

BEFORE INDEPENDENT HEARING COMMISSIONERS IN CHRISTCHURCH

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

IN THE MATTER OF the Resource Management Act 1991

and

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

Statement of Evidence of Adele Mary Radburnd

Planning

Hearing Topic: Other Zones

DATED

20 SEPTEMBER 2023

QUALIFICATIONS AND EXPERIENCE

1. My name is Adele Mary Radburnd. I hold the position of Principal Development Planner with ChristchurchNZ, the city's economic development agency, a position I have held for two years.
2. I hold the qualifications of Bachelor of Arts (Geography) and Master of Regional and Resource Planning (with credit) from the University of Otago. I have approximately 20 years' planning experience gained both in New Zealand and the United Kingdom, where I have held roles in local government (planning policy) and private planning consultancies. I am an Intermediate member of the New Zealand Planning Institute.
3. Prior to my role at ChristchurchNZ, I was employed by the Christchurch City Council in the position of Principal Advisor – Planning. In this role I worked primarily in district plan formulation (rural, designations, commercial, industrial chapters), and sub-regional growth planning. I was also involved in the early development of Plan Change 14, primarily on matters related to commercial centres and zones.

CODE OF CONDUCT

4. Whilst 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 Practice Note 2023) and I have complied with it when preparing my evidence. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.
5. I can confirm that whilst I am employed by ChristchurchNZ, my employer has agreed to me providing this statement of evidence as an expert witness and in accordance with the Code of Conduct.
6. In preparing this evidence, I rely on the expert evidence prepared for ChristchurchNZ by Mr Shaun Hardcastle (transport) and Mr Simon Johnson (architectural). I also rely on the urban design evidence of Ms Nicola Williams for Council.

SCOPE OF EVIDENCE

7. My evidence covers:
 - (a) The appropriateness of the relief sought by ChristchurchNZ (**CNZ**) in its submission and further submission, relating to the proposed mixed use zone provisions for the Sydenham and Lancaster areas covered by the proposed new Comprehensive Housing Precinct; and
 - (b) The zoning of land at 2 Barnett Avenue and 14 Milton Street, Sydenham (**Sydenham Yard**).
8. In preparing my evidence, I have reviewed and considered the S42A reports of Mr Lightbody (planning) and Ms Piper (transport) regarding the Mixed Use Zone provisions and the report of Mr Kleybos for the zoning of Sydenham Yard. Except where I have stated otherwise in my evidence below, I support the proposed provisions (and amendments) as recommended in those reports.
9. For completeness, no technical evidence is provided to support CNZ submission points relating to the central city zones. CNZ's position remains however, that it is appropriate to consider changes to those zones where necessary to achieve a well-functioning urban environment and in particular to address issues that the Council has identified as currently negatively impacting on the liveability of medium and high-density housing.

OVERVIEW OF CHRISTCHURCHNZ'S SUBMISSION

10. The crux of CNZ's submissions is to support district plan provisions which best respond to the Policy 3 directions of the National Policy Statement on Urban Development (**NPS-UD**) to intensify around the city centre, in a way that recognises both the transformational opportunity that the location presents, and the constraints associated with transitioning from an existing industrial setting.
11. Specifically, its submission and further submission points¹ fall into the following categories:

Industrial zones within the walkable catchment of the City Centre Zone

¹ In addition to the central city submission points noted in paragraph 9 above but which is not addressed in technical evidence.

- a) Support for the proposed rezoning of the existing Industrial General Zone in Sydenham and around Lancaster Park to Mixed Use Zone with a precinct and associated provisions to enable and guide the establishment of comprehensively designed high-density housing and manage new non-residential activities that may conflict with housing.

- b) Request minor amendments or additions to the Mixed Use Zone provisions to better reflect the intent of the rezoning to enable more people to live within the walkable catchment of the City Centre, in a way that achieves the wider objectives of the NPS-UD. This includes amendments or additions to:
 - (i) Objectives, policies and rules for the mixed use zone to better promote a walkable and well-functioning future outcome (Objectives 15.2.3 and 15.2.4 and Policies 15.2.3.2(b), 15.2.4.1(b) and 15.2.4.2 and rules in 15.10 and 15.14.3.40).

 - (ii) Definitions for comprehensive residential development, greenway, shared pedestrian/cycleway, accessible residential unit, apartment building, perimeter block development and pedestrian access, to assist with understanding and applying the mixed use zone rules.

 - (iii) Appendices to improve clarity for plan users and include locations for two additional pedestrian / cycle linkages.

Zoning of Sydenham Yard

- a) Request for a consistent (preferably high density) zoning for land at 2 Barnett Ave and 14 Johnson Street.

PROPOSED MIXED USE ZONE AND PRECINCT METHOD

12. The Council has proposed to give effect to the Policy 3(c)(ii) directions of the NPS-UD in part by rezoning industrial land within the walkable catchment of the City Centre Zone to Mixed Use Zone, with the introduction of a precinct and other provisions to guide the extent and form of future housing and promote a well-functioning urban environment. Having regard to the range of alternative options for implementing Policy 3(c)(ii), I support the position of the

planning officer that this is the most appropriate method, having regard to the wider objectives of the NPS-UD.

13. In reaching that position, I consider the following considerations are particularly relevant:

- a) An intensification response is required for *all zones* within the walkable catchment of the city centre zone.
- b) Councils have discretion to determine the extent of the walkable catchment;
- c) Councils may modify the requirements of Policy 3 in an urban non-residential zone to be less enabling of development if necessary to accommodate a qualifying matter².
- d) Low density zones (like industrial zones) are a listed qualifying matter if required to provide sufficient business land suitable for low density uses to meet expected demand³ (my emphasis).
- e) Councils may create new urban non-residential zones or amend existing urban non-residential zones when preparing an IPI for the purposes of giving effect to the Policy 3 directions⁴;
- f) Industrial, commercial and mixed use zones are not 'relevant residential zones' and so are not constrained by scope in the same way that 'relevant residential zones' are.

14. I agree with the position expressed in the Council's s32 report that the city's significant over-supply of industrial land supports consideration of the potential for more flexible use of centrally located industrial land, for uses with a greater propensity to utilise the heights anticipated by Policy 3 (e.g. housing, offices and visitor accommodation)⁵. In my view this is appropriate because simply increasing heights in a zone limited to low density uses would not achieve the *intent* of the Policy 3 directions, which is to enable more people to live in, and more businesses and community services to locate in, areas with many employment opportunities (NPS-UD Objective 3).

² [RMA \(Enabling Housing Act\) 2021 S77N](#)

³ [RMA \(Enabling Housing Act\) 2021 S77O](#)

⁴ [RMA \(Enabling Housing Act\) 2021 S77N](#)

⁵ [Section 32, Appendix 4](#) page 5

15. On that point, Mr Lightbody identifies that the Industrial General Zone does not currently have a height limit *per se*, such that it could be argued that the Policy 3(c)(ii) height direction is already met⁶. He also mentions the potential for industrial sites to be considered for commercial or residential development under the brownfield policies in Chapter 16. However, as the section 32 report explains, simply increasing heights in the Industrial General Zone [or having no limits at all as the case may be] would not add much, if any, further development capacity because of the zone's restrictions on high density land uses. I agree with that observation and would add that whilst the brownfield policies may provide a potential (discretionary activity status) pathway for *some* sites to be redeveloped for housing under the status quo industrial zoning, few would meet the criteria such that any opportunities would be very limited in number and piecemeal in location.

