

**BEFORE INDEPENDENT HEARING COMMISSIONERS
IN CHRISTCHURCH**

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

IN THE MATTER of the Resource Management Act 1991

AND

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

**STATEMENT OF PRIMARY EVIDENCE OF AMANDA FRANCES MACKAY ON
BEHALF OF CHRISTCHURCH CITY COUNCIL**

URBAN DESIGN – SPECIFIC PURPOSE (SCHOOLS) ZONE

Dated: 11 August 2023

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EXECUTIVE SUMMARY

1. My full name is **Amanda Frances Mackay**. I am employed as an Urban Designer at the Christchurch City Council (the **Council**).
2. I have prepared this statement of evidence on behalf of the Council in respect of urban design matters relating to the Specific Purpose (School) Zone (**SPSZ**) and related matters arising from the submissions on Plan Change 14 to the Christchurch District Plan (the **District Plan**; **PC14**).
3. PC14 introduces new policies and accompanying provisions that support the strategic outcomes in respect to urban form. My evidence specifically relates to the proposed District Plan provisions under PC14 for the SPSZ in relation to the proposed National Policy Statement on Urban Development (**NPS-UD**) adjoining High Density Residential Zones (**HRZs**), where the rules allow for more development than under the operative District Plan zoning.
4. I am the author of the technical report entitled “Technical Review of Specific Purpose – School Provisions” dated 10 March 2023 (**Technical Report**) which is Appendix 1 of the section 32 report for the revised provisions for the SPSZ and Hospital Zone.¹
5. My evidence assesses the enabled height and form of buildings within the SPSZ sites and considers the interface (adjoining boundary) with the HRZ from an urban design perspective. My evidence also addresses issues raised in submissions and where appropriate I make recommendations in response to the issues raised by the submissions.
6. The main issue raised by the submitters relevant to the SPSZ relate to the impacts of the changes of the built form standards and how they are applied.
7. The overarching approach taken in my previous technical reporting work and in this evidence, is focussed on a corresponding response for the SPSZ’s urban form in relation to the anticipated HRZs and broader Commercial Centres to coherently integrate these sites into the overall city form. The proposed SPSZ provisions addressing scale, form, and massing of buildings, that are commensurate with the adjacent HRZ provisions,

¹ <https://ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC14/Section-32-Appendices-1/Updated-Specific-Purpose-Schools-Zone-Provisions-Technical-Review-10-March-20232.pdf>.

should support city legibility and positively contribute to the cumulative overall urban form of Ōtautahi Christchurch.

8. Having assessed the PC14 provisions for the SPSZ in relation to the adjoining HRZ and considered submissions in summary, my recommended proposed changes include:
 - (a) Changes to the Built Form Standards in response to submissions.
 - (b) Amendments to Matters of Discretion for further clarification.

INTRODUCTION

9. My full name is **Amanda Frances Mackay**. I am employed as an Urban Designer at the Council. I have been an Urban Designer at the Council for the past two years, following two and a half years at a New Zealand based multi-disciplinary environment consultancy. I hold a Bachelor of Architecture Studies from Ara Institute in Christchurch.
10. I am the author of the Technical Report which is Appendix 1 of the section 32 report for the revised provisions for the SPSZ and Hospital Zone.
<https://ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC14/Section-32-Appendices-1/Updated-Specific-Purpose-Schools-Zone-Provisions-Technical-Review-10-March-20232.pdf>
11. Post-notification, I have also carried out some additional analysis on recent educational development to identify the common dimensions and form.
12. In preparing this evidence I have:
 - (a) Read the submissions relating to my evidence and area of technical expertise.
 - (b) Reviewed the draft evidence of David Hattam:
 - (c) Reviewed the following documents:
 - (i) PC 14 Provisions as they relate to the SPSZ (sub-chapter 13.6);
 - (ii) Section 32 Evaluation of the SPSZ and Hospital Zone prepared by the Council, including appendices (noting that I authored Appendix 1);

- (iii) Draft Section 42A Report 'Strategic Overview' prepared by Sarah Oliver; and
- (iv) Draft Section 42A Report 'Specific Purpose School, Tertiary and Hospital – Zones' prepared by Clare Piper.

