

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of Proposed Plan Change 14 to the Operative
Christchurch District Plan

**SUMMARY STATEMENT OF MARK NICHOLAS ARBUTHNOT FOR
LENDLEASE NEW ZEALAND LIMITED IN RELATION TO PC14:
HOUSING AND BUSINESS CHOICE**

31 OCTOBER 2023

1. INTRODUCTION

- 1.1 My full name is Mark Nicholas Arbuthnot.
- 1.2 I have prepared a Statement of Evidence dated 20 September 2023 in relation to Proposed Plan Change 14 (Housing and Business Choice) (“**PC14**”) on behalf of Lendlease New Zealand Limited (“**Lendlease**”), who have sought amendments to recognise Hornby as a Metropolitan Centre in giving effect to the NPS-UD.
- 1.3 This Summary Statement of Evidence (“**Summary Statement**”) has been prepared to provide an overview of the key matters raised in my Statement of Evidence.
- 1.4 In preparing this Summary Statement, I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and that I agree to comply with it. My qualifications as an expert are set out in my Statement of Evidence.

2. NATIONAL POLICY STATEMENT – URBAN DEVELOPMENT

- 2.1 Objective 3 requires district plans to enable more people to live in, and more businesses and community services to be located in, areas of an urban environment where:
- (a) the area is in or near a centre zone or other area with many employment opportunities; or
 - (b) the area is well-serviced by existing or planned public transport; or
 - (c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.
- 2.2 I consider that objective 3 requires a clear framework to be put in place to direct urban intensification to appropriate locations to support planned growth and to create a more efficient development pattern.

2.3 Policy 3 and policy 4 of the NPS-UD support a centres based approach, and intensification within and around centres according to their hierarchy. By not differentiating between metropolitan centres and town centres, I am of the opinion that PC14 does not encourage the “Priority Development Areas” of Hornby, Riccarton, and Papanui to grow to meet their potential, role, and catchment, and does not appropriately provide for the level of intensification required by the NPS-UD.

3. DRAFT GREATER CHRISTCHURCH SPATIAL PLAN

3.1 The draft Greater Christchurch Spatial Plan (“**draft Spatial Plan**”) is a Future Development Strategy (“**FDS**”) under the NPS-UD¹ (and will replace the 2018 FDS that was prepared under the 2016 version of the NPS-UD). I understand that the hearings of submissions on the draft Spatial Plan will be completed on 3 November 2023, and that the plan will be adopted in early 2024.

3.2 Subpart 4 of the NPS-UD² requires Council to have regard to the relevant FDS when preparing or changing RMA planning documents.

3.3 The draft Spatial Plan, which is an FDS, identifies the Central City as the “primary centre” and Riccarton, Hornby, and Papanui as “significant urban centres” that will:

- (a) Function as significant employment centres and major towns to improve the productivity and growth of economic activity and attract additional businesses investment.
- (b) Have an important role to play in accommodating higher levels of future growth.

3.4 Specific to Hornby:³ (emphasis added)

The opportunity is to transition the current poor quality urban form of Hornby, which has a wide mix of business and industrial activities, low density and poor quality residential, and low tree cover, **into the second sub-regional service centre after the Central City.**

¹ Pg.23; Greater Christchurch Spatial Plan (Draft for consultation).

² Clause 3.17; National Policy Statement on Urban Development 2020.

³ Pg.37; Greater Christchurch Spatial Plan (Draft for consultation).

Hornby is strategically positioned in relation to Christchurch Airport and the western areas of Greater Christchurch. There is the opportunity for regeneration and significant brownfield redevelopment to enhance its urban form, support community integration, and provide a stronger and more integrated centre core with the transition of surrounding areas from industrial to high density residential (50 to 100 households per hectare).

