

**HOUSING AND BUSINESS CHOICE – COMMERCIAL AND INDUSTRIAL SUB-CHAPTERS
EVALUATION REPORT**

[PART 4]

This report relates to the Commercial and Industrial provisions proposed by Plan Change 14. The specific issues that this plan change seeks to address are all directly related to giving effect to Policy 3 of the NPSUD. In addition, the names of the Commercial Zones of the Operative Christchurch District Plan are proposed change to the nearest applicable zone described in the National Planning Standards. For ease of evaluation, the response to Policy 3 is split into a number of sub-issues as follows:

- Implementing Policy 3(a) - intensification in the city centre zone;
- Implementing Policy 3(c)(ii) – intensification in commercial zones within the walkable catchment of the city centre zone;
- Implementing Policy 3(d) – intensification in suburban commercial zones; and
- Implementation of Policy 3(c)(ii) and Policy 3(d) in respect to potential intensification of industrial zones within the walkable catchments of the city centre, town centre and local centre zones

The proposed plan change proposes to enable greater heights in the commercial zones of Christchurch City and enable intensification in industrial zones within walkable catchments of city centre, town centre and local centres.

Table of contents

1	Introduction	3
1.1	Purpose of this report	3
2	Resource management issues.....	3
2.1	Council’s legal obligations and strategic planning documents	3
2.2	Current Christchurch District Plan provisions.....	12
2.3	Problem definition - the issues being addressed.....	20
3	Development of the plan change	26
3.1	Background.....	26
3.2	Description and scope of the changes proposed.....	27
3.3	Community/Stakeholder engagement.....	43
3.4	Consultation with iwi authorities.....	46
4	Scale and significance evaluation.....	47
4.1	The degree of shift in the provisions.....	47
4.2	Scale and significance of effects	47
5	Evaluation of the proposal.....	49
5.1	Statutory evaluation.....	49
5.2	Evaluation of options for objectives	49
5.3	Evaluation of options for provisions	55
	Table 1: Summary of Relevant Christchurch District Plan Strategic Objectives	12
	Table 2: Summary of Relevant Christchurch District Plan Objectives.....	15
	Table 3: Technical Reports Informing Plan Change 14 (Commercial and Industrial).....	26
	Table 4: Summary of Proposed Changes to Objectives	28
	Table 5: Summary of Proposed Changes to Commercial Provisions.....	29
	Table 6: Summary of Proposed Changes to Industrial Provisions.....	42
	Table 7: Scale and Significance Assessment	47
	Table 8: Evaluation of Options for Objectives.....	51
	Table 9: Evaluation of Options for Provisions	56

1 Introduction

1.1 Purpose of this report

- 1.1.1 The overarching purpose of section 32 (**s32**) of the Resource Management Act 1991 (**RMA / Act**) is to ensure that plans are developed using sound evidence and rigorous policy analysis, leading to more robust and enduring provisions.
- 1.1.2 Plan Change 14 is an Intensification Planning Instrument (**IPi**), which the Council is required to progress to provide for urban intensification pursuant to the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. This report relates to the Commercial and Industrial provisions proposed by Plan Change 14.
- 1.1.3 Section 32 requires that the Council provide an evaluation of the changes proposed in Plan Change 14 (Commercial and Industrial Chapter) to the Christchurch District Plan (**the Plan**). The evaluation must examine whether the proposed objectives are the most appropriate way to achieve the purpose of the RMA, and whether the proposed provisions are the most appropriate way to achieve the objectives of the Plan. The report must consider reasonably practicable options, and assess the efficiency and effectiveness of the provisions in achieving the objectives. This will involve identifying and assessing the benefits and costs of the environmental, economic, social and cultural effects anticipated from implementing the provisions. The report must also assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.
- 1.1.4 The purpose of this report is to fulfil the s32 requirements for proposed Plan Change 14 – relating to the Commercial and Industrial Chapters, related definitions (chapter 2) and planning maps. In addition, the report examines any relevant directions from the statutory context including higher order documents.
- 1.1.5 This report should be read in conjunction with other parts of the section 32, particularly, Part 1 – Overview and High Level District Issues, Part 2 – Qualifying Matters, Part 8 – Planning Maps, Overlays and Zone Boundary Changes and Part 9 – Consequential Amendments and Appendices.

2 Resource management issues

2.1 Council's legal obligations and strategic planning documents

- 2.1.1 Sections 74 and 75 of the RMA set out Council's obligations when preparing a change to its District Plan. The Council has a responsibility under Section 31 of the RMA to establish, implement and review objectives and provisions for, among other things, achieving integrated management of the effects of the use, development, or protection of land and associated resources. One of the Council's functions is to control the actual and potential effects of land use or development on the environment, and to do so in accordance with the provisions of Part 2 of the Act.
- 2.1.2 Within Part 2, the purpose of the Act (Section 5) includes the sustainable management of physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural wellbeing and for their health and safety. This supports

promotion of a sustainable urban form by using land and infrastructure resources efficiently and managing commercial activity via a centres-based strategy. Such a strategy encourages economic activity in centres in a manner that does not inhibit or undermine the growth of other centres but rather promotes an efficient network of vibrant, viable and accessible commercial centres to support community wellbeing.

- 2.1.3 Of relevance to this part of the plan change, section 6 matters of national importance to be recognised and provided for include the protection of outstanding natural features and landscapes from inappropriate subdivision, use and development. This requires consideration of any impact on the Port Hills / Te Poho-o-Tamtea, which is an identified Outstanding Natural Landscape recognised by s6, in part due to its importance as the natural backdrop to the City.
- 2.1.4 Other matters to be achieved when exercising functions and powers under the Act include (relevantly), the efficient use and development of physical resources (urban land) (s7b) and maintenance and enhancement of the quality of the environment (s7(f)) and amenity values (s7(c)).
- 2.1.5 The plan change must also take account of the Principles of Te Tiriti o Waitangi in accordance with section 8 of the RMA. Through seeking input from Papatipu Rūnanga in preparation of the plan change, their feedback has been addressed in the plan change.
- 2.1.6 As required by s74 and s75 of the RMA, a Plan Change must specifically give effect to, not be inconsistent with, take into account, or have regard to the following “higher order” documents / provisions which provide directions for the issues relevant to this plan change:
- 2.1.7 Plan Change 14 is the Council’s IPI under s77G of the Act. As such, there are a number of bespoke sections of the Act that Plan Change 14 seeks to address. These are summarised below:

IPI-related Sections of the Act	Direction to Council
Section 77N	<ul style="list-style-type: none"> • Must use the IPI (defined under s80E) and intensification streamlined planning process • Must ensure provisions give effect to the changes required by policy 3 or policy 5 as the case requires. • May create new urban non-residential zones or amend existing urban non-residential zones. • May modify the requirements set out in policy 3 to be less enabling of development than provided for by policy 3, if authorised to do so under section 77O.
Section 77O	<ul style="list-style-type: none"> • May modify the requirements of policy 3 in urban non-residential zones to be less enabling of development to the extent necessary to accommodate specified "qualifying matters".
Sections 77P – 77R	<ul style="list-style-type: none"> • Requirements specified for the evaluation report required under s32

IPI-related Sections of the Act	Direction to Council
Section 77S	<ul style="list-style-type: none"> Amends Policy 3 (d) to state: “(d) within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent), building heights and density of urban form commensurate with the level of commercial activity and community services.”
Section 80E	<ul style="list-style-type: none"> Defines the scope of an IPI. Provides that an IPI must give effect to Policies 3 and 4 of the NPS-UD. Provides that an IPI may include provisions relating to financial contributions, to enable papakāinga housing, and “related provisions” that support or are consequential on the MDRS or Policies 3, 4, and 5 of the NPS-UD. Specifies, in a non-exhaustive list, several matters which may be provided for as "related provisions".
Section 80F	<ul style="list-style-type: none"> Specifies that a Territorial Authority that must notify an IPI on or before 20 August 2022 includes every Tier 1 Authority
Section 80G	<ul style="list-style-type: none"> Specifies that a Territorial Authority must not notify more than 1 IPI, use the IPI for any purpose other than specified in section 80E, or withdraw the IPI.
Section 80H	<ul style="list-style-type: none"> The IPI must show how MDRS and objectives and policies are incorporated.
Schedule 3A	<ul style="list-style-type: none"> Includes an Objective for inclusion in the District Plan that seeks: <i>“a well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future”</i>

2.1.8 MDRS

2.1.9 Section 77G of the RMA, while specific to residential zones, requires the Council to include specified Objectives and Policies in its IPI. The following briefly describes the relevance of these to the Commercial and Industrial chapters:

MDRS: Objectives and policies included in Plan Change 14	Direction
<p>Objective 1</p> <p><i>A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future:</i></p>	<p>Provides overarching direction for commercial and industrial zones of a "well-functioning urban environment", which the NPS-UD defines in policy 1.</p>

a. National Policy Statement on Urban Development

2.1.10 The next most significant higher order documentation is the NPS-UD, which came into effect on 20 August 2020 and was updated in May 2022, replacing the NPS on Urban Development Capacity that was first introduced in December 2016.

2.1.11 The NPS-UD establishes a framework for urban development across all Aotearoa New Zealand's town and cities. It establishes the goal of achieving well-functioning urban environments for all urban areas, with specific direction for larger centres, known as "Tier 1 urban environments". The Council is identified as a Tier 1 territorial authority and is therefore required to give effect to most of the directives of the NPS-UD.

2.1.12 Objective 1 anticipates Well Functioning Urban Environments that enable people and communities to provide for their well-being, and health and safety. Policy 1 of the NPS-UD then provides a non-exhaustive list of some of the matters that define a well-functioning urban environment, and which planning decisions must contribute to. This includes urban environments that:

- Have a variety of homes that meet the needs, in terms of type, price and location, of different households, and enable Māori to express their cultural traditions and norms;
- Have or enable a variety of sites that are suitable for different business sectors in terms of location and site size;
- Have good accessibility for all people including by way of public or active transport;
- Support and limit as much as possible, the adverse effects on the operation of competitive land markets;
- Support reductions in green-house gas emissions; and
- Are resilient to the likely current and future effects of climate change.

2.1.13 These matters set the minimum requirements as to what constitutes a well-functioning environment, which local authority planning decisions must achieve, and it is left to local authorities to further identify any other relevant matters. This may, for example, include matters relating to good urban design¹.

2.1.14 Plan Change 14 directly responds to the outcome sought in Objective 3 relevantly, to:

“enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:

¹ [MfE Factsheet on Well-functioning Urban Environments \(2020\), page 2](#)

(a) the area is in or near a centre zone or other area with many employment opportunities

(b) the area is well-serviced by existing or planned public transport

(c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.

(Objective 3)

2.1.15 Policy 3 of the NPS-UD supports the achievement of Objective 3 and directs the following:

“...District plans enable:

a. In city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise the benefits of intensification; and

b. in metropolitan centre zones, building heights and density of urban form to reflect demand for housing and business use in those locations, and in all cases building heights of at least 6 storeys; and

c. building heights of at least 6 storeys within at least a walkable catchment of the following:

(i) existing and planned rapid transit stops

(ii) the edge of city centre zones

(iii) the edge of metropolitan centre zones; and

d. within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent), building heights and densities of urban form commensurate with the level of commercial activity and community services”.

2.1.16 Policy 3 is premised on a ‘centres-based approach’ where intensification is directed within and around specific centres and rapid transport stops, aligning with national planning standards terminology for centres, or those that are seen to be their equivalents.

2.1.17 Policy 3 requires a degree of evaluation to determine the appropriate scale of intensification. For Policy 3(c), this centres on whether Christchurch has “metropolitan centre zones”, and ‘at least’ for both height and extent (walkable catchment), meaning that territorial authorities must consider the other spatial and form directive policies of the NPS-UD. For Policy 3(d), it means that each suburban commercial centre must be evaluated in accordance with the hierarchy of centres through national planning standards and an intensification response provided accordingly. Lastly, the requirement in Policy 10 is to ensure that any intensification response is consistent across the urban environment, recognising opportunities for infrastructure optimisation and relative land development opportunities.

2.1.18 Policies 1 and 2 contain the supply-driven directions of the NPS-UD. As described earlier, Policy 1 anticipates that the city has “a variety of sites that are suitable for different business sectors in terms of location and site size”. Policy 2 directs that all Councils must provide sufficient development capacity to meet expected demand for housing and for business land over the short, medium, and long term by requiring regular reviews of existing plan enabled development capacity and preparation of a Future Development Strategy to describe where

and how any capacity shortfalls will be addressed. This aligns with other directives in the NPS-UD to monitor housing and business development capacity through assessments (**HBAs**) every three years.

- 2.1.19 Policies 4, 6, and 9 establish what kinds of constraints are able to be considered through the required intensification response. The NPS-UD introduces the concept of ‘qualifying matters’ (as defined through Clause 3.32) that detail specific features that are able to be considered to modify any intensification directive Policy 3 requires (Policy 4). A number of the qualifying matters identified in subpart 6 (3.32) are relevant to Plan Chapters 15 (Commercial) and 16 (Industrial). Qualifying matters are considered in Part 2 of the s32 report and will be referenced in the evaluation that follows.
- 2.1.20 Objective 4 of the NPS-UD is relevant to the plan change in articulating that the urban environment develops and changes over time in response to changing needs of people, communities and future generations. In this context, the NPSUD anticipates change from what outcomes were previously defined as appropriate. Policy 6 supports Objective 4 by highlighting the change that should be anticipated through the wider intensification direction (which is not considered in itself an adverse effect), its benefits of urban development, and how development may impact the climate. In giving effect to the intensification direction, authorities must also develop in accordance with any future development strategies (FDSs), the values and aspirations of local hapū and iwi, involving them in policy development.
- 2.1.21 Decisions on urban development are to be integrated with infrastructure planning and funding decisions, strategic and responsive, having regard to proposals that add significantly to development capacity, in accordance with Objective 6. This is relevant in consideration of the appropriate locations for intensification of commercial activity that is directed by policy 3.
- 2.1.22 The NPSUD (Objective 8) also anticipates that urban environments support a reduction in greenhouse gas emissions and are resilient to the current and future effects of climate change. By directing greater levels of intensification in the City centre, there is an opportunity to achieve greater accessibility to employment, services and amenities and support greater use of public transport and active modes.
- 2.1.23 The plan change must give effect to these directions.

b. Canterbury Regional Policy Statement

- 2.1.24 The Canterbury Regional Policy Statement (**CRPS**) seeks to support and maintain the existing network of centres as a focus for commercial, community and service activities (Objective 6.2.5) and identifies Key Activity Centres (Objective 6.2.1(2)). Reflecting their role as a focal point for commercial activity, Objective 6.2.6 states that commercial activities are to be “*primarily directed to the Central City, Key Activity Centres, and Neighbourhood Centres*”. The development and distribution of commercial activity is to avoid significant adverse effects on the function and viability of centres (Objective 6.2.5).
- 2.1.25 Policies to achieve the objectives support these outcomes by recognising the Central City’s role as the city’s primary commercial centre and reinforcing the role of Key Activity Centres (Policy 6.3.6(3)). New commercial activities are primarily to be directed to the Central City, Key Activity Centres and Neighbourhood Centres *where these activities reflect and support the function and role of those centres* (Policy 6.3.6(4)).

- 2.1.26 These directions support a hierarchical approach to the centres-based strategy with a deliberate policy bias in favour of the central city and key activity centres but with significant discretion and choice able to be exercised as to how a centres based approach is to be implemented.
- 2.1.27 Objective 6.2.5 states that centres will be high quality, support a diversity of business opportunities including appropriate mixed-use development, and incorporate good urban design principles. Objective 6.2.1 and Policy 6.3.2 again emphasise the importance of high quality mixed use development that incorporates the principles of good urban design.
- 2.1.28 Policy 6.3.7 (residential location, yield and intensification) seeks that residential intensification be focused around commercial centres commensurate with their role and function, along core public transport routes, in mixed use areas and on suitable brownfield land. It specifically points to enabling intensification and brownfield redevelopment to support housing affordability by providing a range of lot sizes, densities and appropriate development controls and more intensive development including mixed use, apartments, townhouses and terraced housing.
- 2.1.29 Regarding brownfield redevelopment, the CRPS (Policy 6.3.8 – Regeneration of Brownfield Land) encourages the regeneration of existing brownfield areas through new comprehensive residential, mixed use or business developments, provided such activities will not have adverse effects on the transport network nor significant adverse distributional or urban form effects on the central city and other centres. The reasoning in the CRPS points to the benefits of increasing high intensity and often more appropriate activities in these locations (Commercial centres) and enhancing the amenity of these areas. Recognition is also given to the benefits of reducing the adverse effects of travel to work, making efficient use of existing infrastructure and avoiding development in more sensitive locations. Significant emphasis is placed on the need for such regeneration projects to occur in a comprehensive matter to ensure that good design and amenity outcomes are achieved, and which can be supported by councils through for example, the provision of, and improvements to, open space and the streetscape.
- 2.1.30 The CRPS is strongly directive in Policy 6.2.6 (Business Land Development) that if land is zoned for industrial purposes, it should primarily be used for industrial purposes, unless it is identified for brownfield redevelopment.
- 2.1.31 Of relevance when considering the impact of significant changes to the city’s urban form, will be any potential impact on the Port Hills / Te Poho-o-Tamatea given its national and regional significance as an Outstanding Natural Landscape (ONL). The whole of the Port Hills / Te Poho-o-Tamatea is identified in Appendix 4 of the CRPS as an ONL for a range of values including (relevantly) its legibility and significance as a backdrop to the City and as a landscape highly valued by tourists and locals. Te Poho-o-Tamatea is highly significant to Tangata Whenua who have a long spiritual and physical association with the Peninsula landscape. CRPS Objective 12.2.1 and Policy 12.3.1 seeks to identify and protect ONLs from inappropriate subdivision, use and development.
- 2.1.32 The plan change must give effect to these directions.

c. Land Use Recovery Plan

- 2.1.33 There are a number of relevant ‘outcomes’ in the Land Use Recovery Plan (**LURP**) to have regard to for this plan change including the following:
- Outcome 1: Key activity centres and neighbourhood centres provide for commercial activity needs including redevelopment of damaged centres.