- 13. I am authorised to provide this evidence on behalf of the Council.
- 14. This evidence is intended to be read in conjunction with the above reports, documents, assessments, expert evidence, and other material which I have used or relied upon in support of the opinions expressed in this evidence.

QUALIFICATIONS AND EXPERIENCE

- 15. I have been an Urban Designer at the Council for the past two years, following two and a half years at a New Zealand based multi-disciplinary environment consultancy.
- 16. I hold the qualification of Bachelor of Architecture Studies from Ara Institute in Christchurch. I am currently completing a master's in urban design at the University of Auckland.
- 17. My current role involves providing urban design advice for resource consent applications and Council projects. My experience includes strategic spatial planning, central city projects, design guidance, and resource consent assessment for residential and commercial developments, subdivisions, and infrastructure projects.
- 18. I am a member of the New Zealand Urban Design Forum.

CODE OF CONDUCT

- 19. While this is a Council hearing, I have read the Code of Conduct for Expert Witnesses (contained in the 2023 Practice Note) and agree to comply with it. Except where I state I rely on the evidence of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions. I confirm that, while I am employed by the Council, the Council has agreed to me providing this evidence in accordance with the Code of Conduct.

SCOPE OF EVIDENCE

20. My statement of evidence is focused on the management of the development envelope within the SPSZ. It relates to the amended provisions that were notified as part of the PC14 for the SPSZ in sub-chapter 13.6 of the District Plan and considers and responds to the issues raised and the relief sought in submissions, as they apply to the SPSZ.
21. As above, I authored the Technical Report. In preparing this evidence I have relied on my Technical Report where I have:
- (a) Undertaken a technical analysis of SPSZ provisions.
 - (b) Undertaken an assessment and modelling of potential options for intensification of SPSZ built form provisions, including mitigating effects.
 - (c) Reviewed the Designing Schools in Aotearoa New Zealand – School Property Design Standards, V2.0 June 2022, which includes design principles for school property and site planning guidance. (Author Ministry of Education).
 - (d) Attended a virtual meeting (December 2022) with representatives from the Ministry of Education.
22. Except where I say otherwise in this evidence, I agree with the content and analysis in my Technical Report. I rely on, adopt and refer back to, that report in support of the opinions expressed in this evidence but do not intend to repeat its content in order to minimise duplication. This evidence is intended to be read in conjunction with my Technical Report. <https://ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC14/Section-32-Appendices-1/Updated-Specific-Purpose-Schools-Zone-Provisions-Technical-Review-10-March-20232.pdf>

SUB-CHAPTER 13.6 Specific Purpose (School) Zone (SPSZ)

23. PC14 introduces new provisions to give effect to policy 3 of the NPS-UD by providing for more intensification in around the City Centre and existing town and local centres. These provisions include amendments to SPSZs that lie within the HRZ, City Centre (**CC**), Central City Mixed Use (**CCMU**),

and Future Urban Zones (**FUZ**) areas. The relevant SPSZ provisions relate to the following fourteen (14) schools:

(a) State Integrated Schools (as per Appendix 13.6.6.2):

- (i) Aidanfield Christian School;
- (ii) Catholic Cathedral College;
- (iii) Christchurch Adventist School;
- (iv) Emmanuel Christian School;
- (v) Marian College;
- (vi) St Mary's School; and

(b) Private Schools (as per Appendix 13.6.6.3):

- (i) Cathedral Grammar School;
- (ii) Christ's College;
- (iii) Rangī Ruru Girls' School;
- (iv) Selwyn House School;
- (v) St Andrews College;
- (vi) St Margaret's College;
- (vii) St Michael's School; and
- (viii) Westmount School.