16. I also agree with the council's conclusion that:

“Retaining the zoning for less efficient, low density uses would not make best use of these locations’ accessibility to jobs, services and amenities, to the same extent that higher density alternative uses (like residential) would. Whilst industrial zones perform an important function, there is opportunity to better utilise this land by providing more flexibility to transition to more efficient uses in these locations, should the market wish to take up the opportunity. A more flexible zone or district plan mechanism which enables existing activities to be retained, whilst providing for appropriate and comprehensively designed residential uses, would offer many benefits including provision of housing and enabling people to live close to jobs, services and amenities with less dependence on private vehicles”⁷.

17. I note that the operative Industrial General (**IGZ**) and Commercial Mixed Use zones (**CMUZ**) have more similarities than differences, such that the rezoning is not as significant as one might otherwise assume by the zone names. The CMUZ provides for the same range of industrial activities as the IGZ and both zones provide for uses such as gyms, preschools and food and beverage outlets. The main differences between the two zones, is that a slightly wider range of community uses is enabled in the CMUZ (e.g. healthcare, tertiary education and research, visitor accommodation and spiritual activities) and housing is not anticipated in the IGZ, whilst it is enabled to some extent in the operative Commercial Mixed Use Zone.

⁶ [Section 42a of Mr Kirk Lightbody](#) page 117

⁷ [Section 32, Appendix 4](#) page 3

18. CMUZ Rule 15.10.1.1 (P27) currently permits housing⁸ provided that it is located above ground floor level or located to the rear of a permitted (including industrial) activity. Housing that does not meet the permitted standards is classified as a restricted discretionary activity, with limited assessment matters and no policy guidance as to the outcomes sought for housing in this zone. For this reason, I do not consider that the operative mixed use zone provisions for housing (without amendment) are adequate to support a well-functioning urban environment and I do not consider it appropriate to apply them in their current form to other areas of the city. Moreover, they would not be effective for achieving the proposed built form objectives for the zone (i.e. high density, high quality, perimeter block development). That said, with the amendments as proposed by the Council (and as sought to be amended through CNZ's submission), I consider a mixed use zone would appropriately give effect to Policy 3 and the wider objectives of the NPS-UD.

19. In my view, applying the Mixed Use Zone of the operative plan to this location (with amendments to ensure development and the land use transition is appropriately managed) would best achieve the objectives and policies of the NPS-UD, notably:

Objective 2 - Enabling the competitive operation of land and development markets through the application of a flexible zone that provides for both the ongoing use and establishment of light industrial uses and the establishment of appropriately designed comprehensive housing.

Objective 3 – Enabling more people to live close to employment opportunities, with good public transport services and where there is high demand; and

Objective 8 – Supporting reductions in greenhouse gas emissions by enabling more people to live in a location that allows them to meet their day to day needs without the need for a car.

20. I agree with the conclusion of the section 32 evaluation⁹ that the alternative options considered are less appropriate, for the reasons cited.

21. I consider the appropriateness of the proposed amendments and CNZ's relief sought to the provisions for the mixed use zone in paragraphs 32-72 below.

⁸ Except along Blenheim Road and Main South Road.

⁹ [Commercial and Industrial Section 32 Report pages 74-80](#)

EXTENT OF THE PROPOSED MIXED USE ZONE AND PRECINCT

22. I support the notified boundary of the Mixed Use Zone which includes the existing light industrial areas of Sydenham (between Moorhouse and Brougham) and the industrial zone around the recently redeveloped Lancaster Park¹⁰. Whilst I do not have a firm view on whether a case can or should be made for a qualifying matter to apply to some parts of the industrial zone within the walkable catchment of the City Centre Zone, including Philipstown¹¹, I acknowledge that some parts of the zone may be more or less well-suited to land use transition than others (at least in the short to medium term) due to a number of factors including existing character, land uses and amenities. In my view, the extent of the Mixed Use Zone and Comprehensive Housing Precinct ought to be based on the ability of the area to achieve a well-functioning (including walkable) urban environment rather than the need to preserve it *exclusively* for industrial activities. That assessment should be future focused reflecting Objective 4 of the NPS-UD which states that urban environments including their amenity values are anticipated to develop and change over time in response to the diverse and changing needs of people, communities and future generations. I would suggest however that the larger the mixed use zone, the slower it will be to transition, and the more dispersed the take-up of opportunities and infrastructure investment will be, such that some areas may not be well-functioning for a long time.

23. Areas that are particularly well suited to transition to housing / mixed use in my view are those parts of the zone within the walkable catchment of the Sydenham and Addington commercial centres, areas that are contiguous with existing residentially zoned land and areas that have good access to existing greenspace (Lancaster Park, Hagley Park, Buchan Park and Sydenham Park). With the addition of new greenspace over time (as signalled through the PC14 provisions¹² and in line with council's levels of service for parks) the wider Sydenham area could also support the transition to walkable, mixed use neighbourhoods. Whilst the proposed provisions will improve street amenity over time by requiring active street edges and new frontage trees, supporting investment in amenities and infrastructure will be required outside of the district plan, as is similarly required for other intensification areas such as Hornby and the Central City Mixed Use Zones¹³. I note that Christchurch City Council is already considering

¹⁰ [Lancaster Park: Christchurch City Council \(ccc.govt.nz\)](http://ccc.govt.nz)

¹¹ Or exclusion of some parts on the basis of applying a lesser walkable catchment threshold to those areas.

¹² i.e. Proposed Greenway provision identified in Appendix 15.15.12.

¹³ [Preparations for south-east central neighbourhoods future growth gets underway: Newsline \(ccc.govt.nz\)](http://ccc.govt.nz)

the need for such investment for Sydenham in its Long Term Plan deliberations¹⁴ and that the Ōtautahi Urban Forest Plan¹⁵ proposes to increase tree canopy coverage in industrial and mixed use zones.

24. I agree that parts of the industrial zone around the Waltham rail yard and the old Waltham gas works site are less likely to be capable of achieving living environments consistent with a well-functioning urban environment (due to high and enduring levels of noise and land contamination) and where it would be appropriate to limit land uses to low density industrial activities (as per the notified proposal).

25. Finally, I acknowledge that transitioning from one land use to another takes time and investment and may have a few issues along the way but I consider that that in itself should not present an unwavering constraint to starting the journey. In my opinion, for areas where land use change is deemed appropriate, being clear about the long term objectives and setting clear planning parameters to guide that change is important, in the same way that has occurred for the Central City Mixed Use Zone. The alternative would be that the market is likely to respond in a speculative and unplanned manner, and which may result in opportunity costs and poorer outcomes.