- Outcome 3: Land use recovery integrates with and supports wider recovery activity, particularly within the central city.
- Outcome 4: RMA plans and regulatory processes enable rebuilding and development to go ahead without unnecessary impediments.
- Outcome 6: The range, quality and price of new housing meets the diverse and changing needs of those seeking to buy or rent, including the needs of a growing temporary rebuild workforce.
- Outcome 7: Opportunities are available for the market to deliver comprehensive redevelopment in suitable existing neighbourhoods.
- Outcome 8: Investment in community facilities and services supports vibrant key activity centres and neighbourhood centres.
- Outcome 9: Sufficient industrial business land is available to accommodate relocations and industrial sector growth.

2.1.34 One of the Actions (Action 24) required to be addressed by Christchurch City Council in its District Plan Review was to include zoning that defines the extent of each activity centre. This action was implemented through the last District Plan Review and more recently as part of Plan Change 5B (Commercial).

2.1.35 The plan change must have regard to these directions.

d. Christchurch Central Recovery Plan (CCRP)

2.1.36 The CCRP (2012) provides a spatial framework for the recovery and rebuild of central Christchurch. It describes the form in which the central city is to be rebuilt, and defined the locations of ‘anchor’ projects, proposed to stimulate further development and investment.

2.1.37 Of particular relevance, the CCRP set building heights and density controls as part of a package of amendments to the Christchurch District Plan, to support recovery of the central city and promote a low rise city form. This included a central city height plan and provisions which limited the type and size of commercial tenancies in the commercial zones outside of the Central City Business Zone (CCBZ), to support the recovery and role of the CCBZ as the principal commercial centre for the City. Appendix 1 provides an overview of the background to the height limits inserted into the Christchurch District Plan, through the CCRP.

2.1.38 The key focus of the CCRP was the inclusion of the ‘blueprint’ which sought to consolidate a central area of the Central City so that it would function more effectively. The spatial blueprint was produced based on design principles that addressed the specific challenges posed in a post-natural disaster urban setting, including the significant areas of vacant land in an already ‘oversized’ commercial zone, public preferences for a lower rise (perceived as safer) city, development feasibility and the desire for a high amenity central city.

2.1.39 Key elements of the CCRP included:

- An overall design concept for development of a greener, more accessible city with a compact core, more greenspace and a stronger built identity.
- Identification of a new central city “core”, where a high quality of design and active frontages was sought through specific urban design controls.
- Introduction of the “frame” concept, to reshape central Christchurch with its three components – East, South and North – each having its own distinct character and serving to contain the commercial area. It was considered that containing the available land area in this way would address the issue of too much development capacity and potentially

unconstrained development, whilst also adding high quality urban open space to the centre.

- Incorporation of five key changes emanating from the community's responses during the 'Share an Idea' campaign, including stronger built identity and a compact CBD. Recast as aspirations, these five key changes ultimately translated into the concept of a lower-rise city with safe, sustainable buildings that look good and function well.
- Key to the CCRP's recovery response to the central city were the principles of 'compress' and 'contain'; 'compressing' the size and scale of expected development to generate a critical mass in the Core, and 'containing' the core to the south, east and north with a frame.

2.1.40 The CCRP states that, *"the Frame in tandem with zoning provisions, reduces the extent of the central city commercial area to address the oversupply of land. This is purported to help increase the value of properties generally across the central city in a way that regulations to contain the central core, or new zoning decisions, could not. The Frame helps to deliver a more compact core while diversifying opportunities for investment and development. The Frame allows the Core to expand in the future if there is demand for housing or commercial development"*².

2.1.41 The Plan states that, *"lower buildings will become a defining central city feature in the medium term and that a lower rise city fits in with the community's wishes and takes into account of the economic realities and market demand for property in the Core. It also recognises the character and sensitivity of certain areas, such as New Regent Street, and reduces wind tunnels and building shade"*³.

2.1.42 A key part of the CCRP was an appendix which set out statutory directions for amendments to the then Christchurch City Plan, to give effect to the CCRP. This was given effect to, and the provisions carried over into the operative District Plan, relatively unchanged. The operative provisions for the central city commercial zones therefore derive directly from this recovery planning process, led by central government.

2.1.43 When the District Plan was reviewed in 2017, the CER Act required that the District Plan must not be inconsistent with the CCRP. That legislation has since been revoked with the effect that lesser weight is now afforded to the Recovery Plan. PC14 must still *have regard to* the directions of the CCRP under s74(2)(b)(i) of the RMA.

e. Iwi Management Plans (IMP)

2.1.44 A plan change must take into account any relevant iwi management plan. There are two iwi management plans relevant to Christchurch District, being the Mahaanui Iwi Management Plan (2013) and the Te Mahere Whakahaere o Oruaka (2019). Both have been reviewed and have no or little relevance to this aspect of plan change 14 for Commercial and Industrial areas other than in respect of a policy in the Mahaanui IMP seeking early, appropriate and effective involvement of Papatipu Rūnanga in the development of district plan changes relating to urban and township planning (P3.2).

2.1.45 Through Mahaanui Kurataiao Limited, the views of Papatipu Rūnanga of Ngāi Tahu were sought about this plan change.

² [Christchurch Central Recovery Plan \(2012\)](#), page 35.

³ *Ibid*, page 40.

g. Future Development Strategy

- 2.1.46 Regard must also be had to *Our Space 2018 – 2048*, which is a review of the land use planning framework for Greater Christchurch and is intended to address the requirement under the NPS-UDC (2016) to prepare a Future Development Strategy (FDS).
- 2.1.47 The FDS confirms the City to have more than sufficient long-term plan-enabled development capacity for housing and industrial activity and sufficient medium term capacity for commercial activity. It further concludes that the City has sufficient industrial land around the Central City to enable transition from industrial to commercial use if required, to meet any longer term shortfall of commercial space if it does eventuate.
- 2.1.48 *Our Space’ states that “the Partnership will continue to focus commercial developments predominantly in the Central City, reinforcing it as the principal commercial hub of the Canterbury region, while also supporting developments in key activity centres, town centres and neighbourhood centres as part of supporting thriving local communities” (5.1, page 19).*
- 2.1.49 Reflecting the above, it is anticipated that employment is concentrated in a select number of areas, being “existing industrial and commercially zoned land and expansion of existing centres in the long-term if required” (5.2, page 27). Outside corridors identified for rapid transit, it is anticipated that “...commercial activity will continue to be located within the existing network of commercial centres particularly key activity centres” (Ibid).

h. Other

- 2.1.50 The proposed Plan Change is not inconsistent with any Water Conservation Orders or any regional matter under a regional plan.
- 2.1.51 No other management plans or strategies prepared under other Acts are relevant to the resource management issue identified.

2.2 Current Christchurch District Plan provisions

- 2.2.1 The current Plan’s Strategic Directions objectives, chapter objectives and provisions relevant to this plan change are summarised below.

Table 1: Summary of Relevant Christchurch District Plan Strategic Objectives

Objective, Policy and Provision	Particular relevance to this plan change
Strategic Objective 3.3.1 – Enabling recovery and facilitating the future enhancement of the District	When preparing, changing, interpreting, and implementing the District Plan, all objectives and policies are to be expressed and achieved in a manner consistent with this objective. It is focused on the expedited recovery and growth of the City that essentially achieves the four well-beings for

	<p>communities (economic, social, cultural, and environmental) and fosters investment certainty.</p> <p>This objective is particularly relevant for PC14 in regard to setting height limits and density controls which continue to support recovery of the city, particularly the central city, which this s32 demonstrates remains a relevant resource management issue.</p>
Strategic Objective 3.3.2 – Clarity of language and efficiency	<p>The District Plan through its preparation, change, interpretation, and implementation, is required to minimise transaction costs, the number, extent and prescriptiveness of development controls and design standards in the rules, to encourage innovation and choice.</p> <p>It sets expectations for drafting clarity; including the clear expression of intended outcomes and use of clear and concise language to ensure that the District Plan is easy to understand and use.</p>
Strategic Objective 3.3.3 – Participation of mana whenua in decision making	<p>This objective (relevantly) seeks active participation of Ngāi Tahu mana whenua in decision making on matters relating to the recovery and future development of the City. Through Mahaanui Kurataiao Limited, the views of the relevant Papatipu Rūnanga who hold mana whenua status in Christchurch District, have been sought.</p>
Strategic Objective 3.3.4 - Housing capacity and choice	<p>Sets the minimum dwellings to be enabled through a combination of residential intensification, brownfield and greenfield development and seeks greater housing diversity and affordability. It is relevant to this plan change in so far as additional capacity enabled by increasing building heights will have the benefit of increasing opportunities for housing intensification in centres, potentially improving development feasibility and providing for a typology (apartments) that are not currently well served by the Christchurch market.</p>
Strategic Objective 3.3.5 – Business and Economic Prosperity	<p>Whilst high level, this objective expresses the critical importance of business and economic prosperity to Christchurch’s recovery and to community wellbeing and resilience by providing a range of opportunities for business activities to establish and prosper. This acknowledges the importance of commercial centres and their role as community focal points and the resource management basis (community wellbeing) for intervening in the market to ensure their success and prosperity.</p>

<p>Strategic Objective 3.3.7 – Urban growth, form and design</p>	<p>The objective recognises that commercial centres are important community focal points that support a range of housing and business opportunities. The objective, inter alia, seeks a high quality urban environment and development opportunities in locations that improve overall accessibility and connectivity for people. It supports provisions in this plan change aimed at facilitating a consolidated urban form and a high quality urban environment.</p>
<p>Strategic Objective 3.3.8 – Revitalising the Central City</p>	<p>This objective recognises the devastating impact that the earthquakes had on the Central City and the priority for its revitalisation as the primary community focal point for the community of Christchurch and a priority area for housing growth and public and private investment. It seeks a high amenity urban environment for residents, businesses and workers and acknowledges the unique identity and sense of place of the Central City; matters of relevance to this plan change.</p> <p>This plan change makes significant changes to the central city zone provisions by enabling more height and related provisions aimed at ensuring that such enablement will continue to achieve the objective of promoting the timely recovery and prosperity of the central city.</p>
<p>Strategic Objective 3.3.10 – Commercial and industrial activities</p>	<p>This objective supports the centres-based strategy which focuses on revitalisation of centres to support their recovery and long term economic and employment growth.</p> <p>In line with the NPS on Urban Development, it also requires sufficient and suitable land development capacity to be available to meet growth needs, and which supports proposed amendments in this plan change aimed at ensuring sufficient opportunities are available to meet projected needs for commercial land, whilst enabling the operation of competitive land markets and managing centres efficiently to promote their vitality and viability.</p>

2.2.2 As relevant to this Plan Change, the commercial and industrial chapters give effect to these higher order strategic objectives and directions from the District Plan with 13 objectives, more than half of which relate specifically to the central city.

Table 2: Summary of Relevant Christchurch District Plan Objectives

Objective	Relevance to this plan change
<p>Objective 15.2.1 – Recovery of Commercial activity</p>	<p>This objective recognises the critical importance of commercial activity (defined as retail, offices, and commercial services) to the recovery and long term growth of the City, and which is facilitated in a framework that supports commercial centres.</p> <p>This is a high level objective that, together with Objective 15.2.2, promotes a centres-based approach to planning and managing commercial activity.</p>
<p>Objective 15.2.2 – Centres-based framework for commercial activities</p>	<p>This objective establishes the overarching management framework for commercial activity in the City. Commercial activity is to be focussed within a hierarchical network of commercial centres, consistent with their specified role and in a way that gives primacy to the Central City followed by lower order centres.</p> <p>The centres-based framework promotes intensification of centres supporting their viability, vitality, and growth.</p> <p>A range of other outcomes are sought including recovery of centres that sustained significant damage (including Lyttelton) or population loss from their catchment (including the Central City), integration of a range of complementary activities and achievement of a compact and sustainable urban form. PC14 responds to these matters, particularly with regards to ensuring the primacy and recovery of the central city and by including development controls which recognise the focus of centres as community spaces.</p>
<p>Objective 15.2.3 – Office parks and mixed use areas</p>	<p>This objective recognises all existing office parks located around the City zoned Commercial Office Zone but seeks to avoid their expansion or the development of new office parks or mixed use areas.</p> <p>PC14 proposed to amend this objective to respond to directions to intensify in areas close to the amenities afforded by commercial centres. It does this by zoning well located industrial land surrounding the central city to mixed use and expressing in this objective the outcomes for this area to enable high quality residential development that can contribute to housing diversity and affordability.</p>
<p>Objective 15.2.4 – Urban Form, scale, and design outcomes</p>	<p>Sets out the objective of centres having a scale, form and design of development that is consistent with the role of a centre, recognising the central city and</p>

	<p>district/town centres as strategically important focal points for community and commercial investment.</p> <p>It identifies the urban design outcomes for centres including that development is visually attractive, safe, easy to orientate, conveniently accessible and responds positively to local character and context.</p> <p>A number of the proposed changes seek to improve the urban design and amenity outcomes for centres.</p> <p>Minor additions are also proposed to this objective so that it applies to mixed use zones, and in so doing enables consideration of reverse sensitivity effects.</p>
Objective 15.2.5 – Diversity and distribution of activities in the Central City	<p>Sets out the range of activities anticipated in the central city generally and of particular relevance, it currently seeks to limit the height of buildings to support an intensity of commercial activity across the CCCBZ and limit the extent to which retail and offices can establish outside the CCCBZ – both key tenets of the CCRP.</p>
Objective 15.2.6 – Role of the Commercial Central City Business Zone	<p>Establishes that the CCBZ is the principal commercial centre for Christchurch district, thereby aligning with the City Centre Zone in the National Planning Standards Zone Framework.</p> <p>Secondly it expresses an outcome that the zone will be attractive for business, residents, workers and visitors, consistent with the Strategic Direction for the built environment and providing the direction of the level of amenity anticipated for the city’s pre-eminent commercial zone.</p>
Objective 15.2.7 – Role of the Commercial Central City Mixed Use Zone	<p>Expresses a development outcome for the CCMUZ that the zone should be a vibrant place with a compatible mix of activities that co-exist in support of the CCCBZ. This supports principles established through the CCRP to consolidate and prioritise the CCCBZ over the recovery period and informs amendments to policies and rules in this plan change to ensure that intensification in this zone, supports those outcomes.</p>
Objective 15.2.8 – Built form and amenity in the Mixed Use Zone	<p>Sets an outcome that the built form will contribute positively to the amenity values of the area, including people’s health and safety and to the quality and enjoyment of the environment for those living, working within or visiting the area.</p> <p>This is particularly relevant to PC14 because a number of changes are proposed to the CCMU Zone provisions to better implement this objective e.g. through development controls and design assessment for</p>

	some developments, whilst enabling more development through increased height.
Objective 15.2.9 – Role of the Commercial Central City (South Frame) Mixed Use Zone	This objective implements aspects of the CCRP including one of the public amenity frames used to help consolidate commercial activity in the CCBZ. Relevant to PC14, it seeks to enable activities that are compatible with each other and do not compromise the consolidation of the CCBZ. Further, it highlights the zone’s function to support a connected, safe and attractive open space urban landscape.
Objective 15.2.10 – Built form and amenity in the Commercial Central City (South Frame) Mixed Use Zone	This objective relevantly sets an outcome for the zone to be focused on safety, amenity, vibrancy, accessibility and attractiveness – all matters that PC14 must consider when enabling further intensification in the zone, to help achieve a well-functioning urban environment.
Objective – Role of the Commercial Local Zone in the Central City	Expresses the small scale role of this zone and its local catchment function, relevant when considering the extent of intensification appropriate for this zone.
Objective 16.2.2 - Brownfield Redevelopment	This objective directly responds to the CRPS directions to enable redevelopment of appropriate brownfield sites whilst not compromising the function of the wider industrial area for primarily industrial activities. It enables consideration of the additional brownfield areas identified in this plan change, to give effect to the NPSUD directions to intensify in locations close to jobs, services and amenities.

