

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

Christchurch Casinos Limited

Submitter 2077

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 Christchurch Casinos Limited (**Submitter**). This evidence relates to their submission¹ to rezone 56 to 72 Salisbury Street and 373 Durham Street North, Christchurch Central, Christchurch (**Site**) from notified High Density Residential Zone (**HRZ**) to Central City Zone (**CCZ**).
- 6 I have visited the Site and am familiar with the area.
- 7 I have prepared evidence in relation to:
 - (a) The Site and existing environment;

¹ Submitter #2077 and submission point references 2077.6 and 2077.7

- (b) The proposed rezoning to achieve the relief sought by the Submitter (**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.
- 8 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

- 9 The Submission seeks to rezone 6,170m² of land at 56 to 72 Salisbury Street and 373 Durham Street North, Christchurch Central, Christchurch (**Site**) from notified High Density Residential Zone (**HRZ**) to Central City Zone (**CCZ**).
- 10 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.
- 11 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)).

- 12 Evidence provided by Mr Compton-Moen confirms the appropriate management of interface effects with adjoining residential zones and I note that 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.
- 13 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 the CDP PC14.

The Site and Existing Environment

- 14 The Site legal descriptions are provided in **Annexure [A]**.
- 15 The rectangular shaped site is approximately 6,170m² in area, bound by Salisbury Street to the north and Durham Street South to the east. The Site is currently operated as a temporary at-grade parking facility².

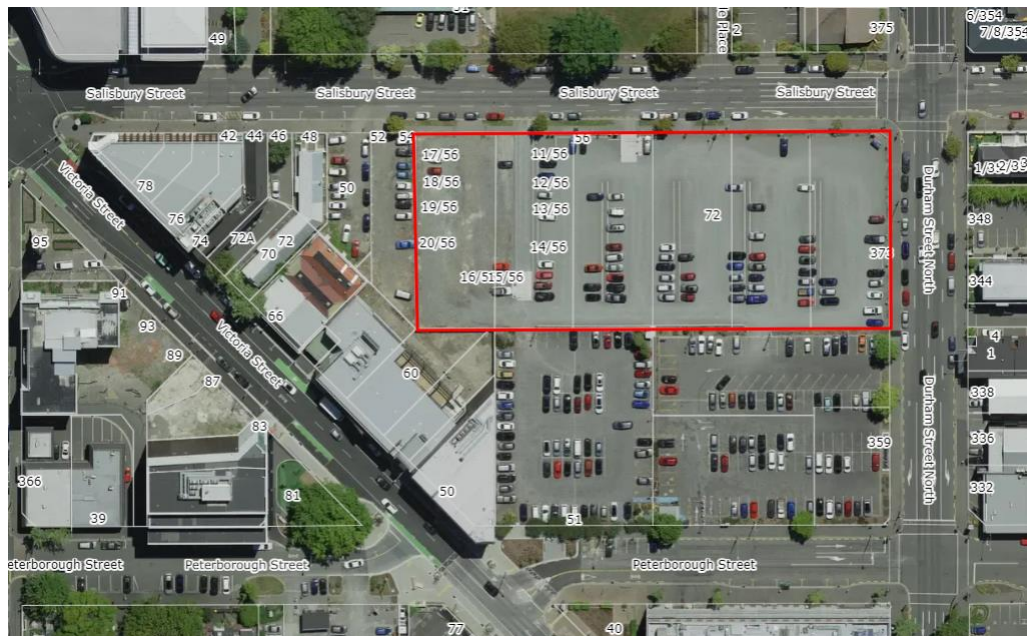


Figure 1 Site identified by red outline (Grip Maps)

² Resource Consent RMA2021542 authorises the use of land for car parking until January 2028.