PROPOSED PROVISIONS FOR THE MIXED USE ZONE – SYDENHAM AND LANCASTER AREAS

General approach

26. In paragraph 18 above, I set out why I consider that the operative Mixed Use Zone provisions (without change) are not appropriate to apply to the Sydenham and Lancaster Park areas as a method for giving effect to the objectives of the NPS-UD.

27. In my view the notified proposal addresses those deficiencies by including clear objectives and policies to guide the land use transition in a way that directly responds to the NPS-UD directions whilst managing potential land use conflicts and reverse sensitivity impacts. More specifically, the objectives and policies enable a flexible and competitive zoning and development framework that promotes high density living in an appropriate location and in a way that can make a meaningful contribution to the city's climate resilience.

¹⁴ [Video of CCC LTP Briefing 8 August 2023](#) (at 53m40s) and associated [City Growth & Partnership Activity Management Plan Slides](#) page 19

¹⁵ [CCC Urban Forest Plan June 2023](#)

28. The proposed provisions are future focused and supported by evidence about the current lack of affordable and diverse housing options in Christchurch¹⁶, whilst applying learnings from medium density developments in the Central City Mixed Use Zone¹⁷. In my view, the outcome of seeking higher density apartments and townhouses in a perimeter urban block structure is particularly appropriate in this location where this form can be readily absorbed into the existing industrial fabric of the area with less impact than is likely to occur in other (suburban residential) locations.
29. The proposed provisions prioritise the provision of mature trees and communal greenspace, as a response to the lack of existing greenspace and street amenity in much of the area¹⁸. I believe this will also improve the attractiveness of denser living for many people, noting that the Life in Christchurch Resident Survey results have repeatedly cited lack of greenspace and gardens as a reason many would not consider living in medium or high density housing typologies.
30. The proposed provisions recognise the contribution that more housing (especially car-lite housing) in this location can make to achieving the city's ambitious but pressing emissions reductions targets. Mr Hardcastle emphasises this point in section 3 of his evidence, concluding that areas like Sydenham have the potential to do more of the 'heavy lifting' in this regard to compensate for other areas where the potential for impact is more limited.
31. The provisions are workable and clear (with a few amendments as discussed in paragraph 59-60 below and in the evidence of Mr Johnson). The proposed approach to provide two consenting pathways for comprehensive housing - one more prescriptive but more certain and the other more qualitative in its approach to assessment (both restricted discretionary), provides applicants with clear guidance on the outcomes sought for development but with a pathway available for alternative schemes that do not meet the built form standards but still achieve the zone objectives. I agree that a permitted or controlled activity pathway would not be appropriate for this zone at this stage, given the need to be able to decline applications where significant reverse sensitivity impacts exist that cannot be managed and to enable an overall urban design assessment to be undertaken by the Council. The latter is particularly appropriate for new provisions in a new area where the outcomes have not yet been tested in practice.

¹⁶ [Section 32 Report](#) page 51.

¹⁷ [Section 32 Appendix 8](#) page 7.

¹⁸ *Ibid*, page 11.

Objectives, policies and rules that promote a walkable neighbourhood

32. CNZ's submission sought minor amendments to Objectives 15.2.3 and 15.2.4 and Policies 15.2.3.2(b), 15.2.4.1(b) and 15.2.4.2 to better promote a walkable and well-functioning future neighbourhood outcome. Several changes are sought to rules in Chapter 15.10 and 15.14.3.40.

33. Specifically, CNZ sought the addition of the words 'walkable' to Objective 15.2.3 and Policy 15.2.3.2(b) to better reflect the basis for the rezoning and to support future improvements that facilitate that outcome. In my view that is appropriate having regard to the Policy 3 directions which focus on walkable catchments and also because that policy wording better reflects rules that contribute to that outcome, such as the provision of active street interfaces and trees and the introduction of new connections to improve block permeability. Mr Lightbody has recommended that submission point be accepted-in-part for the objective, but not for the policy. For the above reasons I consider that reference to walkability in *both* the objective and policy is appropriate.

34. CNZ also sought additional clauses to Policy 15.2.3.2(b) to read:

“(b) Support mixed use zones located within a 15 walking distance of the City Centre Zone to transition into high quality **walkable** residential neighbourhoods by:

...

(iv) Encourageing...

(v) Limiting new high trip generating activities; and

(vi) Promoting a network of safe, convenient and attractive pedestrian and cycle connections within the zone and to adjoining neighbourhoods.

35. Along with this suggested policy amendment, CNZ sought changes to several permitted activity rules to implement the policy direction and support the neighbourhood transition to a more walkable environment over time. This includes limiting the location of service stations to arterial roads in the zone (Rule 15.10.1.1 P8) and limiting car parking to one space per 150m² GFA for permitted retail activities including yard based suppliers, trade suppliers, food and beverage outlets and second hand goods stores (Rules 15.10.1.1 P4-P7).

36. Kāinga Ora’s further submission ‘supports in part’ CNZ’s proposed changes to Policy 15.2.3.2(b) ‘where it aligned with the intent of their primary submission,” but opposes changes to the rules seeking to give effect to those clauses by limiting the location and parking associated with high trip generating activities. The reasons cited for the objection are that ‘parking is sufficiently directed by the NPS-UD’ and the limitation on service stations is ‘overly restrictive.’
37. Mr Lightbody recommends that clause (vi) be accepted but clause (v) and the limitations on activities P4-P8 be rejected. The reason for the officer’s objection to including clause (v) and limiting activities P4-P8 is that in his view these changes may be ultra vires in light of the recent Waikanae Environment Court case¹⁹. Whilst that is ultimately a matter for legal counsel, on my reading there does not appear to be anything in the Waikanae decision that precludes the introduction of new provisions to a new zone where needed to support, or as a consequence of, implementing the Policy 3 directions²⁰. That is, if land is rezoned because it is located within a walkable catchment area but needs some related provisions to ensure that the area meets the wider objectives of the NPS-UD, including that it contributes to a well-functioning urban environment and contributes to a reduction in greenhouse gas emissions, then it appears to me to be appropriate and necessary and not ultra vires. In my view the changes here are required to support an appropriate response to Policy 3 i.e., to limit or manage activities which are demonstrably incompatible with the enablement of high density housing and the outcomes sought for the zone. In any event, I understand that the Environment Court case is not binding on other councils and has been appealed.
38. In my view it would also be peculiar if the Enabling Housing Supply Act anticipated new and amended zones as a response to giving effect to Policy 3²¹ but did not anticipate that there would, as a consequence, be some differences in what activities are enabled and how they are managed. That is the very point of having different zones. However, if it is to be interpreted that new zones are anticipated but only if they are more enabling of activities to give effect to the Policy 3 directions, my view is that the enablement of the zone *as a whole* should be considered, not specific activities where limits on those activities are deemed necessary to facilitate the wider enablement in the zone in a way that is well functioning.

