

Before an Independent Hearings Panel  
Appointed by Christchurch City Council

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*under:* the Resource Management Act 1991

*in the matter of:* proposed Plan Change 14 to the Christchurch District  
Plan

*and:* **LMM Investments 2012 Limited**  
(Submitter 826)

Summary statement of Jonathan Clease (planning) on behalf of  
LMM Investments 2012 Limited

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Dated: 16 November 2023

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## **SUMMARY STATEMENT OF JONATHAN CLEASE ON BEHALF OF LMM INVESTMENTS 2012 LIMITED**

### **INTRODUCTION**

- 1 My full name is Jonathan Guy Clease. I am a Partner in the planning and resource management consulting firm Planz Consultants Limited.
- 2 I provided a statement of evidence in relation to the relief sought by LMM Investments 2012 Limited (*LMM Investments*) on proposed Plan Change 14 to the Christchurch District Plan (*PC14*) dated 20 September 2023 (*EiC*). My qualifications, experience and confirmation I will comply with the Code of Conduct for Expert Witnesses (Part 9, Environment Court Practice Note 2023) are set out in my *EiC* and I do not repeat those here.
- 3 This statement is intended to provide a brief summary of my evidence. This includes updates where relevant in light of the rebuttal evidence filed for Christchurch City Council (*Council*).

### **TREATMENT OF RESIDENTIAL AREAS WITHIN THE SPECIAL PURPOSE (GOLF RESORT) ZONE**

- 4 As set out in my *EiC*, the Special Purpose (Golf Resort) Zone (the *SP Zone*) provides for a bespoke golf resort, including a large area of housing, and associated recreational facilities and ecological restoration.
- 5 In terms of questions of scope I rely on Counsel's legal submissions on behalf of LMM Investments Ltd. Because of concerns regarding scope, Council staff have not provided any merit-based assessment of LMM Investments' submission for me to respond to.
- 6 In terms of outcome, the *SP Zone* provides for a significant level of residential development through 150 residential units and 160 bed student hostels (which is a sub-set of the Operative Plan definition of 'residential activity'). It also provides for 380 bedrooms that can be allocated as a mix of hotel and/or serviced apartments ('visitor accommodation').
- 7 LMM Investments' submission originally sought that the residential parts of the site as shown on the Outline Development Plan be rezoned to Medium Density Residential (*MRZ*).
- 8 The relief has now been reduced and simplified such that it is now sought that the site retains the current *SP Zoning*, with amendments limited to discrete changes to the accommodation typology mix and two built form rules.
- 9 The economic evidence of Mr Colegrave is that amending the accommodation mix will facilitate a greater range of residential

typologies and would thereby enable the SP Zone to better respond to market demand in this location.

- 10 In my view reallocating the accommodation mix between typology, whilst not increasing the overall number of beds / scale of activity, does not threaten the purpose or intent of the SP zone. The same overall mix of activities remains, just in different proportions. Mr Hall's evidence confirms that changing the typology mix does not have a material effect on the ability to service the SP Zone.
- 11 I also recommend that the height and height-to-boundary rules applying to residential activity within the SP Zone be amended to align with the Medium Density Residential Zone so that residential activity is able to be treated in a consistent manner and to enable greater flexibility in providing terraced housing typologies as well as stand-alone homes. I note that the balance of the SP Zone rules regarding the treatment of the zone interface with neighbours and staging remain unchanged.

**Jonathan Clease**

**16 November 2023**