

**1. SUMMARY STATEMENT INDUSTRIAL AND MIXED USE ZONES
(OUTSIDE THE CENTRAL CITY) AND BROWNFIELD OVERLAYS**

- 1.1 My name is **Kirk Joseph Lightbody**. I am a Policy Planner in the City Planning team of the Christchurch City Council (the **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 in relation to Plan Change 14 (**PC14**).
- 1.3 This statement relates to the matters of my evidence outlined in the Panel's topic's schedule for week 7 of the PC14 hearing, being the Industrial and Mixed Use Zones, and Brownfield overlay.
- 1.4 The Council's section 32 analysis for this topic relied on in my evidence is the "Plan Change 14 – Section 32 Evaluation – Part 4: Commercial and Industrial Evaluation Report".¹
- 1.5 Of relevance to this hearing stream, in my s42A report I recommended the following changes to the original notified PC14 proposal:
- (a) Changes to Height built form standards in the Comprehensive Housing Precinct (**CHP**) from 20m to 22m.
 - (b) Extension of the CHP to include Phillipstown and Mandeville Street.
 - (c) Additional Brownfield Overlay applying to Lydia Street, Papanui Industrial General Zone (**IGZ**).
 - (d) Changes to the Mixed Use Zone (**MUZ**) and IGZ Objectives, Policies and Rules to improve clarity or consistency.
- 1.6 I consider the key outstanding matter of contention between myself and submitters such as Kāinga Ora and ChristchurchNZ is the spatial application of the MUZ rezoning and CHP into Central City Zone (**CCZ**) walking catchments, which is the focus of this summary statement. Other matters of contention between myself and submitters Kainga Ora is the introduction of office and retail to the MUZ which I consider contrary to the primacy of the centres hierarchy. Ms Radburn the planning expert for ChristchurchNZ and myself have produced a joint witness statement that will be before you prior to her

¹ [Plan-Change-14-HBC-NOTIFICATION-Section-32-Commercial-and-Industrial.pdf \(ccc.govt.nz\)](#)

appearance. Myself and Ms Radburnd now largely agree to all matters within ChristchurchNZ's submission.

2. THE NPS-UD AND SCOPE

- 2.1 Policy 3(c) of the NPS-UD directs that in relation to tier 1 urban environments District Plans are to enable building heights of at least 6 storeys within a walking catchment of the edge of CCZs. The CCZ walking catchment recommended by Mr Kleynbos includes the entirety of the Four Aves, and extends to the Sydenham, Addington, and Phillipstown Industrial areas. So, it is established by the walking catchment that these areas are to enable 6 storey development and may include related provisions that support Policy 3 as per 80E(b)(iii)(B).
- 2.2 Sydenham, Addington, Phillipstown and Lancaster Park are zoned IGZ in the operative District Plan (District Plan). In terms of height, the only limitation within the IGZ is a 15m maximum within 20m of a residential zone to avoid adverse effects of shading and bulky dominant buildings at the residential/industrial interface. The rest of IGZ has an unlimited height limit for permitted industrial and other activities. I note in my s42A report² and rebuttal evidence³ that I consider the IGZ already satisfies the requirements of the NPS UD in that it enables activity to at least 6 storeys.
- 2.3 While the operative District Plan provisions achieve the requirements of Policy 3(c) of the NPS UD, an appropriateness evaluation under s32 is still necessary, along with addressing the requirements of s75(3) to give effect to a NPS and RPS. As such it is my view that consideration of the Objectives and Policies of the NPS-UD and Canterbury Regional Policy Statement is relevant to the planning determination of what is the most appropriate method to give effect to policy 3(c).

3. NPS-UD AND CANTERBURY REGIONAL POLICY STATEMENT DIRECTION

- 3.1 In my section 42A report I summarise the themes of the NPS-UD as; that planning decisions are to contribute to a well-functioning urban environment (Objective 1, Policy 1); and that planning decisions are to have regard to the benefits of urban development ((Policy 6(c)). In this summary I note the themes; that district plans are to enable more people, businesses and

² Kirk Lightbody s42A report – paragraph 8.5.35

³ Kirk Lightbody Rebuttal evidence – paragraph 31.

community services to live in areas of urban environments that are in or near a centre zone (Objective 3); that decisions on urban development are to be strategic over the medium and long term ((Objective 6(b)); and New Zealand's urban environments support reductions in greenhouse gas emissions ((Objective 8(a)).

- 3.2 The CRPS in Chapter 6 outlines the recovery framework for Greater Christchurch, a key message that is conveyed is the consolidation of urban environments in Greater Christchurch. The CRPS envisions this will be achieved through directing intensification throughout the centres hierarchy and providing for the regeneration of brownfield land through comprehensive residential and mixed use development.
- 3.3 In my opinion, the collective message of the NPS-UD and CRPS is that consolidation of urban environments is sought and encouraged. Consolidation will realise the benefits of urban development and achieve well-functioning urban environments, that the intensification of residential activity is appropriate in brownfield contexts, and that decisions are to be strategic over the medium and long term.

