

Before the Independent Hearings Panel  
Appointed by the Christchurch City Council

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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

**Scenic Hotel Group Limited**

*Submitter 809*

Statement of evidence of Samantha Leeanne Kealey

20 September 2023

### **Qualifications and experience**

- 1 My full name is Samantha Leeanne Kealey.
- 2 I have over seven years' experience in the field of resource management planning and on numerous occasions have provided planning evidence in proceedings. I hold a Bachelor of Planning from the University of Auckland. I hold the position of Senior Planner at Town Planning Group where I have been employed since 202. I am an Intermediate Member of the New Zealand Planning Institute.
- 3 My previous work experience includes working in the public 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 Scenic Hotel Group Limited (**Submitter**). This evidence relates to part of their submission<sup>1</sup> which seeks to provide for visitor accommodation and community facilities at 88 Papanui Road, 96 Papanui Road and 19 Holly Road, Christchurch (**Site**).
- 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;
  - (b) The proposed introduction of the overlay to achieve the relief sought by the Submitters (**Proposal**);

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<sup>1</sup> Submitter #817 and submission point reference 817.1 and 817.2, and consequential matters

- (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) Submission filed by the Submitter;
  - (b) PC14 provisions relevant to my evidence;
  - (c) Operative Christchurch District Plan;
  - (d) Section 42A Report on PC14 prepared by Ike Kleynbos dated 11 August 2023;
  - (e) Any relevant further submissions;
  - (f) National Policy Statement on Urban Development 2020 (NPSUD);
  - (g) Canterbury Regional Policy Statement (CRPS).

### **Executive Summary**

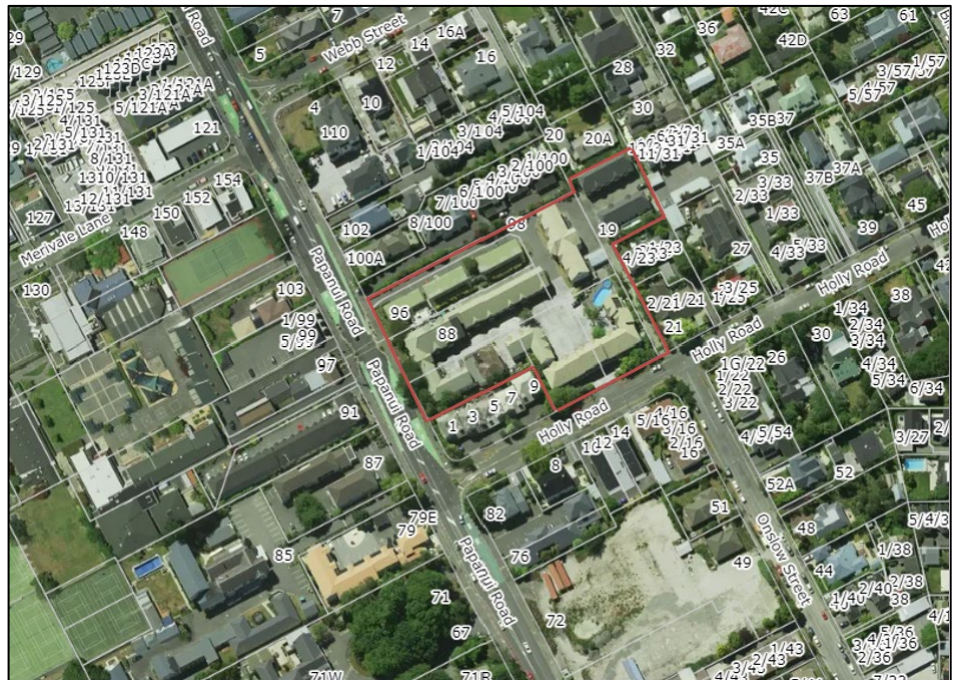
- 9 The Submission seeks to reintroduce the Accommodation and Community Facilities Overlay for the entirety of the 8,250m<sup>2</sup> of land at 88 Papanui Road, 96 Papanui Road and 19 Holly Road, Christchurch (**Site**) whilst retaining the notified High Density Residential Zone (**HRZ**).
- 10 The 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 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 Sites and Existing Environment