24. In addition, thirteen (13) State Schools sit within an alternative HRZ. The Ministry of Education has a 'Designing Schools in Aotearoa NZ Design Guide' (Version 2.0, June 2022), which provides expectations for the planning and design of schools located on these designated sites. The built form on these State School sites therefore is not directly subject to rules within 13.6 'Specific Purpose (School) Zone'.
25. As noted above, I prepared the Technical Report that was appended to the section 32 report for the revised provisions for SPSZ and Hospital Zone. In the Technical Report I assessed the potential impacts and outcomes of the enabled built form standards for the SPSZs in relation to the adjoining HRZ

for the above mentioned schools, and the objectives and policies for the SPSZ.

26. In summary, in my Technical Report I explored the significant shift in built form, amenity, and neighbourhood character that could result from introducing more intensification adjacent to the SPSZs through the upzoning from lower intensity residential zones to HRZ. Reflecting this, my recommendations in my Technical Report aimed to align the SPSZ provisions with the provisions of the adjacent HRZs.
27. The notified SPSZ includes provisions in relation to building length and landscaping to help manage and mitigate the potential adverse effects on the adjacent sites and surrounding neighbourhood areas.
28. Except where otherwise recommended in my evidence below, following a review of submissions, I continue to support in principle the recommendations in the Technical Report for the reasons given in that Report.

RESPONSE TO SUBMISSIONS

29. Since preparing the Technical Report, I have reviewed submissions lodged in relation to the SPSZs (and HRZ where applicable). Having considered those submissions, for the reasons discussed below I recommend some changes in response to submissions.

Overview of submissions in relation to SPSZ provisions (within the HRZ)

30. A number of submissions seek changes to PC14 provisions for the SPSZs (within the HRZ), particularly in relation to built form standard and matters of discretion. The relevant submissions are shown in the following **Table 1**.

List of submitters	
Original Submission No	Submitter
814	Carter Group Limited
823	The Catholic Diocese of Christchurch
806	Te Tāhuhu o te Mātaranga (Ministry of Education)
26	Rosemary Fraser
870	Susanne Antill

Table 1: List of submitters relevant to the PC14 SPSZ provisions

31. The overarching approach taken in the previous Technical Report and in this evidence, is to align the SPSZs urban form with the anticipated HRZs and broader Commercial Centres to coherently integrate these components into the overall city form.
32. The below section reviews the submissions received on the built form standard provisions for school sites and make recommendations in response to the relief sought.

Maximum site coverage – rule 13.6.4.2.1.a.iii

33. The District Plan currently has no maximum coverage. PC14 as notified proposes rule 13.6.4.2.1.a.iii providing for a maximum of 50% site coverage within HRZ (Residential Precincts), City Centre, Central City Mixed Use or Industrial General Zones. This rule was supported by the Technical Report as part of the notified package.
34. Submissions have been lodged by Carter Group Limited (#814) and Catholic Diocese of Christchurch (#823) opposing the 50% maximum site coverage stating it proposes greater constraints on building site coverage and requesting that the status quo of ‘no maximum percentage’ site coverage is retained.
35. The notified provision was proposed to ensure an efficient use of the site and to avoid potentially large-scale buildings adjoining and adversely impacting on HRZs which have a maximum site coverage of 50%. Additionally, site coverage was intended to encourage these schools to provide for active and passive recreation, community use of open space and facilities to contribute a well-functioning urban environment, particularly in relation to the surrounding neighbourhood (supporting 13.6.2.1.1 Policy – Community use of education facilities, 13.6.2.1.2 Policy – Effects on neighbourhoods).
36. On reflection however, overall, I consider that without the site coverage provision, the remaining proposed built form standards package (13.6.4.2 with ‘Height in relation to boundary’, ‘Minimum building setback from internal boundaries’, ‘Maximum building length’ and ‘Landscaping’) will still

be able to adequately mitigate the potential adverse effects of the building bulk for school buildings on these specific sites in HRZ.

37. Therefore, I recommend amending the notified rule 13.6.4.2.1.a.iii, to revert to the operative District Plan provision such that 'no maximum percentage' is required.