- 16 The Site is located in an area that is in the process of redevelopment and has a mixed character comprising commercial, community and residential land uses.
- (a) To the north-west, west and south-west of the site are commercial buildings fronting Victoria Street, with a mix of retail, hospitality, commercial and (on upper floors) office activities.
 - (b) To the south is a permanent at-grade car park operated by the Submitter, which provides parking for staff and visitors to the Casino premises, short-term parking for the general public, and both casual and leased day parking which the Submitter advises is mostly utilised by locally based workers and students.
 - (c) To the east and south-east are commercial buildings fronting Durham Street North, comprising a motel, and various offices and retail activities.
 - (d) To the east and northeast are two residential properties, comprising a number of units / townhouses³.
 - (e) To the north is a church on the corner of Durham Street North and Salisbury Street, and a large undeveloped area of land owned by Ōtautahi Community Housing Trust (**OCHT**). Part of that land is leased to the adjacent commercial building for ancillary parking⁴.
- 17 The Site is zoned Residential Central City (**RCC**) in the operative CDP, and adjacent to land zoned Central City Business (**CB**) to the south and west. Land on the opposite side of Salisbury Street and Durham Street North to the north, north-east and east is zoned RCC. Land to the south-east is zoned Central City Mixed Use (**CCMU**). **Figure 2** shows the operative CDP zoning.

³ 350 and 354 Durham Street North

⁴ Resource consent RMA/2020/2219 authorises use of the land for parking for the adjacent Sudima Hotel and other commercial activities in the same building, until 3 March 2026.

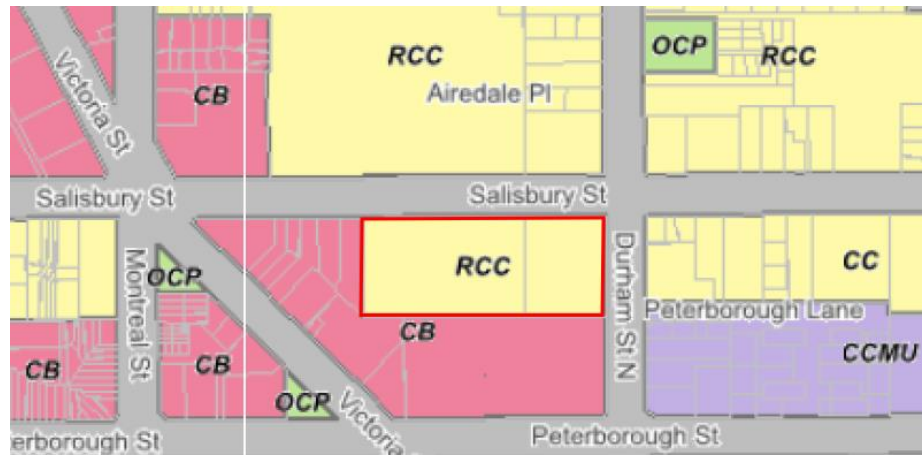


Figure 2 Operative CDP zoning with site boundary shown by red outline (CCC District Plan)

18 The PC14 zoning as notified is shown in **Figure 3** below. The site is proposed to be rezoned to High Density Residential (**HRZ**). The spatial boundaries of zones in the surrounding area do not appear to have changed with land zoned CB under the operative CDP being rezoned to CCZ, and land zoned RCC under the operative CDP being rezoned to HRZ. Nearby land zoned CCMU retains the same zoning.



Figure 3 PC14 notified zoning with site boundary shown by red outline (CCC PC14 maps)

Plan Change 14 Context

19 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 (**Policy 3**) in both residential and non-residential zones.

20 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 Policy 3.

21 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.*

22 The Site is located within the Christchurch Central City, defined in the CDP and PC14⁵ 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 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.*

23 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 Submitter’s 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 the HRZ height limit be amended to 39m, in order to meet the requirements of Policy 3(c).

24 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:

⁵ Chapter 2 Definitions

- (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.
- (d) Objective 6 of the NPS-UD requires that decisions on urban development that affect urban environments are responsive, particularly in relation to proposals that would supply significant development capacity. In my view, this Proposal does add significant business land development capacity, due to the size of the Site.

25 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

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

Assessment of Effects of the Proposal

- 28 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

- 29 The Proposal will result in the loss of 6,170m² of residentially zoned land, which is currently all vacant.
- 30 This is a conservative assessment as the Proposal to rezone the land to CCZ 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.
- 31 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:⁶

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

- 32 The 60-year projected housing demand of 80,000 households is exceeded by the estimated feasible development capacity of 91,580.⁷ 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 provide at least sufficient development capacity to meet expected demand for housing and business land over the short, medium and long term.
- 33 Within the Christchurch Central City, the s42A report prepared by Tim Heath identifies 12.03ha of undeveloped land in residential zones located within the four avenues. Residential land supply outside of the Central City is not included in this number. The Proposal would reduce this by 6,170m². The reduction is small in the

⁶ S42A Report prepared by Sarah Oliver, paragraph 108-111

⁷ 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

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.

