

Before the Independent Hearings Panel
Appointed by the Christchurch City Council

Under the Resource Management Act 1991

In the matter of a hearing on submissions on the Housing and Business Choice
Plan Change (PC14) to the Christchurch District Plan

NHL Properties Limited

Submitter 706

**Wigram Lodge (2001) Limited, Elizabeth Harris and John
Harris**

Submitter 817

Statement of evidence of Anita Clare Collie

20 September 2023

Qualifications and experience

- 1 My full name is Anita Clare Collie.
- 2 I have over fifteen years' experience in the field of resource management planning and on numerous occasions have provided planning evidence in proceedings. I hold a Bachelor of Science in Environmental Science (University of Western Australia). I hold the position of Principal Planner at Town Planning Group where I have been employed since 2017. I am an Associate Member of the New Zealand Planning Institute.
- 3 My previous work experience includes working in both the public and private sector. In my role as a planning consultant, my experience includes providing planning advice to clients with respect to plan development and changes, applying for resource consents, and preparing evidence in respect of these matters. I am familiar with the operative Christchurch District Plan (**CDP**), and with Plan Changes 13 and 14 (**PC13 and PC14**) to the CDP.

Code of Conduct for Expert Witnesses

- 4 While this is not a hearing before the Environment Court, I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court of New Zealand Practice Note 2023 and that I have complied with it when preparing my evidence. Other than when I state I am relying on the advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

Scope of evidence

- 5 I have been engaged to provide planning evidence by NHL Properties Limited (**NHL**) and Wigram Lodge (2001) Limited, Elizabeth Harris and John Harris (**Wigram Lodge**) (collectively, the **Submitters**). This evidence relates to their submission¹ which seeks to rezone:
 - (a) 132-136 Peterborough Street and 137-151 Kilmore Street, Christchurch Central, Christchurch (**NHL Site**) from notified **HRZ** to Central City Mixed Use Zone (**CCMU**), and
 - (b) 152-158 Peterborough Street and 237-333 Manchester Street Christchurch (**Wigram Lodge Site**) from notified **HRZ** to Central City Mixed Use Zone.

¹ NHL is submitter #706 and submission point reference 706.1 Wigram Lodge is submitter #817 and this evidence relates to submission point reference 817.4 and 817.5. I have provided a separate statement of evidence in relation to Wigram Lodge's other submission points.

- 6 These submission points are addressed in the same statement of evidence as the land is contiguous. Collectively I refer to the NHL Site and the Wigram Lodge Site as the **Site**.
- 7 I have visited the Site and am familiar with the area.
- 8 I have prepared evidence in relation to:
- (a) The Site and existing environment;
 - (b) The proposed rezoning to achieve the relief sought by the Submitters (**Proposal**);
 - (c) The effects of the Proposal;
 - (d) The s42A Report and planning framework;
 - (e) Assessment of the appropriateness of the Proposal in accordance with Section 32AA of the RMA; and
 - (f) The statutory framework.
- 9 In preparing this statement of evidence I have considered the:
- (a) Submissions filed by the above listed parties;
 - (b) PC14 provisions relevant to my evidence;
 - (c) Operative Christchurch District Plan;
 - (d) Statement of evidence dated 20 September 2023, prepared by Mr David Compton-Moen.
 - (e) PC14 Section 42A reports;
 - (f) PC14 Section 32 reports;
 - (g) relevant further submissions; and
 - (h) National Policy Statement on Urban Development 2020 (NPSUD).

Executive Summary

- 10 The Submissions seek to rezone 5,930m² of land at the following locations from notified **HRZ** to Central City Mixed Use Zone (**CCMU**);
- (a) 132-136 Peterborough Street and 137-151 Kilmore Street, Christchurch Central, Christchurch, and

(b) 152-158 Peterborough Street and 237-333 Manchester Street Christchurch.

- 11 The stated purpose of PC14 is to incorporate medium density residential standards (**MDRS**), include mandatory objectives and policies, and to give effect to the urban intensification requirements of the National Policy Statement on Urban Development 2020 (**NPS-UD**) Policy 3 in both residential and non-residential zones. These changes are mandated by the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act.
- 12 Council reports have identified that PC14 enables ample housing and business land development capacity to meet long-term projected requirements. There are no identified constraints that would prevent achievement of the NPS-UD Policy 2 requirement for Council to provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term. I consider that ample development land capacity is supported in a policy sense, considering provisions in the NPS-UD which seek to support competitive land and development markets (Objective 2, Policy 1(d)).
- 13 Evidence provided by Mr Compton-Moen confirms the appropriate management of interface effects with adjoining residential zones. For these zones to be adjacent is not an unusual outcome in the Central City. I consider the Proposal is consistent with the commercial centres hierarchy and maintains a consolidated urban form.
- 14 Overall, I consider the Proposal will give effect to the NPS-UD and are the most appropriate, efficient and effective means of achieving the purpose of the Resource Management Act, and the relevant objectives of CDP PC14.

The Site and Existing Environment

- 15 The Site legal descriptions are provided in **Annexure [A]**.
- 16 The NHL Site and Wigram Lodge Site together are approximately 12,770m² in area. Given the split zoning of the NHL Site, together they comprise 8,170m² of residentially zoned land. These are located on the block bound by Peterborough Street to the north, Manchester Street to the east and Kilmore Street to the south. The NHL Site is currently developed with Forte Health Hospital and ancillary at-grade parking. The Wigram Lodge Site is undeveloped land, where a community garden operated for a number of years.

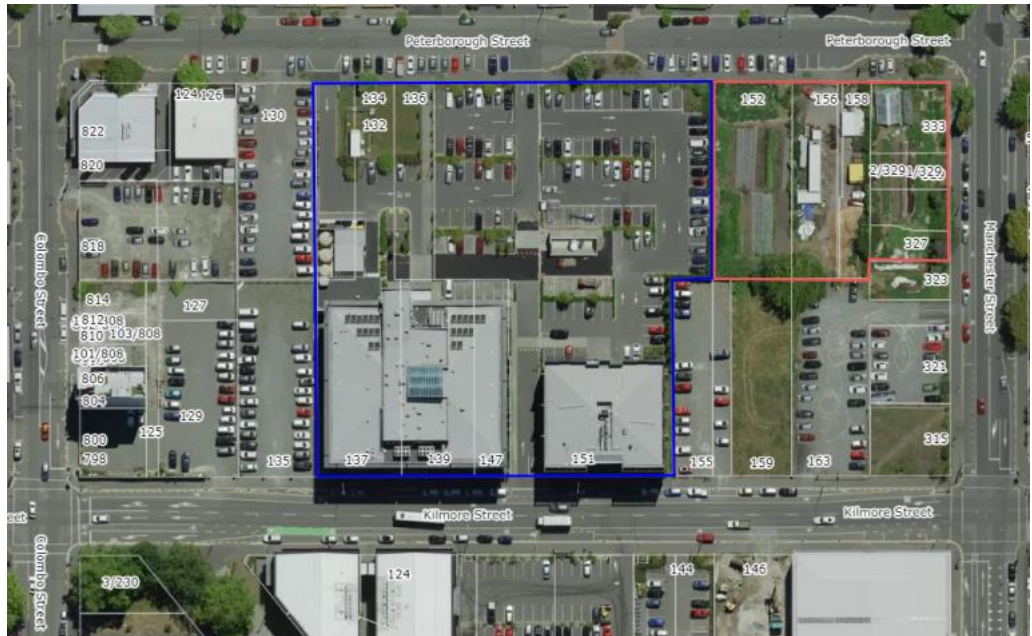


Figure 1 NHL Site identified by blue outline, Wigram Lodge Site identified by red outline (Grip Maps)