2.2.3 Policies and rules are included in Chapter 15 and 16 to implement these objectives. Of particular relevance, Policy 15.2.2.1 describes the role of commercial centres as focal points for the community and business through intensification, in a way that reflects their functions and catchment sizes and in a framework that gives primacy to, and supports the Central City, whilst supporting and enhancing the role of district centres and maintaining the role of lower order centres (Neighbourhood centres, Local centres and Large Format Centres). As noted by the Independent Hearings Panel in its decision on the commercial provisions of the proposed district plan, “*whilst the Canterbury Regional Policy Statement is relatively prescriptive in its direction that district plans adopt a centres-based approach to the planning for commercial centres, it allows for the exercise of significant discretion and choice as to how a centres based approach is to be implemented*” (Decision 11, paragraph 40).

2.2.4 Consequently, the policies and rules of Chapter 15 set out how the centres-based framework is to be achieved and which includes a description of the role of each centre with reference to the extent of each centre, their size, function, catchment areas and the range and scale of activities anticipated within them. This follows through to implementation by zoning and zone rules with regards to the range and scale of activities permitted in different commercial zones (including heights and in some cases, tenancy and floorspace controls). Generally, the higher

order centres⁴ permit a greater range and scale of activities, are larger and serve a wider catchment compared to lower order centres. This is generally consistent with the way that centres are classified in the NPSUD and National Planning Standards, albeit that some of the zone names reflect a different type of centre (e.g., the operative district plan's local centres are described as neighbourhood centres in the NPDUD and vice versa).

- 2.2.5 A number of policies (including Policies 15.2.4.1 and 15.2.4.2) are concerned with ensuring that development is of a scale and form anticipated for a centre, according to their function. All new development is required to be well-designed and laid out and residential activity is also required to be designed to ensure a high quality healthy living environment. PC14 proposes amendments to these policies to reflect the revised outcomes for commercial zones, giving effect to the NPSUD directions, and to provide an appropriate policy framework to inform appropriate zone provisions and for considering consent applications for development in intensifying commercial areas.
- 2.2.6 Policy 15.2.4.3 requires regard be given to relevant Suburban Centre Master Plans when considering resource consent applications for development within those centres, in support of their recovery and long term growth. Of particular relevance to this plan change, this includes the Lyttelton and Sydenham suburban centre masterplans. The Lyttelton Master Plan, amongst other things, supports a 12 metre maximum height primarily to ensure new buildings are sympathetic to the surrounding development. The operative district plan also includes design guidelines for this centre seeking a similar outcome, acknowledging the special character of this particular centre. Policy 15.2.2.5 also seeks to recognise and protect the special character and role of Lyttelton centre.
- 2.2.7 Sydenham is another centre specifically listed in Policy 15.2.4.3 because it suffered considerable damage in the earthquakes and a master plan was developed to support its recovery. Of relevance to this plan change seeking to enable more intensification in and around Sydenham commercial centre, the master plan recognises that the centre's function and viability is impacted by not having an immediately surrounding residential catchment⁵.
- 2.2.8 The operative district plan contains a range of policies related to the anticipated activities, design and amenity outcomes of central city commercial zones. These are intended to reflect the outcomes sought by the Christchurch Central Recovery Plan and consequently seek to prioritise commercial activity in the Central City Business Zone, in support of its recovery and to ensure that a high standard of amenity is achieved. The surrounding Central City Mixed Use zones are intended to provide a supporting commercial role, where the scale and range of activities is more limited. Residential intensification is supported in all central city commercial zones. PC14 proposes a number of amendments to these policies to support the proposed additional intensification and improved built form and amenity outcomes, that will contribute to the NPSUD's objectives of achieving well-functioning urban environments. The Plan Change also proposes additions to these policies to ensure that, where relevant, they also apply to commercial zones that are not centres, for example suburban mixed use zones and office parks.
- 2.2.9 Guidance for development and activity in the mixed use zones outside the central city is currently provided by Policy 15.2.3.2. As currently drafted, the policy provides no guidance to inform development in the suburban mixed use zones, other than describing a general presumption against new commercial activity. Whilst it is considered out of scope to revisit

⁴ i.e. Key Activity Centres and the Central City

⁵ [Sydenham Master Plan](#) (2012), page 10.

the outcomes and policy framework for the Mixed Use Zone more widely, amendments to this policy are proposed to support the proposed enablement of comprehensive residential development within an identified new precinct within this zone, which is made in direct response to the Policy 3 directions in the NPSUD.

- 2.2.10 Policies 16.2.2.1 (Brownfield site identification) and 16.2.2.2 (Brownfield redevelopment) are the relevant policies for assessing non-industrial redevelopment proposals in circumstances where they would not compromise the wider area for primarily industrial activities. To be classified as a brownfield site, the site needs to either be identified by an overlay or meet all of the stated criteria in Policy 16.2.2.1. Only two sites are currently identified via an overlay - Waterloo Business Park in Islington and the Tannery boutique retail complex in Woolston. The relevant criteria includes whether the site meets the definition of “brownfield”, whether the land is needed to meet industrial land supply needs and whether the site / area is located in an area surrounded by other industrial activities and/or would erode the outcomes of the wider area for primarily industrial activity. Sites identified by an overlay, or that meet the criteria, can be considered for appropriate redevelopment (via resource consent), having regard to the matters set out in Policy 16.2.2.2.

2.3 Problem definition - the issues being addressed

2.3.1 The specific issues that this plan change seeks to address are all directly related to giving effect to Policy 3 of the NPSUD. For ease of evaluation, they are split into a number of sub-issues as follows:

- Implementing Policy 3(a) - intensification in the city centre zone;
- Implementing Policy 3(c)(ii) – intensification in commercial zones within the walkable catchment of the city centre zone;
- Implementing Policy 3(d) – intensification in suburban commercial zones; and
- Implementation of Policy 3(c)(ii) and Policy 3(d) in respect to potential intensification of industrial zones within the walkable catchments of the city centre, town centre and local centre zones.

2.3.2 The technical report on “Approach to Alignment with National Planning Standards” set out in Appendix 2 has identified what zones are the nearest equivalent for giving effect to Policy 3, concluding as follows:

National Planning Standards / NPSUD Centre Zone	Equivalent Christchurch District Plan Zone
City Centre Zone	Commercial Central City Business Zone
Town Centre Zone	Commercial Core Zones (District Centre)
Local Centre Zone	Commercial Core Zone (Neighbourhood Centre)
Neighbourhood Centre Zone	Commercial Local Zone

2.3.3 As explained in Part 1 – ‘Overview and High Level District Issues’ and the technical report mentioned above⁶, it is considered that Policy 3(b) – intensification within metropolitan centres and 3(c)(i) and (iii) – intensification within the walkable catchments of metropolitan centres and existing and planned rapid transit stops, are not relevant in the local Christchurch context on account of there being no centre zones equivalent to a metropolitan centre zone and no existing or planned rapid transit stops. The approach to giving effect to those directions is therefore not evaluated.

2.3.4 Consideration of those issues includes understanding the full package of provisions needed to give effect to those directions, relating both to the level of enablement (heights and densities) and any other provisions needed to maintain and enhance the quality of the environment and support well-functioning urban environments.

2.3.5 **ISSUE 1 – How to give effect to Policy 3(a) of the NPSUD – Intensification in City Centre Zones**

2.3.6 Policy 3(a) directs councils to prepare a plan change to *“in city centre zones, enable building heights and density of urban form to realise as much development capacity as possible, to maximise the benefits of intensification”*. Unlike Policy 3(c) which specifies a minimum height

⁶ Technical Report: Approach to Alignment with National Planning Standards, Christchurch City Council (2022) **Appendix 2**

limit, Policy 3(a) leaves it to Tier 1 councils to determine for themselves, what that limit is. The Ministry for the Environment (MfE) provides some additional guidance to assist the understanding and implementation of this policy⁷, expressing the opinion that:

- ‘As much as possible’ means removing unnecessary and unreasonable barriers to accommodate the maximum amount of development capacity that can be realised.
- This will likely look different in various urban environments.
- City centres are a step up in the zoning hierarchy from metropolitan centres, so enabling as much development capacity as possible is expected to mean greater than 6 storeys (because 6 storeys is the minimum in policy 3(b) of the NPSUD for metropolitan centres);
- Tier 1 authorities should be considering the level of demand and accessibility in determining what heights and densities can be enabled.
- In practice, this could mean:
 - No maximum building heights or maximum gross floor area (GFA) standards in city centre zones or large parts of city centre zones; or
 - Development standards that may limit building height and density, where there is evidence that doing so will contribute to a well-functioning urban environment and achieve the objectives of the NPSUD as a whole.

2.3.7 MfE (p30) suggests stepping through the following considerations:

- Consider what ‘as much as possible’ is going to mean in the city centre, taking into account local circumstances and factors – specifically, the level of demand and accessibility should be key considerations.
- Consider if any of the qualifying matters (eg, matters of national importance, open space, heritage orders or other matters) apply to the city centre. Also, look at to what extent heights and densities may need to be modified to accommodate the qualifying matter. (The qualifying matters set out the matters local authorities need to consider in enabling ‘as much as possible’.)
- Review the current city centre controls and determine if they are enabling enough to support the outcomes intended in the NPS-UD and by Policy 3(a). This means checking the controls are enabling as much development capacity as possible to maximise the benefits of intensification. If not, the controls will need to be amended accordingly.
- In maximising the benefits of intensification, consider whether enough intensification has been enabled to support outcomes such as transport choice, accessibility and climate emissions reduction. If you are not maximising the benefits of intensification due to other factors (eg, character), ensure the effects of doing so have been taken into account using adequate evidence in a section 32 report.
- As directed by Policy 6, consider what ‘as much as possible’ will mean for the urban environment in terms of urban form, amenity changes and the benefits of urban development. Local authorities will need to ensure the specific outcome of enabling as much development capacity as possible is consistent with the wider NPS-UD policy direction.
- Consider if the outcome and/or decision on what ‘as much as possible’ means for the city centre environment will ensure that a well-functioning urban environment is achieved.

⁷ [MfE Guidance - Understanding and Implementing Intensification Provisions for the NPSUD](#)

- 2.3.8 The reference above to qualifying matters in the context of Policy 3(a) is somewhat puzzling because Policy 3(a) does not set a quantifiable intensification baseline or limit against which to assess the impact of a qualifying matter, as required under 3.33(2)(b). Unlike Policy 3(c) which sets a minimum 6 storey height limit, Policy 3(a) provides Council with the authority to set that limit, without the need to justify a lesser limit on the basis of a qualifying matter. We therefore read the directions to be that Council should seek to enable as much capacity as possible to maximise the benefits of intensification, having regard to the wider objectives of the NPSUD, which have at their core, the objective of achieving well-functioning urban environments and having particular regard to the matters identified above (e.g. accessibility, demand, transport choice, housing affordability, local circumstances etc).
- 2.3.9 Adopting that approach, we do not consider it necessary to assess proposed height limits in the city centre zone as qualifying matters but rather to assess their appropriateness under section 32, in the usual manner. That said, for the avoidance of all doubt, we have included lower height limit areas within the qualifying matters assessment (Part 2) to demonstrate that an even higher threshold of evaluation than necessary has been undertaken.
- 2.3.10 Crucial to the implementation of the intensification policies is Policy 1 of NPSUD, which requires that planning decisions contribute to well-functioning urban environments (WFUEs). Elsewhere⁸, this s32 report describes a WFUE and how it not only means the specific matters listed in Policy 1 of the NPSUD, but extends to a range of other matters, relevantly including development that demonstrates the principles of good urban design⁹. This is an important consideration for giving effect to Policy 3(a) and which appears to rule out any option of having no development controls at all (i.e., no height limit, no built form or other controls that are necessary to achieve a well-functioning urban environment). We arrive at that conclusion because the RMA's set of medium density provisions¹⁰ include urban design controls necessary to achieve a satisfactory standard of residential accommodation and amenity consistent with a well-functioning urban environment, and Policy 3 generally anticipates a greater scale and intensity of development in the listed centres than is anticipated in medium density zones. It follows that the areas with the most scale and range of activities, are more likely to have greater potential for adverse effects that need to be managed through the district plan. The technical report entitled "Urban Design – Commercial Zones" (Appendix 6) provides additional discussion on this matter including how the principles of good urban design contribute to WFUEs and the extent to which they are a necessary part of the package of provisions for more intensively enabled development in the City Centre Zone.
- 2.3.11 As also discussed in Part 1 of this section 32 report, "enable" is interpreted to mean that the district plan provides for intensification in accordance with the directions of Policy 3(a), as either a permitted, controlled or restricted discretionary activity. In the case of the latter, the extent of matters where discretion is restricted, should not be so extensive that they have the effect of being disabling of the anticipated level of intensification set out in the Policy. MfE's intensification guidance¹¹ supports this view, clarifying that:

⁸ Part 1 – Overview and High Level District Issues

⁹ [MfE Factsheet on Well-functioning Urban Environments \(2020\), page 2](#)

¹⁰ Schedule 3A of the RMA

¹¹ [MfE Guidance - Understanding and Implementing Intensification Provisions for the NPSUD](#) page 6.

District plans include a package of controls relating to built form that manage a range of effects. These controls are still relevant when giving effect to the intensification provisions.

The intensification provisions are not intended to direct local authorities to have no controls. Plans will still have development controls, however local authorities need to pay careful attention to controls that affect height and density. If the controls in a plan undermine or restrict the ability to enable intensification as directed and prevent intensification outcomes from being achieved, then those controls need to be reviewed. This does not necessarily mean removing those controls from plans, but carefully reviewing and testing each control to ensure it is balanced to enable intensification.

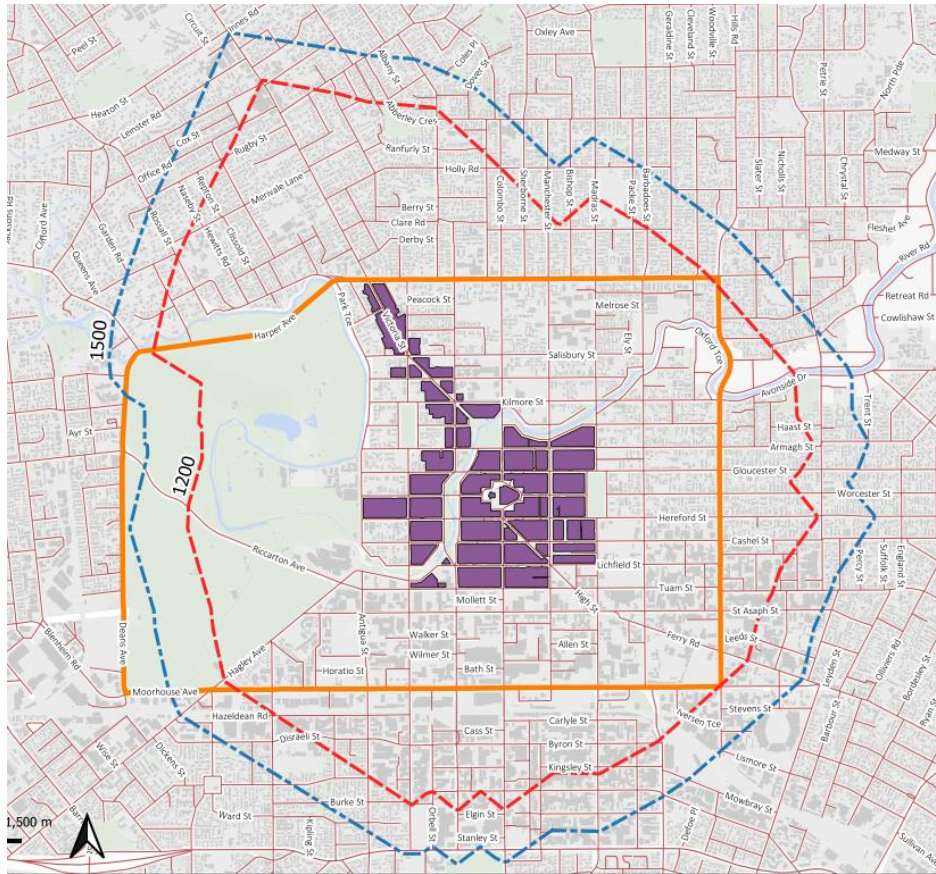
None of the intensification requirements are intended to override or undermine good quality urban design or quality urban environments.

2.3.12 ISSUE 2 – How to give effect to Policy 3(c)(ii) – Intensification in commercial zones within the walkable catchment of the City Centre Zone

2.3.13 Policy 3(c)(ii) directs building heights of at least 6 storeys (20 metres) within *at least* a walkable catchment of the edge of the city centre zone. Council has determined that this is generally 1200 metres on the basis of analysis of various metrics including accessibility, population demand and consideration of anticipated urban form. Refer to the s32 evaluation for the Residential chapter (Chapter 14) for more detail (Part 3).