- 3.5 Not only is Hornby envisaged to be supported in the long term by mass rapid transit, but it is also intended to develop “...into the second sub-regional service centre after the Central City” and has been identified as offering “...significant opportunities for change”, including “...accelerated urban development at the right scale”.
- 3.6 Both the “Greater Christchurch Spatial Plan and Mass Rapid Transit Indicative Business Case Briefing” (at page 6), and the “Urban Form Scenarios Evaluation Report” (at pages 6 and 7), which inform the draft Spatial Plan, identify Hornby as a “significant sub-regional centre”.
- 3.7 I note that no amendments have been recommended by officers to the hearings panel in respect of those parts of the draft Spatial Plan that are relevant to Hornby. Nor am I aware of any submissions on the draft Spatial Plan opposing the strategic direction for Hornby.
- 3.8 I consider the draft Spatial Plan to be the relevant FDS to inform PC14. It clearly identifies that Hornby has a role and function as a sub-regional centre, and that this status is expected to continue.

4. REZONING OF HORNBY TOWN CENTRE TO METROPOLITAN CENTRE

National Planning Standards’ description of Metropolitan Zone

- 4.1 When determining the nearest equivalent zone, I consider it necessary to have regard to both the existing and future function of Hornby, including whether it services a sub-regional catchment. This is more likely to provide a more accurate and beneficial classification that is in line with the intent of the National Planning Standards and the intensification outcomes of the NPS-UD.
- 4.2 When regard is had to the distinction that the draft Spatial Plan makes between the “significant urban centres” and the other “locally important

urban centres and towns” of Shirley, Linwood, North Halswell, Belfast, etc., it is clear to my mind that Riccarton, Hornby, and Papanui are intended to perform a sub-regional role.

- 4.3 Mr Colegrave, on behalf of Kainga Ora identifies in his statement of economic evidence that Hornby, Papanui, and Riccarton have a significantly higher retail spend than all other centres in the city, except the CBD,⁴ and serve broad, sub-regional catchments, which best reflect the roles and functions of metropolitan centres, not town centres.⁵ In Mr Colegrave’s opinion:⁶

...They already fulfil diverse roles and functions for customers from diverse/sub-regional catchments, and these catchments will naturally grow over time alongside the population and economic activity.

Classifying the three centres as metros would also signal to the market that they are primed for significant development *now*. It would help provide the certainty needed to de-risk and stimulate private sector investment to complement significant, planned public expenditure. Absent that certainty, the market will likely adopt a “wait and see” approach, which would hamper realisation of the city’s true potential and delay progress towards a more compact, urban form.

- 4.4 In my opinion, and having regard to the evidence of Mr Colegrave, Hornby provides a broad range of commercial, community, recreational, and residential activities, and is a focal point for a sub-regional urban catchment, consistent with the National Planning Standards’ description of the Metropolitan Centre Zone. This is also consistent with the draft Spatial Plan which identifies Hornby as a sub-regional centre. It follows that Hornby should be defined as a Metropolitan Centre in the District Plan in accordance with the National Planning Standards, and in implementing the NPS-UD.

Effects on City Centre Zone

- 4.5 Having regard to the economics evidence of Dr Fairgray on behalf of Scentre (New Zealand) Limited, limiting the development potential of significant urban centres such as Hornby to improve the City Centre’s competitiveness and to facilitate its ongoing recovery is not, in my

⁴ Para. 5.15; Statement of Evidence of Fraser Colegrave on behalf of Kainga Ora – Homes and Communities.

⁵ Para. 5.17; Ibid.

⁶ Para. 5.20; Ibid.

opinion, consistent with the direction of the draft Spatial Plan or the intensification outcomes of the NPS-UD:⁷

It is important to not give primacy to the CBD through constraining growth unnecessarily in the other major centres, including by keeping their status below the Metropolitan Centre Zone. It is critical to monitor the status of other major centres independently of the primacy of the CBD, and not see the primacy of status translate through to a primate CBD, where [the] city does not perform effectively and growth is constrained.