- 17 The Site is located in an area that is in the process of redevelopment and has a mixed character comprising commercial, health and residential land uses. Approximately half of the block is undeveloped land.
- (a) To the north and west of the Site (on the opposite side of Peterborough Street and Manchester Street) are predominantly residential land uses comprising one, two and three storey townhouse / unit style buildings.
 - (b) To the south of the Wigram Lodge site is vacant land, some of which is operated as temporary car parking. Further south across Kilmore Street are commercial buildings and ancillary at-grade car parking.
 - (c) To the west are commercial buildings fronting Colombo Street and some areas of vacant land.
- 18 The NHL Site is split zoned Residential Central City (**RCC**) and Central City Mixed Use (**CCMU**) in the operative CDP. Adjacent land to the west and south is zoned CCMU. The Wigram Lodge Site is zoned RCC in the operative CDP and adjacent land to the south is zoned CCMU. Land on the opposite side of Peterborough Street and Manchester Street to the north and east is generally zoned RCC. **Figure 2** shows the operative CDP zoning.

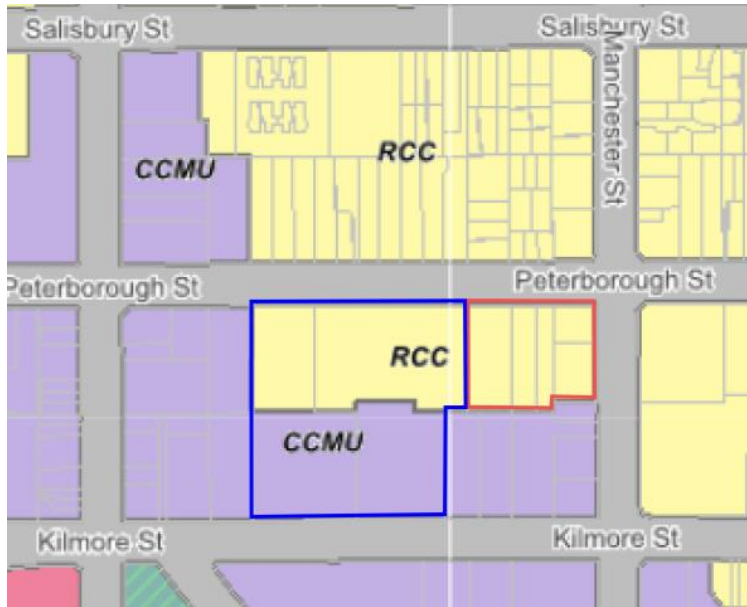


Figure 2 Operative District Plan zoning with NHL Site identified by blue outline, and Wigram Lodge Site identified by red outline (CCC District Plan)

19 The PC14 zoning as notified is shown in **Figure 3** below. The NHL and Wigram Lodge Sites, where these are currently zoned RCC under the operative CDP, are proposed to be rezoned to High Density Residential (**HRZ**). Where the NHL site is zoned CCMU under the operative CDP, the notified PC14 zoning remains CCMU. The spatial boundaries of zones in the surrounding area do not appear to have changed with land zoned CCMU under the operative CDP retaining that zoning and all land zoned RCC under the operative CDP being rezoned to HRZ.



Figure 3 PC14 notified zoning with NHL Site identified by blue outline and Wigram Lodge Site identified by red outline (CCC PC14 maps)

Plan Change 14 Context

- 20 The PC14 provisions are in response to the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act that directs Council to make changes to the Christchurch District Plan (**CDP**) to incorporate the medium density residential standards (**MDRS**), include mandatory objectives and policies, and to give effect to the urban intensification requirements of the NPS-UD Policy 3 in both residential and non-residential zones.
- 21 To achieve these matters, Section 77G(4) of the RMA enables a territorial authority to create new residential zones or amend existing residential zones. Section 77N specifically addresses non-residential zones and allows a territorial authority to create new urban non-residential zones or amend existing non-residential zones in order to give effect to the NPS-UD Policy 3 (**Policy 3**).
- 22 Policy 3 states:

In relation to tier 1 urban environments, regional policy statements and district plans enable:

- (a) *in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; and*
 - (b) *in metropolitan centre zones, building heights and density of urban form to reflect demand for housing and business use in those locations, and in all cases building heights of at least 6 storeys; and*
 - (c) *building heights of at least 6 storeys within at least a walkable catchment of the following: (i) existing and planned rapid transit stops (ii) the edge of city centre zones (iii) the edge of metropolitan centre zones; and*
 - (d) *within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent), building heights and densities of urban form commensurate with the level of commercial activity and community services.*
- 23 The Site is located within the Christchurch Central City, defined in the CDP and PC14² as the land within Bealey, Fitzgerald, Moorhouse, Deans and Harper Avenues. Part (a) of Policy 3 relates to city centre zones. The National Planning Standards define city centre zone as: “Areas used predominantly for a broad range of commercial, community, recreational and residential activities. The zone is the main centre for the district or region.” I consider the Proposal fits within this

² Chapter 2 Definitions

definition and contributes to giving effect to the direction in Policy 3(a) to *realise as much development capacity as possible, to maximise benefits of intensification.*

- 24 Part (c) of Policy 3 is also relevant considering the Site location as notified is within a walkable catchment of the city centres zones and requires building heights of at least 6 storeys for the Submitters' Site. The operative CDP and PC14 as notified would not achieve that, with the height limit for the Site specified as 14m in both. I understand that the Council s42A report recommends HRZ height limit be amended to 39m, in order to meet the requirements of Policy 3(c).
- 25 Policy 3 gives effect to the NPS-UD Objectives and should be read in conjunction with these. The following Objectives are particularly relevant to this Proposal:
- (a) Objective 1, which seeks a well-functioning urban environment (defined in Policy 1), which enables people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.
 - (b) Objective 2 which requires planning decisions to support competitive land and development markets. This is relevant as the proposal provides for additional business land capacity.
 - (c) Objective 3, which seeks to enable more people to live in, and more businesses and community services to be located in urban environments that are in or near a centre zone, where there are many employment opportunities and are well serviced by public transport. I consider this Site meets the locational criteria in Objective 3, hence consideration of the intensification directive in this Objective is required.
- 26 A detailed assessment against the NPS-UD Objectives and Policies is provided following further assessment on the merits of the Proposal below.

Relief Sought by Submission

- 27 The Submitters' submissions seek that the Site is rezoned to enable mixed use development by amending the zone to Central City Mixed Use, and any consequential amendments required. This would mean that the land is capable of providing for housing or for business use.
- 28 The submission supports intensification of urban form to provide for additional development capacity, particularly in the Central City.

Assessment of Effects of the Proposal

29 Due to the similar nature and location of the proposed rezonings, I have considered the effects jointly in the section below. The following effects are considered relevant to the Proposal:

- (a) Residential land supply;
- (b) Commercial land supply;
- (c) Amenity and urban form;
- (d) Transport;
- (e) Servicing and infrastructure; and
- (f) Positive Effects

Residential land supply

30 The Proposal will result in the loss of 8,170m² of residentially zoned land, although only 2,950m² would potentially be available for residential development given part of the NHL Site is already developed with ancillary car parking.

