoretical development capacity taking account of the recommends heights for centres.

Table 17 PC14 Recommended Heights development capacity within Centres

Local Centres	Households	
	3 story (12/14m)	6 Story (22m)
Merivale		2880

Church Corner		4080
Sydenham		6240
Ferrymead		4608
Theoretical Development Capacity across recommended Large Local Centres		14688
New Brighton	780	
Bishopdale	756	
Prestons	1284	
Barrington	1560	
Sydenham (Brougham and Milton)	432	
Aranui	132	
Woolston	384	
Wigram	588	
Hilmorton	144	
Wairakei/Greers	144	
Sumner	240	
Stanmore/Linwood Village	168	
St Martins	204	
Richmond	264	
Redcliffs	96	
Parklands	156	
NorthWest Belfast	192	
Ilam-Clyde	192	
Halswell	384	
Fendalton	156	

Edgware	228	
Cranford	192	
Colombo/Beaumont	144	
Beckenham	192	
Avonhead	144	
Addington	312	
Development Capacity Across recommended Local Centres Total	8496	
PC14 Recommended Heights Local Centres Theoretical Development Capacity	23,184	

10.1.16 Evaluating the theoretical development capacity within centres, it highlights that a significant amount of residential activity is enabled within centres by PC 14. In total the residential development capacity within centres arising from PC14 is 91,904 households accounting for coastal qualifying matters in New Brighton and Ferrymead, Lyttelton building heights qualifying matter and the compromised function and role of Belfast/Northwood KAC.

Table 18 Total Residential Household Development Capacity in Centres

Centre	Residential Household Theoretical Development Capacity
Town Centre Zones (Excluding Belfast/Northwood)	68,720
Large Local Centres at 22m	14,688
Local Centres at 14m	8,496
Total Development Capacity	91,904

APPENDIX 8 - THEORETICAL BUSINESS LAND SUPPLY IN TOWN AND LOCAL CENTRES

The following notes the potential theoretical supply of business land above ground floor enabled by PC14 height and density provisions within centres. The BCA supply only accounts for vacant land, not potential development capacity through height above ground floor, the following assessment provides theoretical floorspace supply including above ground floor if the heights proposed by PC 14 were developed.

Assumptions for determining supply are based on 500sqm sites, retail activity of 500sqm on ground floor, office tenancies of 500sqm on each floor above ground floor.

Table 19 Business Theoretical Supply Assumptions in Town Centres

Assumptions based on Permitted Standards in Town Centres						
500sqm Sites assumed across the centre (Refer to paragraph below Table)						
500sqm Office tenancies above						
500sqm Retail Ground Floor						
Height	6 storey (22m)	8 storey (28m)	10 Storey (32m)	12 storey (38)	14 storey (42)	16 storey (48)
Total Floorspace per 500sqm site	3000	4000	5000	6000	7000	8000

Applying those assumptions to centres I have divided the total hectares of a centre into 500sqm sites, using the same approach as for the theoretical residential supply. Table 20 notes the potential number of sites in Town Centres at 500sqm excluding areas subject to qualifying matters. Shirley has significantly less sites due to the Vacuum Sewer Qualifying Matter.

Table 20 Total number of 500sqm sites in Centres

Town Centres	Total Hectares of Commercial Core (ha)	Total sites at 500sqm
Papanui	21.6	432
Riccarton	15	300
Hornby	13	260
Shirley	1	20
North Halswell	16.6	332
Belfast	18	360
Linwood	9.2	184

Based on the assumed number of units per 500sqm site, the total theoretical development capacity for households in Town Centres is as follows.

Table 21 Hectares of Business Land theoretically enabled in Town Centres

Town Centres	Hectares					
	6 storey (22m)	8 storey (28m)	10 Storey (32m)	12 storey (38)	14 storey (42)	16 storey (48)
Papanui	129.6	172.8	216	259.2	302.4	345.6
Riccarton	90	120	150	180	210	240
Hornby	78	104	130	156	182	208
Total Development capacity in 'Large Town Centres'	297.6	396.8	496	595.2	694.4	793.6
Shirley	6	8	10	12	14	16
North Halswell	99.6	132.8	166	199.2	232.4	265.6
Belfast	108	144	180	216	252	288
Linwood	55.2	73.6	92	110.4	128.8	147.2
Total Theoretical Development Capacity in 'Town Centres'	268.8	358.4	448	537.6	627.2	716.8
Total Theoretical Development Capacity in Large Town Centres and Town Centres, excluding Belfast	458.4	611.2	764	916.8	1069.6	1222.4

Table 21 highlights that significant theoretical business supply is enabled within centres, Belfast has been excluded from the development capacity as the viability and role of the centre is uncertain due to the development of a retirement village on the land previously identified for a town centre, zoned Commercial Core.