- 34 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

- 35 Assuming the zoning is treated as pure commercial, the Proposal will increase the supply of commercially zoned land in the Central City by 6,170m². The s42A report prepared by Mr Heath identifies 14.95ha of undeveloped CCZ land and 11.63ha of undeveloped CCMU land. Mr Heath concludes that there is significant development capacity remaining within the four avenues of the city⁸.
- 36 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 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.*⁹

- 37 Council's PC14 s32 report concluded that there is sufficient business land capacity in central Christchurch to meet demand for the next 30 years.¹⁰ The definition of long term in the NPS-UD is 10-30 years.
- 38 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.
- 39 Rezoning of the Site to CCZ will maintain the primacy of the Central City. The land forms a logical extension of the existing Central City Zone surrounding Victoria Street and will maintain consistency with the hierarchy of commercial centres.

⁸ S42A Report prepared by Tim Heath, paragraphs 108-111

⁹ Greater Christchurch Partnership, *Our Space 2018 – 2048*, page 17

¹⁰ S32 Report, Part 4, Appendix 5 - Land Demand Estimate and Business Capacity Assessment, page 12.

- 40 The Site is a large area of land owned by one party, noting the CCZ land to the immediate south is also owned by the Submitter. The Proposal would enable the Submitter to undertake a comprehensive development of the Site and adjoining land, providing significant business development capacity in a Central City location.
- 41 I do not consider there to be 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

- 42 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.
- 43 I note that the interface between CCZ / HRZ is apparent in several locations in central Christchurch and the Proposal does not result in an unusual or unique zoning outcome. Existing provisions in the CDP controlling noise, lighting, glare and built form will be unchanged by the rezoning. The proposed rezoning therefore will not result in any change in respect of the management of these effects. I consider the CDP adequately manages interface effects between the CCZ and HRZ.
- 44 I have considered the existing CDP and notified PC14 provisions as related to the CCZ on Victoria Street. Both the CDP and PC14 provide for lower height limits along Victoria Street, compared to other CCZ land. PC14 notifies a qualifying matter that provides for a 45m height restriction within CCZ land around Victoria Street, shown in **Figure 4** below.
- 45 Mr Compton-Moen considers that the proposed 45m height limit on the CCZ is not dissimilar to the 39m height control limit in the HRZ with any change between the two built forms being largely Indiscernible or Very Low.



Figure 4 PC14 notified planning maps showing Victoria Street height qualifying matter extent (brown dotted overlay). Casino Site shown in blue outline.

46 The s32 report¹¹ states at 5.1.5 that the 45m height limit:

“is appropriate to reflect the longstanding fact that the Victoria Street precinct is a distinct and separate area from the rest of the Commercial City Central Business zone. The characteristics of the street (a single linear projection from the consolidated commercial core) and its surrounding residential zoning (rather than broader commercial uses) signal that a lower height limit would be more appropriate in this location, providing better outcomes in terms of visual impact, shading and built form.”

47 I support the Site having the same height limit as the adjoining CCZ land and consider that the s32 reasoning applies to the Site. Not applying the Victoria Street height qualifying matter would result in an isolated site where built form height could be significantly taller than the surrounding sites, potentially creating a built form outcome that is incongruous with the surrounding area and potentially adversely impact on surrounding residential activities. The Victoria Street height qualifying matter mitigates this effect.

48 Overall, I consider that effects on residential amenity of surrounding HRZ land are able to be appropriately managed by way of the operative CDP provisions and a

¹¹ S32 Report prepared by J. Chester, *Lower height Limits: Victoria Street & Cathedral Square – Qualifying Matters*

consequential amendment to the planning maps to include the Victoria Street height restriction qualifying matter over the Site.

- 49 Based on the above, I consider effects on amenity and urban form are able to be appropriately avoided or mitigated.

Transport

- 50 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 will be addressed through a future consent process.

Servicing and infrastructure

- 51 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

- 52 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

- 53 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.¹²

Scope of PC14

- 54 Legal submissions will address whether the Submissions are within the scope of PC14. I comment only on planning matters in the following paragraphs.
- 55 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.¹³
- 56 I disagree and consider the situation to be more complex. I note that the name of both the RCC zone and the CCB zone are proposed to be changed to HRZ and

¹² S42A report, Ms Gardiner, Appendix B, page 149-150.