31 This is a conservative assessment as the Proposal to rezone the land to Central City Mixed Use enables residential development as a permitted activity on the Site, and I consider that a future mixed-use development on the Site may include a residential component based on the nature of surrounding development. An example of a local mixed-use development is on the south-western corner of the Colombo Street / Salisbury Street intersection, where commercial spaces are provided on the ground floor and residential uses are on the upper floors.

32 I understand that Council updated their housing capacity estimate for the s42A reports and this estimate supersedes that provided in the s32 reports. PC14 provides for a significant amount of additional housing capacity, summarised in Ms Oliver's s42A report:³

i. The MDRS and NPS-UD Policy 3 response is not required to resolve a housing demand issue and the Operative District Plan already provides a level of enablement to meet long term housing demand projections.

ii. The MDRS and NPS-UD Policy 3 directs a level of enablement that is likely to meet 80-100 years of growth,

³ S42A Report prepared by Sarah Oliver, paragraph 108-111

based on unchanged immigration policy and/or other significant world and natural hazard events. ...

- 33 The 60-year projected housing demand of 80,000 households is exceeded by the estimated feasible development capacity of 91,580.⁴ While these are modelled results, there appears to be general agreement that the housing capacity provided by PC14 will achieve the NPS-UD Policy 2 directive to provide at least sufficient development capacity to meet expected demand for housing and business land over the short, medium and long term.
- 34 Within central Christchurch, the s42A report prepared by Mr Heath identifies 12.03ha of undeveloped land in residential zones located within the Central City. Residential land supply outside of the Central City is not included in this number. The Proposal would reduce the quantity of vacant and residential zoned land by 1,960m². The reduction is small in the context of the quantity of residentially zoned land available solely in the Central City, and very small in the context of the housing capacity available within Christchurch District to meet long-term housing requirement projections.
- 35 For the above reasons, I consider that the Proposal will have a negligible effect on housing land capacity in Christchurch District or the Central City.

Commercial land supply

- 36 Although the CCMU zone is regarded as a commercial zone, it enables mixed land uses, including residential land uses. However, I have considered whether the Proposal would create adverse effects in relation to commercial land supply.
- 37 Assuming the zoning is treated as pure commercial, the Proposal will increase the supply of commercially zoned land in the Central City by 8,170m². The s42A report prepared by Mr Heath identifies 14.95ha of undeveloped CCZ land and 11.63ha of undeveloped CCMU land, within the Central City. Mr Heath concludes that there is significant development capacity remaining within the four avenues of the city⁵.
- 38 Council's Future Development Strategy (**FDS**), *Our Space 2018 – 2048*, identifies that there is more than sufficient long-term plan-enabled housing and industrial capacity, but that commercial capacity is only met over the medium term. Notably, this assessment pre-dates PC14.

Over the longer term, the Capacity Assessment identifies potential shortfalls in commercial space, notably in areas

⁴ 91,580 comprises feasible development capacity, all qualifying matters applied excluding potential typologies above 6-storeys and including greenfield capacity. S42A Report prepared by Sarah Oliver, paragraph 10.43, Diagram 2

⁵ S42A Report prepared by Tim Heath, paragraphs 108-111

projected to experience significant residential growth, including the Central City, the south-west and north-west parts of the City, and the main centres in Selwyn and Waimakariri.⁶

- 39 Council's PC14 s32 report concluded that there is sufficient business land capacity in central Christchurch to meet demand for the next 30 years.⁷ The definition of long term in the NPS-UD is 10-30 years.
- 40 The NPS-UD Policy 2 requires that at least sufficient development capacity is provided to meet expected demand for housing and business land over the short, medium and long term. There is no requirement in the NPS-UD to limit development capacity, within the framework of a well-functioning urban environment. NPS-UD Objective 2 supports competitive land and development markets.
- 41 The Proposal will maintain consistency with the hierarchy of commercial centres. Existing CDP provisions which restrict the types of activities and nature of built form will apply, protecting the primacy of the CCZ and continuing to support the recovery of the Central City.
- 42 I do not consider there to be any policy constraint of additional commercial land supply, particularly when considered in light of the substantial housing land capacity available, as discussed above. I do not consider that the Proposal will undermine existing commercial areas in the Central City.

Amenity and urban form

- 43 Mr Compton-Moen has provided an assessment of the effects of the rezoning on urban form and residential amenity and confirms that no adverse effects are anticipated.
- 44 I note that the interface between land zoned CCMU / HRZ is apparent in several locations in central Christchurch and the Proposal does not result in an unusual or unique zoning outcome. I consider the CDP adequately manages interface effects between the HRZ and CCMU zones.
- 45 Existing provisions in the CDP controlling noise, lighting and glare will be unchanged by the rezoning. The proposed rezoning therefore will not result in any change in respect of the management of these effects.
- 46 Overall, I consider that effects on residential amenity of surrounding HRZ land are able to be appropriately managed by way of the operative CDP and PC14

⁶ Greater Christchurch Partnership, Our Space 2018 – 2048, page 17

⁷ S32 Report, Part 4, Appendix 5 - Land Demand Estimate and Business Capacity Assessment, page 12.

provisions. I consider the effect on urban form to be acceptable, noting the position of the site adjacent to existing CCMU land and in a location where the character is transitional between commercial, health and residential land uses.

Transport

- 47 Existing provisions in the CDP controlling transport matters will be unchanged by the rezoning, and therefore, transport effects can be appropriately managed by the CDP provisions. Development specific transport matters are able to be addressed through a future consent process.

Servicing and infrastructure

- 48 The Site is located within the Central City with access to existing infrastructure. Given the existing HRZ zoning, it is anticipated that infrastructure could be extended to service the site and that this could be addressed through a future consent process.

Effects Conclusion

- 49 On the basis of the above conclusions, I consider that any potential adverse effects of the Proposal are able to be appropriately avoided or mitigated.

S42A Report

- 50 The S42A Report recommends that the submission points are rejected, considering the scope of PC14, the NPS-UD, and the existing use and pattern of development.⁸

Scope of PC14

- 51 Legal submissions will address whether the Submissions are within the scope of PC14. I comment only on planning matters in the following paragraphs.
- 52 Ms Gardiner considers that the spatial extent of zones within the Central City are not proposed to change, nor are any zoning changes proposed in the area surrounding the Site.⁹
- 53 I disagree and consider the situation to be more complex. I note that the name of the RCC zone is proposed to be changed to HRZ, while the CCMU zone retains its title unchanged. There are substantial changes to zone specific provisions, including objectives, policies and rules. I consider that the nature of development

⁸ S42A report, Ms Gardiner, Appendix B, page 137 and 143.

⁹ S42A report, Ms Gardiner, Appendix B, page 137 and 143.

enabled and anticipated within these zones is to be changed substantially. The main factor which does not change is whether the zone is of a primarily of a residential or commercial nature. In my view, rezoning is occurring through PC14, albeit to an alternative zone that remains primarily residential in nature.