2.3.14 The map below shows the extent of a 1200m and 1500m walking distances from the edge of the City Centre Zone (CCZ - purple) and shows that it takes in all the zones located within the four avenues (the defined extent of the Central City). For the purposes of Chapter 15 (Commercial) this includes the:

- Central City Mixed Use Zone (CCMU);
- Central City Mixed Use (South Frame) Zone (CCMU(SF)); and any
- Neighbourhood Centre Zones located in the Central City.



Above: Christchurch District Plan Zoning showing Walkable Distances from the City Centre Zone.

- 2.3.15 The small Neighbourhood Centre zones¹² currently have an 8m height limit (2 storeys) with any height breach assessed as a restricted discretionary activity. Under Policy 3, these heights must be increased to achieve the mandatory 6 storeys, unless a qualifying matter applies. No qualifying matters are identified for central city neighbourhood centre zones. Of relevance also, the residential zones immediately surrounding these zones are proposed to have their height limits increased to at least 6 storeys (part 20m/part 32m) – Refer to the s32 evaluation for the Residential chapter (Chapter 14) for more detail (Part 3).
- 2.3.16 The Central City Mixed Use Zones currently have a permitted height limit of 17 metres, with restricted discretionary activity status for breaches of that height, and therefore at least 3 metres (one storey) of additional building height must be provided for to give effect to Policy 3. The CCMU and CCMU(SF) zones also have density controls (tenancy limits for retail and offices) in place to support the recovery of the city centre which need further review to determine whether they are still required, having regard to the enabling directions of Policy 3(c)(ii). The background to these is provided in ‘Appendix 1 - Technical Report on Background to Central City Height and Density Controls’. Economists, Property Economics Limited, specifically address the need to retain the existing density controls (office and retail tenancy limits) and assess the potential costs and benefits of different height options, in their report – Economics Cost Benefit Analysis of Commercial Centres, included as Appendix 3.
- 2.3.17 It is also pertinent that monitoring of the effectiveness and efficiency of the existing CCMU and CCMU(SF) provisions has identified a range of quality-related issues that are detracting from achieving the intended outcomes of these zones and achievement of a well-functioning

¹² Classified as Local Centres in the Operative Christchurch District Plan

urban environment. It is therefore necessary to ensure that, when reconsidering the provisions for these zones to enable further intensification, appropriate consideration is given to the conclusions of this monitoring with a view to addressing existing issues and not perpetuating them. These matters are considered in detail in the Technical Report – Urban Design – Commercial Zones (Appendix 6).

- 2.3.18 **ISSUE 3 – How to give effect to Policy 3(d) – intensification in suburban commercial zones**
- 2.3.19 Policy 3(d) requires council to enable building heights and densities of urban form within neighbourhood, local and town centre zones (or equivalent), commensurate with the level of commercial activity and community services in those centre zones. This requires an assessment of the relative role and function of each centre and the actual levels of commercial activity and community services in all centres. The technical report entitled, “Centres: Approach to Alignment with National Planning Standards” (Appendix 2), provides the context and centre composition analysis in relation to that direction. As these centres are lower in the centres hierarchy compared to metropolitan centres, the starting point for assessment is considered to be building heights that are less than the minimum anticipated for metropolitan centres (i.e. 6 storeys). This is consistent with the MfE’s guidance referenced earlier and set out in page 29 of their guidance¹³.
- 2.3.20 It is notable that significant heights and densities in suburban centres were enabled through the most recent District Plan review to implement a centres-based framework for managing commercial activity. All of the District Plan’s district centres/key activity centres currently have a permitted height limit of 20 metres (6 storeys) which is the level of enablement that Policy 3 anticipates for metropolitan centres. Lower order centres (neighbourhood and local centres) currently have lesser heights (12m/8m respectively) to implement CRPS directions to give primacy to higher order centres (KACs and the Central City) and support their recovery.
- 2.3.21 **ISSUE 4 – How to give effect to Policy 3(c)(ii) and Policy 3(d) intensification of industrial zones within a walkable catchment of the City Centre, Town Centre and Local Centre zones.**
- 2.3.22 Policy 3 (c)(ii) and (d) does not just apply to commercial zones, it applies to all zones *around* the specifically listed zones in the Policy. This includes industrial zones unless a ‘qualifying matter’ set out in clause 3.32 of the NPSUD applies. The qualifying matters set out in clause 3.32 provide scope (3.33(1)(g)) to exclude low density business areas (such as industrial zones) from the intensification directions, however this is only to the extent that such areas are required to “*meet expected demand*” for those (low density) uses. It follows that where this land is not required to meet expected demand for those uses, council should consider enabling intensification in accordance with Policy 3 and the broader outcomes sought by the national direction.
- 2.3.23 Appendix 4 includes a technical report¹⁴ which identifies a number of industrial areas located close to commercial centres that are potentially appropriate to transition to housing, for further evaluation in this report. No further consideration was given to enabling these areas for commercial activities as this would be inconsistent with the centres-based policy framework embedded in both the regional and district plan which directs that new commercial activity be primarily focused within the existing network of centres while providing for commercial activities outside centres where it will not give rise to significant adverse distributional or urban form effects¹⁵.

¹³ [Understanding and implementing intensification provisions for the NPS on urban development \(environment.govt.nz\)](https://www.environment.govt.nz/understanding-and-implementing-intensification-provisions-for-the-nps-on-urban-development)

¹⁴ Technical Report: Potential Industrial Land Transition Assessment, Christchurch City Council (2022) **Appendix 4**

¹⁵ Objective 3.3.10 of Strategic Directions chapter (Chapter 3) of Christchurch District Plan

2.3.24 Appendix 5 provides an assessment of capacity in the Central City while a Business Development Capacity Assessment prepared for Greater Christchurch concludes that the City has a significant surplus of industrial land, such that there is no land supply basis for preserving the full extent of industrial land exclusively for low density industrial uses. With the two most recent industrial land capacity assessments forecasting surpluses in excess of 200 hectares over the next 30 years, consideration of enabling some of this surplus capacity to transition to high density residential, is considered necessary and appropriate. This report evaluates the options for such enablement.

3 Development of the plan change

3.1 Background

3.1.1 The background to this plan change is discussed in Part 1 of the section 32.

3.1.2 Given the directive policies of the NPSUD that give rise to this plan change, Council’s evaluation and evidence is focused on those areas where Council has most discretion when implementing the national direction. For example, there is no need to evaluate what centres are to be subject to intensification, but rather the evaluation should focus on the scale and form of that intensification within the prescribed centres and where applicable, their walkable catchments.

3.1.3 The following technical advice informs this plan change.

Table 3: Technical Reports Informing Plan Change 14 (Commercial and Industrial)

	Title	Author	Description of Report
Appendix 1	Technical Report – Background to Central City Height and Density Controls	Christchurch City Council	Brief overview of the background to existing central city height limits and office tenancy controls.
Appendix 2	Technical Report – Centres: Approach to Alignment with National Planning Standards	Christchurch City Council	Describes the process and analysis for aligning the commercial centres identified in the Christchurch District Plan, with the NPSUD and National Planning Standards to apply the Policy 3 directions.
Appendix 3	Economics Cost-Benefit Analysis – Commercial Centres	Property Economics Ltd	High-level economic cost-benefit analysis of allowing greater height limits for development envelopes in suburban centres and the Central City.
Appendix 4	Technical Report – Assessment of Potential Industrial Transition Areas	Christchurch City Council	A high level assessment of the appropriateness of enabling the potential transition of Industrial General zoned land within the walkable catchments of the city centre, town and local centre zones for medium or high density housing.
Appendix 5	Business Land Capacity Assessment for Central City (2022)	Lincoln University	Updated land supply assessment for the central city and surrounding land which considers the sufficiency of zoned capacity to meet forecast demand.

Appendix 6	Technical Report – Urban Design – Commercial Zones	Christchurch City Council	Comprehensive Issues and Options report for revised urban design rules and assessment matters for intensification in commercial zones.
Appendix 7	Cost-Benefit Analysis of Proposed Industrial Land Rezoning	Sense Partners	Cost-benefit analysis of proposed rezoning of industrial land within the walkable catchment of the City Centre Zone.
Appendix 8	Technical Report: Comprehensive Residential Precinct Analysis Urban Design	Christchurch City Council	Overview of modelling undertaken to consider District Plan provisions that support the transition from areas of industrial activity to high quality, high density residential activity, through the provision of a Mixed Use Zone (MUZ), and Comprehensive Housing Precinct.
Appendix 9	Residential Market Demand Report – 2021	Real Estate Institute of NZ	Research report providing data on Christchurch’s housing market to April 2021, undertaken to inform an assessment of market demand pursuant to Policy 3(d) of the (then) NPSUD (prior to that policy being revised).
Appendix 10	Hierarchy of Centres – Urban and Built Form Descriptors	Boffa Miskell	Defines descriptors for each of the centre “types” within the new Centres framework.
Appendix 11	Technical Report - Lyttelton Town Centre Height Limit – QM	Christchurch City Council	A technical report on the appropriateness of a lower height limit in Lyttelton.

3.1.4 In addition, this plan change proposes changes to the commercial and industrial chapters to support greater tree provision in intensification areas through landscaping rules, particularly those areas that are demonstrably deficient in tree canopy cover, namely industrial areas within walking distance of the Central City. Changes to those provisions rely on technical reports attached to the Tree canopy cover section 32 report.

3.2 Description and scope of the changes proposed

3.2.1 The purpose of this plan change is to implement the intensification directions of the NPSUD, in relation to the commercial and industrial zones of the Christchurch District Plan (and related changes to chapter 2 and planning maps).

3.2.2 In relation to Chapters 15 and 16, the changes comprise of:

- a. Restructuring and renaming zone sub-chapters to align with their equivalent centres in the NPSUD and National Planning Standards (and consequential renumbering); and
- b. Amendments to objectives, policies and methods (including planning maps) to give effect to Policies 3 and 4 of the NPSUD, to increase heights and density of urban form in the specified locations. This includes amendments to provisions where necessary to ensure that implementation of those directions is undertaken in a manner consistent with the broader objectives of the NPSUD, including contribution to a well-functioning urban environment.

3.2.3 In relation to chapter 2, the changes relate to those necessary to reflect the partial implementation of the zone framework set out in the National Planning Standards and additional new definitions to support amended provisions in the substantive chapters. This includes new and amended definitions for:

Alternative housing models	Mean speed m/s;
Apartment	Perimeter block development
Building base	Small building
Building tower	Commercial centre
Central city heritage triangles	Commercial zones
Fine grain	Comprehensive residential development
Human scale	Key activity centres
Gust equivalent mean	Large format centre
Neighbourhood centre	Local centre
Town centre	City centre

3.2.4 Changes are proposed to existing objectives described below. Note that this overview does not include changes made to any part of chapters 15 and 16 relating to changed zone names, numbering, which are immaterial. For the most part, the existing District Plan objectives remain fit for purpose and this plan change proposes only refinements or additions to address demonstrable gaps in provisions relating to housing and business intensification in commercial and industrial zones.

Table 4: Summary of Proposed Changes to Objectives

Objective	Proposed Change	Reason for change
Objective 15.2.3 – Office parks and mixed use areas	Amend title to clarify that this objective relates only to mixed use zones outside the central city. To describe the outcome for mixed use zones close to the City Centre that are proposed to be enabled for greater intensification pursuant to Policy 3(c)(ii) of the NPSUD.	To improve clarity for plan users. To clearly express the resource management outcomes sought for Mixed Use Zones that are located close to the City Centre Zone, as a consequence of PC14 proposing to enable intensification in part of this (expanded) zone [via a new Comprehensive Housing Precinct].
Objective 15.2.4 – Urban form, scale and design outcomes	Add references to urban form, mixed use zones and to managing reverse sensitivity effects. Introduction of references to reducing greenhouse gas emissions and climate change effects. Add words ‘anticipated’ in circumstances where it is necessary to clarify that	This overarching objective that sets the urban form, scale and design outcomes for commercial zones, is currently focused on centres, and therefore does not consider non-centre commercial zones (e.g. office and mixed use zones) nor how the urban form of commercial zones collectively contribute to the anticipated urban form the City in achieving a Well-functioning Urban Environment as sought by Objective 1 of Schedule 3 to the RMA. To reflect matters introduced through the NPSUD relating to amenity values and aspects

	character or built form will evolve over time.	of a well-functioning urban environment as defined. The need to emphasise the potential for reverse sensitivity effects in transitioning mixed use areas because of the further intensification proposed to be enabled in these areas.
Objective 15.2.7 – Role of the Central City Mixed Use Zone	Add the words ‘high quality’.	To better implement Strategic Objectives 3.3.7 and 3.3.8 that set the direction for the central city to be a high quality urban environment for residents, visitors and workers, in achieving a Well-functioning Urban Environment as sought by Objective 1 of Schedule 3 to the RMA.
Objective 15.2.8 – Built form and amenity in the Central City Mixed Use Zone	Add the word ‘evolving’.	To implement NPSUD direction in Objective 4 that 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 16.2.2 - Brownfield Redevelopment	Add a number of new brownfield overlay areas to those already in this objective (and consequential amendments to reflect those additions).	To support new brownfield areas (subject to a brownfield overlay) on identified Industrial General zoned land at Woolston, Hornby, Cranford and Papanui, giving effect to the NPSUD Policy 3 directions to intensify in and around specified centres unless a qualifying matter justifies that intensification as being inappropriate.

3.2.5 **Table 5** provides an overview of the provisions proposed to be changed to address the issues identified in section 2.

Table 5: Summary of Proposed Changes to Commercial Provisions

PROVISION	PROPOSED CHANGE
15.1 INTRODUCTION	
(c)	<ul style="list-style-type: none"> Amend to add the words “<i>and the form and function of commercial centres and mixed use zones</i>” to better reflect the matters covered by Chapter 15, as particularly relevant to PC14 i.e. commercial centres and mixed use zones.
POLICIES – APPLICABLE TO ALL COMMERCIAL ZONES	
Policy 15.2.2.1 – Role of centres	<ul style="list-style-type: none"> Amendments to reflect new centre zone structure, identification of local centres with different levels of commercial activities and commercial services (small, medium and large) to enable implication of NPSUD Policy 3d.

	<ul style="list-style-type: none"> • Amendments to (c) Local Centres to better express the density of residential activity proposed to be enabled within and around local centres depending on their level of commercial activity and community services. • Minor amendment to (c) regarding the naming of Sydenham commercial centre, for clarity, given the number of small centres located along Colombo Street. • Amendment to (d) Large format centres to add Northlink, Chappie Place and SupaCenta Large Format Centres, in order to implement the new centre zone structure. • Amendment to (e) to delete references to the different zoning of standalone supermarket centres which is no longer necessary as a result of the increased height enabled for all neighbourhood centres.
Policy 15.2.4.1 – Scale and form of development	<ul style="list-style-type: none"> • Amend to clearly articulate how the policy implements Policy 3 directions in the NPSUD relating to height and density, and implement Strategic Objective 3.3.7 and Objective 15.2.4 (Urban form, scale and design outcomes) with particular reference to the hierarchical approach to building heights, clustering of high rise buildings and specifying the parts of the central city where lesser heights are appropriate to manage potential impacts (Cathedral Square and Victoria Street). • Introduce policy direction for perimeter block form of development in the new mixed use zone where greater enablement of residential activity is proposed.
Policy 15.2.4.2 – Design of new development	<ul style="list-style-type: none"> • Amend to include the new matters of relevance for considering the design of new development, in response to the additional enablement of building heights and density of urban form proposed by PC14. • Policy support for new activity to be permitted in the city centre and south frame zones (small buildings) – acknowledging that buildings exhibiting certain built form characteristics are unlikely to generate adverse effects that require management through a consent process. • Policy direction introduced for the anticipated design of new development in the proposed new mixed use zone where comprehensive residential activity is proposed to be enabled.
CITY CENTRE ZONE	
Policy 15.2.6.3 – Amenity	<ul style="list-style-type: none"> • Amend to reflect that amenity values evolve over time and to reference new built form standards introduced to manage the impacts of tall buildings. • Also, to reflect that the urban design assessment requirement is proposed to apply to all buildings in the city centre zone, not just in the ‘core’ because a high standard of design is sought for all buildings in the central city and to reflect that there is no valid resource management reason for Victoria Street having a lesser standard of urban design assessment than other parts of the central city, outside the city centre zone. • Amendments to reflect that height limits are no longer proposed to be set to manage effects associated with the distribution of commercial activity (with reliance on tenancy/ floorspace limits) across the zone, but rather that design

	standards are set to manage the effects of tall buildings, where justified and consistent with the overall direction of the NPSUD.
Policy 15.2.6.4 - Residential intensification	<ul style="list-style-type: none"> Amend to add reference to support existing and proposed provisions relating to sunlight access, communal amenity space and outlook spaces. Amend to reference the intention for residential development to be high quality and supporting a range of residential typologies, tenures and prices.
Policy 15.2.6.5 - Pedestrian focus	<ul style="list-style-type: none"> Amend to add reference to wind generation to reflect potential new effects of tall buildings on pedestrians.
Rule 15.11.1.1 P13 - Residential activity and Rule 15.11.1.3 RD4	<ul style="list-style-type: none"> Amend to include a consistent set of activity specific standards for residential activity in all commercial zones by amending/ adding outdoor living space requirements (size and dimensions) and minimum requirements for outlook spaces. Add reference to relevant assessment matters (glazing and outlook spaces) to Rule 15.11.1.3 RD4 to enable assessment of any breaches of those new standards.
Rule 15.11.1.1 P18 - Small buildings) and 15.11.1.3 RD2, RD5 and RD10	<ul style="list-style-type: none"> Add new rule to permit 'small buildings' as defined in order to enable by a permitted pathway, an activity that is deemed to have no or minimum adverse effects on the environment and therefore provide an option for development not requiring an urban design assessment, including in the Retail Precinct. Add reference to RD5 to enable consideration by a restricted discretionary consent, any breach of the built form standards for small buildings. Add rule (RD10) to enable consideration of proposals for a small building that doesn't meet one or more of the activity specific standards and apply the exclusion in (c) so that RD10 does not apply to demolition, repairs and alterations etc. Exempt small buildings from needing to comply with the following built form standards: Rules 15.11.2.1 (Building setback and continuity), 15.11.2.3 (Sunlight and access to the street), 15.11.2.6 (Location of onsite parking areas), 15.11.2.7 (Fences and screening structures), 15.11.2.11 (Maximum building height) 15.11.2.12 (Maximum road wall height), 15.11.2.14 (Building tower setbacks), 15.11.2.15 (Max. building tower dimension and building tower coverage), 15.11.2.16 (Building tower separation) and 15.11.2.18 (Wind). This is on the basis that these are not appropriate and / or necessary for the prescribed form of small buildings that are permitted under P18. Add new restricted discretionary rule for small buildings which breach of any of the activity specific standards (Rule 15.11.1.3 - RD10).
Rule 15.11.1.2 C1 - Urban Design Certification	<ul style="list-style-type: none"> Amend rule so that it applies to sites in all parts of the City Centre zone and is limited to developments of 28m or less (the status quo threshold for the availability of the certification route). Introduce two new built form standards that must also be met - (sunlight and outlook on the street and the maximum road wall height).