¹³ S42A report, Ms Gardiner, Appendix B, page 149.

CB respectively, 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 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.

- 57 Ms Gardiner also identifies concern related to the recent decision by the Environment Court on the Waikanae case¹⁴, in that the Proposal may impact on the status quo operative CDP development rights¹⁵. 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 Submitter 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 17m and the Site is subject to boundary setbacks and recession plane built form controls. Under PC14, the HRZ and CCZ provisions enable greater height limits¹⁶ 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

- 58 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.¹⁷ 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.

¹⁴ NZEnvC056 Waikanae Land Company Limited

¹⁵ S42A report, Ms Gardiner, paragraph 8.2.1

¹⁶ For the CCZ subject to the Victoria Street height restriction, the height limit is 45m. For the HRZ – the height limits as identified in the s42A report version of provisions is greater, as discussed in paragraph 23 above.

¹⁷ S42A report, Ms Gardiner, Appendix B, page 149.

Existing Use and Pattern of Development

59 Ms Gardiner comments that the Site provide a transition between commercially and residentially zoned land and reflects the residential zoning to the north of Salisbury Street.¹⁸ 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 42 to 49 above.

Further submissions

60 One further submission was received on the Submitter's submission. Kāinga Ora – Homes and Communities¹⁹ supports intensification of the urban area. There were no further submission points in opposition.

Resource Management Act – s32AA

61 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.

62 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

63 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

64 In assessing the benefits and costs of the Proposal, the following options are considered:

¹⁸ S42A report, Ms Gardiner, Appendix B, page 149.

¹⁹ FS2099.72, FS2099.73, FS2099.74

- (a) Option 1: Retain the PC14 proposed zoning (HRZ);
- (b) Option 2: Rezone the Site to CCZ in accordance with the Proposal, with the Victoria Street height restriction qualifying matter; and
- (c) Option 3: Rezone the Site to CCZ without the Victoria Street height restriction qualifying matter.

65 The benefits and costs of each option are assessed in detail in **Annexure [C]**.

66 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.

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

Risk of Acting or Not Acting

68 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 or commercial 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.

69 Risk associated with not acting includes lack of incentive for the Submitter to undertake redevelopment providing for a range of activities on the Site.

Overall assessment

70 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)

71 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.

72 In summary, I consider that the Proposal is consistent with, and gives effect to, the NPS-UD.

Canterbury Regional Policy Statement

73 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

74 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.

75 None of the matters identified in section 6 of the RMA are relevant to this Proposal.

76 In regard to section 7, the Proposal will enable the efficient use and development of the subject land and enable the maintenance of local amenity values by appropriately managing the interface of the proposed CCZ 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.

77 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

78 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

Address	Legal Description	Record of Title
357 Durham Street North	Section 85 TN OF Christchurch	CB220/249
	Section 87 TN OF Christchurch	CB220/249
72 Salisbury Street	Section 89 TN OF Christchurch	CB364/79
56 Salisbury Street	Section 91 TN OF Christchurch	CB364/79
11, 12, 13, 14, 15 of 56 Salisbury Street	Section 93 TN OF Christchurch	CB364/79
16, 17, 18, 19, 20 of 56 Salisbury Street	Section 95 TN OF Christchurch	CB364/79

Annexure [B]

Assessment of Proposal against PC14 Objectives

PC14 Objective ²⁰	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. The Site has been vacant since the former buildings were demolished following the Canterbury Earthquakes.</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 business development which may include some residential component, provides the Submitter 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>

²⁰ The versions of the Objectives cited are those recommended by the Council as filed on 18 August 2023.