- 54 Ms Gardiner also identifies concern related to the recent decision by the Environment Court on the Waikanae case¹⁰, in that the Proposal may impact on the status quo operative CDP development rights¹¹. The Waikanae case identifies that provisions notified in PC2 went beyond making the MDRS less enabling and removed existing development rights under the District Plan. I consider this situation to be different. Under the Proposal, the Submitters could develop a built form that is larger that could be developed under the operative CDP and could implement a wider range of activities (including residential activity) under the Proposal than the operative CDP. For example, under the operative CDP, the height limit for the Site is 14m and the Site is subject to boundary setbacks and recession plane built form controls. Under PC14, the HRZ and CCMU provisions enable greater height limits¹² and less restrictive built form controls. Therefore, I do not agree that the Proposal impacts on the status quo operative CDP development rights.

NPS-UD

- 55 Ms Gardiners' comments in relation to the submission points are that changes to zoning provisions rather than the zoning itself would be a more appropriate way of giving effect to Policy 3(a) of the NPS-UD.¹³ I do not agree and consider this to be inconsistent with Council's approach to change the zoning through large areas of Christchurch. Further, I do not agree that the NPS-UD specifies a method as suggested by the s42A report, i.e., changes to zone provisions rather than the underlying zones. The NPS-UD and Policy 3(a) in particular is fundamentally an enabling policy provision that directs additional development capacity within well-functioning urban environments. Whether the Proposal achieves that is most appropriately determined on the merits of the Proposal within the statutory framework.

¹⁰ NZEnvC056 Waikanae Land Company Limited

¹¹ S42A report, Ms Gardiner, paragraph 8.2.1

¹² For the HRZ – the height limits as identified in the s42A report version of provisions is greater, as discussed in paragraph 24 above. For the CCMU, the height limit is 32m as notified in PC14.

¹³ S42A report, Ms Gardiner, Appendix B, page 140.

Existing Use and Pattern of Development

- 56 Ms Gardiner comments that the Site provides a transition between commercially and residentially zoned land and reflects the residential zoning to the north of Peterborough Street.¹⁴ Separation of commercial and residential zones with a road boundary is not an unusual outcome in Central Christchurch. Mr Compton-Moen's evidence addresses the zone interface and effects on the amenity of existing and future anticipated residential activities. My conclusions in relation to this effect are as discussed in paragraphs 43 to 46 above.
- 57 Specifically in relation to the Wigram Lodge Site, Ms Gardiner is concerned that the rezoning would interrupt the wider zoning pattern¹⁵, however this is not the case if considered in conjunction with the NHL Site. With reference to **Figure 4** below, and noting the Site is centred in the image, CCMU zoning is identified immediately to the south and west of the Site. While there is a large area of HRZ land to the north and east, I do not consider that the zoning pattern is interrupted.

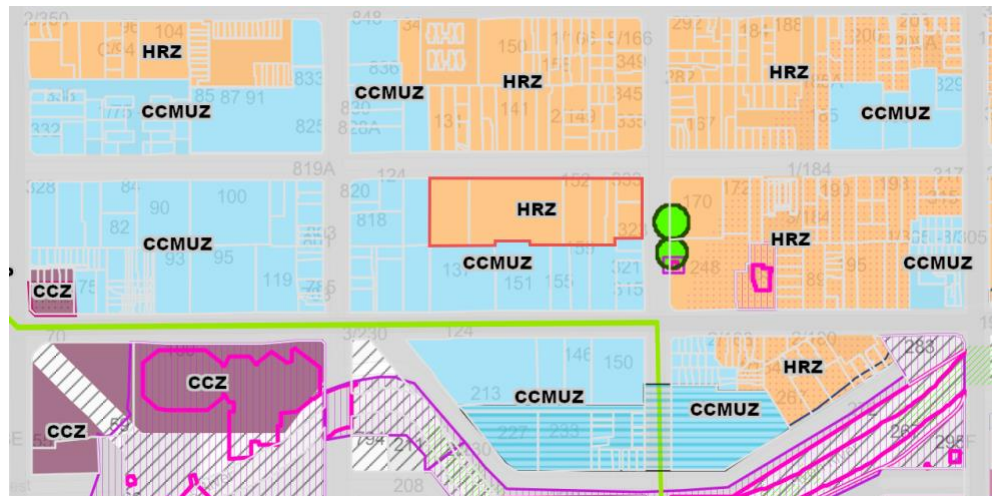


Figure 4 PC14 Notified Planning Maps with Site boundary shown by red outline (CCC)

Further submissions

- 58 No further submissions were received in respect of the NHL submission.
- 59 Two further submissions were received in respect of the Wigram Lodge submission. Pierce Crowley on behalf of the University of Canterbury Students' Association¹⁶ supports intensification of housing and urban form. Kāinga Ora –

¹⁴ S42A report, Ms Gardiner, Appendix B, page 138 and 143.

¹⁵ S42A report, Ms Gardiner, Appendix B, page 143

¹⁶ FS#2109

Homes and Communities¹⁷ supports intensification of the urban area. There were no further submission points in opposition.

Resource Management Act – s32AA

- 60 Section 32AA(1)(a) of the (**RMA**) requires a further evaluation in respect of the amendments sought to the existing proposal since the section 32 evaluation was completed. Section 32AA(1)(b) states that the further evaluation must be undertaken in accordance with sections 32(1) to (4), while section 32AA(c) requires that the level of detail must correspond to the scale and significance of the changes.
- 61 Section 32(1)(a) requires that an evaluation must examine the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA. No alterations are proposed to the PC14 Objectives and in accordance with section 32AA(1)(a), no evaluation of the existing objectives is required.

Christchurch District Plan Objectives and Policies

- 62 Section 32(1)(b) requires examination of whether the Proposal is the most appropriate way of achieving the District Plan objectives. These are assessed in detail in **Annexure [B]**. In summary, I conclude that the Proposal is consistent with the PC14 Objectives.

Efficiency and Effectiveness

- 63 In assessing the benefits and costs of the Proposal, the following options are considered:
- (a) Option 1: Retain the PC14 proposed zoning (HRZ);
 - (b) Option 2: Rezone the Site to CCMU in accordance with the Proposal; and
 - (c) Option 3: Rezone the Site to an alternative commercial zone, such as CCZ.
- 64 The benefits and costs of each option are assessed in detail in **Annexure [C]**.
- 65 Option 2 is the preferred option as the benefits outweigh the costs. The costs outweigh the benefits in respect of Option 1 and Option 3.
- 66 I consider the Proposal to be the most efficient and effective means of achieving the objectives of PC14 and the CDP. The Proposal provides for a mixed-use development in a suitable location, providing increased development choice, while

¹⁷ FS2082.674

appropriately maintaining the amenity of surrounding residential zones and contributing to a well-functioning urban environment.

Risk of Acting or Not Acting

- 67 No fundamental risks of the Proposal have been identified and the urban design and planning evidence confirm the suitability of the Site for mixed-use development. This information has been provided at a level of detail that is appropriate to a rezoning proposal, however further detailed technical investigation will be required for any specific development to proceed. This creates a risk in relation to acting, however it is small as further assessment through the resource consent process enables appropriate management of this risk.
- 68 Risk associated with not acting includes lack of incentive for the Submitters to undertake redevelopment providing for a range of activities on the Site.

Overall assessment

- 69 In summary, I consider the Proposal is the most appropriate way, having had regard to matters of efficiency and effectiveness, to achieve the Objectives of PC14.

