

SECTION 32 / 32AA CONSIDERATIONS

This Section 32 / 32AA evaluation of the issues raised in the submission of LLM Investments Ltd is provided further to the planning Evidence in Chief (EiC) of Jonathan Cleese. The text amendments sought to the Christchurch District Plan were attached as Appendix 2 to the EiC.

REALLOCATION OF ACCOMMODATION MIX

- 1 In a nutshell, the zone provides for housing as part of the activity mix inherent with modern resorts, with Clearwater Resort being a Christchurch example of a similar facility. The ODP shows the location of the various activities within the SP zone. The housing area is subject to a cap on overall unit numbers (rather than a minimum site size per unit control). Dividing the housing area by the cap = detached suburban typologies, reflective of the time the plan change was processed where the plan direction for all residential areas in suburban locations was for low density detached typologies. Low density housing is not mandatory under the operative provisions, however it is the most likely market outcome.
- 2 The NPS-UD likewise seeks to enable housing choice in suitable locations. MDRS likewise seeks to lift the base in terms of housing provision and typology range in suburban locations, thereby changing community expectations as to the character of suburban environments. Rather than increase the geographic extent of the residential area on the ODP, the most effective tool to facilitate a greater typology range is to increase the housing cap.
- 3 The resort centre is permitted to include a range of retail and service facilities that are equivalent in size to a neighbourhood centre. An existing primary school is located within walking distance of the zone.
- 4 To increase the housing cap without increasing demand on 3-waters infrastructure, the mix of uses is reallocated.
- 5 Care has been taken to ensure that this reallocation does not unpick the resort purpose of the zone, and therefore large numbers of student hostel and serviced apartment/ hotel beds have been retained.

<p>Effectiveness and efficiency</p>	<ul style="list-style-type: none"> • The reallocation of the accommodation mix to increase the housing cap is effective in facilitating a greater range of housing typologies within the ODP area identified for housing. • It is efficient in that the rule is simple to understand, implement, and enforce. • The recommended provisions continue to give effect to the objective and policies of the SP Zone i.e. continue to enable a golf resort to be established, whilst providing for a more appropriate mix of activities in a manner that will not affect the amenity of the wider area or increase demand on 3-waters infrastructure.
<p>Costs/Benefits</p>	<ul style="list-style-type: none"> • The recommended changes to the provisions do not present any increased consenting costs compared to the notified provisions but provide greater clarity for Plan users. • The amendments do not threaten the purpose of the golf resort and the associated economic benefits. • The amendments allow for a greater range of housing typologies to better meet market demand and to improve housing choice relative to the operative provisions. • The changes to built form enabled by the amendments are internalised within the site, with the retention of separate rules controlling zone boundary interface areas.
<p>Risk of acting or not acting</p>	<ul style="list-style-type: none"> • The risk of not acting is that intensification or redevelopment opportunities are not taken up in a way which provides for housing choice. • There are minimal risks associated with acting, as the overall SP zone purpose and layout are unchanged, as are the balance of the rules relating to staging and boundary interface.
<p>Decision about more appropriate</p>	<ul style="list-style-type: none"> • The recommended amendments as set out in my evidence are therefore considered to be more appropriate in achieving the purpose of the RMA than PC14 as notified.