¹⁹ [2023-NZEnvC-056-Waikanae-Land-Company-Limited-v-Heritage-New-Zealand-Pouhere-Taonga.pdf](#)

²⁰ [RMA \(Enabling Housing Supply Act\) 2021 S80E\(i\)\(b\)\(iii\)\(B\)](#)

²¹ [RMA \(Enabling Housing Supply Act\) 2021 S77N\(3\)\(a\)](#)

39. In my view, there would be an inherent policy conflict with supporting high vehicular trip generating activities in an environment that is intended to transition to a more walkable and pedestrian friendly environment²² over time (notwithstanding its mixed use character). As such, I consider the proposed limitations on a small number of future incompatible activities to be appropriate for giving effect to Objective 15.2.3. I note that this is consistent with the Council's proposed limitation on incompatible industrial activities (metal product manufacturing and demolition and salvage yards) in notified Rule 15.10.1.1 P12²³.
40. Returning to the points raised by Kāinga Ora, it is my view that there is nothing in the NPS-UD that prevents the introduction of car parking maxima. The NPS-UD introduced directions to preclude *minimum* parking standards in district plans, so as *"to enable more housing and commercial developments, particularly in higher density areas where people do not necessarily need to own a car to access jobs, services or amenities"*²⁴. Guidance prepared by the Ministry for the Environment on the NPS-UD car parking policies specifically says that the NPS does not impact rules which set maximum parking rates²⁵. I note also that the Auckland Unitary Plan has maximum parking rules for some zones, and Waka Kotahi's National Parking Management Guidance²⁶ expressly acknowledges the role that management of private parking (including through maximum parking standards for activities in an area) can play to *"help break the cycle of automobile dependency."* Council's urban design evidence²⁷ demonstrates the need to minimise on site car parking to achieve a satisfactory living environment for residents in this location and Mr Hardcastle's evidence discusses in detail the need for, and benefits of, a bespoke response to car parking management in this location in the context of achieving walkable mixed use environments and responding to our emissions and VKT reductions targets. I note that the Emissions Reductions Plan also identifies an action for the Crown to promote innovation in low-emissions, liveable neighbourhoods²⁸.
41. I do not agree with Kāinga Ora that limiting the establishment of service stations on collector or local roads is onerous. In my view, these activities are inherently car dependent and likely to conflict with a well-functioning mixed-use environment. I note that there are several high

²² Policy 15.2.4.2(a)(i) – Design of new development (notified proposal)

²³ Refer to evaluation in the [Section 32 Report](#), pages 37 and 79.

²⁴ [car-parking-factsheet.pdf \(environment.govt.nz\)](#) page 2

²⁵ *Ibid*, page 2.

²⁶ [National parking management guidance \(nzta.govt.nz\)](#) page 13

²⁷ [Section 32 Appendix 8](#) page 14.

²⁸ Ministry for the Environment's [Emissions Reductions Plan](#) Action 7.5

profile arterial roads in the zone, so there would remain plenty of opportunities for service stations to establish in the area, and in locations where they predominantly choose to locate anyway. Whilst CNZ did not make a submission seeking a similar limitation on 'drive-through services,' the issues for that activity are the same and I would support consideration of that also if the scope of other submissions allows.

42. Ryman and the Retirement Villages Association (RVA) oppose the CNZ relief seeking to limit high trip generators in Policy 15.2.3.2(b) due to its potential to limit the establishment of retirement villages in the zone. Those submitters also seek an enabling and bespoke development framework in the MUZ for the establishment of retirement villages.

43. Mr Hardcastle addresses the merits of proposed clause (v) and the relief sought by Ryman and RVA in transport terms, in his evidence at paragraphs 4.14 – 4.20. He considers the relief sought by CNZ is appropriate but recommends that the policy wording be amended slightly to include the word 'vehicle' i.e. "limiting new high vehicle trip generating activities". I agree that change is more appropriate and would ensure that activities that by definition in chapter 7 that are deemed 'high traffic generating' due to their *size* rather than their actual traffic generation effects, are not captured. The words 'new' means that existing activities are not affected but over time the desired transition sought in Objective 15.2.3 will occur in a way that continues to provide for the same mix of activities but with the traffic environment improving (from a pedestrian perspective). Mr Hardcastle's evidence points out that retirement villages typically "generate around 80% fewer vehicle trips per dwelling than traditional housing"²⁹. On that basis, providing for retirement villages as a restricted discretionary activity would, in my view, be consistent with that policy direction. Having regard to section 32AA of the RMA, I consider that the proposed wording would be more appropriate for giving effect to Policy 3 of the NPS-UD and proposed Objective 15.2.3 by enabling more opportunities for housing, including retirement villages, but with appropriate limits to ensure that the area transitions in a way that is well-functioning.

Greenways and other connections

44. In response to another submission, Mr Lightbody recommends a change to Policy 15.2.3.2 clause (c) to read:

²⁹ Evidence of Mr Hardcastle, paragraph 4.16.

“c. ~~Avoid—Restrict~~ Comprehensive Residential Development of sites ~~within the Comprehensive Housing Precinct~~ that are identified in [Appendix 15.15.12](#) and [15.15.13](#) unless the relevant shared pedestrian / cycleway, greenway or road connection is proposed.

45. In my view the proposed change is inappropriate and would be ineffective for achieving the outcome sought which is to ensure urban blocks are not so large that they discourage walking³⁰. As I understand it, the rule is in place to preclude housing in that location unless or until such time as a new greenway is provided by a future developer or acquired by council through its collected development contributions. Without that constraint, there is a risk that the land could be developed for housing, without and precluding the necessary connections to improve block size / permeability. For that reason, I support the notified wording over the proposed wording now put forward by Mr Lightbody.

46. I note that Kāinga Ora expresses concerns with the proposed mechanism for protecting land for a future greenway, suggesting instead that the Council ought to designate the land if it is needed for a future connection. They also refer to the greenway rule as an “impediment.” In my view designation would be a less appropriate mechanism because that could have the effect of limiting the operation of existing industrial activities. The proposed policy and rule as notified, does not limit existing activities in any way, and only comes into effect if a developer wants to develop the land for housing. I have read and agree with the need for these connections as set out in the urban design evidence of Ms Williams³¹. I note her comments at paragraph 114 about the limited funds available for acquisition of future linkages which suggests that it will take some time for sufficient development contributions to be accumulated for land purchase such that designation is even less appropriate³². I note however that funding for strategic land acquisition is currently under consideration by the Council³³. For completeness, I also support the suggestion made by Ms Williams³³ of incentivising the provision of land for a greenway by not requiring these properties to provide the usual three metre landscape front yard.

47. CNZ sought the addition of two new pedestrian / cycle linkages from Kent Street to Burke Street and Disraeli Streets in Appendix 15.15.12 to improve connectivity for future residents.

³⁰ See evidence of Ms Williams para 81-82 and paragraph 102 (d)

³¹ [Evidence of Ms Nicola Williams](#) paragraphs 82-84

³² Because it could require immediate purchase under the Public Works Act.