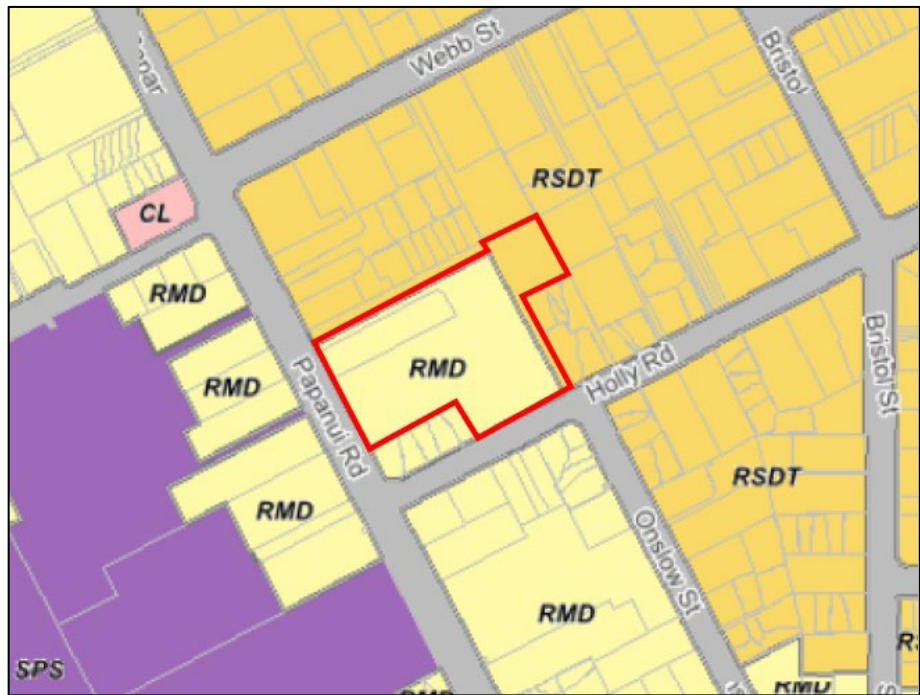
- 13 The Site legal descriptions are provided in **Annexure [A]**.
- 14 The site is approximately 8,250m<sup>2</sup> in area, with access to Papanui Road to the west and Holly Road to the south. The sites are developed with the Scenic Hotel, formerly known as the Heartland Hotel.



**Figure 1 Site Location (Grip Maps)**

- 15 The Site is located in an area that is largely developed and has a mixed character comprising commercial, community and residential land uses.
- (a) To the north of the site is a row of residential units.
  - (b) To the east of the site are townhouse residential developments.
  - (c) To the west, there are numerous guest accommodation facilities across Papanui Road including Merivale Court Motel, Milao Motor Lodge, as well as access to Acland House which is the boarding facility for Christchurch Girl's High School.

- (d) To the south of the site is Holly Road where there are various residential houses and townhouse type development.
- 16 The properties at 88 and 96 Papanui Road are located within the Residential Medium Density Zone (**RMD**) and are subject to the Accommodation and Community Services Overlay (**ACSO**) under the operative CDP. This part of the site is proposed to be zoned High Density Residential (**HDR**) and will also be within the Large Local Centre Intensification Precinct under PC14. 96 Papanui Road will also be within the High-Density Residential Precinct under PC14.
- 17 The property at 19 Holly Road is located within the Residential Suburban Density Transition Zone (**RSDT**) under the operative CDP and is not subject to the Accommodation and Community Facilities Overlay. This part of the site is proposed to be zoned High Density Residential and will also be within the High-Density Residential Precinct under PC14. **Figure 2** shows the operative CDP zoning.