PC14 Objective ²⁰	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 Submitter 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>i. Ngāi Tahu mana whenua are able to actively participate in decision-making; and</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 ²⁰	Assessment
<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>b. There is a range of housing opportunities available to meet the diverse and changing population and housing needs of Christchurch residents, including:</p> <p>i. a choice in housing, types, densities and locations; and</p>	<p>As discussed in paragraphs 29 to 34 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 ²⁰	Assessment
<p>ii. papakāinga/kāinga nohoanga housing, including within the urban area and on Māori land; and affordable, community and social housing.</p>	
<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 business development that is not currently available by virtue of the Site's location, size and zoning. Redevelopment of the Site will contribute 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> <p>i. is to be avoided in areas where the risks from natural hazards to people, property and infrastructure are assessed as being unacceptable; and</p> <p>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> <p>b. New critical infrastructure or strategic infrastructure may be located in areas where the risks of natural hazards to people, property and infrastructure are otherwise assessed as being unacceptable, but only where:</p> <p>i. there is no reasonable alternative; and</p> <p>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</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 ²⁰	Assessment
<p>iii. the natural hazard risks to people, property and infrastructure are appropriately mitigated.</p> <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> <p>a. A well-integrated pattern of development and infrastructure, a consolidated urban form, and a high quality urban environment that:</p> <p>i. Is attractive to residents, business and visitors; and</p> <p>ii. Provides for development and change over time to address the diverse and changing needs of people and communities, and</p> <p>iii. Provides for a distinctive, legible urban form and strong sense of place, comprising:</p> <p>A. pre-eminence of the city centre built form, supported by enabling the highest buildings;</p> <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>The Site is located on a prominent Central City corner site with frontage to two Central City Distributor roads. Immediately adjoining land to the south is zoned CCZ. 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. The sensitivity of the Victoria Street locality is recognised by applying the Victoria Street height limit qualifying matter, consistent with adjacent sites.</p>

PC14 Objective ²⁰	Assessment
<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> <p>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:</p> <p>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</p> <p>B. in those parts of Residential Greenfield Priority Areas identified in Canterbury Regional Policy Statement Chapter 6, Map A; and</p> <p>C. in suitable brownfield areas; and</p>	

PC14 Objective ²⁰	Assessment
<p>v. Maintains and enhances the Central City, Key Activity Centres, Town centres, and Local centres as community focal points; and</p> <p>vi. Identifies opportunities for, and supports, the redevelopment of brownfield sites for residential, business or mixed use activities; and</p> <p>vii. Promotes the re-use and re-development of buildings and land; and</p> <p>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</p> <p>ix. Promotes the safe, efficient and effective provision and use of infrastructure, including the optimisation of the use of existing infrastructure; and</p> <p>x. Co-ordinates the nature, timing and sequencing of new development with the funding, implementation and operation of necessary transport and other infrastructure.</p>	
<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>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 paragraphs 29 to 34 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 ²⁰	Assessment
<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> <ul style="list-style-type: none"> i. a green edge and gateway to the City defined by the Frame and Hagley Park; ii. a variety of public spaces including the Avon river, squares and precincts and civic facilities; 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; iv. a wide diversity and concentration of activities that enhance its role as the primary focus of the City and region; and 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>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> <ul style="list-style-type: none"> i. Enabling rebuilding of existing business areas, revitalising of centres, and provision in greenfield areas; and ii. Ensuring sufficient and suitable land development capacity. 	<p>It is acknowledged that there is adequate commercial development capacity 'on paper' and in broad Central City context, however, the Site's location on a corner site of two minor arterial roads and adjacent to existing CCMU land, ensures the Proposal will not give rise to adverse distributional or urban form effects.</p>

PC14 Objective ²⁰	Assessment
<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>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>
<p>Chapter 14 - Residential</p>	
<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>Residential activities are enabled in the CCZ, and the notified PC14 provisions respond to housing needs and demands.</p>

PC14 Objective ²⁰	Assessment
<p>i. housing needs and demands; and</p> <p>ii. the neighbourhood's planned urban built character, including 3-storey buildings.</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>
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> <p>i. supports intensification within centres;</p> <p>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;</p>	<p>The Proposal enables the appropriate development of commercial activity, consistent with the centres-based framework. The Proposal will contribute to the primacy of the City Centre and is consistent with the role of that centre as defined in Policy 15.2.2.1.</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 ²⁰	Assessment
<p>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;</p> <p>iv. gives primacy to the City Centre followed by Town Centres and Local Centres identified as Key Activity Centres;</p> <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>	