Statutory Framework

National Policy Statement on Urban Development 2020 (May 2022 version)

- 70 An assessment of the Proposal against the specific objectives and policies of the NPS-UD is provided in **Annexure [D]**. The Site falls within the definition of an urban environment and Christchurch is a Tier 1 Council.
- 71 In summary, I consider that the Proposal is consistent with, and gives effect to, the NPS-UD.

Canterbury Regional Policy Statement

- 72 Section 74(2) requires Council to have regard to the Canterbury Regional Policy Statement (**CRPS**) when preparing PC14. No changes to the PC14 Objectives are proposed and the Proposal has been assessed above as remaining consistent with the CDP and PC14 Objectives.

Part 2 of the RMA

- 73 Section 5 of the RMA outlines that the purpose of the RMA is to promote the sustainable management of natural and physical resources. The Proposal will enable the provision of people and communities social, economic, and cultural wellbeing by providing additional business land contributing to greater

intensification and a well-functioning urban environment. Any adverse effects on the environment from the Proposal are able to be appropriately avoided, remedied or mitigated.

- 74 None of the matters identified in section 6 of the RMA are relevant to this Proposal.
- 75 In regard to section 7, the Proposal will enable the efficient use and development of the Site and enable the maintenance of local amenity values by appropriately managing the interface of the proposed CCMU zones with adjoining HRZ land. The Proposal has the ability to respond to effects of climate change, by locating within an urban area and enabling active and public modes of transport to be used to access development on the Site.
- 76 With respect to section 8, the principles of the Treaty of Waitangi have been taken into account through the PC14 development and submission process.

Conclusion

- 77 For the reasons set out above, I consider that the Proposal is the most appropriate outcome, and is the most efficient and effective means of achieving the purpose of the RMA, the relevant objectives of the CDP PC14 and gives effect to the NPS-UD.

Anita Clare Collie

Dated this 20th day of September 2023

Annexure [A]

Legal Descriptions of the Site

NHL Site Details		
Address	Legal Description	Record of Title
	Part Section 183 TN OF Christchurch	CB364/119
132-134 Peterborough Street and 137 Kilmore Street	Lot 1 DP 46407	CB34B/799
136 Peterborough Street	Part Section 185 TN OF Christchurch	CB318/77
151 Kilmore Street	Lot 2 DP 52122	CB31B/207
147 Kilmore Street ¹⁸	Lot 1 DP 52122	CB31B/206
139 Kilmore Street	Lot 2 DP 46407	CB34B/799

Wigram Lodge Site Details		
Address	Legal Description	Record of Title
152 Peterborough Street	Lot 1 Deposited Plan 4112	CB21K/1309
156 Peterborough Street	Lot 1 and Part Lot 2 Deposited Plan 3393	CB329/270
158 Peterborough Street	Part Lot 2 Deposited Plan 3393	CB326/110
327 Manchester Street	Lot 2 Deposited Plan 8974	CB411/132
	Lot 1 Deposited Plan 8974	CB411/131
329 Manchester Street	Part Town Section 197 City of Christchurch	CB364/145
333 Manchester Street	Part Section 197 Town of Christchurch	CB38B/376

¹⁸ 139 and 147 Kilmore Street are wholly zoned CCMU, however NHL Properties buildings are constructed over these titles as well as other titles in the above table which are split zoned CCMU and RCC/HRZ. These titles are included for completeness only.

Annexure [B]

Assessment of Proposal against PC14 Objectives

PC14 Objective ¹⁹	Assessment
Chapter 3 – Strategic Directions	
<p>3.3.1 Objective - Enabling recovery and facilitating the future enhancement of the district</p> <p>a. The expedited recovery and future enhancement of Christchurch as a dynamic, prosperous and internationally competitive city, in a manner that:</p> <p>i. Meets the community’s immediate and longer term needs for housing, economic development, community facilities, infrastructure, transport, and social and cultural wellbeing; and</p> <p>ii. Fosters investment certainty; and</p> <p>iii. Sustains the important qualities and values of the natural environment;</p> <p>b. A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; that</p> <p>i. Supports reductions in greenhouse gas emissions; and</p> <p>ii. Is resilient to natural hazards and the current and future effects of climate change.</p>	<p>The Proposal will aid the recovery of Christchurch. Part of the Site has been occupied by a temporary use (the community garden) but is now vacant.</p> <p>The Council s42A reports confirm a significant supply of housing development capacity and so removal of this Site from the supply of residentially zoned land will not have a detrimental effect on the community’s immediate or long term needs for housing. The rezoning of the Site provides for mixed use development which may include some residential component, provides the Submitters with investment certainty, and will contribute to economic development.</p> <p>Built form and activity controls in the operative CDP and PC14 that provide for a well-functioning urban environment are not proposed to be altered. Mr Compton-Moen’s evidence confirms that the zoning interface appropriately manages the effects on nearby residential communities. An assessment against the NPS-UD definition of a well-functioning urban environment in Policy 1 is provided below.</p> <p>The Proposal contributes to intensification of urban form in central Christchurch, supporting a reduction in greenhouse gas emissions by</p>

¹⁹ The versions of the Objectives cited are those recommended by the Council as filed on 18 August 2023.

PC14 Objective ¹⁹	Assessment
	<p>locating mixed use development close to a concentrated population base, other businesses and public and active transport infrastructure. Resilience to natural hazards and climate change is appropriately managed by the CDP provisions and these matters are able to be addressed in a resource consent process, if necessary.</p>
<p>3.3.2 Objective - Clarity of language and efficiency</p> <p>a. The District Plan, through its preparation, change, interpretation and implementation:</p> <p>i. Minimises:</p> <p>A. transaction costs and reliance on resource consent processes; and</p> <p>B. the number, extent, and prescriptiveness of development controls and design standards in the rules, in order to encourage innovation and choice; and</p> <p>C. the requirements for notification and written approval; and</p> <p>ii. Sets objectives and policies that clearly state the outcomes intended; and</p> <p>iii. Uses clear, concise language so that the District Plan is easy to understand and use</p>	<p>The Proposal does not change any language or provisions in the District Plan, though will minimise future resource consent costs for the Submitters' and contribute to potential for innovation and choice of development on the Site.</p>
<p>3.3.3 Objective - Ngāi Tahu mana whenua</p> <p>a. A strong and enduring relationship between the Council and Ngāi Tahu mana whenua in the recovery and future development of Ōtautahi (Christchurch City) and the greater Christchurch district, so that:</p>	<p>Ngāi Tahu mana whenua active participation is enabled by the PC14 process, and any development specific cultural matters are able to be addressed at the resource consenting stage as enabled by the Plan provisions.</p>

PC14 Objective ¹⁹	Assessment
<p>i. Ngāi Tahu mana whenua are able to actively participate in decision-making; and</p> <p>ii. Ngāi Tahu mana whenua's aspirations to actively participate priorities for their well-being and prosperity are recognised and provided for in the revitalisation of Ōtautahi, including through papakāinga/kāinga nohoanga housing within the urban area and on Māori land; and are recognised; and</p> <p>iii. Ngāi Tahu mana whenua's culture and identity are incorporated into, and reflected in, the recovery and development of Ōtautahi; and</p> <p>iv. Ngāi Tahu mana whenua's historic and contemporary connections, and cultural and spiritual values, associated with the land, water and other taonga of the district are recognised and provided for; and</p> <p>v. Ngāi Tahu mana whenua can retain, and where appropriate enhance, access to sites of cultural significance.</p> <p>vi. Ngāi Tahu mana whenua are able to exercise kaitiakitanga.</p>	
<p>3.3.4 Objective - Housing bottom lines and choice</p> <p>a. For the period 2021-2051, at least sufficient development capacity for housing is enabled for the Ōtautahi Christchurch urban environment in accordance with the following housing bottom lines:</p> <p>i. short-medium term: 18,300 dwellings between 2021 and 2031; and</p> <p>ii. long term: 23,000 dwellings between 2031 and 2051; and</p> <p>iii. 30 year total: 41,300 dwellings between 2021 and 2051; and</p>	<p>As discussed in paragraphs 30 to 35 above, PC14 provides ample feasible housing development capacity, and as such, the Proposal will not undermine the housing bottom lines in this Objective.</p>