The following Table 22 shows theoretical development capacity in Town Centres if the PC14 recommended heights are accepted, being 32m for Large Town Centres and 22m in Town Centres.

Table 22 Theoretical Supply if recommended heights are accepted

Town Centres	Hectares
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	6 Story (22m)	10 Story (32m)
Papanui		216
Riccarton		150
Hornby		130
Shirley	6	
North Halswell	99.6	
Belfast	108	
Linwood	55.2	
Total Recommended Development Capacity (excluding Belfast)	656.8	

Local Centres Business Land Supply

It follows that the business land supply of Large Local Centres is based on the same assumptions as detailed above in Table 19 but with different heights, ranging from 3 story to 10 story.

Table 23 Business Theoretical Supply Assumptions in Town Centres

Assumptions based on Permitted Standards in Local Centres					
500sqm Sites assumed across the centre (Refer to paragraph below table)					
500sqm Office Space First Floor					
500sqm Retail Ground Floor					
Height	3 storey (12/14m)	4 storey (16/17m)	6 Storey (22m)	8 storey (28m)	10 storey (32)
Total Floorspace per 500sqm	1500	2000	3000	4000	5000

Applying the same method as detailed above in Table 21, the following theoretical supply is enabled in Local Centres. The Large Local Centres have had 8 and 10 story scenarios applied to them for context to the panel of what could be achieved if greater heights were enabled.

Table 24 Hectares of Business Land theoretically enabled in Local Centres

Local Centres	Hectares				
	3 storey (12/14m)	4 storey (16/17m)	6 Storey (22m)	8 storey (28m)	10 storey (32)

Merivale	18	24	36	48	60
Church Corner	25.5	34	51	68	85
Sydenham	19.5	26	39	52	65
Ferrymead	28.8	38.4	57.6	76.8	96
Development Capacity across recommended Large Local Centres	91.8	122.4	183.6	244.8	306
New Brighton	39	52			
Bishopdale	18.9	25.2			
Prestons	32.1	42.8			
Barrington	39	52			
Sydenham (Brougham and Milton)	10.8	14.4			
Aranui	3.3	4.4			
Woolston	9.6	12.8			
Wigram	14.7	19.6			
Hilmorton	3.6	4.8			
Wairakei/Greers	3.6	4.8			
Sumner	6	8			
Stanmore/Linwood Village	4.2	5.6			
St Martins	5.1	6.8			
Richmond	6.6	8.8			
Redcliffs	2.4	3.2			
Parklands	3.9	5.2			
NorthWest Belfast	9.6	12.8			
Ilam-Clyde	4.8	6.4			
Halswell	9.6	12.8			

Fendalton	3.9	5.2			
Edgeware	5.7	7.6			
Cranford	4.8	6.4			
Colombo/Beaumont	3.6	4.8			
Beckenham	4.8	6.4			
Avonhead	3.6	4.8			
Addington	7.8	10.4			
Theoretical Supply recommended					
'Local Centres' Total	222ha	273.2ha			

The following Table 25 reflects the theoretical development capacity taking account of the recommended heights for centres.

Table 25 Theoretical Supply if recommended heights are accepted

Local Centres	Households	
	3 story (14m)	6 Story (22m)
Merivale		36
Church Corner		51
Sydenham		39
Ferrymead		57.6
Theoretical Development Capacity across recommended Large Local Centres	183.6ha	
New Brighton	39	
Bishopdale	18.9	
Prestons	32.1	
Barrington	39	
Sydenham (Brougham and Milton)	10.8	

Aranui	3.3	
Woolston	9.6	
Wigram	14.7	
Hilmorton	3.6	
Wairakei/Greers	3.6	
Sumner	6	
Stanmore/Linwood Village	4.2	
St Martins	5.1	
Richmond	6.6	
Redcliffs	2.4	
Parklands	3.9	
NorthWest Belfast	9.6	
Ilam-Clyde	4.8	
Halswell	9.6	
Fendalton	3.9	
Edgware	5.7	
Cranford	4.8	
Colombo/Beaumont	3.6	
Beckenham	4.8	
Avonhead	3.6	
Addington	7.8	
Theoretical Supply Across recommended Local Centres Total	261ha	
PC14 Recommended Heights Local Centres Theoretical Supply	444.6ha	

Evaluating the theoretical development capacity within centres, it highlights that a significant amount of business activity is enabled within centres by PC 14. In total the residential development capacity within centres arising from PC14 is an additional 335.4ha, and a total of 1101.4ha across the hierarchy, accounting for coastal qualifying matters in New Brighton, Lyttelton building heights qualifying matter and the compromised function and role of Belfast/Northwood KAC.