**Figure 2** Operative District Plan 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**).

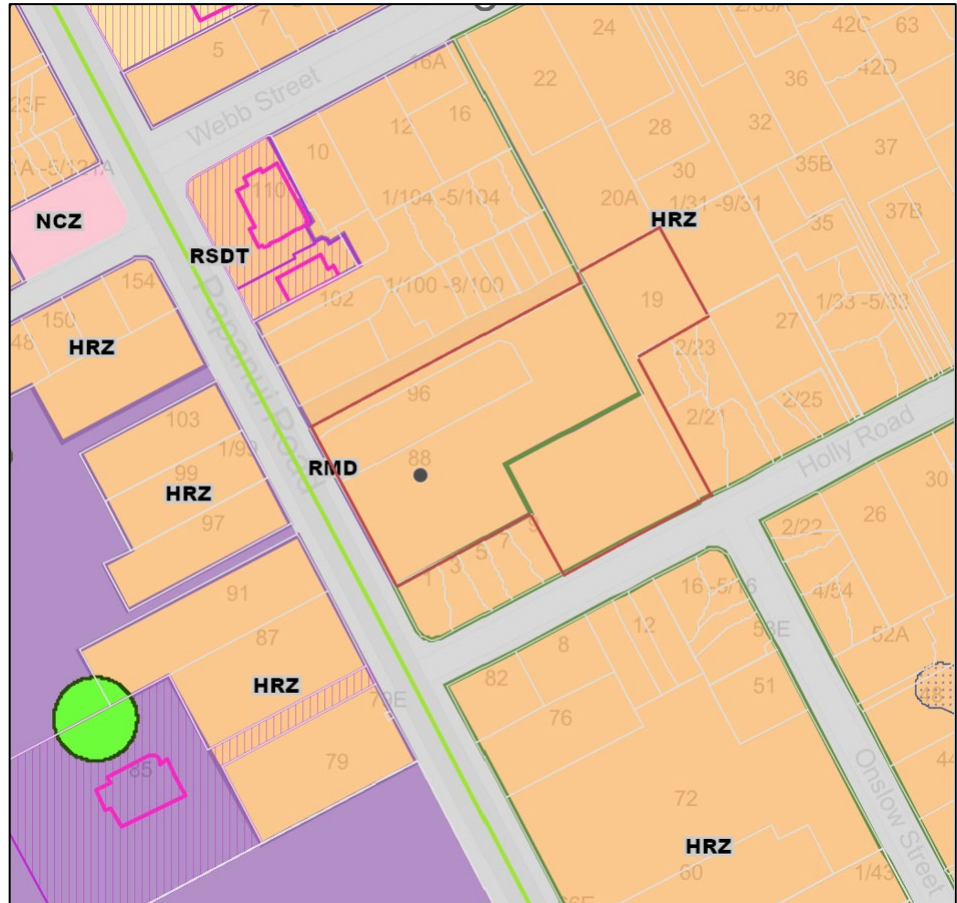


Figure 3 PC14 notified zoning with site boundary shown by red outline (CCC PC14 maps)

### 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 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 NPS-UD Policy 3 (**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 identified Papanui Larger Town Centre periphery of High Density and is located on the Papanui Road which has been identified as Papanui Parallel<sup>2</sup>. I consider part(a) of Policy 3 to be relevant to the Proposal.
- 23 Part (c) of Policy 3 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 proposes to amend the HRZ height limit to 22m, in order to meet the requirements of Policy 3(c). I support this increase in height.
- 24 Policy 3 gives effect to the NPS-UD Objectives and should be read in conjunction with these. In particular, Policy 3 relates directly to Objective 3, which seeks to enable more people to live in, and more businesses and community services to be located in certain urban environments.

#### **Relief Sought by Submission**

- 25 The Submitter's submission seeks that the Site has the overlay of Accommodation and Community Facilities Overlay across all three of the parcels of land to enable the continuation of the activity taking place on site and allow for future development of the site that best aligns with that use.
- 26 The submission also supports intensification of urban form to provide for additional development capacity.

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<sup>2</sup> <https://www.nzta.govt.nz/projects/christchurch-motorways/christchurch-northern-corridor/>

## **Assessment of Effects of the Proposal**

27 The following effects are considered relevant to the Proposal:

- (a) Amenity and urban form
- (b) Transport
- (c) Servicing and infrastructure
- (d) Positive Effects

### *Amenity and urban form*

28 I note that the interface between land zoned HRZ and the proposal of the Accommodation and Community Facilities Overlay does not result in an unusual or unique outcomes, the site currently operates as a hotel with the surrounding area largely made up of the same.

29 Existing provisions in the CDP controlling noise, lighting and glare will be unchanged by the reintroduction of the overlay. The proposed overlay therefore will not result in any change in respect of the management of these effects.

30 Overall, I consider that effects on residential amenity of surrounding HRZ land are able to be appropriately managed by way of the operative CDP (overlay) and PC14 provisions. I consider the effect on urban form to be acceptable, noting the position of the site on a prominent street corner, and other visitor accommodation surrounding the site predominantly along the Papanui Road frontage.