PC14 Objective ¹⁹	Assessment
<p>b. There is a range of housing opportunities available to meet the diverse and changing population and housing needs of Christchurch residents, including:</p> <ul style="list-style-type: none"> i. a choice in housing, types, densities and locations; and ii. papakāinga/kāinga nohoanga housing, including within the urban area and on Māori land; and affordable, community and social housing. 	
<p>3.3.5 Objective - Business and economic prosperity</p> <p>a. The critical importance of business and economic prosperity to Christchurch's recovery and to community wellbeing and resilience is recognised and a range of opportunities provided for business activities to establish and prosper.</p>	<p>The Proposal will provide an opportunity for mixed use development, contributing to business and economic prosperity and a wider range of opportunities for business activities.</p>
<p>3.3.6 Objective - Natural hazards</p> <p>a. New subdivision, use and development (other than new critical infrastructure or strategic infrastructure to which paragraph b. applies):</p> <ul style="list-style-type: none"> i. is to be avoided in areas where the risks from natural hazards to people, property and infrastructure are assessed as being unacceptable; and ii. in all other areas, is undertaken in a manner that ensures the risks of natural hazards to people, property and infrastructure are appropriately mitigated. <p>b. New critical infrastructure or strategic infrastructure may be located in areas where the risks of natural hazards to people, property and</p>	<p>The District Plan provisions enable appropriate management of risks associated with natural hazards. The Proposal does not change these, nor is the rezoning of the Site to a commercial zone considered to increase any risks associated with natural hazards.</p>

PC14 Objective ¹⁹	Assessment
<p>infrastructure are otherwise assessed as being unacceptable, but only where:</p> <ul style="list-style-type: none"> i. there is no reasonable alternative; and ii. the strategic infrastructure or critical infrastructure has been designed to maintain, as far as practicable, its integrity and form during natural hazard events; and iii. the natural hazard risks to people, property and infrastructure are appropriately mitigated. <p>c. There is increased public awareness of the range and scale of natural hazard events that can affect Christchurch District.</p> <p>d. The repair of earthquake damaged land is facilitated as part of the recovery.</p>	
<p>3.3.7 Objective - Urban growth, form and design</p> <ul style="list-style-type: none"> a. A well-integrated pattern of development and infrastructure, a consolidated urban form, and a high quality urban environment that: <ul style="list-style-type: none"> i. Is attractive to residents, business and visitors; and ii. Provides for development and change over time to address the diverse and changing needs of people and communities, and iii. Provides for a distinctive, legible urban form and strong sense of place, comprising: <ul style="list-style-type: none"> A. pre-eminence of the city centre built form, supported by enabling the highest buildings; 	<p>The Proposal will encourage clustering of commercial development around existing commercial areas. Specific development on the site can be designed to appropriately contribute to a high-quality urban environment through existing development controls in the District Plan.</p> <p>The Proposal is consistent with a distinctive and legible urban form, given the specific characteristics of the Site's location as described above. Specific development on the site can be designed to appropriately contribute to a high-quality urban environment through existing development controls in the District Plan.</p> <p>The Site is located in an existing urban area and in a location with good public and active transport accessibility for people.</p>

PC14 Objective ¹⁹	Assessment
<p>B. clustering of development in and around commercial centres, with an extent, intensity and built form commensurate with the role of the centre; where</p> <p>C. 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</p> <p>D. specific design controls and lower heights for development located in more sensitive environments;</p> <p>iv. Recognises that whilst amenity values will change through the planned redevelopment of the existing urban area, the amenity values and the quality of the urban environment will be maintained and enhanced; and</p> <p>v. Enables Ngāi Tahu mana whenua to express their cultural traditions and norms;</p> <p>v.i Ensures the protection and/or maintenance of specific characteristics of qualifying matters;</p> <p>iii. Provides for urban activities only:</p> <p>A. within the existing urban areas unless they are otherwise expressly provided for in the CRPS; and</p> <p>B. on greenfield land on the periphery of Christchurch’s urban area identified in accordance with the Greenfield Priority Areas in the Canterbury Regional Policy Statement Chapter 6, Map A; and</p>	

PC14 Objective¹⁹

Assessment

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 Local 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; and

vi. Identifies opportunities for, and supports, the redevelopment of brownfield sites for residential, business or mixed use activities; and

vii. Promotes the re-use and re-development of buildings and land; and

viii. Has good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces including by way of public and active transport; and

ix. Promotes the safe, efficient and effective provision and use of infrastructure, including the optimisation of the use of existing infrastructure; and

x. Co-ordinates the nature, timing and sequencing of new development with the funding, implementation and operation of necessary transport and other infrastructure.

PC14 Objective ¹⁹	Assessment
<p>3.3.9 Objective - Revitalising the Central City</p> <p>a. The Central City is revitalised as the primary community focal point for the people of Christchurch; and</p> <p>b. The amenity values, function and economic, social and cultural viability of the Central City are enhanced through private and public sector investment, and</p> <p>c. A range of housing opportunities are enabled to support at least 5,000 additional households in the Central City between 2012 and 2028.</p> <p>d. The Central City has a unique identity and sense of place, incorporating the following elements, which can contribute to a high amenity urban environment for residents, visitors and workers to enjoy:</p> <p>i. a green edge and gateway to the City defined by the Frame and Hagley Park;</p> <p>ii. a variety of public spaces including the Avon river, squares and precincts and civic facilities;</p> <p>iii. built form and historic heritage that reflects the identity and values of Ngai Tahu, and the City's history as a European settlement; including cathedrals and associated buildings at 100 Cathedral Square and 136 Barbadoes Street;</p> <p>iv. a wide diversity and concentration of activities that enhance its role as the primary focus of the City and region; and</p>	<p>The Proposal supports the revitalisation of the Central City, enhancing the viability of the Site for additional private investment. The Proposal will not undermine the Central City housing targets as there remains an ample supply of housing development capacity in the Central City (refer to paragraph 30 to 35 above).</p> <p>The Proposal fits comfortably within the Central City structure described in part (d) of the objective, which contribute to the Central City's unique identity, sense of place and high amenity urban environment. The Site is located with access to various options for movement, supporting the increased use of active and public transport.</p>