³³ [Evidence of Ms Nicola Williams](#) paragraph 85

CNZ is no longer pursuing the link with Burke Street because the land concerned is currently residentially zoned not industrial (proposed Mixed Use) and therefore the rule would not apply to it. CNZ is still seeking the addition of a potential future link at the northern end of Kent Street. CNZ wrote to all potentially affected landowners to advise them of the submission and the opportunity for them to make a further submission. No submissions, in opposition or otherwise, were received. I agree with the merit of including an additional pedestrian / cycle link in that location should the land be redeveloped; it being a natural linkage that will greatly improve permeability through the area.

Greenhouse gas emissions

48. Kāinga ora (#834.241) seeks deletion of the reference to ‘greenhouse gas emissions’ in Objective 15.2.3. I do not support that relief for the reasons set out in CNZ’s further submission, namely that including the reference to greenhouse gas emissions:

- more appropriately implements Objective 8 and Policy 1 of the NPS-UD which specifically refers to urban environments supporting reductions in greenhouse gas emissions; and
- provides stronger alignment with the implementing policies and rules which promote a development and zoning framework that supports emissions reductions. This is achieved by promoting high density housing in an accessible location as well as promoting low carbon transport³⁴ and development³⁵.

49. In my view the government has sent a clear signal in both the NPS-UD and the Emissions Reductions Plan (**ERP**), that the resource management system has a key role to play in meeting the country’s climate change obligations. From 30 November 2022, it became a legal requirement for local government to ‘have regard to’ the ERP when preparing district plan changes. Focus Area 1 of the ERP is to reduce reliance on cars and support people to walk, cycle and use public transport. Guidance prepared to help local authorities implement the actions of the ERP identifies that RMA-related plans can support reductions in greenhouse gas emissions including by (relevantly):

³⁴ E.g., Rules 15.10.2.9 (j) and (i) and assessment matters 15.14.3.40 (Q).

³⁵ E.g., provisions that promote apartments and conversions and energy efficient design initiatives.

- Enabling people to live in communities with access to convenient, affordable and frequent public transport, and safer walkways and cycleways; reducing the distance people need to travel for their daily needs...;
- Enabling mixed use, medium and high density zoning that supports the efficient use of public transport, walking and cycling infrastructure;
- Reducing or discouraging activities that can increase transport emissions;
- Enabling strategic planning for the development and effective operation of the transport infrastructure required to lower emissions; and
- Making electric vehicle charging facilities and bicycle parking available in areas people live and work³⁶.

50. The provisions for the Mixed Use Zone to give effect to the Policy 3 directions, go a long way to not only 'having regard to' those directions, but 'giving effect to' them. They do this by promoting mixed use, high density zoning in an accessible location, managing new high vehicular trip generating activities and promoting housing that supports low emissions mobility. This planning response is a direct response to government's directions to reduce greenhouse gas emissions and therefore I consider specific reference to that is appropriate in the objective and policy framework.

Built form standards for Comprehensive Residential Development

51. CNZ sought several changes to the notified built form standards for Comprehensive Residential Development in the Mixed Use Zone (Rule 15.10.2.9) including:

- (a) Minor amendments to clauses (e) and (h) so that the glazing standards would also apply to development that fronts a greenway or other public open space, as well as a road.
- (b) Amendment to (h) to remove the height limit of apartments located on the south sides of streets.

³⁶ [national-adaptation-plan-and-emissions-reduction-plan-guidance-note.pdf \(environment.govt.nz\)](#) page 19.

(c) Amendment to the cycle parking rule in (j) so that it is located at grade and within a fully enclosed and lockage storage facility integrated within the building and accessed via a shared pedestrian path. Also, to add requirements for charging of e-bikes, cargo bike storage and visitor cycle parking.

(d) Removal of the maximum two space limit on parking for car share and disability parking.

52. The evidence of Ms Williams supports the proposed amendments (except for (b) above regarding building heights for south side properties)³⁷. It is unclear from the s42a reports of Mr Lightbody and Ms Piper what their positions are on this relief, but I note that the revised proposal does not make any of those changes sought by CNZ.

53. In my view the proposed amendments to standards (e) and (h) of Rule 15.10.2.9 as sought by CNZ are appropriate for the reasons cited in its submission. Without those amendments, there is a risk of inappropriate development fronting a greenway or another public open space (like Lancaster Park) resulting in non-active frontages that run counter to the principles of Crime Prevention Through Urban Design). That would not achieve the high quality objectives sought for development by Policy 15.2.3.2 (as notified).

54. In regard to the proposed standard to limit building height for properties on the south side of streets, I have considered the position of Ms Williams in her evidence (paras 110-113) and concur with it. Whilst Mr Johnson's solar modelling shows that 4-6 storeys would be possible for properties on the south side of streets, that does involve trade offs to the layout on the ground plane which might not be desirable from a space utilisation and yield point of view. In my view, three storey apartments would be an appropriate development response to the objectives of the zone and are more likely to ensure sufficient access to light for the enjoyment of residents. Taller developments would still be able to pursue development under the alternative pathway (RD4) and which might for example lend itself to an outcome where more height is achieved with the inclusion of a resident's roof garden.

55. Regarding the cycle parking standards, in my view and relying on the evidence of Mr Hardcastle, I consider that bespoke standards for cycle parking in the Mixed Use Zone are

³⁷ [Evidence of Ms Nicola Williams](#) paragraph 110.

appropriate given the greater role that active modes will need to play in the zone to achieve the objective of a walkable neighbourhood that reduces greenhouse gas emissions. Requiring cycle parking to be integrated within the building of these large comprehensive housing developments also has many benefits including impacting less on the shared communal spaces of developments and potentially greater security and peace of mind for residents. If that is not possible the RD4 pathway is available to consider other options.

56. Mr Lightbody states in his s42a report that the cycle parking rules would be more appropriately located in Chapter 7. I can understand why he suggests that but CNZ's submission was amending an *existing* cycle parking rule in Rule 15.10.2.9. I also see the benefit of retaining the rule in Chapter 15 because it would, in my view, ensure that it is considered as part of 'comprehensive' residential development early in the design stage as an integrated and integral component of the built form considerations. I note that there is precedent in the District Plan for transport rules to be located in the zone chapters where they address zone-specific amenity issues³⁸.

57. Whilst I would not oppose the rule being located in chapter 7, I would not want to see the intent of the provision diluted. I rely on the evidence of Mr Hardcastle regarding the need for a bespoke approach to parking, including cycle parking in this zone, including the need for appropriate charging facilities to support the increasing take-up of e-mobility anticipated in this future growth area. I note Ms Piper's recommendation for chapter 7 to include an advice note for providing e-charging facilities but in my view, there is a need to go further for the MUZ Zone given the zone objectives and built form requirements. Having regard to the potential costs and benefits of requiring e-charging points when a building is constructed, I would surmise that the costs of needing to retrospectively install charging points including getting the permission of all apartment owners and the costs associated with deterring the take-up of e-mobility, would not outweigh the benefits of early installation. In the context of the high costs associated with constructing comprehensive housing schemes (\$12M plus), the small initial outlay for e-charging facilities would not be onerous, in my view.