- 4.6 In terms of height, the difference in height between the 45m proposed for Hornby and the 90m planned for the City Centre Zone is substantial, ensuring that the City Centre retains its primacy as the core urban area. Furthermore, while the evidence of Mr Heath⁸ raises concern that higher densities within centres such as Hornby may detract from the (re)development of the City Centre, the economic viability of developments in the City Centre, as highlighted by Ms Allen's evidence, indicates that the height at which developments become profitable in the City Centre is significantly higher than what is proposed for Hornby.
- 4.7 Further, the evidence of Mr Colegrave advises that the potential risk of the increased height and density of built form challenging the primary and vibrancy of the city centre is minimal and that enabling and attracting buildings in the city's (proposed) metropolitan centres does not necessarily reduce the rate or quality of city centre development.⁹
- 4.8 In respect of office activity, Mr Colegrave goes on to state that should the Panel consider that the metropolitan centre zoning of Hornby, Papanui, and Riccarton challenges the primacy and vibrancy of the city centre, a cap of 1,000m² could be applied to office tenancy "to ensure that top-tier firms seeking large floorplates remain concentrated in and around the CBD".¹⁰ I agree that, if this is considered necessary, a constraint of this nature can be imposed on the Metropolitan Centre Zone provisions that have been proposed within my statement of evidence. Beyond that, Mr Colegrave does not consider it necessary to impose activity restrictions.¹¹

⁷ Para. 5.7; Statement of James Fairgray for Scentre (New Zealand) Limited.

⁸ At paragraph 165.

⁹ Para. 5.24; Statement of Evidence of Fraser Colegrave on behalf of Kainga Ora – Homes and Communities.

¹⁰ Para. 5.27; Ibid.

¹¹ Para. 5.28; Ibid.

- 4.9 I am therefore of the opinion that the City Centre will continue to be the most attractive and efficient location for high-density developments, and the proposed metropolitan zoning for Hornby will not detract from this. Instead, it will allow Hornby to serve its sub-regional catchment more effectively without compromising the development potential and primacy of the City Centre.

Effects on surrounding land

Effects of intensification of industrial-zoned land

- 4.10 If Council is concerned that the enablement of building heights of up to 6 storeys is inappropriate for the Industrial General Zone and Industrial Heavy Zone at Hornby within the walkable catchment of the centre, I note that within the walkable catchment, the following height standards apply to the Industrial General and Industrial Heavy zones:

- (a) Standard 16.4.2.1 restricts the maximum height of buildings within the Industrial General Zone to 15m where they are located within 20m of a residential or rural zone. Otherwise, there is no maximum height or building coverage constraint.
- (b) Standard 16.5.2.1 restricts the maximum height of buildings within the Industrial Heavy Zone to 15m where they are located within 20m of a residential or rural zone. Otherwise, there is no maximum height or building coverage constraint.

- 4.11 I consider that Standards 16.4.2.1 and 16.5.2.1 adequately address the amenity effects and recommend that they are retained and applied as a qualifying matter to those parts of the Industrial General Zone and Industrial Heavy Zone that are located within a walkable catchment.

Reverse sensitivity effects on industrial zoned land

- 4.12 While I agree that residential intensification within Hornby proximate to the Industrial General Zone and Industrial Heavy Zone has the potential to result in increased reverse-sensitivity effects, I note that PC14 already incorporates the High Density Residential Zone in locations that are directly adjacent to these Industrial zones.

4.13 PC14 addresses the potential reverse sensitivity effects of this additional building height and density through the application of the “Industrial Interface Qualifying Matter Area” (which restricts building height to 8m).

4.14 This qualifying matter has been applied to all residential/industrial zone interfaces within Hornby. I am therefore of the opinion that matters pertaining to reverse sensitivity have been sufficiently addressed.

5. AMENDMENTS TO DISTRICT PLAN PROVISIONS TO FACILITATE METROPOLITAN CENTRE ZONE

5.1 The specific provisions that are proposed for the Metropolitan Centre Zone, and the associated amendments to the District Plan provisions, are set out within Lendlease’s submission and reproduced as **Attachment 1** and **Attachment 2** respectively to my statement of evidence.

5.2 I support the changes that are proposed by Lendlease, and for the benefit of the Panel, I have collated my primary evidence with reference to section 32AA of the RMA, which is appended as **Attachment 3**.