PC14 Objective ¹⁹	Assessment
<p>v. a range of options for movement within and to destinations outside the Central City that are safe, flexible, and resilient and which supports the increased use of public transport, walking and cycling.</p>	
<p>3.3.11 Objective - Commercial and industrial activities</p> <p>a. The recovery and stimulation of commercial and industrial activities in a way that expedites recovery and long-term economic and employment growth through:</p> <p>i. Enabling rebuilding of existing business areas, revitalising of centres, and provision in greenfield areas; and</p> <p>ii. Ensuring sufficient and suitable land development capacity.</p> <p>b. 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.</p>	<p>It is acknowledged that there is adequate commercial development capacity 'on paper' and in broad Central City context, however, the Site's location adjacent to existing CCMU land, ensures the Proposal will not give rise to adverse distributional or urban form effects.</p>
<p>3.3.15 Objective - Incompatible activities</p> <p>a. The location of activities is controlled, primarily by zoning, to minimise conflicts between incompatible activities; and</p> <p>b. Conflicts between incompatible activities are avoided where there may be significant adverse effects on the health, safety and amenity of people and communities.</p>	<p>Mr Compton-Moen's evidence demonstrates that the Proposal does not give rise to any incompatible activities.</p>

PC14 Objective ¹⁹	Assessment
Chapter 14 - Residential	
<p>14.2.1 Objective - Housing supply</p> <p>a. An increased supply of housing that will:</p> <p>i. enable a wide range of housing types, sizes, and densities, in a manner consistent with Objectives 3.3.4(a) and 3.3.8;</p> <p>ii. meet the diverse and changing needs of the community and future generations; and</p> <p>iii. assist in improving housing affordability.</p>	<p>The Proposal does not undermine the provision of housing supply that will meet the needs of the community and future generations, with this demonstrated by the capacity assessments referenced above.</p>
<p>14.2.3 Objective - MDRS Objective 2</p> <p>a. A relevant residential zone provides for a variety of housing types and sizes that respond to:</p> <p>i. housing needs and demands; and</p> <p>ii. the neighbourhood's planned urban built character, including 3-storey buildings.</p>	<p>Residential activities are enabled in the CCMU, and the notified PC14 provisions respond to housing needs and demands.</p>
<p>14.2.45 Objective - High quality residential environments</p> <p>a. High quality, sustainable, residential neighbourhoods which are well designed in accordance with the planned urban character and the Ngāi Tahu heritage of Ōtautahi and meet the community's housing needs, in particular those of Ngāi Tahu whānui.</p>	<p>Appropriate controls managing the amenity of the HRZ adjoining the Site is maintained through the CDP and PC14 provisions.</p>

PC14 Objective ¹⁹	Assessment
Chapter 15 - Commercial	
<p>15.2.1 Objective – Recovery of commercial activity centres</p> <p>The importance of commercial and community activity to the recovery and long term growth of the City is recognised and facilitated in a framework that supports commercial centres.</p>	<p>The Proposal is consistent with the commercial centres framework, and development on the site will contribute to the recovery and long-term growth of the Central City.</p>
<p>15.2.2 Objective - Centres-based framework for commercial activities</p> <p>Commercial activity is focussed within a network of centres (comprising the City Centre, 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:</p> <ul style="list-style-type: none"> i. supports intensification within centres; ii. 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; iii. supports the function of Town Centres as major focal points for commercial activities, entertainment activities, visitor accommodation, employment, transport and community activities, and Local Centres as a focal point for primarily small-scale commercial activities with a focus on convenience shopping, community activities and guest accommodation; iv. gives primacy to the City Centre followed by Town Centres and Local Centres identified as Key Activity Centres; 	<p>The Proposal enables the appropriate development of commercial activity, consistent with the centres-based framework.</p> <p>Existing District Plan provisions that ensure the CCMU acts as a support zone to the CCZ are retained and as such, the Proposal will maintain the primacy of the City Centre.</p> <p>The Site is located within the Central City an adjacent to existing commercial land, which supports a compact and sustainable urban form. The location is accessible by a range of transport modes.</p> <p>Transport and infrastructure matters are able to be appropriately managed through a resource consent process.</p>

PC14 Objective ¹⁹	Assessment
<p>v. is consistent with the role of each centre as defined in 15.2.2.1 Policy – Role of centres Table 15.1;</p> <p>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;</p> <p>vii. supports the recovery of centres that sustained significant damage or significant population loss from their catchment, including the City Centre, Linwood, and Local Centres subject to 15.2.4.3 Policy Suburban centre master plans;</p> <p>viii. enhances their vitality and amenity and provides for a range of activities and community facilities;</p> <p>ix. manages adverse effects on the transport network and public and private infrastructure;</p> <p>x. is efficiently serviced by infrastructure and is integrated with the delivery of infrastructure; and</p> <p>xi. 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).</p>	
<p>15.2.3 Objective - Urban form, scale and design outcomes</p> <p>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>The Proposal is consistent with recognition of the Central City as strategically important for commercial investment. The Proposal retains the specific design and activity controls that support the outcomes in the Objective.</p>

PC14 Objective ¹⁹	Assessment
<ul style="list-style-type: none"> i. recognises the Central City and District Town Centres as strategically important focal points for community and commercial investment; 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 recognising that urban environments develop and change over time; iii. recognises the functional and operational requirements of activities and the anticipated existing built form; iv. manages adverse effects (including reverse sensitivity effects) on the site and surrounding environment; v. recognises Ngāi Tahu/ mana whenua values through landscaping and the use of low impact urban design, where appropriate.; and vi. Promotes a zoning and development framework that supports a reduction in greenhouse gas emissions and adverse climate change effects. 	
<p>15.2.4 Objective - Diversity and distribution of activities in the Central City</p> <p>A range of commercial activities, community activities, cultural activities, residential activities and 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:</p> <ul style="list-style-type: none"> i. Defining the City Centre Zone as the focus of retail activities and offices and limiting the height of buildings to support an intensity of commercial activity across the zone; 	<p>The Proposal maintains plan provisions that control the distribution of activities in the City Centre Zone and surrounding zones, consistent with this Objective.</p>

PC14 Objective ¹⁹	Assessment
<p>ii. Limiting the extent to which retail activity and offices occur outside the City Centre Zone;</p> <p>iii. Providing for key anchor projects within and around the City Centre Zone;</p> <p>iv. Encouraging entertainment and hospitality activity (including late-night trading) in defined precincts and managing the extent to which these activities (except for visitor accommodation) occur outside the precincts.</p>	
<p>15.2.7 Objective - Role of the Commercial Central City Mixed Use Zone</p> <p>The development of vibrant, high quality urban areas where a diverse and compatible mix of activities can coexist in support of the City Centre Zone and other areas within the Central City.</p>	<p>The Proposal retains the activity and built form provisions which give effect to this Objective.</p>
<p>15.2.8 Objective - Built form and amenity in the Central City Mixed Use Zone</p> <p>Ensure a form of built development that contributes positively to the evolving amenity values of the area, including people's health and safety, and to the quality and enjoyment of the environment for those living, working within or visiting the area.</p>	<p>The Proposal retains the activity and built form provisions which give effect to this Objective.</p>

Annexure [C]

Benefits and costs assessment

Benefits	Costs
<i>Option 1 - Retain proposed HRZ zoning</i>	
<ul style="list-style-type: none">• The land remains available for residential activity and contributes to housing supply in the Central City. Noting part of the site is currently developed, this benefit is limited to 2,950m². Noting the housing capacity available, this benefit is considered to be small.• Commercial land supply remains unchanged and mixed-use development is more likely to occur on to existing CCMU zoned land.• Peterborough Street (adjacent to the Site) remain predominantly residential in nature.	<ul style="list-style-type: none">• Any future mixed-use redevelopment of the Site would need to be addressed through a resource consent process, within a planning framework that is not generally supportive of a such an outcome. There are economic costs to the Submitters and a high degree of uncertainty that resource consent would be obtained for this type of project.• The underlying zoning would not support a mixed-use development which would provide greater scope for a development on the site to suitably emphasise the street corner on a prominent intersection adjacent to existing CCMU land.• The types of activities that could establish on the Site are more limited.• The range of available development land in the Central City is more restricted, reducing development choice.