Height in relation to boundary – rule 13.6.4.2.2a.ii

38. PC14 as notified proposed that height in relation to boundary should consist of 3m at 60° (north), 3m at 55° (east and west), 3m at 50° (south). This rule was supported by the Technical Report as part of the notified package to help manage the potential adverse shading effects on the adjacent HRZ as it applies the same provision (which are proposed qualifying matters and could be subject to change).
39. Submissions have also been lodged by Carter Group Limited (#814), and The Catholic Diocese of Christchurch (#823) opposing the proposed height in relation to boundary stating it proposed greater constraints on the building height and requesting that the status quo is retained.
40. I consider the proposed provision package enables greater height closer to the boundary than the status quo as illustrated below in **Figure 1**.

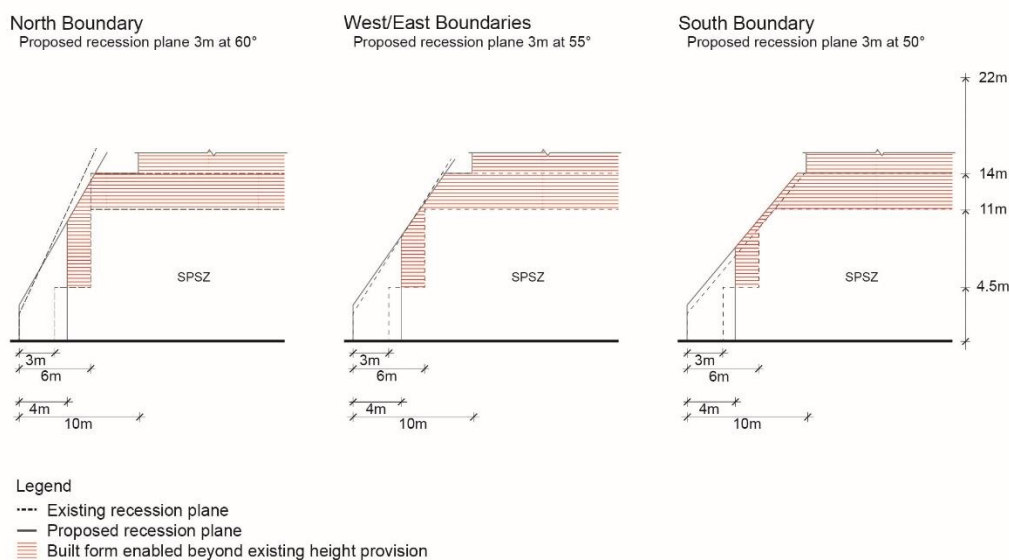


Figure 1. Illustration of proposed height in relationship to boundary

41. As discussed in the Technical Report, the proposed recession planes of 3m at 60° (north), 3m at 55° (east and west), 3m at 50° (south) are intended to

enable a commensurate building scale at the boundary and ensure access to an anticipated degree of sunlight for the adjoining HRZ.

42. PC14 as notified includes a Sunlight Access QM to apply to all sites in the Medium Density Residential Zone and HRZ. This would implement more restrictive recession planes than those from the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (**Enabling Housing Amendment Act**). The QM reflects the different sun angles experienced in Christchurch when compared to the other, more northern, tier 1 cities. This research and modelling has been undertaken and is included in the technical report for the residential zone (referred to as Residential Technical Report)² and the technical report for Sunlight Access QM (referred to as Sunlight Access QM Report).³ I defer to the technical analysis and findings in relation to sunlight access in those reports.
43. In response, the SPSZ adopts the recession planes that have been recommended in the residential report for the Residential Zones to ensure the built form (on the SPSZ) supports an anticipated level of access to sunlight on the HRZ adjacent.
44. For the reasons above, I recommend the SPSZ recession planes are consistent with those proposed in the adjoining HRZ and the provision is retained as notified.