<p>Rule 15.11.1.3 RD1 – Urban Design Assessment</p>	<ul style="list-style-type: none"> Amend so that it applies to sites in all parts of the City Centre Zone on the basis that there is no valid resource management reason why a lesser standard of quality and / or threshold for urban design assessment should apply in one part of the City Centre zone compared with another.
<p>Rule 15.11.2.9 – Sunlight and Outlook</p>	<ul style="list-style-type: none"> Amend to reflect the MDRS recession plane standard, for consistency between residential and commercial zones.
<p>Rule 15.11.2.11 – Maximum building height Rule 15.11.2.12 – Maximum road wall height Rule 15.11.1.4 D1 Rule 15.12.1.3 RD2</p>	<ul style="list-style-type: none"> Amend rules to give effect to Policy 3(a) – including a new 90 metre maximum building height limit, new maximum building heights for the building base of 28m (lower part of the building that is typically built up to the street and side boundaries), introduction of lower height control areas around parts of Cathedral Square and Victoria Street (45m height limit applies) and the Arts Centre (16 metres) and New Regent Street (8 metres) where 90 metres is not appropriate for various reasons including protection of heritage values, logical and legible urban form and building bulk and dominance on surrounding residential activity. Amend Rule 15.11.1.4 – D1, as the activity status for breaches of the new height rule. Additional allowance (bonus height) rule for corner buildings to encourage improved definition of the street corner and encourage mixed use.
<p>15.11.2.14 – Building tower setback (new) Rule 15.11.2.15 – Maximum building tower dimension and building tower coverage (new) Rule 15.11.2.16 – Minimum building tower separation (new) Rule 15.11.2.18 – Wind (new) Rule 15.11.1.3 RD5 15.14.3.35 - Upper floor setbacks, tower dimension and site coverage in the central city and 15.14.3.39 - Wind.</p>	<ul style="list-style-type: none"> Amend to add new built form standards to manage the potential effects of tall buildings [refer to Technical Report – Urban Design – Commercial Zones Appendix 6]. Add new matters of discretion (via Rule 15.11.1.3 RD5) for breaches of those rules.
<p>Rule 15.11.1.2(d)(ii) and 15.11.2 - Advice notes</p>	<ul style="list-style-type: none"> Make consequential amendments to advice note to reflect that urban design assessment not limited to sites within the core only. Add new advice note regarding potential infrastructure constraint.
<p>CENTRAL CITY MIXED USE ZONE</p>	
<p>Policy 15.2.7.1 - Diversity of activities</p>	<ul style="list-style-type: none"> Amend to add a clause to support opportunities for taller buildings (for residential and visitor accommodation) outside the City Centre Zone, where they are co-located with the large-

	<p>scale anchor projects of Te Kaha and Parakiore, that are themselves of significant scale to support a cluster of taller buildings around them.</p>
Policy 15.2.8.1 - Usability and adaptability	<ul style="list-style-type: none"> Amend to add additional considerations related to ground floor, street fronting development to support an active and attractive streetscene.
Policy 15.2.8.2 - Amenity and effects	<ul style="list-style-type: none"> Amend to ensure that buildings and/or landscaping is located adjacent to the street frontage, to ensure adequate setbacks are provided with adjoining residential zones or activities to enable sufficient space for outdoor living space, sufficient sunlight access and outlook and that outdoor service space and car parking is located away from street frontages and entrances to buildings. Specify that an urban design assessment is required for large scale (development exceeding 17m height) or residential developments of 4 units or more.
Policy 15.2.8.3 - Residential development	<ul style="list-style-type: none"> Amend to require that sufficient private amenity space is provided for residents that is proportionate to the extent of residential activity to compensate for the predominantly commercial nature of the area and which can be provided as communal space. The proposed policy amendments are aimed at ensuring greater consistency in respect to the standards and outcomes sought for development and activity in all central city commercial zones and to improve outcomes in the CCMU which monitoring demonstrates are inferior to those in other zones where urban design standards and assessment requirements apply.
Rule 15.12.1.1 P16 - Residential activity Rule 15.12.1.3 RD1	<ul style="list-style-type: none"> Amend activity specific standard (a)(i) to refer to outdoor service space (a defined term) rather than outdoor service space consistent with other zones. Amend to provide active and attractive street frontages in mixed use zones and a satisfactory set of amenity standards for permitted residential activity relating to the location of outdoor service space and outdoor living space, the size and dimensions of outdoor living space (including communal), minimum glazing for street facing elevations, outlook space requirements, maximum site coverage for predominantly residential buildings. These standards are broadly consistent with those in the adjoining High Density Residential Zone. Add reference to relevant assessment matters (glazing and outlook spaces) to Rule 15.12.1.3 RD1 to enable assessment of any breaches of those new standards.
Built form standards Rule 15.12.2.1 - Landscaping and trees Rule 15.12.2.2 - Height Rule 15.12.2.4 - Fencing and screening structures	<ul style="list-style-type: none"> Rule 15.12.2.1 (Landscaping and trees) to require more trees and landscaping on site, to specify the minimum dimensions to facilitate tree roots and canopies, to increase the landscaped front boundary setback from 2m to 3m to accommodate trees and to specify landscaping of required building setbacks. Rule 15.12.2.2 (Height) – increasing the height limit from 17m to 21m but introducing a maximum height for the building base of 17m, providing a road wall height consistent with the status quo.

<p>Rule 15.12.2.5 - Screening of outdoor storage, service areas/spaces and car parking</p> <p>Rule 15.12.2.6 - Sunlight and outlook</p> <p>Rule 15.12.2.7 - Minimum setback from the boundary with a residential zone or from an internal boundary</p> <p>Rule 15.12.2.8 - Minimum number of floors)</p> <p>Rule 15.12.2.10 - Building setbacks and Rule 15.12.2.11 - Building tower coverage</p> <p>Rule 15.12.2.12 – Glazing</p> <p>Rule 15.12.1.3 RD2</p>	<ul style="list-style-type: none"> • Rule 15.12.2.4 (Fencing and screening structures) – introducing additional controls where residential activity is proposed to be located at ground floor to ensure that the public street environment is not adversely impacted by fencing and screening structures put in place to secure privacy for ground floor dwellings. • Rule 15.12.2.5 (Screening of outdoor storage, service areas/spaces and car parking) – introducing car parking to the rule to ensure that it adequately located and screened so as not to adversely impact on the public street environment. • Rule 15.12.2.6 (Sunlight and outlook) – amend recession plane rule to align with the MDRS standard adopted in other zones for consistency. • Rule 15.12.2.7 (Minimum setback from the boundary with a residential zone or from an internal boundary) to specify the side boundary setbacks for residential buildings in support of a perimeter block urban form and require any required setback to be landscaped. • Rule 15.12.2.8 (Minimum number of floors) – include a new requirement for buildings to be a minimum of 2 floors, consistent with the approach in the neighbouring City Centre and CCMU (South Frame) Zones to make more efficient use of land and discourage low density building forms that are generally not appropriate in the inner city • Rule 15.12.2.10 (Building setbacks) and Rule 15.12.2.11 (Building tower coverage) – specifying minimum setbacks and site coverage for any building towers to support a comfortable and attractive environment for people on the street and reduce building tower bulk, dominance and other effects. • Rule 15.12.2.12 (Glazing) – consistent with other commercial zones and the MDRS standard applied widely in the residential zones, introduce a new rule specifying minimum glazing on building facades facing the street or a public space. • Additional matters of discretion are added to enable consideration of breaches of new built form standards.
<p>Rule 15.12.1.4 D2</p>	<ul style="list-style-type: none"> • Introduce new discretionary activity status (Rule 15.12.1.4 D2) for building heights exceeding 21 metres to reflect that, having regard to the anticipated urban form of the city and the strategic distribution of development capacity, buildings above 32m are not generally anticipated in the large CCMU Zone. Buildings between 17m-32m would be classified as restricted discretionary activities, as they are currently – Rule 15.12.1.3 RD2.
<p>Rule 15.12.1.3 RD4</p> <p>Rule 15.12.1.3 RD5</p>	<ul style="list-style-type: none"> • Two new thresholds of development requiring an urban design assessment via a restricted discretionary consent are introduced – Rule 15.12.1.3 RD4 in respect of multi-unit developments of 4 or more residential units and Rule 15.12.1.3 RD5 for any building over 17 metres in height. • Appropriate matters of discretion are included to assess relevant urban design matters. This responds to monitoring of the quality of developments in the CCMUZ that suggest that

	<p>additional controls are necessary to ensure a high quality residential environment is achieved for residents and that new buildings make a positive contribution to the central city recognising the significant role it plays as a community and commercial focal point for residents, workers and visitors.</p>
Rule 15.12.1.3 RD3 - Retirement Villages	<ul style="list-style-type: none"> Consequential amendment to this rule to reflect the deletion of 15.13.3.26 to consolidate assessment matters in 15.14. The relevant matters in the existing matter of discretion have been carried over into Matter of Discretion 15.14.1(b)(vi) and (a)(xiv) such that there is no material change in effect.
Rule 15.2.2 - Advice Note	<ul style="list-style-type: none"> Add new advice note under Rule 15.12.2 regarding potential infrastructure constraint.
Rule 15.12.1.3	<ul style="list-style-type: none"> Add in P22 to address current plan defect where commercial film studios are not currently subject to any built form standards.
CENTRAL CITY MIXED USE ZONE (SOUTH FRAME)	
Policy 15.2.10.2 - Residential development	<ul style="list-style-type: none"> Amend to require that sufficient private amenity space is provided for residents that is proportionate to the extent of residential activity and to add additional matters that contribute to an appropriate level of amenity for residents, including: <ul style="list-style-type: none"> separation of balconies or habitable spaces from internal site boundaries, minimum outlook requirements and internal noise protection standards. <p>This provides a consistent set of matters for all the central city commercial zones.</p>
Rule 15.13.1.1 P13 - Residential activity And Rule 15.13.1.3 RD4	<ul style="list-style-type: none"> Amend to require active and attractive street frontages in mixed use zones and a satisfactory set of amenity standards for permitted residential activity relating to the location of outdoor service space and outdoor living space, the size and dimensions of outdoor living space (including communal), minimum glazing for street facing elevations, outlook space requirements, boundary setbacks where residential activity is located at ground floor at the boundary of a street or public space, front and side boundary setback rules to encourage buildings to be built up to the front of a site to achieve a perimeter block form (unless ground floor residential in which case a 3 metre front setback is required), maximum site coverage for predominantly residential buildings. <p>These standards are broadly consistent with those in the adjoining High Density Residential Zone and CCMUZ.</p> Add reference to relevant assessment matters (glazing and outlook spaces) to Rule 15.13.1.3 RD4 to enable assessment of any breaches of those new standards.

<p>Built form standards</p> <p>Rule 15.13.2.4 - Landscaping and trees</p> <p>Rule 15.13.2.1 - Height</p> <p>Rule 15.13.2.5 - Outdoor storage, fencing and screening structures</p> <p>Rule 15.13.2.10 - Building setbacks) and Rule 15.13.2.11 (Building tower coverage)</p> <p>Rule 15.13.2.12 - Glazing</p> <p>Rule 15.13.2.8 - Minimum number of floors</p>	<ul style="list-style-type: none"> • Rule 15.13.2.4 (Landscaping and trees) to specify the minimum dimensions to facilitate tree roots and canopies and to increase the landscaped front boundary setback from 2m to 3m to accommodate trees. • Rule 15.13.2.1 (Height) – increasing the height limit from 17m to 21m but introducing a maximum height for the building base of 17m, providing a road wall height consistent with the status quo. • Rule 15.13.2.5 (Outdoor storage, fencing and screening structures) – introducing additional controls where residential activity is proposed to be located at ground floor to ensure that the public street environment is not adversely impacted by fencing and screening structures put in place to secure privacy for ground floor dwellings. • Rule 15.13.2.10 (Building setbacks) and Rule 15.13.2.11 (Building tower coverage) – specifying minimum setbacks and site coverage for any building towers to support a comfortable and attractive environment for people on the street and reduce building tower bulk, dominance and other effects. • Rule 15.13.2.12 (Glazing) – consistent with other commercial zones and the MDRS standard applied widely in the residential zones, introduce a new rule specifying minimum glazing on building facades facing the street or a public space. • Rule 15.13.2.8 (Minimum number of floors) – amend so that it relates to all buildings in the zone, not just those fronting Colombo Street or High Street, to improve land efficiency.
<p>Rule 15.13.1.3 RD5</p>	<ul style="list-style-type: none"> • Additional matters of discretion are added to Rule 15.13.1.3 RD5 to enable consideration of breaches of those new built form standards.
<p>Rule 15.13.1.4 D2 [and related Rule 15.13.1.3 RD5].</p>	<ul style="list-style-type: none"> • Introduce new discretionary activity status for building heights exceeding 21 metres to reflect that, having regard to the anticipated urban form of the city and the strategic distribution of development capacity, buildings above 32m are not generally anticipated in the large CCMU Zone. Buildings between 17m-32m would be classified as restricted discretionary activities, as they are currently – Rule 15.13.1.13 RD5.
<p>Rule 15.13.1.1 P16 - Small buildings; and</p> <p>15.11.1.3 RD5 and RD7</p> <p>15.13.2.3 (Sunlight and access to the street), and 15.13.2.1 (Maximum building height)</p> <p>Rule 15.13.1.3 - RD7</p>	<ul style="list-style-type: none"> • Add a new rule to permit ‘small buildings’ (P16), as defined, in order to enable by a permitted pathway, an activity that is deemed to have no or minimum adverse effects on the environment and therefore provide an option for development not requiring an urban design assessment. • Add reference to RD5 to enable consideration by a restricted discretionary consent, any breach of the built form standards for small buildings. • Exempt small buildings from needing to comply with the following built form standards: 15.13.2.3 (Sunlight and outlook to the street), and 15.13.2.1 (Maximum building height). This is on the basis that these are not appropriate and / or necessary

	<p>for the prescribed form of small buildings that are permitted under P16.</p> <ul style="list-style-type: none"> • Add new restricted discretionary rule (RD7) for small buildings which breach of any of the activity specific standards.
Rule 15.13.1.2 C1 – Urban Design Certification	<ul style="list-style-type: none"> • Amend so that rule applies to buildings on sites up to 17m (the status quo threshold for the availability of the certification route).
Rule 15.13.2 – Advice Note	<ul style="list-style-type: none"> • Add new advice note regarding potential infrastructure constraint.
MIXED USE ZONE (OUTSIDE OF THE CENTRAL CITY)	
Planning Maps and Appendices	<ul style="list-style-type: none"> • Zone boundary – rezone part of IG to MUZ (consequential zone name change throughout the district plan). • Add Comprehensive Housing Precinct to show extent of area where comprehensive housing will be enabled. • Appendix 15.15.10 – update to include new mixed use zone. • Appendix 15.15.12, 15.15.13 – Development Plans for Comprehensive Housing Precinct.
Introduction / General	<ul style="list-style-type: none"> • Amend 15.1(c) to include reference to mixed use zones because Chapter 15 is not just concerned with centres but also non-centre commercial zones. • Amend zone name to align with a zone in the National Planning Standards Zone framework, i.e. from ‘Commercial Mixed Use Zone’ to ‘Mixed Use Zone’.
Policy 15.2.3.2 - Mixed use areas outside the central city	<ul style="list-style-type: none"> • Amend to clarify through the title that the policy relates to the mixed use areas outside the central city and add new clause (b) to clearly articulate how Objective 15.2.3 (Office parks and suburban mixed use areas) will be implemented i.e. including through enabling comprehensively designed, high quality, high density development and by ensuring that the location, form and development of residential development supports the objective of reducing greenhouse gas emissions and provides for greater housing diversity.
Policy 15.2.4.2 (a)(i) - Design of new development	<ul style="list-style-type: none"> • Amend to recognise and support the intention for mixed use areas to transition to pedestrian friendly street environments and improved accessibility by walking and cycling to reflect the intended new mix of activities. • Additional reference added to (c) to reflect the fact that mixed use areas have a greater propensity to give rise to reverse sensitivity issues that requirement management.
Rule 15.10.1.1 P12 – Industrial activity	<ul style="list-style-type: none"> • Amend to reflect that the expanded mixed use zone will continue to enable industrial activities, other than those where evidence¹⁶ shows that they are more likely to cause amenity conflicts with residential activities (e.g. scrap yards and metal product manufacturing and storage activities).