### *Transport*

31 Existing provisions in the CDP controlling transport matters will be unchanged by the introduction of the overlay, 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*

32 Existing provisions in the CDP controlling servicing and infrastructure matters will be unchanged by the introduction of the overlay, and therefore, servicing and infrastructure effects can be appropriately managed by the CDP overlay provisions. Development specific servicing and infrastructure matters are able to be addressed through a future consent process.

### *Effects Conclusion*



- 33 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 and will overall be appropriate.

#### **S42A Report**

- 34 The S42A Report recommends that the submission point to rezone the site to a commercial zone is rejected, considering the scope of PC14, the NPS-UD, and the existing use and pattern of development however, the reintroduction of the Accommodation and Community Facilities Overlay should be accepted.<sup>3</sup>

#### *Existing Use and Pattern of Development*

- 35 Mr Kleynbos comments that no modification of the operative standards has been recommended.<sup>4</sup> However, the submitters submission requested that the overlay include all three land parcels whereas the operative CDP only included two of the land parcels. The reasoning for this is due to the existing use of all three parcels working in unison and operating together as the Scenic Hotel.

- 36 This in my opinion is the most appropriate outcome.

#### **Further submissions**

- 37 No further submissions were received in respect of the Scenic Hotel Limited submission.

#### **Resource Management Act – s32AA**

- 38 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.
- 39 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*

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<sup>3</sup> S42A report, Ike Kleynbos, Appendix B, page 58.

<sup>4</sup> S42A report, Ike Kleynbos, Appendix B, page 122.

40 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*

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

- (a) Option 1: Retain the PC14 proposed zoning (HRZ); or
- (b) Option 2: Retain the PC14 proposed zoning (HRZ) and reintroduce the Accommodation and Community Facilities Overlay for the entire Site in accordance with the Proposal; or
- (c) Option 3: Rezone to a different zone, such as Residential Visitor Accommodation Zone (RVAZ).

42 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.

43 The Proposal is considered to be the most efficient and effective means of achieving the objectives of PC14. The Proposal provides for an overlay that reflects the current uses of the land and provides for development in the future 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*

44 No fundamental risks of the Proposal have been identified and the planning evidence confirm the suitability of the Site for the overlay to be reintroduced. This information has been provided at a level of detail that is appropriate. Further assessment through the resource consent process enables appropriate management of risk if future development was to take place.

#### *Overall assessment*

45 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)*

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

*Canterbury Regional Policy Statement*

- 48 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*

- 49 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 an overlay that is reflective of what currently occurs on site and provides for redevelopment of the site in the future that will contribute to a well-functioning urban environment. Any adverse effects on the environment from the Proposal are able to be appropriately avoided, remedied or mitigated.
- 50 None of the matters identified in section 6 of the RMA are relevant to this Proposal.
- 51 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 Accommodation and Community Facilities Overlay with adjoining HRZ land.
- 52 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**

- 53 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.

**Samantha Leeanne Kealey**

Dated this 20th day of September 2023

**Annexure [A]**

**Legal Descriptions of the Site**

<b>Address</b>	<b>Legal Description</b>	<b>Record of Title</b>
88 Papanui Road	Part Lot 43 Deposited Plan 364	CB20B/22
96 Papanui Road	Lot 2 Deposited Plan 25250	CB7A/247
19 Holly Road	Lot 2 Deposited Plan 15583	C542/153

**Annexure [B]**

**Assessment of Proposal against PC14 Objectives**

PC14 Objective <sup>5</sup>	Assessment
<b>Chapter 3 – Strategic Directions</b>	
<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>The Proposal will aid the recovery of Christchurch. The Site has been utilised by the Scenic Hotel for a number of years and intends to operate from the site for the foreseeable future however may look to redevelop in the future.</p> <p>The Council s42A reports confirms that the Accommodation and Community Facilities Overlay should be reinstated over the HRZ and was an oversight upon drafting. The overlay should be reinstated over all three of the land parcels to reflect the existing use of the site which 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. 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 locating accommodation and community facilities close to a concentrated population base, other businesses and public and active transport</p>

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<sup>5</sup> The versions of the Objectives cited are those recommended by the Council as filed on 18 August 2023.