5.3 I note that the economic evidence of Mr Colegrave identifies the following economic costs and benefits in respect of the metropolitan rezoning of Hornby, Papanui, and Riccarton:

(a) Taller buildings improve viability in the local context, and enabling greater height will boost the number of financially viable developments that can be delivered by the market over time.¹²

(b) Taller and higher density buildings foster economic vibrancy by concentrating residents, businesses, commercial spaces, and cultural institutions near one another, giving rise to agglomeration benefits and boost foot traffic for retailers and service providers.¹³

¹² Para. 5.47; Statement of Evidence of Fraser Colegrave on behalf of Kainga Ora – Homes and Communities.

¹³ Para. 5.49(a); Ibid.

- (c) Taller and higher density buildings optimise the use of high value urban land, accommodating more people and providing greater amenities within the existing urban.¹⁴
- (d) Building upwards in established areas (i.e. intensification) can help reduce infrastructure needs by consuming spare capacity within existing networks but may trigger upgrades in networks close to capacity. Generally, though, intensification is thought to improve infrastructure efficiency, especially in relation to transport.¹⁵
- (e) As density increases, so too does the potential for adverse effects from living and working closer to one another. While the suite of effects arising from this situation varies, the most common are traffic congestion, noise pollution, loss of sunlight, and overcrowded public spaces.¹⁶

5.4 Overall, Mr Colegrave considers the provision of additional height in and around centres to have positive economic benefits and will address a shortfall of 110ha of commercial floorspace capacity, identified in the 2023 Business Capacity Assessment (“**BCA**”).¹⁷ As it is not possible to create more land in existing centres, or create new centres of the scale required, Mr Colegrave considers that the provision of greater height is the best way to address the shortfall.¹⁸

Mark Arbuthnot

31 October 2023

¹⁴ Para. 5.49(c); Statement of Evidence of Fraser Colegrave on behalf of Kainga Ora – Homes and Communities .

¹⁵ Para. 5.49(d); Ibid.

¹⁶ Para. 5.49(e); Ibid.

¹⁷ Para. 5.58; Ibid.

¹⁸ Para. 5.60; Ibid.

Attachment 3

Nature of assessment	RMA provision	Assessment
Objectives of the proposal	S32(1)(a) – examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act	<p><u>Objective of the proposal</u></p> <p>Plan Change 14 is an Intensification Planning Instrument (IPI), which the Council is required to progress in order to provide for urban intensification pursuant to the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. Plan Change 14:</p> <ol style="list-style-type: none"> i. includes new objectives and policies relating to a well-functioning urban environment and providing for a variety of housing types and sizes; and ii. incorporates Medium Density Residential Standards (MDRS) in most existing residential areas across the city, enabling the development of up to three residential units per site, where each building must not exceed 11 metres in height with some additional height enablement for sloped roofs; and iii. gives effect to policy 3 and 4 of the National Policy Statement on Urban Development 2020 (NPS-UD), as also set out in Schedule 3B to the RMA. <p>Policy 3 of the NPS-UD requires district plans to enable building heights and density of urban form in the city centre zone, metropolitan centre zone, within walkable catchments of those centres and rapid transit stops, and within and adjacent to other (lower order) centres. Policy 3 supports objective 3 which requires district plans to enable more people to live in, and more businesses and community services to be located in, areas of an urban environment where:</p> <ol style="list-style-type: none"> (a) the area is in or near a centre zone or other area with many employment opportunities; or (b) the area is well-serviced by existing or planned public transport; or (c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment. <p>The submission of Lendlease identifies that Hornby functions as a metropolitan centre, being a key destination area that serves a catchment beyond its immediate and adjoining suburbs. It is a focal point for the surrounding sub-regional urban catchment, and with more than 12,000 new homes expected in Christchurch’s south-west by 2044, it has the potential to become a more prominent metropolitan centre in the future.</p> <p>The submission concludes that the most appropriate method to enable Hornby’s future growth, including a commensurate level of commercial activity and community and recreational services, is through the intensification and diversification opportunities delivered through the application of the Metropolitan Centre Zone to the Hornby Commercial Core.</p>