¹⁶ Council review of complaints made between 2016 and 2019 pertaining to amenity conflicts between residential and industrial activities.

<p>Rule 15.10.1.1 (P27) – Residential activity</p>	<ul style="list-style-type: none"> • Amend to limit permitted residential activity to the status quo enablement of residential activity outside the new Comprehensive Housing Precinct. • Add new outlook space and minimum glazing rules, consistent with all other zones (in scope) where residential activity is enabled (MDRS standard). <p>This is responding to the limited scope of the plan change and to ensure that any new residential activity achieves the intended objectives for housing in the mixed use zones via the comprehensive residential development mechanism.</p>
<p>Restricted discretionary activities Rule 15.10.1.3 RD1, RD2 and RD3</p>	<ul style="list-style-type: none"> • Minor consequential changes to Rule 15.10.1.3 (RD1) to reflect revised names of some of the built form standards in Rule 15.10.2, to ensure new RD3 activities can be assessed under this rule and to correct a current plan defect where P29 is currently omitted from this rule in error. • Rule 15.10.1.3 (RD2) add assessment matters to address breaches of introduced residential activity standards (P27) for glazing and outlook spaces (MDRS standard consistent with other zones). • New Rule 15.10.1.3 (RD3) to provide via a restricted discretionary activity for developments comprising of four or more residential units (comprehensive residential development) with associated new and amended matters of discretion to ensure high standard of design and amenity.
<p>Built form standards – 15.10.2</p>	<ul style="list-style-type: none"> • Amend Rule 15.10.2(a) so that new rule 15.10.1.3(RD3) is also subject to the built form rules. • Amend Rule 15.10.2.1 (Maximum building height) to enable Comprehensive Residential Development to 21 metres, consistent with the 6 storey enablement in the walkable catchment of the City Centre Zone (not applicable more widely to low density uses). • Amend Rule 15.10.2.2 (Minimum building setback from residential zones) to ensure that all street boundaries have setbacks of sufficient size to enable tree planting, regardless of whether they are on a corner site or not. • Amend Rule 15.10.2.4 (Sunlight and outlook at boundary with a residential zone) Amend the recession plane rule so that it aligns with the MDRS standard being adopted for most other residential zones. Delete reference to Appendix 15.15.9 which is no longer required with the adoption of a single, standardised recession plane rule. • Amend Rule 15.10.2.5 (Outdoor storage areas) so that it also applies to outdoor service areas and car parking and to require that these parts of an activity are not located at the front of a site, consistent with the approach proposed for the Central City Mixed Use Zones. This is to reflect that the environment as the zone becomes more mixed, higher levels of amenity are anticipated.

	<ul style="list-style-type: none"> • Amend Rule 15.10.2.6 (Landscaping and trees) to require a landscaping width of 3 metres rather than 1.5 metres in order to accommodate trees along the frontage and provide consistency with a similar rule in the Central City Mixed Use Zone. Require a minimum root growth pit dimension and to require landscaping within residential zone boundary setbacks to be landscaped. • Add new Rule 15.10.2.9 (Comprehensive Residential Development) introducing a specific set of built form standards applicable to Comprehensive Residential Development only. To ensure that a high quality residential environment will be achieved for residents, that the potential for reverse sensitivity conflicts will be managed, and to promote a built form that is consistent with the objectives for the long term transition of this zone. • Exclusions added to some built form standards for Comprehensive Residential Development given the different built form outcomes expected for housing compared with other activities in the zone.
Other	<ul style="list-style-type: none"> • Correct defect in Rule 15.10.1.1 (P1) – currently doesn't include P28 and P29 • Correct defect in Rule 15.10.1.3 (RD1) by not referencing P29 introduced via the Regeneration Act. Without it the activity isn't subject to any built form controls, and this is not appropriate, particularly given the potential scale of commercial film or video production facilities. • Add new advice note under Rule 15.10.2 regarding potential infrastructure constraint.
MATTERS OF CONTROL AND DISCRETION	
Rule 15.14.2.3 - Residential activity	<ul style="list-style-type: none"> • Amend to add matters to (b) to ensure that adequate consideration is given to providing sufficient space for bicycle storage, servicing, washing lines and heat-pumps and appropriately sized outdoor living space when assessing resource consent applications for residential activities. • Amend (e) to improve clarity and enable consideration of the adequacy of the size of outdoor living space including the ability to establish large-scale trees.
Rule 15.14.2.9 - Residential activity in the City Centre and Mixed Use Zones Rule 15.14.2.11 Urban design in the Central City (South Frame) Mixed Use Zone Rule 15.14.3.4 - Sunlight and outlook at boundary with a residential zone.	<ul style="list-style-type: none"> • Minor amendments to 15.14.2.9 (a)(ii) and (c) to delete words for improve drafting clarity. • Minor amendments to 15.14.2.11(c) and (d) to improve drafting clarity. • Minor amendment to 15.14.3.4(iv) to improve drafting clarity.

Rule 15.14.2.15 - Outdoor living space for residential activity of 4 units of more (new)	<ul style="list-style-type: none"> • New matters added to enable appropriate assessment of proposals with regards to outdoor living spaces in multi-unit complexes, particular to communal spaces.
Rule 15.14.3.1 - Maximum building height	<ul style="list-style-type: none"> • Add matters necessary to ensure comprehensive set of matters for assessing breaches of building height, including matters of urban form, financial viability, and impacts of tall buildings generally and specifically, in areas subject to lower height controls. • Additional matters in particular to respond to the potential impacts for tall buildings in the city centre and central city mixed use zones.
Rule 15.14.3.3 - Minimum separation from the internal boundary with a residential or open space zone.	<ul style="list-style-type: none"> • Minor amendment to (a)(ii) to specifically refer to ‘bulk and dominance’ effects that are more likely to result from tall buildings enabled by this plan change.
Rule 15.14.3.37 - Glazing	<ul style="list-style-type: none"> • Add new matter as a consequence of introducing new glazing rules and ensure consistency with rules adopted for other housing and mixed use zones.
Rule 15.14.3.5 - Screening of outdoor storage areas, service areas and car parking	<ul style="list-style-type: none"> • Amend to enable consideration of service areas/ spaces and car parking in intensifying areas which if not appropriately managed can have a detrimental impact on the street or for neighbours.
Rule 15.14.3.15 - City Centre Zone - Building setback and continuity	<ul style="list-style-type: none"> • Add matters to enable consideration of buildings fronting the street including the quality and activation of adjacent public space and the coherence of the street interface.
Rule 15.14.3.18 - City Centre Zone - Sunlight and outlook for the street	<ul style="list-style-type: none"> • Minor amendment to improve the phrasing of the matter relating to wind effects to reflect that such effects are not confined to wind funnelling.
Rule 15.14.3.24 - Minimum setback from the boundary with a residential zone or from an internal boundary	<ul style="list-style-type: none"> • Amend to broaden the consideration of effects relating to residential and internal boundary setbacks and improve drafting clarity.
Rule 15.14.3.26 - Commercial Central City Mixed Use Zone Maximum building height	<ul style="list-style-type: none"> • Delete assessment matter in its entirety and incorporate matters into the general building height matter of discretion (15.14.3.1) to reduce duplication. The relevant matters in 15.14.3.1 are clauses, (a)(xi), and(a) (xiv) and (b)(vi).
15.14.3.35 - Upper floor setbacks, tower dimension and site coverage in the central city	<ul style="list-style-type: none"> • Add new matters of discretion to enable consideration of proposals that breach the tower and podium development form anticipated by the built form standards for central city zones.
15.14.3.36 - Tall buildings in the Central City Mixed Use Zones	<ul style="list-style-type: none"> • Add new matters of discretion of specific relevance to tall buildings in response to the greater height enabled in these zones.
15.14.3.37 - Glazing	<ul style="list-style-type: none"> • Add new matter of discretion, consistent with the high density residential zone and MDRS standards, to consider the effects of proposals that do not meet the permitted activity specific standard for buildings fronting the street or public spaces.

15.14.3.38 - Outlook spaces	<ul style="list-style-type: none"> Add new matter of discretion, consistent with the High Density Residential Zone and MDRS standards, to consider the effects of proposals that do not meet the residential activity specific standard for outlook spaces.
15.14.3.39 - Wind	<ul style="list-style-type: none"> New matter of discretion to enable consideration of the impacts of wind from tall buildings on the safety and comfort of people at street levels and other public open spaces.
15.14.3.40 - Comprehensive residential development in the Mixed Use Zone	<ul style="list-style-type: none"> New set of assessment matters relevant specifically to comprehensive residential development within the Comprehensive Housing Precinct, to ensure that proposals address all of the matters necessary to implement zone objectives for the long term transition to high quality, high density mixed use neighbourhoods with a perimeter block urban form.
15.14.4.5.1 Development Plan – St Albans Neighbourhood Centre	<ul style="list-style-type: none"> Delete reference to obsolete RMD Zone and replace with reference to ‘residential zone’ to reflect the proposed zoning in the block of mixed high density and medium density.
TOWN CENTRE ZONE, LOCAL CENTRE ZONE, NEIGHBOURHOOD CENTRE ZONE AND COMMERCIAL BANKS PENINSULA ZONE	
General	<ul style="list-style-type: none"> Split the current Commercial Core zone rules that relate to operative district centre and neighbourhood centre zones, into Town and Local Centre zones depending on the role/centre classification identified in Policy 15.2.2.1. Changes to provisions shown in the tracked version of the zone chapters to reflect this structural reorganisation are not listed here or evaluated since they retain the status quo in terms of effects, just carried over into the new chapter zone structure.
Activity specific standards for permitted residential activities Rules 15.4.1.1 P21 15.5.1.1 P21 15.6.1.1 P19	<ul style="list-style-type: none"> Add new standards to achieve standardisation / consistency of provisions between zones for outdoor service space, outdoor living space, glazing to street and public space facing elevations and minimum requirements for outlook spaces. The required outlook spaces from bedrooms are however larger in commercial zones to reflect that there is less certainty about the type of activities that may located on neighbouring properties and therefore greater propensity for land use conflicts that need to be managed more carefully in mixed use / commercial areas.
Restricted discretionary activities Rules 15.4.1.3 RD1 15.5.1.3 RD1 15.6.1.3 RD2, RD4 15.6.1.3 RD5 15.6.1.3 RD6	<ul style="list-style-type: none"> Add relevant assessment matters to RD rules for breaches of the standards relating to glazing and outlook space - Rules 15.4.1.3 RD1, 15.5.1.3 RD1, 15.6.1.3 RD1 and for the TC Zone, amend Rule 15.4.1.3 RD1 so that breaches of the outlook space rule can be limited notified which is appropriate for a rule of this type that has the potential to affect directly adjoining neighbours. For the Neighbourhood centre zone, add two new restricted discretionary activities to enable consideration of urban design matters for multi-unit developments of 4 or more units (Rule 15.6.1.3 RD5) and for sites within a Neighbourhood centre zone in the Central City, for all development exceeding 12 metres in height (Rule 15.6.1.3 RD6).
Building height rules - Rules 15.4.2.2 15.6.2.1 15.4.5.2.1 15.4.4.1.3 - RD2	Amend to: <ul style="list-style-type: none"> Increase permitted height limits at the larger Town Centre zones (Riccarton, Hornby and Papanui) to 22 metres to reflect the increased level of commercial activities and community

<p>15.5.2.2 15.5.3.2.1 15.5.3.1.2 RD4 15.5.3.1.3 RD4 15.5.4.2.1 15.6.1.3 RD6</p>	<p>services in these centres in comparison to other centres (to give effect to Policy 3d) – 15.4.2.2(a)(ii).</p> <ul style="list-style-type: none"> • Delete bespoke height rules in the operative district plan for North Halswell Town Centre Zone (Rules 15.4.4.1.3 RD2 and 15.4.5.2.1), for ‘other locations’ (Rule 15.4.2.2 (a)(v)) and the Neighbourhood Centre Zone at 2 Carrs Road (Rule 15.6.2.1 (a)(ii)). • Increase the height limits for larger Local Centres from 12 metres to 14/20m to reflect their relative levels of community services and commercial activities (Policy 3d NPSUD). • Increase permitted building height in Neighbourhood Centre Zones from 8m to 12 metres (outside the central city) reflecting the heights of buildings in surrounding medium density residential zones. • Increase permitted building heights in Neighbourhood Centre Zones (within the Central City) to either 20m or 32m depending on their location and consistent with scale of anticipated surrounding residential development, with all development over 12 metres height requiring an urban design assessment under Rule 15.6.1.3 RD6. • Delete bespoke height rules for Ferrymead Local Centre in reliance on the standard height rule for Local Centres which is more enabling - Rule 15.5.3.2.1 and consequential amendment to 15.5.3.1.2 RD4.
<p>Sunlight and outlook at the boundary with a residential zone</p> <p>Rules 15.4.2.5, 15.5.2.5, 15.6.2.4</p>	<ul style="list-style-type: none"> • For Town, Local and Neighbourhood Centre Zones - to align with the new, more enabling standard in adjoining residential zones (MDRS standard). [CBP not updated, reflecting limitations of plan change scope to zones outside the urban environment].
<p>Advice notes</p>	<ul style="list-style-type: none"> • Add advice note under Built Form Standard Rules regarding potential infrastructure constraint – Rules 15.4.2, 15.4.4.2, 15.5.2, 15.5.3.2, 15.5.4.2, 15.5.5.2, 15.5.6.2, 15.6.2, 15.6.3.2, 15.7.2.
<p>LARGE FORMAT RETAIL ZONE, COMMERCIAL OFFICE ZONE</p> <p>No material change</p>	

Table 6: Summary of Proposed Changes to Industrial Provisions

PROVISION	PROPOSED CHANGE
<p>POLICIES</p>	
<p>Policy 16.2.2.2 – Brownfield redevelopment</p> <p>Rule 16.4.1.3 RD8 (new)</p> <p>Matter of Discretion 16.7.2.5 (new)</p>	<ul style="list-style-type: none"> • Add wording to Policy 16.2.2.2 to introduce new overlay areas at Hornby, Papanui, Cranford and Woolston, where comprehensive medium density residential development is supported in principle, subject to a restricted discretionary resource consent. • Minor amendments in Policy 16.2.2.2 to differentiate between the two existing overlay areas at the Tannery and Waterloo Business Park where a wider range of activities may be considered for redevelopment.

	<ul style="list-style-type: none"> • Add new restricted discretionary rule to enable ‘comprehensive residential development on sites identified by a brownfield overlay at Hornby, Papanui, Cranford and Woolston’ (15.4.1.3 RD8). • Add new matter of discretion ‘Brownfield Area Redevelopment’ setting out matters to be considered for comprehensive residential development of land identified by the new overlays at Hornby, Papanui, Cranford and Woolston. Those matters include the extent to which the criteria in Policy 16.2.2.2(c) are met, whether a high quality residential environment is achieved that is consistent with outcomes sought for medium density residential zones and the extent to which the proposal addresses the Residential Design Principles in Rule 14.15.1.
<p>Built form standards – Sunlight and outlook at boundary with a residential zone.</p> <p>Rules 16.4.2.4, 16.5.2.4, 16.6.2.5, 16.6.5.2.5, and 16.6.6.2.3</p>	<ul style="list-style-type: none"> • Consequential amendments to recession plane rules to reflect the new standards for residential zones introduced by the MDRS.