58. A final point on the charging of e-scooters and e-bikes, I note the current advice of Fire and Emergency Services is to charge away from sleeping areas due to the risk of fire³⁹. This

³⁸ See for example District Plan Rules 17.4.2.11, 17.5.2.7, 17.6.2.7, 17.7.2.7, 17.10.2.7.

³⁹ [Lithium-ion battery safety | Fire and Emergency New Zealand](#)

supports a view that early and careful consideration of e-charging at the initial stages of design can mitigate risks as well as encourage greater uptake of e-mobility.

59. Kāinga Ora's submission sought replacement of the MUZ rules for comprehensive housing to be replaced with an alternative set that was more 'workable.' In response, ChristchurchNZ engaged Mr Simon Johnson to evaluate how the rules work in practice, drawing on his extensive experience designing medium and high density housing developments. Mr Johnson's evidence outlines his analysis and concludes that the rules are workable subject to a number of amendments. These include:

- Removal of the 1:3 ratio requirement for the communal green space;
- Removal of the restriction on ground floor outdoor living space facing the street for sites located on the south side of streets; and
- Amendment of the standard limiting the extent of ground floor space dedicated to 'living area' so it reads 'living space' instead.

60. I rely on the expert evidence of Mr Johnson on these matters and support these changes being made to the provisions. On the basis of that evidence and having regard to s32aa of the RMA, I am of the opinion that the alternative rules would better achieve the outcome for high quality perimeter block development, sought by Policy 15.2.3.2 and objectives of the NPS-UD to achieve well-functioning urban areas.

Definitions

61. CNZ's submission sought a number of changes to amend or add new definitions for:

comprehensive residential development

- greenway
- shared pedestrian/cycleway
- accessible residential unit
- apartment building
- perimeter block development; and
- pedestrian access.

62. In some cases, definitions are indicated in the provisions (via green underlining) but definitions have not been included in chapter 2.


63. A number of changes were also sought to appendix 15.15.10⁴⁰ to show zoning consistent with the notified planning maps, add labels for the new mixed use zone areas and to add a label for the Main South Road area. A minor change to Appendix 15.15.14 was sought to include reference to 'greenway' as well as 'street' to clarify that the built form standards apply to a greenway in the same way that they would if it were a street.
64. The reporting officer's response to those submission points is not clear from the s42a report but no changes have been made to the revised version of Chapter 2 or Chapter 15 lodged with the Independent Hearings Panel.
65. I support changes being made to the provisions for the reasons set out in CNZ's submission and further submission, namely that they are required to provide clarity for plan users and to help understand and apply the Mixed Use Zone rules. In my view these changes would more appropriately implement Strategic Objective 3.3.2 which seeks clarity of language and efficiency so that the plan is easy to understand and use.
66. Kāinga Ora's further submission raises concern with the proposed wording of ChristchurchNZ's proposed definitions of 'Greenway' and 'Shared pedestrian/cycleway', suggesting they are overly restrictive and require amendment. I do not agree but would welcome further discussion with the submitter to better understand their concerns.
67. The submitter also opposes the wording of a new definition of 'accessible unit' proposed to be introduced by CNZ, stating that "accessible units should be provided through the wider Christchurch area". It appears that Kāinga Ora may be concerned that the proposed definition commences with the words "*For the purposes of the Mixed Use Zone (Sydenham and Waltham)...*". It appears that the submitter is not aware of a convention adopted for the District Plan at the request of the previous Independent Hearings Panel, to state the zone that a definition relates to if it only relates to one zone. CNZ's proposed wording adopts that convention and therefore I support that in this context where these definitions only apply to the MUZ Comprehensive Housing Precinct.

⁴⁰ # 760.20

ZONING OF “SYDENHAM YARD”

68. ChristchurchNZ has an interest (on behalf of Development Christchurch Limited) in land at Milton/Johnson Street in Sydenham (Lot 5 DP 559762). PC14 proposes to rezone it (part) High Density Residential Zone (Local Centre Precinct) and (part) Mixed Use Zone, reflecting the current split zoning of the site. ChristchurchNZ’s submission sought to rezone all of Lot 5 to High Density Residential (Local Centre Precinct), consistent with adjoining Lot 3 DP537999.

Figure 1: Operative and proposed zoning prior to boundary adjustment

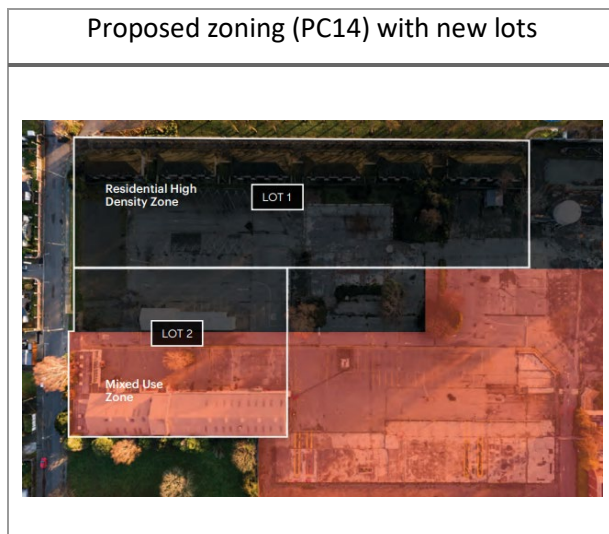
Operative zoning (CDP)	Proposed zoning (PC14)
	
<p>Lot 3 DP 537 999 and Lot 5 DP 559762</p>	

69. Lot 3 (DP 537999) has recently also been acquired by Development Christchurch Limited to form part of a wider site development opportunity, and a boundary adjustment⁴¹ made to create two new developable blocks (see **Figure 2** below). Expressions of interest are currently being sought from the market to develop one or both of the sites for housing⁴².

⁴¹ Subdivision consent reference RMA 2023 1044

⁴² <https://www.christchurchnz.com/media/cg1nt31p/expression-of-interest-sydenham-yard.pdf>

Figure 2: Proposed zoning following boundary adjustment



70. Mr Kleynbos' s42a report⁴³ says that he accepts-in-part CNZ's submission point on the rezoning but it was unclear from that report to what extent the relief is accepted. Mr Lightbody did not address it in his s42a report.

71. In my view it is highly desirable to avoid the split zoning of parcels because this can unnecessarily complicate the development and approvals process. A single consistent zoning would be more appropriate for this land, having regard to Strategic Objective 3.3.2 which seeks efficient plan provisions that minimise transaction costs. It is my opinion that residential zoning would be more appropriate than industrial or mixed use zoning given that the immediate context is primarily residential and the site benefits from excellent access to parks, shops and public transport. I consider the existing (part) industrial zoning of this land to be anomalous in the wider setting and only in place due to the site's historical use (with a neighbouring property) as an industrial depot. Residential zoning would, in my opinion, better achieve a well-functioning urban environment as sought by the NPSUD.

