

1. SUMMARY STATEMENT

- 1.1 My name is **Kirk Joseph Lightbody**. I am a Policy Planner in the City Planning team of the **Christchurch City Council**.
- 1.2 I have prepared evidence on behalf of the Council as it relates to Intensification of Commercial and Industrial Zones outside the Central City.
- 1.3 This statement relates to the matters of my evidence outlined in the Panel's topic's schedule for week 3 of the hearing, being the Centres approach and Commercial Rezoning requests outside the Central City. I understand I will reappear before the Panel regarding industrial and the mixed use zone in late November.
- 1.4 Of relevance to this hearing stream, in my s42A report I recommended the following changes to the original notified proposal:
- (a) Changes to Height performance standards in TCZ, LCZ and NCZs commensurate with the level of commercial activity and community facilities in the centre.
 - (b) Simplifying Local Centre classifications – deleting the Medium Local Classification.
 - (c) Changes to the Objective and Policies to improve clarity or consistency.
- 1.5 I consider the key matters of contention are the centres hierarchy, height in centres, and office tenancy limits.

2. CENTRES APPROACH AND NATIONAL PLANNING STANDARDS

- 2.1 The centres hierarchy is integral to the commercial and urban form of Christchurch City, and PC14 is deliberate in seeking to retain that hierarchy. It is my view that NPS-UD Policy 3 heights and density must co-exist with the commercial aspects of the centres hierarchy.
- 2.2 Council has proposed in PC14 to re-align the Christchurch District Plan (**CDP**) commercial chapter with the National Planning Standards. I have discussed these matters at length in both my s42A and rebuttal, and it remains my view that PC14 has correctly followed the mandatory directions of the National Planning Standards in applying standard zones to the CDP.

3. METROPOLITAN CENTRE ZONE

- 3.1 Much of the discussion in my s42A and rebuttal, along with other planning evidence for the Council and submitters in this hearing, focuses on the possible rezoning of certain centres as Metropolitan Centre Zones (**MCZ**). 'District Centres' are already provided for in the CDP, and in my view are equivalent to Town Centres in the National Planning Standards. As such, I have evaluated the request to create MCZ's as effectively being to rezone (as opposed to simply rename) those centres.
- 3.2 My views on the merits of introducing an individual centre zone for Riccarton, Papanui and Hornby are consistent with those in my s42A report. As noted in that report, I rely on the objective and policy framework built into the CRPS and CDP which establishes the primacy of the Central City and the Key Activity Centres (**KACs**).
- 3.3 It is my view that the addition of a new centre zone adds a rigid commercial restriction on KACs, requiring them to now give primacy to Riccarton, Papanui and Hornby, which is in direct conflict with the 'avoid' direction of RPS Policy 6.3.1(8).
- 3.4 In Appendix 6 of my s42A report I evaluate both zone rule frameworks, finding that the MCZ and TCZ rule frameworks would be identical other than the two areas of contention, being height and office tenancy limits.
- 3.5 It remains my opinion that the introduction of new MCZ would be inappropriate in terms of giving effect to the CRPS, as commercial primacy would be unduly disrupted throughout the hierarchy for no apparent gain.

4. COMMENSURATE HEIGHT AND DENSITY

- 4.1 Turning to commensurate height and density in centres I have recommended increases to permitted heights (as notified) in TCZ, LCZ and NCZs, those heights being:
- (a) Large Town Centres – 32m;
 - (b) Town Centre – 22m;
 - (c) Large Local Centre – 22m;
 - (d) Local Centre – 14m; and

(e) Neighbourhood Centre – 14m.

- 4.2 In my s42A report I have discussed that different approaches of working out what is 'commensurate'. I consider the classification of centres based on resemblance of commercial and community activity, to be the most appropriate method to apply 'commensurate' height and density. While I understand the evidence of submitters seeking one permitted height for each centre zone (on the basis that this would reduce prescriptiveness), it is my view that zoning centres based purely on height could undermine the KAC centre primacy directed by the CRPS and CDP.
- 4.3 I also highlight that centres are not the same; they vary wildly in commercial and community offering across the City. It is my view that classification of centres within zones is an appropriate method to achieve the heights directed by the NPS-UD while maintaining the commercial hierarchy directed by the CRPS and CDP.
- 4.4 As noted in my s42A report, I have considered total commercial floor space in the first instance as an indicator of the level of commercial activity within a centre. For community facilities I have relied on the definition in the NPS-UD which includes commercial activities that service the needs of the community. Appendix 5 of my s42A report notes all the commercial floorspace and community facilities in centres across the city.
- 4.5 It is my opinion that the classifications recommended are an appropriate basis to then consider height and density enablement.
- 4.6 Turning to height and density, I note the height of Large Town Centres are the only centre heights in contention. In the first instance, I agree with the submitters' experts' evidence that these locations have the greatest level of commercial activity and community facilities outside the Central City and thus are appropriate for the most height in the hierarchy (other than the CCZ).
- 4.7 Depending on the centre zone (MCZ or TCZ), the NPS-UD Policy 3 directions to determine heights differ between reflecting demand or being commensurate with commercial and community activity. I consider the recommended 32m height in the large local centres achieves both Policy 3 tests regardless of MCZ or TCZ.
- 4.8 I also rely on the evidence of Mr Heath, who outlines that height increases in other centres could have adverse economic effects on the recovery of the Central City.

4.9 I remain of the view that 32m is the most appropriate height for Large Town Centres as it balances achieving intensification commensurate with the centres place in the hierarchy, while not undermining the primacy of the City Centre Zone.

5. REZONING REQUESTS

5.1 Considering commercial rezoning requests across the City, at a high level my only concerns with rezonings are how the requests would give effect to the RPS and CDP centres hierarchy.

5.2 Regarding Foodstuffs Pak n Save Papanui site, I understand Mr Heath does not consider significant adverse effects on other centres would arise from the rezoning. As such, I consider the rezoning has merit, if scope issues can be overcome.

5.3 Belfast Village Limited seeks an extension to the NW Belfast centre, and I understand that a resource consent application is being processed by Council for the same site which would enable 8,617m² of commercial floorspace. Again, I understand Mr Heath does not consider significant adverse effects on other centres would arise from this rezoning, so I now consider the rezoning has merit.

Date: 24 October 2023

Kirk Lightbody