3.3 Community/Stakeholder engagement

3.3.1 Pre-notification engagement and consultation on proposed Plan Change 14 was open from 11 April 2022 to 13 May 2022 (i.e. five weeks). Various methods were used to encourage public feedback including:

- Letters to the owners of affected properties
- Public advertising placed in The Press and Star and community newspapers, along with Newline articles, and social media posts,
- Hard copies of the consultation flyer provided to all Christchurch City Council libraries and service centres;
- Have your Say online consultation webpage.
- Staff engagement directly with the public via webinars and attending specific organisation or association meetings.

3.3.2 The Public could provide feedback via two ways. Through the Have your Say website and/or email to planchange@ccc.govt.nz. We received 689 responses from the Have your Say page (404) and through email (281).

3.3.3 We heard from a wide range of organisations, including:

- Crown and Council entities,
- Residents Associations and Community Groups,
- Professional associations/organisations, and Commercial entities.

3.3.4 For the pre-notification information provided for public feedback, specific questions were designed to help focus the feedback sought, and included the following questions:

- *Are we proposing the right areas for development above 12 metres? (Yes/No)*
 - *Comments (free text)*
- *Do you have any comments about the proposed Qualifying Matters that will restrict intensified developments or thresholds for needing a resource consent (free text)*
- *Does the proposed plan change allow for enough business intensification? (Yes/No)*
- *Any other comments about the proposed plan change (free text)*

- 3.3.5 A summary of the feedback was prepared and made publicly available (can be found here - <https://www.ccc.govt.nz/assets/Documents/Consultation/2022/07-July/Plan-Change-14-Early-Feedback-Report.pdf>).
- 3.3.6 The specific feedback received in relation to proposed changes to the Commercial and Industrial provisions of the District Plan related to
- Central City
 - Commercial Centres
 - Precincts (Centres Intensification)
- 3.3.7 General comments on commercial matters were concerned about the following matters:
- The right areas have been identified for development over 12m – 950 comments.**
- 3.3.8 In relation to development over 12m, all proposed commercially zoned land, and some industrial zoned land was proposed in the draft consultation documents to have building heights and density to support intensification and demand for business use in those locations.
- 3.3.9 Of the feedback received on the question ‘Are we proposing the right areas for development above 12 metres? (Yes/No)’, 8% (i.e. 265 people) said no – the right areas for development for over 12m had not been identified.
- 3.3.10 When reviewing comments, feedback sought to have a reduced height due to negative impacts on the community. This included impacts on shading of larger buildings on neighbouring residential properties, concerns about parking and traffic congestion, and general loss of amenity as a result of higher buildings.
- 3.3.11 In contrast, there was also support for increasing development within the city centre and other commercial centres, which would have the benefits of access to services and facilities, such as public transport, community facilities and retail/commercial activities.
- 3.3.12 Refer to the feedback separately on planning methods to control heights and density, namely the use of Qualifying Matters, which are discussed in the section 32 evaluation of qualifying matters (Part 2).
- Providing enough business intensification: Mixed use and business intensification – 100 comments**
- 3.3.13 Of the feedback received on the question, ‘Does the proposed plan change allowed for enough business intensification (i.e. supply and extent)?’ 76% of respondents agreed (i.e. yes), whereas 24% did not agree (i.e. no).
- 3.3.14 A substantial number of respondents supported mixed-use commercial and residential zones. Of the comments received, just over 40 respondents made a short supportive statement via a generic/proforma form. The benefits of mixed use (i.e. business on the ground floor and residential above) were seen to provide for a more activated streetscape, and the increased numbers of people on streets that would frequent businesses that would add life and vitality to these areas.
- 3.3.15 Over three quarters of respondents agreed that the plan change allows for enough business intensification, with comments explaining that the post-earthquake and COVID-19 trend of businesses moving to the suburbs and more people now working from home is reducing demand in the centre of the city.

- 3.3.16 Comments were also received which questioned how the supply of business and commercial land may be staged and prioritised to support some areas over others, such as enabling more development in the Central City and other larger commercial centres. Concerns were raised about the economic impact of supporting further development of all business land in the city, on the Central City.
- 3.3.17 Feedback seeking specific changes to the planning provisions of the mixed use and business zone were received from larger organisations that sought to have more enablement supported through the proposed provisions.

Proposed changes to the central zone – 25 comments

- 3.3.18 Feedback received in relation to the Central City was also interweaved with general comments on business intensification, including feedback seeking staging and prioritisation of development in central areas ahead of other centres. Central City development was seen as being important to increase the vitality and success of the central city and to compete with suburban development.
- 3.3.19 It was noted by some comments that the opportunity for Christchurch’s central area was different to that of Auckland and Wellington, due in part to the impacts of the Canterbury Earthquakes and the topography of the land.
- 3.3.20 The feedback also considered it to be beneficial that in addition to business land being redeveloped, the surrounding residential area in the central city was also being redeveloped, which would provide for increased population in the central city to support the businesses in the Central City.
- 3.3.21 When considering enabling heights, some concerns were raised about the post-earthquake recovery planning vision for a low-rise city, the visual and climatic amenity impacts of taller buildings (i.e. dominant buildings, wind tunnelling, and shading), and development which may be at odds with desires for a vibrant central city (i.e. design that contributes to unsafe environments)
- 3.3.22 The following table provides a summary of the changes made to the Commercial and Industrial chapters as a result of the feedback received:

Feedback received	Resulting change to the draft proposal
Areas identified for further intensification (i.e. over 12m in building height) through change to the land use zone provisions of existing commercial centres	<ul style="list-style-type: none"> • Increased heights for Riccarton, Papanui and Hornby • Name change of ‘Emerging Metropolitan Centre Precinct’ to now be ‘Town Centre Intensification Precinct’ • Commercial Retail Parks to be rezoned Large Format Retail Zone
Areas identified for further intensification (i.e. over 12m in building height) through Centre intensification Precinct.	<ul style="list-style-type: none"> • Large reduction in the extent of 10-storey enablement, concentrating only around the City Centre zone, in response to economic evidence.

	<ul style="list-style-type: none"> • Addition to matters for assessment of economic impact on the city centre when in breach of height. • Change in intensification response around some centres in response to further evidence. • Small scale precinct extent modifications: increasing in most instances; and reducing around the Shirley Centre along southern aspect. • Added notification exemptions to specific provisions.
Provisions to address design, layout and height of taller buildings.	<ul style="list-style-type: none"> • Stronger urban design controls or Central City Mixed Use zone • Stronger policy direction and urban design controls for taller buildings

3.3.23 Additional provisions supported post pre-notification

3.3.24 In addition to the above changes to land use zones and provisions, Precincts have also been used, in relation to the Central City area and Industrial Zone, to support either further protection or enhancement of development. These were considered through technical and economic evidence completed after the engagement. They include:

- Cathedral Square and Victoria Street Precinct
- New Regent Street Height Precinct
- Arts Centre Height Precinct
- Brownfield Precinct
- Comprehensive Housing Precinct

3.4 Consultation with iwi authorities

3.4.1 Plan Change 14 has been developed alongside Mahaanui Kurataiao Limited (MKT). Discussions began in late 2021 to help frame overall thinking for the development of Plan Change 14 and involved discussing:

- Strategic Directions development (Chapter 3);
- Scope of relevant residential zones;
- Scope of considerations for papakāinga / kāinga nohoanga development as part of MDRS;
- Types of cultural significance features that should be considered as qualifying matters; and

- Broader strategic outcomes of Plan Change 14.
- 3.4.2 Following the release of the full draft proposal in April 2022, Council met with representatives from MKT to further discuss the above. Support was expressed for the approach undertaken thus far, and reiterated the importance of adequate qualifying matters to be captured in the proposal.
- 3.4.3 Draft evaluation reports and draft changes were provided to MKT on 22 July 2022 prior to notifying the plan change. No specific feedback was provided on the Commercial and Industrial chapters.

4 Scale and significance evaluation

4.1 The degree of shift in the provisions

- 4.1.1 The level of detail in the evaluation of the proposal has been determined by the degree of shift of the proposed provisions from the status quo and the scale of effects anticipated from the proposal and the level of direction (and discretion) provided by the NPSUD.
- 4.1.2 The degree of shift in the provisions from the status quo is significant because it substantially increases building heights in the central city commercial zones to such an extent that the community’s aspirations expressed in the CCRP for a low rise city will no longer be promoted. However that shift will be anticipated by the community to a large extent, because it is directed by the NPSUD, and that direction has been reasonably well publicised.

4.2 Scale and significance of effects

- 4.2.1 The scale and significance of the likely effects anticipated from the implementation of the proposal has also been evaluated, against the criteria set out in the table below.

Table 7: Scale and Significance Assessment

- 4.2.2 The scale and significance of this proposal has been assessed as being medium overall for the following reasons. The proposed provisions are largely confined to existing commercial zones where the type and scale of activity is broadly anticipated and articulated in the NPSUD. That level of enablement is however, at least in the context of the central city, considerably greater than was previously deemed appropriate by central government and the local community when developing the CCRP and 2017 District Plan Review, such that there is likely to be a significant level of interest. Moreover, the areas subject to the proposed changes are community focal points with public interest typically extending beyond an individual’s private property interests.

Criteria	Scale/Significance			Comment
	L	M	H	
Basis for change			x	<ul style="list-style-type: none"> • Give effect to the revised requirements of the National Policy Statement for Urban Development 2022. • In so doing, provides opportunity to resolve several residential development quality issues identified in

Criteria	Scale/Significance			Comment
	L	M	H	
				intensification areas identified through s35 efficiency and effectiveness monitoring.
Addresses a resource management issue		x		<ul style="list-style-type: none"> Enabling greater housing and business development capacity. Supporting a variety of homes that meet the needs in terms of type, price and location of different households. Improving accessibility between jobs, housing and other amenities to support community wellbeing. Ensuring that additional intensification is well-designed and high quality. Supporting development in a location and of a form that promotes reductions in greenhouse gas emissions. <p>In so doing, ensuring that intensification enabled by implementation of Policy 3 contributes to a well-functioning urban environment.</p>
Degree of shift from the status quo		x		<ul style="list-style-type: none"> Spatial extent largely confined to existing commercial centre zones (except for some enablement proposed for industrial areas close to centres).
Who and how many will be affected / geographical scale of effects		x		<ul style="list-style-type: none"> Citywide. Commercial centres are public spaces which people use frequently. The central city is of regional significance. A large number of businesses occupy areas subject to proposed change.
Degree of impact on or interest from iwi/ Māori			x	<ul style="list-style-type: none"> The proposed provisions are of high interest to mana whenua who are concerned with housing affordability and accessibility. Whilst the proposed changes do not concern the development potential of Māori land, additional housing within urban areas is supported. This is subject to ensuring the protection of water quality and avoiding encroachment on waterbodies. Papakāinga/ Kāinga Nohoanga housing is specifically supported in proposed new mixed use areas covered by new Comprehensive Housing Precinct.
Timing and duration of effects		x		<ul style="list-style-type: none"> Effects will be enduring.

Criteria	Scale/Significance			Comment
	L	M	H	
Type of effects		x		<ul style="list-style-type: none"> • A range of positive and negative effects on different stakeholders (e.g. some individual landowner or business owners may have less or more restrictive provisions). • Potential positive effects from greater enablement of development capacity in and around centres – increasing viability, vibrancy and quality of centres. • Proposed additional standards to ensure build quality and amenity likely to have a positive impact on the wellbeing of residents, workers and visitors.
Degree of risk and uncertainty	x			<ul style="list-style-type: none"> • The provisions of the plan change result in effects that have been anticipated and directed to a large extent, by higher order documents e.g. CRPS (centres based approach), and NPSUD Policy 3; however: • Significant deviation from the Christchurch Central Recovery Plan, robustly considered in 2014 to influence timely and appropriate recovery of the central city.

5 Evaluation of the proposal

5.1 Statutory evaluation

5.1.1 A change to a district plan should be designed to accord with sections 74 and 75 of the Act to assist the territorial authority to carry out its functions, as described in section 31, so as to achieve the purpose of the Act. The aim of the analysis in this section is to evaluate whether and/or to what extent the proposed plan change meets the applicable statutory requirements, including the District Plan objectives. The relevant higher order documents and their directions are outlined in section 2.1 of this report. Section 2.2 above sets out the directions provided by the District Plan strategic objectives in Chapter 3 and the specific objectives in Chapters 15 and 16.

5.1.2 For the purposes of changing the District Plan, Rule 3.3a (Interpretation) of the District Plan imposes an internal hierarchy for District Plan objectives. Strategic Directions objectives 3.3.1 and 3.3.2 have relative primacy where all other Strategic Directions objectives are to be expressed and achieved in a manner consistent with those objectives. Furthermore, objectives and policies in all other chapters of the District Plan are to be expressed and achieved in a manner consistent with the Strategic Directions objectives.

5.2 Evaluation of options for objectives

5.2.1 Section 32 requires an evaluation of the extent to which the objectives¹⁷ of the proposal are the most appropriate way to achieve the purpose of the Act.

¹⁷ Section 32(6) defines "objectives" and "proposal" in terms specific to sections 32 – 32A. "Objectives" are defined as meaning: (a) for a proposal that contains or states objectives, those objectives;

- 5.2.2 The plan change proposes to make material (albeit in most cases, minor) amendments to five objectives of the Plan. This section of the report therefore examines whether the objectives, as proposed to be amended, are the most appropriate way to achieve the purpose of the Act. The evaluation relies on the earlier section 32 and s32AA evaluations prepared in support of the existing five objectives, and focuses on the specific areas of proposed change. This evaluation, as did the previous evaluation prepared to support the provisions of the proposed district plan, is largely focused on whether the objectives are the most appropriate means of achieving the provisions of the Canterbury Regional Policy Statement (CRPS), which was prepared in accordance with Part 2 of the Act, along with the more recent directions contained in the National Policy Statement on Urban Development.
- 5.2.3 Whilst the revised NPS on Urban Development has come into force after the CRPS became operative, and contains directive policies focused on commercial centres, the provisions of the CRPS relating to commercial activity and centres remain generally relevant. The exception to this is possibly the concept and pre-eminence of, 'key activity centres', which is an additional classification of centres that is not recognised by the NPSUD or the National Planning Standards. KACs are listed in the CRPS (although not spatially defined) and include all the proposed Town Centres and two Local Centres subject to this plan change (New Brighton and Barrington). CRPS policies direct councils to give primacy to them in district plans, along with the central city that has ultimate primacy. There is therefore a slight tension between the NPS and RPS in this regard, given that the NPS directs intensification in accordance with a hierarchy of centres based on their role and catchment, not any other matter; this contrasts with the CRPS which prioritises some lower order centres as a focus for growth and investment for other reasons, including regeneration need and appropriateness for further residential intensification around them.
- 5.2.4 Table 8 below provides the evaluation of appropriateness of the amended objectives with consideration given to the criteria of relevance, usefulness, reasonableness and achievability.

(b) for all other proposals, the purpose of the proposal.

Table 8: Evaluation of Options for Objectives

Objective	Issue	Proposed Change	Evaluation
<p>Objective 15.2.3 – Office parks and mixed use areas</p>	<p>1. The objective lacks clarity about whether it applies to the central city or suburban mixed use zones, or both; and</p> <p>2. The objective does not describe the outcome sought for mixed use zones other than in respect to limiting commercial activity. Whilst this is an existing issue that is beyond the scope of this plan change to resolve, for the provisions that are proposed to be introduced to give effect to Policy 3 of the NPSUD, it is appropriate and necessary to express the outcomes for that via this objective.</p>	<p>Amend title to read:</p> <p>“Office parks and mixed use areas outside the Central City”</p> <p>Amend objective to read:</p> <p>...</p> <p>“b. <u>Mixed use zones located close to the City Centre Zone are enabled to transition into high density residential neighbourhoods that contribute to an improved diversity of housing type, tenure and affordability and support a reduction in greenhouse gas emissions</u>”.</p>	<ul style="list-style-type: none"> • The proposed objective would be more appropriate than the status quo for achieving the purpose of the RMA to sustainably manage valuable and scarce land resource close to existing jobs, services and amenities, and in particular would: <ul style="list-style-type: none"> • Promote more efficient use of land (s7b); • Maintain and enhance amenity values (s7c), and the quality of the environment (s7f); and • Respond to the effects of climate change (s7(i)). • It does this by setting an outcome for the longer term transition of well-located land for more intensive and efficient uses, that arguably benefit more from this central location than existing uses (although providing certainty for those uses to remain for the foreseeable future through a mixed use zone). The outcome promotes housing affordability and diversity, and a greater intensity of urban form within the walkable catchment of the City Centre Zone, all outcomes sought by the NPSUD as matters of national significance. • High density is more appropriate than medium density in this location, having regard to its proximity to the city centre and other commercial centres (Sydenham and Addington), good transport infrastructure and easy access to significant community facilities/assets (parks, tertiary institutions, hospital etc). Medium density housing is already well provided for throughout the city, particularly with the introduction of the MDRS provisions of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act in 2021 and to be implemented through this plan change. • The outcome expressed in the proposed objective directly responds to the results of Council’s monitoring of urban development indicators (as required by the NPS on Urban Development) which shows that whilst Christchurch has more than sufficient plan-enabled housing capacity (even before considering the significant capacity enabled by the MDRS and Policy 3 of the NPSUD), the housing typologies currently delivered by the market are predominantly low to medium density, single, detached dwellings, and 2 to 3 storey townhouses. Only 1% of houses built in Christchurch in the year to 2021 were apartments¹⁸ and most well outside the price range that the latest housing capacity assessment says is affordable¹⁹. The Future Development Strategy for Greater Christchurch²⁰ and the high level housing development feasibility work undertaken for PC14²¹ both point to increasing housing unaffordability and smaller average household sizes over the next 30 years, which will support the need for greater diversity of housing stock, especially smaller typologies like apartments. • Without policy intervention / support, it is likely that this lack of housing diversity will perpetuate, at least for the short term, on account of the relative profitability of other typologies (including 1-3 storey townhouses) which yield higher returns²². Sense Partners points to the potential for promoting mixed typology development where townhouses might cross-subsidise a proportion of apartments, in circumstances where diversity of build type is important to Council. • A recent Council report examined the barriers to housing diversity in the central city²³, concluding that there were identified deficiencies across typologies and Council support should target those. This included high density housing (particularly one, two and 4+ bedroom units), co-housing, Papakāinga/kāinga nohoanga, and longer term rental and affordable housing (aligning with the first time buyer grant). The report recommends that the focus area for supporting alternative forms of housing in the central city, be expanded to the inner city area just outside the four avenues, due particularly, to the high cost of land in the central city. That revised study area coincides with the proposed new mixed use zone to which this objective relates.