4. METHODS TO GIVE EFFECT TO THE NPS-UD AND CRPS

- 4.1 Turning to the potential methods to give effect to Policy 3(c) and the wider planning framework I consider two options are relevant for evaluation, being the operative IGZ brownfield overlay with PC14 tweaks, and the PC14 MUZ CHP.
- 4.2 The District Plan includes a brownfield development pathway as a discretionary activity, PC14 as proposed changed that consent pathway from a discretionary activity to a restricted discretionary activity through Rule 16.4.1.3 RD8 and matters of discretion in Rule 16.7.2.5 to enable in suburban contexts heights and density commensurate with centres.
- 4.3 PC14 introduced the CHP into the MUZ, which introduces Objectives, Policies, and Rules that apply in the walking catchment of the CCZ and Riccarton Town Centre Zone (TCZ). The CHP would enable residential activities into industrial areas with the implicit outcome sought of a land use transition to high density residential environment over the medium and long term.

Brownfield Overlay

- 4.4 As noted above, PC14 as proposed changed the brownfield overlay pathway from a discretionary activity to a restricted discretionary activity through Rule 16.4.1.3 RD8. This change enables comprehensive residential development (more than 3 units) to be developed in the identified brownfield overlays. The origin of this change and additional brownfield overlays being identified is linked to Policy 3(d), being the enablement of height and density commensurate to the relevant centre.
- 4.5 This method is considered appropriate in suburban centres where the intention of PC14 is not to achieve the entire transition of industrial areas. Objective 16.2.2 of the District Plan makes it clear that brownfield redevelopment in the IGZ is appropriate where the redevelopment does not compromise the form and function of the wider industrial area. Ms Williams also makes note of the urban design qualities sought through application of the brownfield overlay and how the activity is strictly a residential activity in an industrial zone, rather than a whole land use transition of industrial areas to residential.

Comprehensive Housing Precinct

- 4.6 Turning to the CHP, the CHP as proposed by PC14 enables comprehensive residential development as a restricted discretionary activity within the precinct which includes the Sydenham, Phillipstown, Addington and Lancaster Park IGZ areas. The CHP has two restricted discretionary pathways that are outlined in 15.10.1.3, being RD3 and RD4.
- 4.7 RD3 is the 'complying/standards led pathway' where a resource consent proposal meets all relevant built form standards in 15.10.2 and as such the matters of discretion are limited to reverse sensitivity and the residential design principles that are located in the Residential Chapter.
- 4.8 RD4 is the "non-conforming/design pathway" where an activity does not comply with the built form standards of 15.10.2, and the resource consent decision will be focused on the matters of discretion and policy framework, ultimately the RD4 framework is concerned with how the development achieves the high density perimeter block outcome.
- 4.9 The PC14 proposed Objectives and Policy within the Commercial chapter directs that the CHP is enabled to transition to a high density residential environment.

5. APPROPRIATENESS OF METHOD

- 5.1 Evaluating the two options of the IGZ and MUZ residential frameworks against the themes of the NPS-UD and CRPS I have summarised above, the brownfield overlay enables residential development to at least 6 storeys but it is my view that industrial activity has primacy within the IGZ in giving effect to the CRPS and implementing the District Plan objectives, and as such there is an efficiency and effectiveness issue in relying on the IGZ brownfield overlay mechanism to enable 6 storey developments throughout the CCZ catchment. That issue being, the IGZ says industrial first, residential second, while the NPS-UD says enable more people to live near centres such as the CCZ.
- 5.2 The MUZ/CHP approach in contrast sets an expectation that while industrial activity may continue in the short term, that in the medium and long term high density residential development with residential levels of amenity will occur in the area, which in my view enables more people to live in close proximity to the CCZ direction of Objective 3 of the NPS-UD.
- 5.3 As an overall conclusion, it is my opinion that MUZ zoning within a CHP is the most appropriate development framework for industrial areas within the CCZ walking catchments as it enables at least 6 storeys as per Policy 3(c) while achieving the wider NPS-UD and CRPS planning framework.
- 5.4 In regard to spatial extent, I note that in my rebuttal evidence I agree with the primary evidence of Ms Radburnd and Mr Cleese that a consolidated CHP would improve the vitality of the Sydenham centre and be an effective extent in delivering the high density outcome. I still agree with those comments, but it is now my view that splitting the redevelopment provisions between the Phillipstown and Sydenham walking catchment areas would not be an efficient or effective way to achieve Policy 3(c).
- 5.5 The IGZ areas of Phillipstown, Sydenham, Addington, Lancaster Park all demonstrate similar characteristics with the same or similar industrial land use, they are all equally within the walking catchment of the CCZ and as such I consider they should all have a consistent residential redevelopment mechanism. I therefore recommend the spatial extent of the MUZ and CHP should include Phillipstown which is consistent with the recommendations of my section 42A report.

Date: 21 November 2023

Kirk Lightbody