Table 26 Theoretical Business Land Supply across Town and Local Centres

Centre	PC 14 enabled commercial development capacity floorspace (Including above ground) converted to hectares	PC 14 Additional development capacity floorspace (including above ground) converted to hectares
Town Centre Zones (32m Large and 22m Town Centre)	656.8ha	198.4ha
Local Centres (22m Large and 14m Local Centre)	444.6ha	137ha
Total	1101.4ha	335.4ha

APPENDIX 9 – MIXED USE REZONING PROPOSALS WITHIN WALKING CATCHMENTS OF CCZ AND TCZ

1. Phillipstown Industrial General - Recommended for Mixed Use Zone and Comprehensive Housing Precinct enablement.

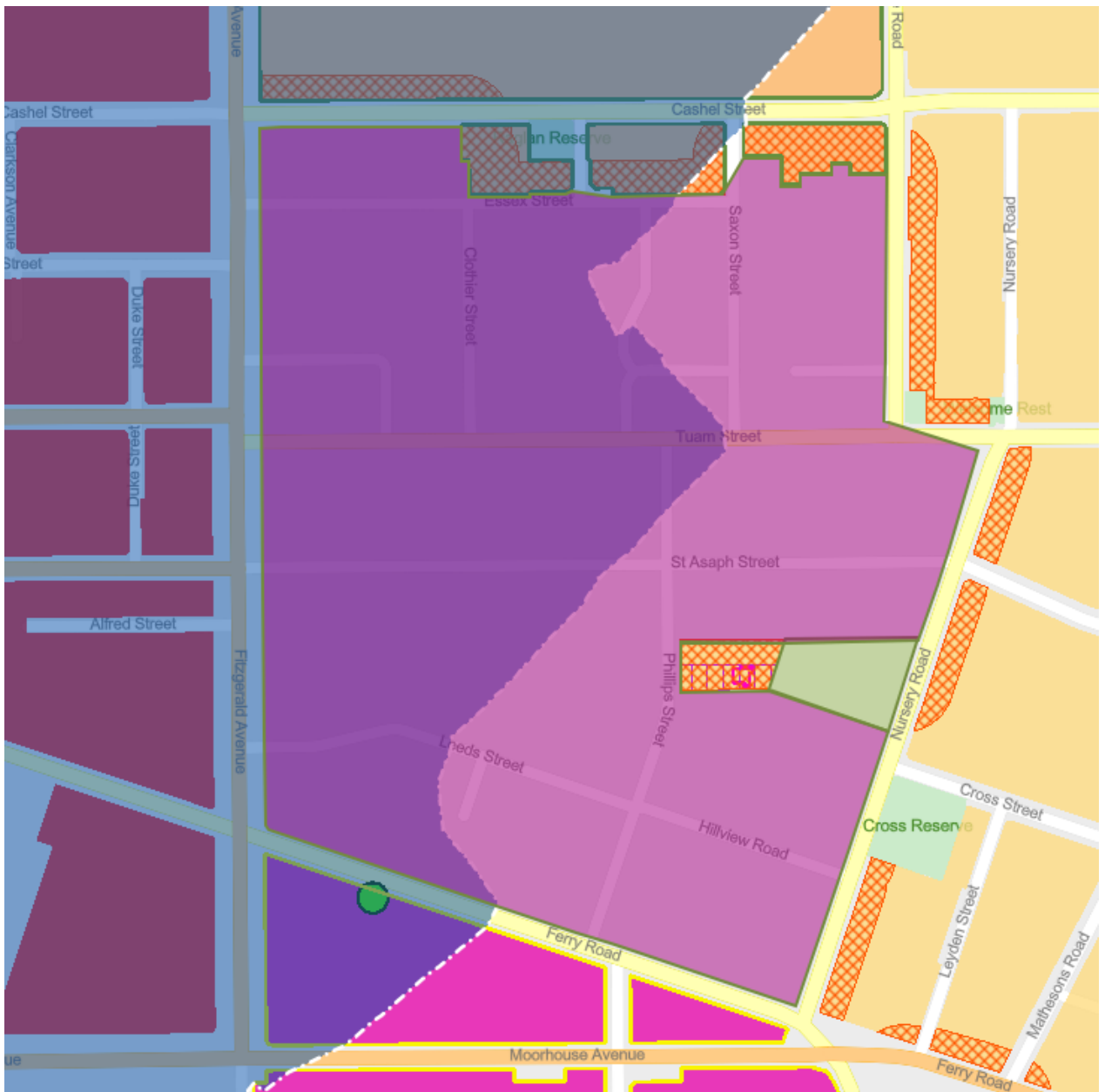


Figure 2 Phillipstown Industrial General(Purple) with CCZ walking catchment

2. Mandeville Street Mixed Use – Recommended for inclusion in the Comprehensive Housing Precinct

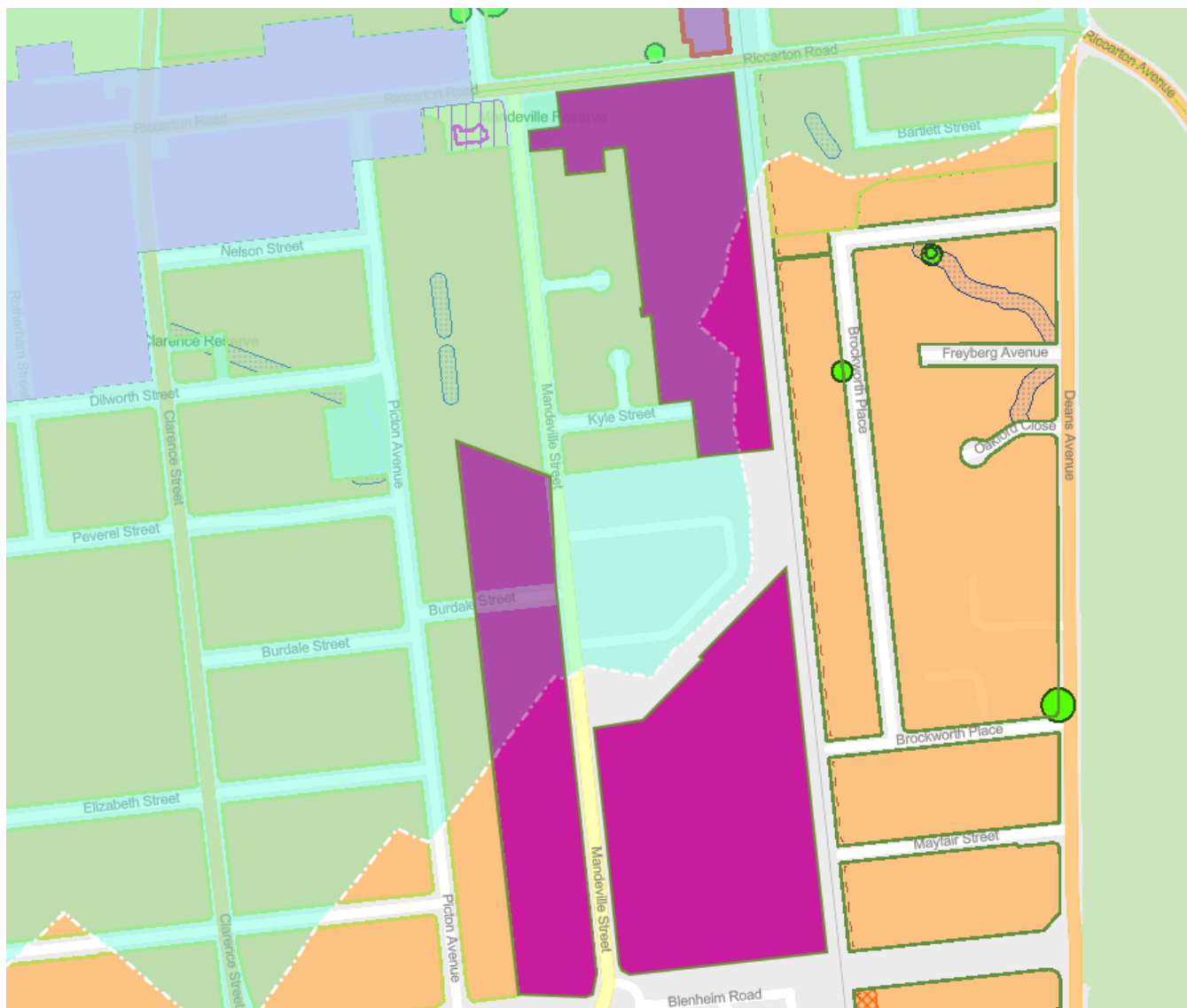


Figure 3 Mixed Use Zone (Purple) in Riccarton recommended for Comprehensive Housing Precinct