Benefits**Costs*****Option 2 - Rezone the Site to CCMU in accordance with the Proposal***

- Provides for a mixed-use development on the site, including commercial activity in an appropriate location, being adjacent to existing CCMU zoned land.
- Enables a wider diversity of activities.
- Residential activity remains enabled on the Site.
- Council can more fully assess any development proposal through a resource consent process with more detail provided as part of a consent application.
- Provides additional mixed use development land, without adverse effect on the commercial key activity centre framework. The range of available development land in the Central City is expanded.
- Economic benefit to the Submitters from access to a wider range of development options. Additional development will provide employment opportunities and contributes to the economy.
- Does not involve any changes to the existing or notified rule framework, enabling mixed use development outcomes on the site while appropriately managing the amenity of adjoining residential zones.

- Reduces potential housing development land. Noting the housing capacity available, this cost is considered to be small.
- Commercial land supply is slightly increased and investment in mixed use development may be drawn from existing CCMU zoned land. Noting the commercial land capacity, this cost is considered to be small.

Benefits	Costs
Option 3 – Rezone to an alternative commercial zone, such as CCZ	
<ul style="list-style-type: none"> • Provides for a mixed-use development on the site, including commercial activity in an appropriate location, being adjacent to existing CCMU zoned land. • Enables a wider diversity of activities. • Residential activity remains enabled on the Site. • Council can more fully assess any development proposal through a resource consent process with more detail provided as part of a consent application. • The range of available business development land in the Central City is expanded. • Economic benefit to the Submitters from access to a wider range of development options. Additional development will provide employment opportunities and contributes to the economy. • Does not involve any changes to the existing or notified rule framework, enabling mixed use development outcomes on the site while appropriately managing the amenity of adjoining residential zones. 	<ul style="list-style-type: none"> • Reduces potential housing development land. Noting the housing capacity available, this cost is considered to be small. • Commercial land supply is slightly increased and investment in commercial development may be drawn from existing CCZ zoned land. Noting the commercial land capacity, this cost is considered to be small. • Inconsistent with existing zoning pattern. • Is likely to undermine the primacy of the CCZ in the city centre and is inconsistent with the commercial centres hierarchy. Commercial activities that the District Plan seeks to focus in the city centre may be drawn away.

Annexure [D]

NPS-UD Objective and Policy Assessment

Objective	Supporting Policies	Assessment
<p>Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.</p>	<p>Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:</p> <ul style="list-style-type: none"> (a) have or enable a variety of homes that... (b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and (d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and (e) support reductions in greenhouse gas emissions; and 	<p>The Proposal will contribute to a well-functioning urban environment, as assessed against the criteria in Policy 1.</p> <p>The Proposal will contribute to the variety of sites that is suitable for mixed use development in an appropriate location.</p> <p>The Proposal is consistent with good accessibility for people, given its location in the Central City, proximate to a concentration of housing and employment opportunities, active transport infrastructure and public transport routes.</p> <p>The Proposal provides for additional mixed use land capacity, contributing to competitiveness in that development market. Considering the significant supply of housing development capacity, any adverse impacts on the competitiveness of that market are considered to be very small.</p> <p>The Proposal enables more intense development within the Central City, providing for a more dense urban centre that will contribute to reduction in greenhouse gas emissions.</p>

Objective	Supporting Policies	Assessment
	<p>(f) are resilient to the likely current and future effects of climate change.</p>	<p>Further, the Site is well positioned in respect of active and public transport networks.</p> <p>The Site has no known vulnerabilities to climate change, and so is considered to be suitably resilient.</p> <p>Overall, the Proposal is consistent with Objective 1 and Policy 1 and will contribute to a well-functioning urban environment.</p>
	<p>Policy 2: Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.</p>	<p>The loss of residentially zoned land will not undermine the provision of at least sufficient housing development capacity as required by Policy 2. The Proposal will add to business land development capacity, meeting the Submitters' expected demand.</p>
<p>Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:</p> <p>(a) the area is in or near a centre zone or other area</p>	<p>Policy 3: In relation to tier 1 urban environments, regional policy statements and district plans enable:</p> <p>(a) in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; and</p> <p>(b) in metropolitan centre zones, ...; and</p> <p>(c) building heights of at least 6 storeys ...</p>	<p>The Proposal will enable mixed use development of the Site, enabling more people to live in, and more businesses and community services to be located in an urban environment near a centre zone where there are many employment opportunities and is well serviced by public transport.</p> <p>The Proposal achieves the relevant requirement in Policy 3(c), and Policy 3(a), to enable as much development capacity as possible, to maximise the benefits of intensification.</p>

Objective	Supporting Policies	Assessment
<p>with many employment opportunities</p> <p>(b) the area is well-serviced by existing or planned public transport</p> <p>(c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.</p>	<p>(d) within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent),</p>	
<p>Objective 4: New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.</p>	<p>Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:</p> <p>(a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement</p> <p>(b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:</p> <p>(i) may detract from amenity values appreciated by some people but improve amenity values appreciated</p>	<p>Although the Site is currently residentially zoned, this is a part of a planned urban built form that is anticipated by the CDP, which was created prior to the gazettal of the NPS-UD.</p> <p>Existing controls in the CDP appropriately manage the interface between commercial mixed-use and residential zones and amenity effects on surrounding land use. The interface between residential and commercial mixed-use zones is common in the Central City and Mr Compton-Moen's evidence confirms compatibility is achieved.</p>

Objective	Supporting Policies	Assessment
	<p>by other people, communities, and future generations, including by providing increased and varied housing densities and types; and</p> <p>(ii) are not, of themselves, an adverse effect</p> <p>(c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)</p> <p>(d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity</p> <p>(e) the likely current and future effects of climate change.</p>	<p>The Proposal has a number of benefits as outlined in Annexure [C] and contributes to a well-functioning urban environment as assessed in accordance with Policy 1.</p> <p>The Proposal will provide additional mixed-use land development capacity and will not undermine housing development capacity requirements as described above.</p> <p>The Proposal is not located in an area that would be subject to hazards arising from climate change. The Proposal has the ability to respond to effects of climate change, by locating with an existing urban area close to a high population base with established transport infrastructure, and enabling active and public modes of transport to be used to access future development on the Site.</p>
<p>Objective 6: Local authority decisions on urban development that affect urban environments are:</p> <p>(a) integrated with infrastructure planning and funding decisions; and</p>	<p>Policy 8: Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:</p> <p>(a) unanticipated by RMA planning documents; or</p>	<p>The Proposal will add to business land development capacity and contribute to a well-functioning urban environment as set out under Policy 1 above.</p>

Objective	Supporting Policies	Assessment
<p>(b) strategic over the medium term and long term; and</p> <p>(c) responsive, particularly in relation to proposals that would supply significant development capacity.</p>	<p>(b) out-of-sequence with planned land release.</p>	