PC14 Objective ²⁰	Assessment
<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> <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>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 ²⁰	Assessment
<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; ii. Limiting the extent to which retail activity and offices occur outside the City Centre Zone; iii. Providing for key anchor projects within and around the City Centre Zone; 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>The Proposal maintains plan provisions that control the distribution of activities in the City Centre Zone and surrounding zones, consistent with this Objective.</p>
<p>15.2.6 Objective - Role of the City Centre Zone</p> <p>A City Centre Zone that re-develops as the principal commercial centre for Christchurch District and is attractive for businesses, residents, workers and visitors, consistent with the Strategic Direction outcomes for the built environment.</p>	<p>The Proposal retains the District Plan provisions which give effect to this Objective, and contributes to the status of the City Centre as the principal commercial centre for the District.</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 6,170m². Noting the housing capacity available, this benefit is considered to be small.• Commercial land supply remains unchanged and business development is more likely to occur on to existing CCZ or CCMU zoned land.• Salisbury Street (adjacent to the Site) remains 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 Submitter 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.• Commercial development on the Submitter's land adjacent to the Site is constrained by boundary restrictions to residential zones (Rules 15.11.2.9 and 15.11.2.10 PC14 s42A Report version of provisions) and reduces the development potential of the adjoining CCZ land.

Benefits**Costs*****Option 2 - Rezone the Site to CCZ in accordance with the Proposal, with the Victoria Street height restriction qualifying matter.***

- Enables the comprehensive development of the Site and adjoining land.
- Provides for a business development on the site, including commercial activity in an appropriate location, being a prominent intersection adjacent to existing CCZ zoned land, and with greater scope to suitably emphasise the street corner.
- 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 business 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 Submitter from access to a wider range of development options. Additional development will provide employment opportunities and contributes to the economy.
- Potential height of built form able to be developed on the site is consistent with adjacent zoning.

- 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
<ul style="list-style-type: none"> Does not involve any changes to the existing or notified rule framework, enabling commercial development outcomes on the site while appropriately managing the amenity of adjoining residential zones. 	
<p><i>Option 3 - Rezone the Site to CCZ without the Victoria Street height restriction qualifying matter</i></p>	
<ul style="list-style-type: none"> Enables the comprehensive development of the Site and adjoining land. Provides for a business development on the site, including commercial activity in an appropriate location, being a prominent intersection adjacent to existing CCZ zoned land, and with greater scope to suitably emphasise the street corner. 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 business 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 Submitter from access to a wider range of development options. Additional development will provide employment opportunities and contributes to the economy. 	<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 mixed use development may be drawn from existing CCMU zoned land. Noting the commercial land capacity, this cost is considered to be small. Inconsistent with existing proposed height restriction pattern, potentially resulting in a built form outcome that is incongruous with the surrounding area and potentially adversely impact on surrounding residential activities.

Benefits	Costs
<ul style="list-style-type: none">• Does not involve any changes to the existing or notified rule framework, enabling commercial development outcomes on the site while appropriately managing the amenity of adjoining residential zones.• Greater development capacity compared to other options.	

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 business 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 business 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. Further, the Site is well positioned in respect of active and public transport networks.</p>

Objective	Supporting Policies	Assessment
	<p>(f) are resilient to the likely current and future effects of climate change.</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. The Proposal will add to business land development capacity, meeting 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 with many employment opportunities</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>(d) within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent),</p>	<p>The Proposal will enable a larger variety of businesses to locate in Central Christchurch, and given the nature of the proposed zoning, the establishment of community and residential activities is also enabled on the Site.</p> <p>The Site is located within a centre zone where there are many employment opportunities and is well serviced by public transport.</p> <p>Demand for large areas of business land is expected to be higher due to less common availability of larger development sites and location of the Site in the Central City, where demand for business land is anticipated to be highest.</p>

Objective	Supporting Policies	Assessment
<p>(b) the area is well-served 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>The Proposal therefore achieve the relevant requirement in Policy 3(a) to enable as much development capacity as possible, to maximise the benefits of intensification.</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 by other people, communities, and future generations, including by providing</p>	<p>Although the Site is currently residentially zoned, this is apart of a planned urban built form that is anticipated by the CDP, which was created prior to the gazettal of the NPS-UD. The Site is not developed with residential activity and the change to a commercial zoning is in response to the demand for large business development sites in the Central City. Existing controls in the CDP appropriately manage the interface between commercial and residential zones and amenity effects on surrounding land use. The interface between residential and commercial zones is common in the Central City and Mr Compton-Moen's evidence confirms compatibility is achieved.</p> <p>The Proposal has a number of benefits and contributes to a well-functioning urban environment as assessed in accordance with Policy 1.</p>

Objective	Supporting Policies	Assessment
	<p>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 will provide unique business 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>(b) out-of-sequence with planned land release.</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>		