Minimum building setback from road boundaries – rule 13.6.4.2.3.a.ii

45. PC14 as notified proposed a minimum 4m building setback from the road boundary (from a 2m minimum setback within the operative District Plan). This rule was supported by the Technical Report as part of the notified package to manage the increase in height at the street boundary.
46. Submissions have been lodged by Carter Group Limited (#814) and The Catholic Diocese of Christchurch (#823) opposing the proposed 4m minimum setback stating the provision proposes greater constraints given the increase in setback.
47. In my opinion and as mentioned in the Technical Report the proposed building setback from the street was intended to help manage the increase

² <https://ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC14/Section-32-Appendices-1/PC-14-Residential-Chapter-Technical-Analysis-Urban-Design-v2.pdf>.

³ <https://ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC14/Section-32-Appendices-1/PC14-QM-Sunlight-Access-Urban-Design-Rpt.pdf>.

of overall built form due to the increase in height. A 4m setback was proposed to provide space for tree planting at the street interface, which could help mitigate and potential adverse effects of large school buildings and contribute to a high standard of visual amenity within the neighbourhood. However, I acknowledge on reflection that a minimum 2m building setback from the road may support a coherent street scene, where HRZ have a 1.5m building setback from the street.

48. Based on the analysis of existing school sites, buildings are generally setback 2m or greater to provide a formal entrance for visitors and/or incorporate landscaping, which contributes to a high standard of visual amenity. Therefore I recommend amending the notified rule 13.6.4.2.3.a.ii, back to the operative District Plan provision of 2m.

Minimum building setback from internal boundaries – rule 13.6.4.2.4.a.iii

49. PC14 as notified proposed that a rule for a 4m minimum building setback from internal boundaries (from a 6m minimum building setback from internal boundaries within the operative District Plan) and 10m minimum building setback from internal boundaries for a building over 14m in height (same as existing rule). The rule was supported by the Technical Report as part of the notified package to manage the interface with the HRZ adjacent.
50. Submissions have been lodged by Carter Group Limited (#814) and The Catholic Diocese of Christchurch (#823) opposing the proposed minimum setback from the internal boundary and maximum building length stating it proposed greater constraints on the building and requesting that the status quo is retained.
51. I consider the proposed provision enables greater height closer to the boundary than the status quo as illustrated below in **Figure 2**.