72. At a meeting with Council planning officers⁴⁴ on 11th September, clarification was provided by council staff that the 'accepted-in-part' recommendation in Mr Kleynbos' s42a report was to accept High Density Zoning over the whole site (i.e. Lot 3 DP537999 and all of Lot 5 DP 559762) but without the Local Centre Precinct (because the precinct is no longer supported by

⁴³ [Section 42a Report of Mr Ike Kleynbos](#) page 718 of 812

⁴⁴ Mr Ike Kleynbos and Mr Kirk Lightbody

officers). In my opinion that is appropriate, for the reasons set out above, and addresses ChristchurchNZ's concern. A note of that meeting is attached as **Appendix 2**.

CONCLUSION

73. In summary I conclude that Council's notified proposal to introduce a future focused mixed use zone to existing industrial land within the walkable catchment of the City Centre, would be the most appropriate response for giving effect to Policy 3(c)(ii) of the NPS-UD.

74. With a small number of amendments as proposed by ChristchurchNZ, the new zoning would provide for the continuing use of existing industrial uses whilst enabling higher value uses to establish over time. This will enable the potential of the area to transition to high density residential use that benefits from a central location to be realised, and in a way that will assist the city to meet its pressing emissions reductions targets.

APPENDIX A: RECOMMENDED CHANGES TO PROVISIONS

(changes to officer's s42a position)

Orange text is revised CNZ planning position

15.2.3.2 Policy - Mixed use areas outside the central city

...

b. Support mixed use zones located in Sydenham, Phillipstown and Mandeville Street within a 15 minute walking distance of the City Centre Zone to transition into high quality, walkable residential neighbourhoods by:

...

- i. enabling comprehensively designed high-quality, high-density residential activity;
 - ii. ensuring that the location, form and layout of residential development supports the objective of reducing greenhouse gas emissions and provides for greater housing diversity including alternative housing models;
 - iii. requiring developments to achieve a high standard of on-site residential amenity to offset and improve the current low amenity industrial environment and mitigate potential conflicts between uses;
 - iv. encourage small-scale building conversions to residential use where they support sustainable re-use, provide high quality living space and contribute to the visual interest of the area.
 - v. promoting a network of safe, convenient and attractive pedestrian and cycle connections within the zone and to adjoining neighbourhoods; and
 - vi. Limiting new high vehicular trip generating activities.
- c. Avoid Restrict Comprehensive Residential Development of sites within the Comprehensive Housing Precinct that are identified in Appendix 15.15.12 and 15.15.13 unless the relevant shared pedestrian/cycleway, greenway or road connection is provided.
- d. For sites identified within Appendix 15.15.12 and 15.15.13 encourage the connection to facilitate convenient and accessible through block connectivity.

Rule 15.10.1.1 Permitted activities

<u>P4</u>	<u>Food and Beverage Outlet</u>	<u>Nil.</u>
<u>P5</u>	<u>Trade supplier</u>	<u>a. Car parking shall be limited to 1 space</u>
<u>P6</u>	<u>Yard-based supplier</u>	<u>per 150sqm.</u>
<u>P7</u>	<u>Second-hand goods outlet</u>	
<u>P8</u>	<u>Service Station</u>	<u>a. Any service station in the Sydenham and Waltham Mixed Use Zones shall be located on a minor or major arterial road.</u>

15.10.2.9 Minimum standards for Comprehensive Residential Development

...

Streetscene and perimeter block development

- a. A site shall be no less than 1,800m² 2,000m² and have a minimum road boundary width of 24-metres.**

...

- e. Buildings fronting a street, greenway or other publicly accessible space and public open space shall include at least 20% glazing on each floor of the building.**
- g. At least 50% of the ground floor of the built development shall be living-area-space.**

Housing diversity and low emissions development

- h. Apartments adjacent to the street or greenway shall be provided, including**
- i. To a minimum of 4 storeys in height; or**
 - ii. To a minimum of 3 storeys for sites located on the south side of a street.**
- j. (i) Enclosed and lockable cycle storage for residents shall be provided at a minimum rate of 1 space per bedroom, located at grade within a fully enclosed and lockable storage facility**

integrated within the building and accessed via a shared pedestrian access from the street or a shared path from within a greenway adjacent to the communal open space.

(ii) For every 5 residential units, 1 cycle park with a charging point shall be provided within the cycle storage facility that can accommodate a cargo bike; and

(iii) 1 cycle park per 1- residential units shall be provided for visitors to the site, accessed from a shared pedestrian access and located adjacent to the communal open space. Visitor cycle parking shall also comply with rules 7.5.2(a)(ii) to (viii) and (x).

l. The maximum onsite car parking to residential unit ratio shall be 0.1 across the Comprehensive Residential Development. Car parking onsite shall only be provided for in the following circumstances:

- i. ~~A maximum of two car parking spaces~~ for a residential car scheme across the Comprehensive Residential Development.**
- ii. A maximum of one space per accessible residential unit.**

Outdoor living space (communal and private) and sunlight access

m. At least 10% of the site must be communal outdoor living space and include:

- i. A minimum dimension of 7 metres**
- ii. ~~A ratio of 1:3 in terms of length and width e.g. the length cannot exceed 1m where the width is 3m.~~**
- iii ii Trees capable of maturing to 8 metres at a rate of 1 per 100sqm of open space.**

p. Any ground floor outdoor living space shall not be located adjacent to the street. This rule does not apply to comprehensive residential development on sites on the south side of streets.

Definitions

Greenway (new)

For the purposes of the Mixed Use Zone (Sydenham and Waltham), means:

“a high amenity corridor for the use of pedestrians, people on bikes and other active transport modes, in addition to the provision of landscaping, trees, stormwater management and informal recreation space. Greenways are not open to general traffic, except authorized maintenance vehicles”.

Shared pedestrian / cycleway (new)

“For the purposes of the Mixed Use Zone (Sydenham and Waltham), means:

a publicly accessible corridor for the use of pedestrians, people on bikes and other active transport modes that is not open to general traffic, except authorized maintenance vehicles”.

Accessible residential units (new)

“For the purposes of the Mixed Use Zone (Sydenham and Waltham), means:

A residential unit that is located, constructed, and configured to allow for people of all ages and abilities to move freely and independently, and meet their functional requirements, to and within the unit”.

Comprehensive residential development (Amend)

Comprehensive residential development ~~in relation to the Residential New Neighbourhood Zone Future Urban Zone~~, means a development of three or more residential units which have been, or will be, designed, consented and constructed in an integrated manner (staged development ~~may is~~ not ~~be~~ precluded). It may include a concurrent or subsequent subdivision component.

Pedestrian access (Amend)

~~A dedicated pathway that provides access for pedestrians from the street to a residential unit and to any parking area for that residential unit.~~

A pathway dedicated to the provision of access for pedestrians.

