

**BEFORE THE INDEPENDENT HEARING COMMISSIONERS
IN CHRISTCHURCH**

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

IN THE MATTER OF Resource Management Act 1991

AND

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

**JOINT STATEMENT OF PLANNING EXPERTS – CASHMERE WORSLEYS OUTLINE
DEVELOPMENT PLAN AREA**

4 December 2023

INTRODUCTION

1. This joint witness statement relates to expert conferencing on the topic of the Cashmere Worsleys Outline Development Plan (**ODP**) Area (**Cashmere Estate**) and PC14.
2. The expert conferencing was held on 23 November 2023 through a video conference.
3. Attendees at the conference were:
 - (a) Pia Jackson is the author of a submission (**#257**) and evidence for Cashmere Land Developments Ltd (**CLD**) in relation to the Cashmere Estate and Cashmere Worsleys ODP dated 19 September 2023;
 - (b) Ike Kleynbos is the author of a s42A Report dated 11 August 2023 and rebuttal evidence dated 16 October and submitter evidence addressing the **Residential** provisions and related Qualifying Matters (**QM's**);
 - (c) Ian Bayliss is the author of a s42A report dated 11 August and rebuttal evidence dated 9 October addressing the FUZ and subdivision chapter.

CODE OF CONDUCT

4. This joint statement is prepared in accordance with sections 9.4 to 9.6 of the Environment Court Practice Note 2023.
5. We confirm that we have read the Environment Court Practice Note 2023 and agree to abide by it.

PURPOSE AND SCOPE OF CONFERENCING

6. The purpose of conferencing was to identify, discuss, and highlight points of agreement and disagreement on Planning issues in Plan Change 14 relating to Cashmere Estate and the Cashmere Worsleys ODP.
7. Conferencing covered the following topics circulated in advance of the conferencing:
 - (a) Issues remaining for Cashmere Land
 - (b) Criteria for the LPTAA QM
 - (c) Criteria for rezoning of FUZ to MRZ
 - (d) Location / accessibility of Cashmere Estate
 - (e) Applicability of Precincts and Overlays including LPTAA QM.
 - (f) Activity Status for minor units in Density Precincts

8. Attendees reviewed relevant s32 reports, evidence, s42A reports, other reports in advance of the conferencing.
9. **Annexure A** records the agreed issues, areas of disagreement and the reasons, along with any reservations.

Date: 28 November 2023

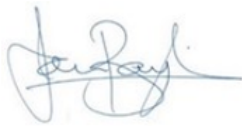
Pia Jackson



Ike Kleynbos



Ian Bayliss



ANNEXURE A – EXPERT CONFERENCING ON CASHMERE WORSLEYS ODP AND CASHMERE ESTATE 23 NOV 2023

Participants: Ike Kleynbos (IK) and Ian Bayliss (IB) for Christchurch City Council (CCC)

Pia Jackson (PJ) for Cashmere Land Development (CLD) #257

| Issue | Agreed Position | Disagreements or reservations with reasons |
|---|--|--|
| Application of LPTAA QM | <p>Agreement on proposed removal of 380 lot limit and ODP provisions and references to stone wall drain noted. CLD not opposed to MRZ with a 650m² minimum lot size consistent with a Residential Hills Zone.</p> <p>Notified FUZ zone a problem in that provisions don't "marry" with the Residential Hills Precinct and Suburban Hill Density Precinct as proposed.</p> | <p>PJ confirmed CLD opposed to the LPTAA QM conceptually and as it has been applied across the City and the Cashmere Estate property.</p> <p>PJ interpreted Council's initial evidence as supporting the Suburban Hill Density Precinct only in lower parts of the Port Hills.</p> |
| Criteria for the LPTAA QM | <p>Regarding the proposed LPTAA QM IK notes he did not author the s32 and his s42 sets out qualified support for applying MRZ and providing a pathway for medium density residential development and intensification within walking distance of core bus routes and routes that connect commercial centres and subject to serviceability. Has narrowed scope of proposed QM in some areas but still supports limiting medium density outside of accessible and constrained areas through QM's.</p> | <p>PJ noted walking distance alone doesn't determine accessibility given changes to accessibility with other modes (electric scooters and e-bikes) and potential to change PT services.</p> <p>PJ also considers that the LPTAA QM ignores the benefits of providing increased housing density close to public open space.</p> |
| Criteria for rezoning of FUZ to MRZ | <p>IB confirmed support for rezoning FUZ to MRZ where subdivision and development has progressed to a point where an ODP and the framework in the FUZ for managing greenfield development is no longer critical – normally once subdivision of the land is consented and development is underway or completed.</p> <p>IB confirmed that when rezoning from FUZ to another zone the applicability of QMs come into play.</p> | |
| Location / accessibility of Worsleys Spur Cashmere Estate | <p>No specific consideration of Cashmere Worsleys site in s42A – overview comments only.</p> | <p>PJ confirmed CLD opposed to LPTAA QM applying to the site noting the shared path connecting the site to adjoining areas (including CCC cycleways) and location</p> |

| Issue | Agreed Position | Disagreements or reservations with reasons |
|---|--|--|
| | <p>PJ confirmed the Environment Court decision which directed areas to be vested and areas to be developed and works to relevant intersections have all been addressed in the initial stages of development such that it now has limited relevance.</p> <p>IK's desktop analysis of distance of residential areas within Cashmere Estate to nearest bus stop in rebuttal evidence confirmed by PJ.</p> | <p>of some of the developed areas within walking distance of an Orbiter bus stop on McVicar Drive.</p> <p>PJ confirmed that the distance assessment included in IK's rebuttal evidence was an accurate reflection of the sites proximity to the nearest Orbiter bus stop.</p> |
| <p>Applicability of Precincts and Overlays including LPTAA QM</p> | <p>IK position in relation to Cashmere Estate is that it is only the undeveloped area furthest from McVicar Drive where the LPTAA QM response is now recommended and he would support MRZ without a precinct or overlay on the balance of the residential areas.</p> <p>The QM (Suburban Hill Density Precinct) would therefore only apply to 235 Worsleys Road (Lot 525 DP 515978) and 245 Worsleys Road (Lot 524 DP 515978).</p> | <p>IK notes that Residential Hills Precinct and Suburban Hill Density Precinct could be superseded by Port Hills Stormwater QM response, subject to the acceptance of the Panel.</p> |
| <p>Other Matters</p> | <p>PJ notes the operative Residential Hills Zone allows a minor residential unit as a permitted activity. Also notes more than 1 unit on a site is RD in the Density Precincts for up to 3 units but only within walking distance of a PT stop and meeting servicing requirements.</p> | <p>PJ queried why no permitted pathway is provided for a minor unit in the Suburban Density Precinct or Suburban Hill Density Precinct (noting minor residential units are permitted in Lyttelton Character Area Overlay and Lyttelton Residential Heritage Area and if standards are not met it becomes RD). IK accepted that this was an omission due to the reliance of the MDRS 3 unit baseline, acknowledging that the recommended QM response limited such a response.</p> <p>CLD do not support the Density precincts in general, but also consider Minor Residential Units should be provided as a permitted activity under any Density Precinct approach.</p> |