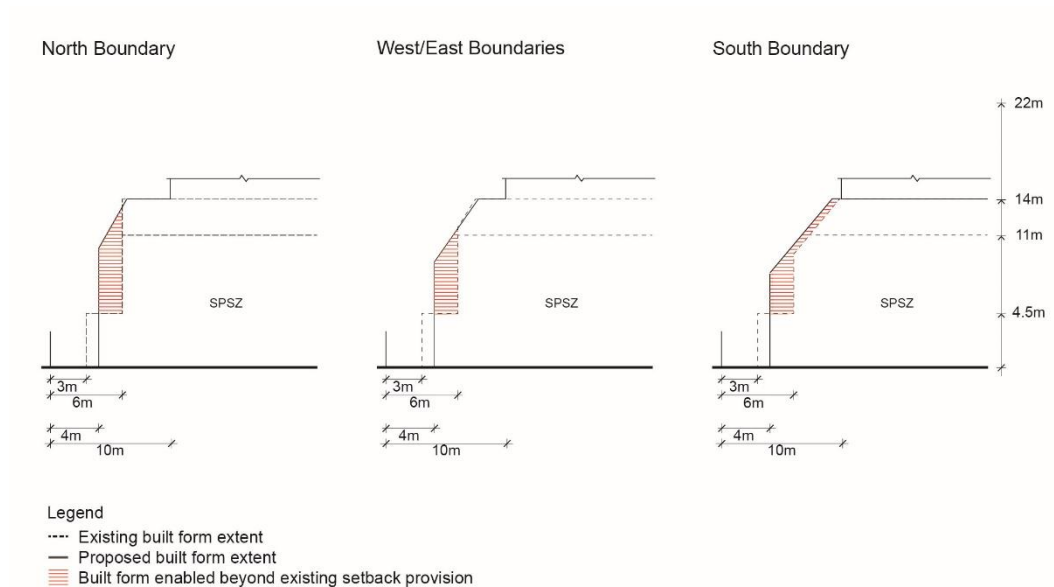


Figure 2. Illustration of minimum building setback from internal boundaries

52. As discussed in the Technical Report, the provision of 4m internal building setback from the boundary was originally proposed to help manage the relationship of built form at the boundary. This provision in combination with the increase in height and proposed recession planes protects HRZ from potential adverse shading effects, overlooking or visual dominance effects of school buildings. In addition, it provides space for landscaping and visual privacy to support student safety.
53. For the above reasons, I recommend no change to the proposed provision in the notified PC14.

Maximum building length (notified as rule 13.6.4.2.4)

54. In the notified PC14, a ‘maximum building length’ of 30m is proposed as a separate built form standard to mitigate potential adverse visual dominance of bulk of long and continuous building facades adjacent to HRZ.
55. In my opinion, this would help ensure there is a degree of modulation and a scale compatible with the residential zone adjacent (which typically have a finer grain of architectural detail).
56. Based on the analysis of recent school developments, up to 30m length appears to be a realistic and achievable continuous building dimension, particularly where more height is enabled. Three recent examples of development are illustrated below.

57. A new block of classrooms was developed for St Margaret's College in 2013. At three storeys high, the building is approximately 12m in height, setback 8m from the internal boundary (with residential) and approximately 27m in total length (see **Figures 3 and 4**).

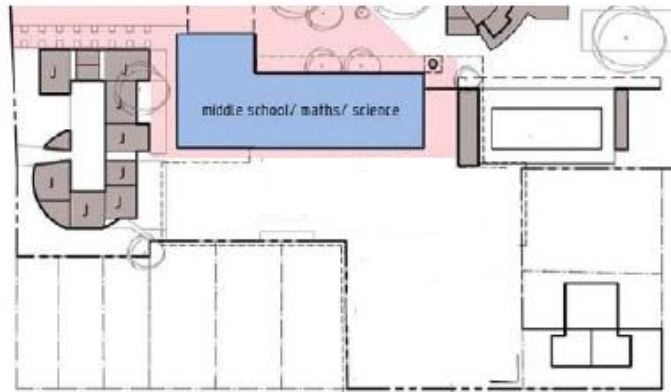


Figure 3: Site Plan illustrating school building (27m in length) setback 8m from the internal boundary adjacent to residential, image not to scale



Figure 4: South elevation illustrating 27m length, approximately 12m in height which faces residential properties, image not to scale (recent school building, 2013)

58. A new block of classrooms was developed on Rangī Ruru Girl’s School in 2012. At two storeys high, this building is approximately 10m in height, setback 3-5m from the road boundary (orientated towards residential properties) and approximately 100m in length (see **Figure 5**).



Figure 5: East elevation illustrating 100m length, approximately 10m in height which faces residential properties, image not to scale (recent school building, 2012)

59. A new sports facility was developed at Christ College in 2021. It is approximately 57m long and 12m in height. This building is not located adjacent to residential development but illustrates the scale of development for sports facility (see **Figure 6**).

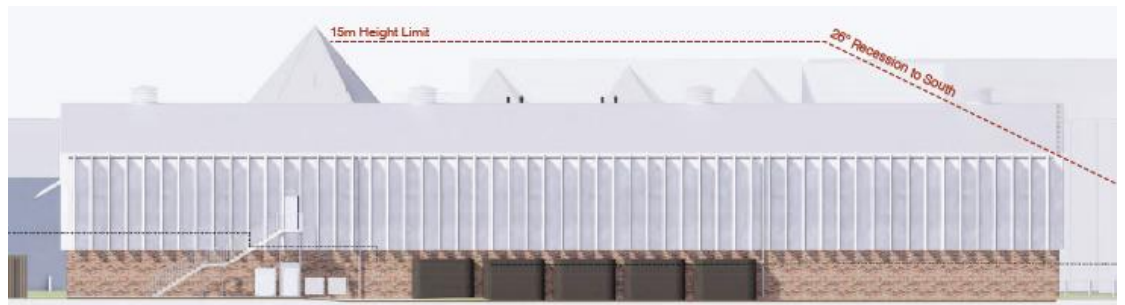


Figure 6: West elevation illustrating 57m length, approximately 12m in height, image not to scale (recent school building, 2021)