		<p><u>Appropriateness to achieve the purpose of the Act</u> Objective 3 of the NPS-UD requires a clear framework to be put in place to direct urban intensification to appropriate locations to support planned growth and to create a more efficient development pattern.</p> <p>Policy 3 and policy 4 of the NPS-UD support the centres hierarchy and intensification within and around urban centres. By not differentiating between metropolitan centres and town centres, PC14 does not encourage the “Priority Development Areas” of Hornby to grow to meet their potential, role, and catchment, and will fail to achieve the intensification requirements and benefits of the NPS-UD.</p> <p>The draft Greater Christchurch Spatial Plan (“draft Spatial Plan”) is a Future Development Strategy (“FDS”) under the NPS-UD (and will replace the 2018 FDS that was prepared under the 2016 version of the NPS-UD).</p> <p>Subpart 4 of the NPS-UD requires Council to have regard to the relevant FDS when preparing or changing RMA planning documents.</p> <p>The draft Spatial Plan identifies Hornby as a “significant urban centre” (alongside the Central City, Riccarton corridor, and Papanui), that will:</p> <ul style="list-style-type: none"> (a) Function as significant employment centres and major towns to improve the productivity and growth of economic activity and attract additional businesses investment. (b) Have an important role to play in accommodating higher levels of future growth. <p>Not only is Hornby envisaged by the draft Spatial Plan to be supported in the long term by mass rapid transit, but it is also intended to develop “...into the <i>second sub-regional service centre after the Central City</i>” and has been identified as offering “...<i>significant opportunities for change</i>”, including “...<i>accelerated urban development at the right scale</i>”.</p> <p>It is essential to have regard to the existing and future function of Hornby, including whether it services a sub-regional catchment, in determining the appropriate equivalent zone.</p> <p>Hornby provides a broad range of commercial, community, recreational, and residential activities, and is a focal point for a sub-regional urban catchment, consistent with the National Planning Standards’ description of the Metropolitan Centre Zone. This is also consistent with the draft Spatial Plan which identifies Hornby as a sub-regional centre. The Greater Christchurch Future Mass Rapid Transit Indicative Business Case also supports and recognises Hornby’s role as a major centre.</p>
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Nature of assessment	RMA provision	Assessment
Provisions in the proposal appropriate to achieve objectives	S32(1)(b)(i) – identifying other reasonably practicable options for achieving the objectives	<p>It follows that Hornby must be defined as a Metropolitan Centre in the District Plan in accordance with the National Planning Standards, and in implementing the NPS-UD.</p> <p>One reasonably practicable option for achieving the objective of PC14 and Lendlease’s submission is to retain a “Town Centre Zone” for Hornby, with additional development opportunity compared to other town centres. This is the approach that is preferred by Council, as recommended within the s.42A Report.</p>
	S32(1)(b)(ii) – assessing the efficiency and effectiveness of the provisions in achieving the objectives	<p>The provisions proposed by Lendlease in respect of the application of the Metropolitan Centre Zone to Hornby are considered to be more efficient and effective of achieving the objectives of PC14 when compared to the town centre approach that is preferred by Council.</p> <p>Objective 3 of the NPS-UD requires a clear framework to be put in place to direct urban intensification to appropriate locations to support planned growth and to create a more efficient development pattern.</p> <p>Policy 3 and policy 4 of the NPS-UD encourage a hierarchy of development in and around urban centres. By not differentiating between metropolitan centres and town centres, PC14 does not encourage the “Priority Development Areas” of Hornby, Riccarton, and Papanui to grow to meet their potential.</p> <p>The distinction between a "Metropolitan Centre Zone" and a "Town Centre Zone" is based on the range of activities and the area they serve. The "Metropolitan Centre Zone" is described as a focal point for sub-regional urban catchments, implying a larger area of influence and a broader range of activities. Whereas, the "Town Centre Zone" is more localised, serving the needs of immediate and neighbouring suburbs.</p> <p>As Hornby provides a broad range of commercial, community, recreational, and residential activities, and is a focal point for a sub-regional urban catchment and is identified as a sub-regional centre by the draft Growth Strategy, it follows that Hornby should be defined as a Metropolitan Centre in the District Plan in accordance with the National Planning Standards, and in implementing the NPS-UD.</p> <p><u>Height</u> In respect of height, while the 45m sought by Lendlease is a further increase to the 32m recommended by Council, it does not alter the existing primacy or further challenge the City Centre’s development potential on less prominent sites.</p>