Appendices

Appendix 15.15.10 – Mixed Use Zones – as per relief sought in CNZ submission

Appendix 15.15.12 – Comprehensive Housing Precinct Development – Sydenham – amend to include new connection from Kent Street to Disraeli Street only

Appendix 15.15.14 – Comprehensive Housing Precinct Bulk and Built Form Standards Diagram – amend to include reference to greenway.

APPENDIX B: NOTE OF CNZ / CCC MEETING – PC14 ZONING OF SYDENHAM YARD

APPENDIX B: NOTE OF CNZ / CCC MEETING – PC14 ZONING OF SYDENHAM YARD

Record of Meeting – PC14 Submitters

Meeting date:	12/9/2023		
Location:	ChristchurchNZ Offices		
Subject:	Zoning of Sydenham Yard		
Council Staff:	Ike Kleynbos – Principal Policy Planner Kirk Lightbody – Policy Planner	Submitter name:	ChristchurchNZ
Submitter / Representatives:	Adele Radburnd Alice Johnson	Submitter number:	760

1 Topics discussed:

- 1.1 Zoning of Sydenham Yard

2 Submitter queries / concerns:

- 2.1 ChristchurchNZ has an interest in land at 2 Barnett Ave and 14 Johnson Street, Sydenham, referred to as “Sydenham Yard”.
- 2.2 PC14 proposes to rezone the land (part) High Density Residential Zone (Local Centre Precinct) and (part) Mixed Use Zone, reflecting the operative split zoning of the site. ChristchurchNZ’s submission sought to rezone all of Lot 5 DP 559762 to High Density Residential (Local Centre Precinct), consistent with adjoining Lot 3 DP537999 (which it is also in the process of acquiring to form a larger development site).
- 2.3 Council s42A reporting recommended to accept in part the relief of ChristchurchNZ, but it was unclear what aspects were accepted.

3 Council response:

- 3.1 Council officers confirmed that the recommendation to ‘accept in part’ relates to accepting the High Density Residential Zoning request from ChristchurchNZ and removing the Local Centre Precinct which was applicable to the site from the notified version of PC 14.
- 3.2 For the NIWA site (outside of ChristchurchNZ’s submission) Council will recommend a separate Mixed Use Zoning through scope of other submissions to avoid a similar split zoning of that land.

4 Concluding comments / next steps/ actions:

- 4.1 ChristchurchNZ and CCC are in agreement regarding the High Density Residential Zoning for the entirety of Lot 3 DP 537999 and Lot 5 DP 559762.
- 4.2 Council will provide this memo that can be attached to ChristchurchNZ’s planning evidence to confirm ChristchurchNZ and CCC’s position.

5 Attachments:

APPENDIX B: NOTE OF CNZ / CCC MEETING – PC14 ZONING OF SYDENHAM YARD

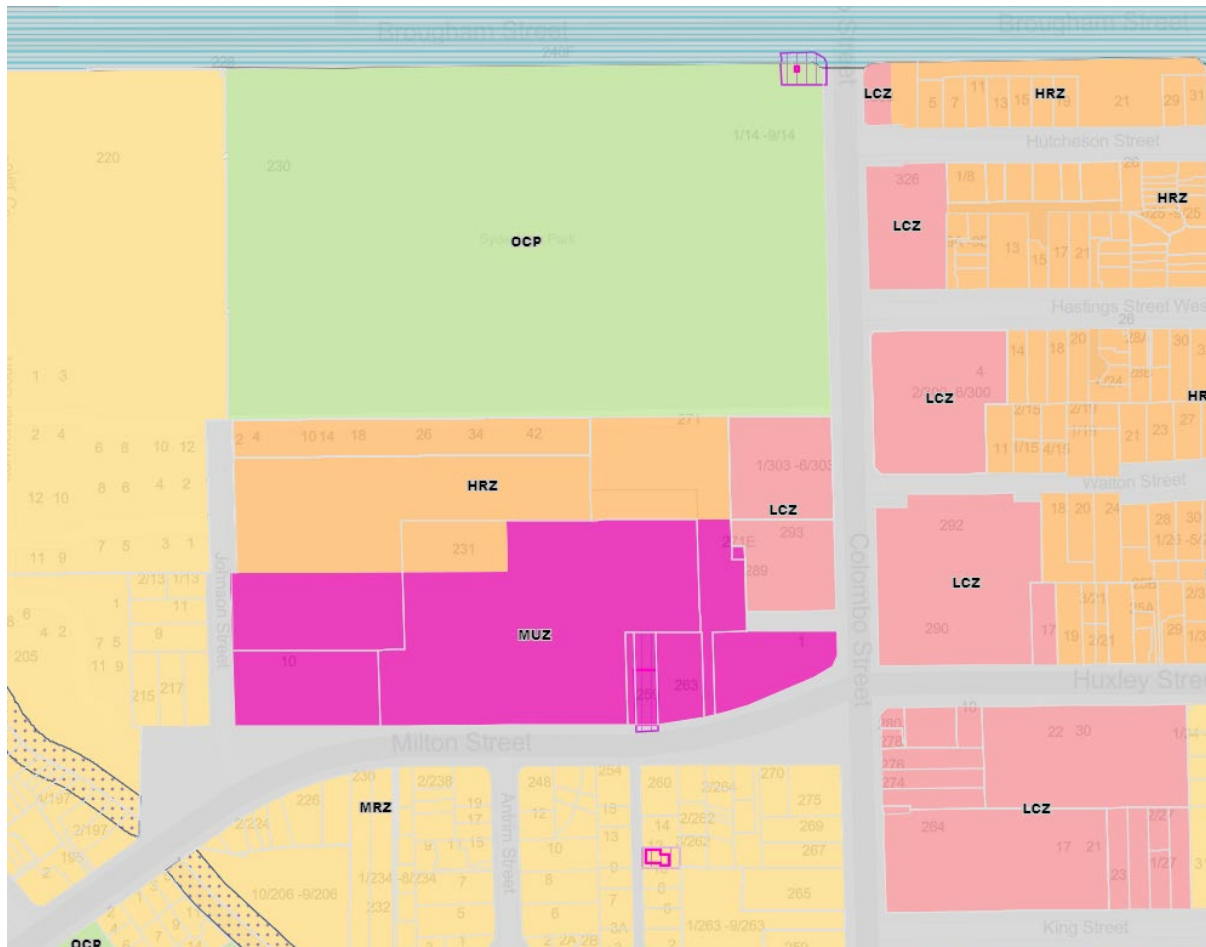
5.1 Map of Sydenham Yard Site from PC 14 zoning maps.

5.2 Aerial Map of Sydenham Yard Site Operative District Plan

Signatories: Ike Kleynbos, Kirk Lightbody, Adele Radburn

Author	Kirk Lightbody
Date	12/9/23

Attachment 5.1 – PC14 Notified Zone Map of Sydenham Yard Site



APPENDIX B: NOTE OF CNZ / CCC MEETING – PC14 ZONING OF SYDENHAM YARD

Attachment 5.2 – Aerial Map of Sydenham Yard Site Operative District Plan



Legal Description: Lot 3 DP537999
Lot 5 DP559762