60. I recommend a building shall not exceed 30m in continuous building length. Where schools within the HRZ, CC, CCMU, and IG Zones do not meet this built form standard (RD activity status) the Council's discretion shall be limited to the following matters: a. Effects on the neighbourhood – 13.6.5.1 a., b., c., e., f., g., and h. to ensure that an appropriate built form outcome is achieved.

Maximum building height – rule 13.6.4.2.5.a.ii and rule 13.6.4.2.5.a.iii

61. PC14 as notified proposed a maximum building height rule providing for 14m within 10m of an internal boundary otherwise 20m (or 32m, depending on what HRZ the school site is within). The rule was supported by the Technical Report as part of the notified package to contribute to a coherent urban form.
62. Submissions have been lodged by Rosemary Fraser (#26), Carter Group Limited (#814), The Catholic Diocese of Christchurch (#823) supporting the provision as notified. Susanne Antill (#870), and Susanne and Janice Antill (#893) opposing the height changes city wide and seeking amendments. These submissions do not specifically note schools. These matters are covered in the s42 reports relating to Strategic Directions and Residential zones.
63. In response to submissions, others' section 42A reports recommend several proposed planning provisions to be changed from the notified PC14 (as noted in the statement of evidence for residential) in relation to HRZ heights, these changes are:
- (a) HRZ - heights increased from 19 to 22m (19m plus a 2m setback then up to 22m – 6 storeys).

- (b) HRZ (Central City Residential Precinct) – 36m to 39m (36m plus a 2m setback then up to 39 - 12 storeys).
64. These proposed HRZ provisions are in response to increased feasibility and incentives for investment.
65. As noted in the Technical Report, maximum height provisions in the SPSZ are intended to align with the adjacent HRZs height to create a coherent urban form. Therefore, I recommend changing the notified provisions to reflect the height of the underlying alternative zones.

Landscaping – rule 13.6.4.2.6

66. PC14 as notified proposed a Landscaping rule providing for 10% of each site to be planted, including at least one tree to be planted within the relevant landscaping strip per 10m of road boundary or part thereof and at least one tree to be planted within the relevant landscaping street per 30m. The rule was supported by the Technical Report as part of the notified package to mitigate the potential adverse effects of the enabled built form and encourage school sites to contribute to the character and amenity of the of neighbourhood.
67. Submissions have been lodged by Te Tāhuhu o te Mātaranga (Ministry of Education) (#806), opposing the proposed Landscaping provision, stating landscaping will be considered and accounted for within an Outline Plan in accordance with S176 (Effect of designation). In addition, submissions have been lodged by Carter Group Limited (#814), and The Catholic Diocese of Christchurch (#823) opposing the proposed Landscaping provision, noting it will limit development capacity. All submissions are requesting that the Landscaping provision is deleted.
68. The provision was proposed to help mitigate the potential adverse effects of the enabled built form, particularly in relation to the internal boundary where HRZ is adjacent and the most significant change to the built form may occur. In relation to the SPSZ within the HRZ's the proposed requirement for trees will not reduce the building capacity along internal boundaries where a minimum of 4m building setback is recommended.
69. As discussed in the Technical Report, due to the potential of large high-density buildings, providing for tree planting, particularly along the street interfaces and internal boundaries with the HRZ would help achieve a level

of landscaping amenity that integrates built form into the surrounding context and could mitigate the potential adverse effects of very large buildings being built on the sites (as an outcome of the enabled intensification).