Nature of assessment	RMA provision	Assessment
		<p>For the balance of the City Centre Zone, the difference in height between the 45m proposed for Hornby and the 90m planned for the City Centre Zone is substantial, ensuring that the City Centre retains its primacy as the core urban area. Furthermore, while the evidence of Mr Heath raises concern that higher densities within centres such as Hornby may detract from the (re)development of the City Centre, the economic viability of developments in the City Centre, as highlighted by Ms Allen’s evidence, indicates that the height at which developments become profitable in the City Centre is significantly higher than what is being proposed for Hornby.</p> <p>While there are areas within the City Centre Zone that are subject to qualifying matters that have the effect of restricting maximum heights to 16m, 28m, or 45m, this has occurred as the characteristics of these areas makes the level of urban development required under Policy 3(a) of the NPS-UD to be inappropriate (thereby ensuring high quality urban design outcomes). It is not appropriate to use this outcome as a reason to constrain growth in other centres such as Hornby.</p> <p>To achieve a well-functioning urban environment and its broader efficiency and sustainability outcomes, the NPS-UD requires intensification to occur not only within city centre zones, but within metropolitan zones and within walkable catchments of these centres and existing and planned rapid transit stops. For example, enabling greater levels of office activities at Hornby which provides more local employment, and employment opportunities closer to where people live, and supporting competitive land and development markets is ‘better’ at giving effect to the NPS UD than concentrating such activities within the CBD.</p> <p>The evidence of Mr Colegrave advises that the potential risk of the increased height and density of built form challenging the primary and vibrancy of the city centre is minimal and that enabling and attracting buildings in the city’s (proposed) metropolitan centres does not necessarily reduce the rate or quality of city centre development.¹</p> <p><u>Office</u> In respect of office activity, the evidence of Mr Colegrave states that should the Panel consider that the metropolitan centre zoning of Hornby, Papanui, and Riccarton challenges the primacy and vibrancy of the city centre, a cap of 1,000m² could be applied to office tenancy “to ensure that top-tier firms seeking large floorplates remain concentrated in and around the CBD”.² If this is considered necessary, a constraint of this nature can be imposed on the Metropolitan Centre</p>

¹ Para. 5.24; Statement of Evidence of Fraser Colegrave on behalf of Kainga Ora – Homes and Communities.

² Para. 5.27; Ibid.

Nature of assessment	RMA provision	Assessment
		<p>Zone provisions that have been proposed within my statement of evidence. Beyond that, Mr Colegrave does not consider it necessary to impose activity restrictions.³</p> <p><u>Residential</u> Mr Colegrave has provided evidence that the capacity for residential development enabled by PC14 is focused in specific suburbs and has not sufficiently considered if it would enable a variety of homes that meet the needs, in terms of type, price and location of different households (Policy 1(a)(i) of the NPS-UD). Enabling greater height in the Metropolitan Centres will enable apartment building development, including the potential for build to rent, providing for different housing typologies, locations, and price points.</p> <p><u>Effects of intensification of industrial-zoned land</u> If Council is concerned that the enablement of building heights of up to 6 storeys is inappropriate for the Industrial General Zone and Industrial Heavy Zone at Hornby within the walkable catchment of the centre, then a qualifying matter can be applied. However, within the walkable catchment, the following height standards apply to the Industrial General and Industrial Heavy zones:</p> <p>(a) Standard 16.4.2.1 restricts the maximum height of buildings within the Industrial General Zone to 15m where they are located within 20m of a residential or rural zone. Otherwise, there is no maximum height or building coverage constraint.</p> <p>(b) Standard 16.5.2.1 restricts the maximum height of buildings within the Industrial Heavy Zone to 15m where they are located within 20m of a residential or rural zone. Otherwise, there is no maximum height or building coverage constraint.</p> <p>Standards 16.4.2.1 and 16.5.2.1 adequately address the amenity effects and recommend that they are retained and applied as a qualifying matter to those parts of the Industrial General Zone and Industrial Heavy Zone that are located within the 800m or 1.2km walkable catchment.</p> <p><u>Reverse sensitivity effects</u> While residential intensification within Hornby proximate to the Industrial General Zone and Industrial Heavy Zone has the potential to result in increased reverse-sensitivity effects, PC14 already incorporates the High Density Residential Zone in locations that are directly adjacent to these Industrial zones.</p>

³ Para. 5.28; Ibid.