PC14 Objective <sup>5</sup>	Assessment
<p>ii. Is resilient to natural hazards and the current and future effects of climate change.</p>	<p>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 <sup>5</sup>	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>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 <sup>5</sup>	Assessment
<ul style="list-style-type: none"> <li>i. a choice in housing, types, densities and locations; and</li> <li>ii. papakāinga/kāinga nohoanga housing, including within the urban area and on Māori land; and affordable, community and social housing.</li> </ul>	
<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 development, contributing to business and economic prosperity and a wider range of opportunities for accommodation or community 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"> <li>i. is to be avoided in areas where the risks from natural hazards to people, property and infrastructure are assessed as being unacceptable; and</li> <li>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.</li> </ul> <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> <ul style="list-style-type: none"> <li>i. there is no reasonable alternative; and</li> </ul>	<p>The District Plan provisions enable appropriate management of risks associated with natural hazards. The Proposal does not change these, nor is the reintroduction of the overlay to the Sites considered to increase any risks associated with natural hazards.</p>

PC14 Objective <sup>5</sup>	Assessment
<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>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>The site is located on a prominent corner with frontage to Papanui Road. The site is surrounded by similar land uses with the character of the area made up of transitory between more commercial land uses and residential areas primarily based on the location and Papanui Road being a key corridor for access to the central city and to the north.</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 is and 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 <sup>5</sup>	Assessment
<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> <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>	

PC14 Objective <sup>5</sup>	Assessment
<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> <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><b>Chapter 14 - Residential</b></p>	

PC14 Objective <sup>5</sup>	Assessment
<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 contributes to an increased range of housing, with accommodation facilities able to be provided under the proposed reintroduction of the overlay. The overlay also provides for the community and future generations by providing options for community facilities to be provided under the overlay.</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 HRZ whilst they will be further maximised by the reintroduction of the overlay which responds to the existing environment but also provides for future redevelopment of the site. The notified PC14 provisions respond to housing needs and demands.</p>
<p>14.2.5 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 High-Density Residential Zone of the Site is maintained through the CDP and PC14 provisions.</p>

**Annexure [C]**

**NPS-UD Objective and Policy Assessment**

Objective	Supporting Policies	Assessment
<p><b>Objective 1:</b> 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><b>Policy 1:</b> Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:</p> <ul style="list-style-type: none"> <li>(a) have or enable a variety of homes that...</li> <li>(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and</li> <li>(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</li> <li>(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and</li> <li>(e) support reductions in greenhouse gas emissions; and</li> </ul>	<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 residential development in an appropriate location with the provision for accommodation and community facilities.</p> <p>The Proposal is consistent with good accessibility for people, given its location, proximate to a concentration of housing and employment opportunities, active transport infrastructure and public transport routes.</p> <p>The Proposal enables more variety and flexibility with development on a prominent carriageway, providing for a more dense 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> <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>

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	<p>(f) are resilient to the likely current and future effects of climate change.</p> <p><b>Policy 2:</b> 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 reintroduction of the overlay will not undermine the provision of at least sufficient housing development capacity as required by Policy 2. The Proposal will add land that can be developed for accommodation purposes whilst also providing for community facilities, meeting the Submitter's expected demand.</p>
<p><b>Objective 3:</b> 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>(b) the area is well-served by existing or planned public transport</p>	<p><b>Policy 3:</b> 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 within at least a walkable catchment of the following:</p> <p>(i) existing and planned rapid transit stops</p> <p>(ii) the edge of city centre zones</p>	<p>The Proposal will enable an overlay to the proposed High-Density Residential Zoning of PC14, enabling more variety and choice not only to the submitter but also for people to stay in, live in, and more community services to be located in an urban environment near a centre zone where there are many employment opportunities and is well served 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>



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<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>(iii) the edge of metropolitan centre zones; and</p> <p>(d) within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent), ....</p>	
<p><b>Objective 4:</b> 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><b>Policy 6:</b> 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 increased and varied housing densities and types; and</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 and amenity effects on surrounding land use. The interface between the accommodation and community facilities overlay and it not being present is an existing situation and the reintroduction of the overlay will see the continuation of existing uses whilst also enabling development as such.</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> <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</p>

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	<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>public modes of transport to be used to access accommodation and community facilities or future development on the Site.</p>
<p><b>Objective 6:</b> Local authority decisions on urban development that affect urban environments are:</p> <p>(a) integrated with infrastructure planning and funding decisions; and</p> <p>(b) strategic over the medium term and long term; and</p>	<p><b>Policy 8:</b> 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 contribute to a well-functioning urban environment as set out under Policy 1 above.</p>

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(c) responsive, particularly in relation to proposals that would supply significant development capacity.		