70. In relation to the Te Tāhuhu o te Mātaranga (Ministry of Education) (#806) submission, the development on State School sites (which are designated) are subject to an Outline Plan. Designing schools in Aotearoa New Zealand: School Property Design Standards (supporting Te Tāhuhu o te Mātaranga (Ministry of Education)) advocates for landscaping and will provide guidance to mitigate any potential adverse effects. However, the process for non-state schools is different and landscaping is not mandatory through the operative provisions.
71. Analysis of school sites suggest, a high number of schools host mature trees, which contribute to the neighbourhood character including visual interest and amenity, visual softening of buildings, attractive outlook, as well as urban biodiversity and ecological benefits. Landscaping and tree planting (particularly along the street interfaces and internal boundaries) contributes to the character of the neighbourhoods and mitigate the adverse effects of intensification both on school and adjoining HRZ sites where intensification occurs.
72. For the above reasons, I recommend that the submissions are accepted in part. I recommend the notified provision for Landscaping is amended to exclude the 10% landscaping, but that one tree per 10 metres of road boundary or part thereof and one tree per 30 metres of internal boundary or part thereof are both retained.

Submissions in relation to Matters of discretion: Effects on the neighbourhood

73. PC14 as notified proposed amendments to the 13.6.5 Rules - Matters of discretion 13.6.5.1 Effects on the neighbourhood, which included changes to the existing matter 13.6.5.1.e. which, is proposed to read 'Opportunities for landscaping and tree planting, that reduce the visual dominance of buildings, vehicle access and parking areas and contributes to the amenity of neighbouring sites and to public and public accessible space'. In addition, an additional matter of discretion was recommended to ensure safety within a context of the neighbourhood is considered. This is

proposed to read '13.6.5.1.i. Address Crime Prevention Through Environmental Design (CPTED) Principles, including achieving a positive street interface'.

74. Submissions have been lodged by Te Tāhuhu o te Mātaraunga (Ministry of Education) (#806), supporting the changes, specifically the inclusion of the CPTED Principles and recommending the matters of discretion are retained as drafted. Submissions have also been lodged by Carter Group Limited (#814), and The Catholic Diocese of Christchurch (#823) opposing the proposed changes, noting it will impose additional constraints on and uncertainty for developments, and in doing so will limited development capacity in a manner that is inconsistent with the NPS-UD. Submissions from Carter Group Limited (#814), and The Catholic Diocese of Christchurch (#823) are requesting that amendments are deleted.
75. In my opinion, the reason for seeking the deletion of the amendments to 13.6.5.1 Effects on the neighbourhood is unclear through the submission received. It is unclear how the changes it will impose additional constraints or uncertainty for developments.
76. As discussed in the Technical Report, Restricted Discretionary Activity standards (13.6.4.1.3 Restricted discretionary activities RD1, 2, 3, 5, 7) manage potential adverse effects when there are breaches of the built form standards on the SPSZ site. School sites are encouraged to contribute to the character of the neighbourhood and provide for community use of education land and buildings (including outside standard school hours), which could become more popular if public open space is limited or further away.
77. In my opinion, given the enabled intensification on the SPSZ sites, particularly adjacent to HRZ, I consider the inclusion of CPTED principles could help mitigate potential safety concerns in relation to site layout. The proposed matters of discretion in 13.6.5.1 'The Effects on the neighbourhood' as notified will help to mitigate potential adverse effects from visual building dominance or safety concerns in the context of the neighbourhood.
78. For the above reasons, I recommend the 13.6.5.1 Effects on the neighbourhood are retained as notified.

CONCLUSION

79. In conclusion, I consider the proposed and amended provisions for the SPSZ as discussed in my evidence above provides for simplification of provisions and supports a built form outcome is commensurate with the adjacent HRZ. The combination of the provisions collectively supports enablement on the school sites and contributes to the cumulative overall urban form for the City.

Dated: 11 August 2023

Amanda Mackay