Nature of assessment	RMA provision	Assessment
		<p>PC14 addresses the potential reverse sensitivity effects of this additional building height and density through the application of the “Industrial Interface Qualifying Matter Area” (which restricts building height to 8m).</p> <p>This qualifying matter has been applied to all residential/industrial zone interfaces within Hornby. Matters pertaining to reverse sensitivity have been sufficiently addressed by PC14.</p>
	S32(1)(b)(iii) – summarising the reasons for deciding on the provisions	<p>The provisions recommended in my evidence:</p> <ul style="list-style-type: none"> (a) give effect to the objectives and policies of the NPS-UD; (b) reduce pressure on urban expansion and associated infrastructure investment requirements by enabling more intensification of an existing urban area; (c) delivers on the role and function of the urban and town centres across Greater Christchurch as outlined in the draft Spatial Plan; (d) better enable the social and economic well-being of the community than the provisions as notified; and (e) promote the sustainable management of resources, achieve the purpose of the RMA and give effect to Part 2 and other provisions of the RMA.
Benefits/costs	S32(2)(a) - identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions	<p><u>Benefits</u></p> <p>The economic evidence of Mr Colegrave identifies the following benefits in respect of the metropolitan rezoning:</p> <ul style="list-style-type: none"> (a) Taller buildings improve viability in the local context, and enabling greater height will boost the number of financially viable developments that can be delivered by the market over time.⁴ (b) Taller and higher density buildings foster economic vibrancy by concentrating residents, businesses, commercial spaces, and cultural institutions near one another, giving rise to agglomeration benefits and boost foot traffic for retailers and service providers.⁵ (c) Taller and higher density buildings optimise the use of high value urban land, accommodating more people and providing greater amenities within the existing urban area.⁶ (d) Building upwards in established areas (i.e. intensification) can help reduce infrastructure needs by consuming spare capacity within existing networks but may trigger upgrades in

⁴ Para. 5.47; Statement of Evidence of Fraser Colegrave on behalf of Kainga Ora – Homes and Communities.

⁵ Para. 5.49(a); Ibid.

⁶ Para. 5.49(c); Ibid.

Nature of assessment	RMA provision	Assessment
		<p>networks close to capacity. Generally, though, intensification is thought to improve infrastructure efficiency, especially in relation to transport.⁷</p> <p>Overall, Mr Colegrave considers the provision of additional height in and around centres to have positive economic benefits and will address a shortfall of 110ha of commercial floorspace capacity, identified in the 2023 Business Capacity Assessment (“BCA”).⁸ As it is not possible to create more land in existing centres, or create new centres of the scale required, Mr Colegrave considers that the provision of greater height is the best way to address the shortfall.⁹</p> <p><u>Costs</u> The economic evidence of Mr Colegrave identifies the following costs in respect of the metropolitan rezoning:</p> <p>(a) As density increases, so too does the potential for adverse effects from living and working closer to one another. While the suite of effects arising from this situation varies, the most common are traffic congestion, noise pollution, loss of sunlight, and overcrowded public spaces.¹⁰</p> <p>The bulk and location standards proposed are considered sufficient to address this matter. The NPS-UD directs urban intensification to occur in appropriate locations to support planned growth and to create a more efficient development pattern. In doing so, the NPS-UD recognises that 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 (objective 4) and that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes 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 (policy 6(b)).</p> <p>Overall, I consider that the benefits of intensification far outweigh the costs, and the costs identified need to be considered through a different lens in accordance with policy 6(b).</p>

⁷ Para. 5.49(d); Ibid.

⁸ Para. 5.58; Ibid.

⁹ Para. 5.60; Ibid.

¹⁰ Para. 5.49(e); Ibid.