

SUMMARY STATEMENT

1. My name is **Elizabeth (Liz) Jane White**. I am a self-employed planning consultant.
2. I have prepared a section 42A report and rebuttal evidence on behalf of the Christchurch City Council (**Council**) in relation to the identification of Residential Character Areas (**RCAs**) as a qualifying matter, and the appropriateness of the provisions responding to this qualifying matter. I was also the principal author of the Residential Character Areas section of the overall s32 report¹, which drew on the technical information contained in various appendices to the s32 report.²
3. RCAs are neighbourhoods that are distinctive from their wider surroundings, and which are considered to have a special character that, on the whole, is worthy of retention. As such, these are areas that contribute particularly to social and cultural well-being - to the feel of the City, to a sense of place, and its attractiveness.
4. The development of PC14 has involved reviewing and revising the existing RCAs, as well as investigating whether there are new areas which have a level of integrity and character worth retaining. This exercise has been undertaken in accordance with the methodology set out in the evidence of Jane Rennie. I consider the evaluation undertaken of each RCA (set out in the s32 report and summarised in Ms Rennie's evidence) is appropriate to demonstrate why each RCA is subject to a qualifying matter.
5. Notwithstanding that the areas meet the thresholds to be included as RCAs, I have recommended the removal of two RCAs (Beverley and Ranfurly); and the reduction in the size of another (Dudley) where I consider the objectives of the NPS-UD and CRPS are better met by removing these areas as RCAs or reducing their extent. For three further areas where this might otherwise have been the case, I have not recommended removal (Englefield and Piko) or reduction (Heaton) of the RCA, because a Residential Heritage Area (**RHA**) also applies to these areas. This is because the application of the

¹ Section 6.29, in Section 32 Report, Part 2 - Qualifying Matters (District Plan Chapters 6, 8, 9, 13, 14, 18) p. 237-353.

² Section 32 Report, Part 2 – Qualifying Matters (District Plan Chapters 6, 8, 9, 13, 14, 18): Appendix 21, *Investigation of Qualifying Matters – Ōtautahi Christchurch Suburban Character Areas*, Boffa Miskell Ltd, 1 June 2022; Appendix 22, *Investigation of Qualifying Matters – Ōtautahi Christchurch Suburban Character Areas – Stage 2A Addendum Report*, Boffa Miskell Ltd, 22 July 2022; Appendix 23, *Investigation of Qualifying Matters - Lyttelton Character Area*, Boffa Miskell Ltd, 22 July 2022; , Appendix 36 – *Planning Assessment of District Plan Character Areas*, Christchurch City Council, 20 February 2023; Appendix 37 - *Technical Analysis of Proposed Character Area Provisions*, Christchurch City Council, 19 January 2023.

RHA means that removing/reducing the RCA would not allow for further intensification.

6. As a result of submissions, inclusion of additional areas as RCAs have been investigated, and based on Ms Rennie's analysis of these, one new RCA is recommended to be included (Cashmere View).
7. The s32 report and the evidence of Ms Rennie demonstrates why the level of development permitted under the MDRS or provided for by Policy 3 would be incompatible with the identified character values. The provisions applying within RCAs are instead aimed at providing for a level of intensification in these areas that still maintains the character values.
8. My evidence focusses on the appropriateness of the specific modifications to MDRS / Policy 3 to accommodate this qualifying matter. In particular, I have considered the appropriateness of introducing built form standards specific to each RCA, as well as the activity status applied to development in RCAs. I consider that:
 - (a) Retention of the current controlled activity status for most building works, without the inclusion of specific built form standards (given the baseline built form standards will shift to those of MDRS) would not be sufficient to maintain the character values of these area and would likely lead to a loss in the integrity and cohesiveness of the RCAs.
 - (b) Retention of the current controlled activity status for most building works, with application of the identified built form standards, would go some way to maintaining character values, but would not address matters of design that are more qualitative (appearance effects), rather than quantitative in nature (form and scale).
 - (c) Application of a restricted discretionary activity status for most building works would be more effective in achieving the relevant objectives of the Plan in relation to RCAs and overcome the issues associated with a controlled activity status. While this approach is less efficient than a controlled activity approach, rationalising the built form standards to those Ms Rennie identifies as a priority, and clearly applying these priority standards to building works, would improve the overall efficiency of the provisions.

9. The package I have recommended is therefore aimed at balancing the overall efficiency and effectiveness of the provisions applying in RCAs.
10. With respect to the specific built form standards applying in each RCA, I have recommended a number of changes that are based on Ms Rennie's technical assessment. These changes would be slightly more enabling of development, while still maintaining the character values of importance to these areas.

Date: 1 November 2023

Liz White