¹⁸ REINZ (2021), Residential Market Demand Report, page 3 **Appendix 9**.

¹⁹ [Greater Christchurch Partnership \(2021\), GC Housing Development Capacity Assessment.](#)

²⁰ [Greater Christchurch Partnership \(2018\), Our Space \(2018-2048\)](#)

²¹ The Property Group (2022), High Density Residential Feasibility Assessment (appended to PC14 Residential s32 report, Part 3).

²² Sense Partners (2022), Cost-Benefit Analysis of Proposed Industrial Land Rezoning, page 3.

²³ [CCC \(2021\), Central City Residential Programme: Supporting Alternative Housing Approaches and Projects.](#)

Objective	Issue	Proposed Change	Evaluation
			<ul style="list-style-type: none"> Land price differentials show that a more efficient land use in this location is housing, not industrial, and that industrial uses are effectively receiving an implicit subsidy by not facing true rents²⁴. Economic analysis concludes that the benefits of mixed use zoning within the walkable catchment of the City Centre Zone would outweigh the costs²⁵. The main benefits include: <ul style="list-style-type: none"> Additional dwellings, lowering houses prices, a little. Small but persistent returns to productivity improvements. Lower transport costs across the city. Infrastructure benefits from not having to provide new infrastructure at more expensive greenfield sites. Property Economics discusses the benefits of increasing building height generally²⁶ and MfE²⁷ identifies social benefits associated with the high density development. These include encouraging greater physical activity, with consequent health benefits, and promotion of social connectiveness and vitality. The proposed objective proactively responds to the challenges of climate change and housing affordability, providing for housing in a location where there is less need to rely on private vehicles, and there is a greater propensity for residents to travel by active modes. It promotes a more intensive form of development in a location that can absorb it, without detracting from any prevailing residential character. Rather, the objective of supporting this area for a mix of uses and over the long term (30+ years) transitioning to high density residential neighbourhoods, presents an opportunity to improve amenity, sustainability and other environmental outcomes for the city. International and even local experience (e.g. CCMU zone) shows that light industry and residential activity can co-exist in a transitioning area. Allowing the area to be used more flexibly for housing, as well as light industrial uses, supports a more competitive land and development market, a further outcome sought by the NPS on Urban Development. Moreover, the CRPS which gives effect to the RMA, generally supports the redevelopment of under-utilised industrial land through its brownfield policies. Whilst not prescribing the mechanism for achieving this, councils are encouraged to consider methods for brownfield redevelopment to help housing affordability and diversity and in recognition that redevelopment of urban land will reduce the need for further expansion of peripheral areas. Overall, it is considered that the proposed objective is the most appropriate for achieving the purpose of the Act and key objectives of higher order planning documents and statutory instruments that give effect to it, including the NPSUD.
Objective 15.2.4 – Urban form, scale and design outcomes	<ol style="list-style-type: none"> This objective is intended to provide direction for the anticipated urban form, scale and design outcomes for all zones in the commercial chapter, including those proposed for further intensification in PC14. As currently drafted, its application and relevance is limited to commercial centres. There are a number of matters that the NPSUD emphasises as being important contributors to well-functioning urban environments that should be acknowledged in this objective to better implement that national direction (including supporting reductions in greenhouse gas emissions and urban environments being resilient to the effects of climate change). 	<p>Amend objective to read:</p> <p>Objective - Urban form, scale and design outcomes</p> <p>a. A scale, form and design of development that is consistent with the role of a centre and its contribution to city form, and the intended built form outcomes for mixed use zones, and which:</p> <ol style="list-style-type: none"> recognises the Central City and District Town Centres as strategically important focal points for community and commercial investment; contributes to an urban environment that is visually attractive, safe, easy to orientate, conveniently 	<ul style="list-style-type: none"> The status quo objective would be less appropriate for achieving the purpose of the Act and in particular with regard to maintaining and enhancing the quality of the environment for those commercial zones that are not classified as centres. The proposed amendments would be more effective at implementing the RMA’s direction to maintain and enhance the quality of the environment and amenity values, sustainably manage physical resources for the benefit of people, communities and the environment and to have particular regard to the effects of climate change. Moreover, the proposed additions more directly implement the national direction of the NPSUD to achieve well-functioning urban environments, by making specific reference to matters of national significance contained in the RMA and NPSUD.

²⁴ Sense Partners (2022), Cost-Benefit Analysis of Proposed Industrial Land Rezoning, page 3.

²⁵ Ibid.

²⁶ Property Economics Limited (2022), Christchurch Central City and Suburban Centres (PC14) Economic Cost Benefit Analysis.

²⁷ Ministry for the Environment, "The Value of Urban Design" (2005), pages 10-12.

Objective	Issue	Proposed Change	Evaluation
	<p>3. Amendments required to reflect NPSUD direction that amenity values change over time so the objective should acknowledge anticipated amenity.</p> <p>4. A minor amendment is needed to acknowledge that mixed use areas have the potential to create conflicts and reverse sensitivity effects that can be managed through the scale, form and design of development.</p>	<p>accessible, and responds positively to anticipated local character and context;</p> <p>iii. recognises the functional and operational requirements of activities and the anticipated existing built form;</p> <p>iv. manages adverse effects (including reverse sensitivity effects) on the site and surrounding environment including effects that contribute to climate change; and</p> <p>v. recognises Ngāi Tahu/ mana whenua values through landscaping and the use of low impact urban design, where appropriate; and</p> <p>vi. supports a reduction in greenhouse gas emissions.</p>	<ul style="list-style-type: none"> The proposed objective is considered the most appropriate for achieving the purpose of the Act.
<p>Objective 15.2.7 – Role of the Central City Mixed Use Zone</p>	<p>1. There is benefit in adding the words “high quality” into the objective to provide clarity about the expected quality outcomes for the CCMU Zone.</p> <p>This objective implements Strategic Objective 3.3.7 which refers to “high quality urban environments” and 3.3.8 which refers to (in regard to the central city) a “high amenity urban environment”.</p> <p>Implementing policies also use the term “high quality” to describe directions for built form, for example:</p> <p>15.2.8.2 – “...high standard of built form”.</p> <p>15.2.4.2 – “...high quality healthy living environment”.</p>	<p>Amend as follows:</p> <p>“Objective 15.2.7</p> <p>a. The development of vibrant, high quality urban areas where a diverse and compatible mix of activities can coexist in support of the Commercial Central City Business City Centre Zone and other areas within the Central City Central City”.</p>	<ul style="list-style-type: none"> Whilst a relatively minor matter in the context of the purpose of the RMA, the status quo would be less appropriate than the proposed change for implementing matters in Part 2 that recognise the importance of quality environments for the wellbeing of people and communities. It is reasonable to expect that those communities would benefit more from a high quality environment over a lesser quality one. Whilst section 7 of the RMA refers to a quality environment and not a high quality one, it does refer to maintaining and <i>enhancing</i> the quality of the environment and amenity values (emphasis added) and which implies promotion of an improved or enhanced state. A high quality urban area can be considered an element of a well-functioning urban environment. In any event, whether urban areas should be quality or high quality may be immaterial if the desired outcomes and responses to the objective are the same in practice. That is, it is the interpretation and application of the words quality/high quality that matters. That said, the words “high quality” are more consistent with the language used in strategic objectives 3.3.7 and 3.3.8, and District Plan rule 3.3a (interpretation) directs that the objectives and policies in all other chapters of the Plan are to be expressed and achieved in a manner consistent with the objectives in Chapter 3. The amendment to seek a high quality urban area is to achieve Objective 1 in Schedule 3 of the RMA, which seeks a ‘Well-functioning Urban Environment’. As discussed, this can include development that demonstrates the principles of good urban design²⁸. It is therefore concluded that the proposed change is the most appropriate for achieving the purpose of the Act and related strategic objectives in Chapter 3.
<p>Objective 15.2.8 – Built form and amenity in the Central City Mixed Use Zone</p>	<p>1. Objective 4 of the NPSUD states 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”.</p> <p>A minor amendment to this objective is recommended to reflect this stated outcome by referencing the ‘evolving amenity values’ of the Central City Mixed Use Zone.</p>	<p>Amend as follows:</p> <p>Objective 15.2.8 - Built form and amenity in the Central City Mixed Use Zone</p> <p>a. Ensure a form of built development that contributes positively to the evolving amenity values of the area, including people’s health and safety, and to the quality and enjoyment of the environment for those living, working within or visiting the area”.</p>	<ul style="list-style-type: none"> The proposed addition is the most appropriate for implementing the national direction of the NPSUD, a statutory instrument prepared under the RMA, having regard to the clearly stated outcome expressed in Objective 4 of the NPSUD.

²⁸ MfE Factsheet on Well-functioning Urban Environments (2020), page 2

Objective	Issue	Proposed Change	Evaluation
<p>Objective 16.2.2 - Brownfield Redevelopment</p>	<p>1. Policy 3(d) directs intensification in areas <i>adjacent</i> to neighbourhood centre zones, local centre zones and town centre zones and this includes all zones in an urban environment unless a qualifying matter applies.</p> <p>PC14 proposes to enable several suburban industrial zones that are located close to / adjacent to centres, to transition to residential use, should that opportunity be taken up (refer to Residential Section for discussion around interpretation of ‘adjacent’). To achieve this, additional brownfield overlays are proposed to be introduced for these areas, which will mean that sites within the overlay can be considered for comprehensive housing redevelopment via a restricted discretionary consent pathway, and without needing to consider the broader objectives and policies of Chapter 16 which would otherwise be a constraint. An amendment to Objective 16.2.2 is required to facilitate this.</p> <p>The proposed objective also requires amendment to set out the intended outcome for these areas to achieve quality residential environments, consistent with the outcomes sought for the surrounding residential medium density zones. Further amendment is necessary to make a distinction between brownfield <i>sites</i>, and the new brownfield <i>areas</i>; because the latter have only been assessed for their appropriateness to transition to housing, not any other activity including commercial.</p> <p>The proposal to introduce these new overlays follows an assessment of industrial land supply and analysis of the potential for industrial land close to commercial centres to redevelop for housing. Those assessments conclude that there is no land supply need for several areas at Hornby, Papanui, Cranford and Woolston to remain in industrial use, and redevelopment would be appropriate (subject to further evaluation through s32)²⁹. Relevantly, that assessment considered whether these areas met the definition of ‘brownfield land’ such that it could be considered for redevelopment under the current district plan brownfield policy.</p>	<p>Amend to add reference to proposed new overlays as follows:</p> <p>a. The recovery and economic growth of the Christchurch District is provided for by enabling <u>residential, mixed-use or commercial</u> redevelopment, including mixed-use development, of appropriate brownfield sites and areas while not compromising the function of the wider industrial area for primarily industrial activities. ensuring that:</p> <p>i. <u>Commercial activities are primarily directed to the Central City and commercial centres; and</u></p> <p>ii. <u>Where commercial activities are located out of centres as a result of brownfield redevelopment, there are no significant adverse distributional or urban form effects on the Central City and commercial centres; and</u></p> <p>iii. <u>For brownfield sites (not within brownfield areas)</u>, the function of the wider industrial area for primarily industrial activities <u>is not compromised</u>; and</p> <p><u>iv. For brownfield areas identified by an overlay at Woolston, Hornby, Cranford and Papanui, a high-quality residential environment is achieved that is consistent with the outcomes sought for residential medium density zones.</u></p>	<ul style="list-style-type: none"> Objective 16.2.2 as proposed to be amended is supported by CRPS policies that encourage appropriate brownfield redevelopment, especially for comprehensive housing. CRPS Policy 6.2.6 (Business Land Development) strongly directs that if land is zoned for industrial purposes, unless it is identified for brownfield redevelopment, it should primarily be used for industrial purposes. However, if land is not required for / zoned for industrial activities, redevelopment for alternative uses, including comprehensive housing, is encouraged. Business Land Capacity Assessments prepared for Council in 2018 and 2022 both identify a significant surplus of industrial land. The benefits of brownfield redevelopment are specifically acknowledged in CRPS Policy 6.3.8, which supports the regeneration of existing brownfield areas through new comprehensive residential, mixed use or business redevelopment, provided such activities will not have adverse effects on the transport network nor significant adverse distributional or urban form effects on the central city and other centres. The areas considered for new overlays at Woolston, Hornby, Cranford and Papanui, benefit from good accessibility to shops, services, and amenities including public transport, and adjoin existing residentially zoned land, such that they are unlikely to cause any significant urban form or transport effects. Further assessment of effects would, however, be required at the resource consent stage by Policy 16.2.2.2. As the areas are only proposed to enable comprehensive housing development and not commercial activities, an assessment of potential distributional impacts is not necessary. It is relevant that the Christchurch District Plan currently gives effect to the higher order policies of the CRPS by the identification of two brownfield overlay areas, and a policy that is applicable to sites, rather than areas. These objectives and policies have previously been assessed as being the most appropriate for achieving the purpose of the RMA. The NPSUD has recently been revised to direct further intensification of urban zones around key commercial centres and which has led to the identification of a number of additional sites where brownfield redevelopment may be appropriate, subject to further, more detailed, assessment (in resource consent applications). In light of the above, the objective as proposed to be amended is considered to be more appropriate than the status quo for achieving the purpose of the Act including key objectives and policies of higher order planning documents and statutory instruments that give effect to it, including the NPSUD.
<p>Objective 15.2.6 – Role of the City Centre Zone Objective 15.2.9 – Role of the Central City Mixed Use Zone Objective 15.2.10 – Built form and amenity in the South Frame Objective 15.2.11 – Role of the Neighbourhood Centre Zone in the Central City</p>	<p>Zone name change only – change not evaluated.</p>		

²⁹ Christchurch City Council (2022), Technical Report, Potential Industrial Transition Areas (Appendix 4).

5.3 Evaluation of options for provisions

- 5.3.1 As an ‘amending proposal’³⁰, the examination of proposed provisions must consider whether they are the most appropriate means of achieving both the provisions and objectives of the amending proposal (this plan change) and the relevant objectives of the operative district plan.
- 5.3.2 This evaluation is provided in the following section and contains a level of detail corresponding to the scale and significance assessed in section 4.2. It focuses primarily on evaluating the preferred option against the status quo option.

³⁰ A proposal that amends a standard, statement, national planning standard, regulation, plan or change that is already proposed or that already exists (section 32(3))

Table 9: Evaluation of Options for Provisions

Issue 1 – Policy 3A – City Centre Zone intensification response

Refer to section 2.3 of this report for discussion on this issue.

Relevant technical reports:

Background to City Centre Building Heights and Densities (2022) **Appendix 1**

Centres: Approach to Aligning with National Planning Standards (2022) **Appendix 2**

Lower Height Limits: Victoria Street and Cathedral Square – Qualifying Matters (2022) **Appendix to s32 on qualifying matters, Part 2**

Property Economics – Cost Benefit Analysis (2022) – **Appendix 3**


Lincoln University – Central City Business Capacity Assessment (2022) – **Appendix 5**

CCC – Technical Report – Urban Design – Commercial Zones (2022) **Appendix 6**

Note that as a package, there are many potential options to respond to this issue. The most reasonably practicable options have been selected for evaluation below, informed by feedback received during pre-notification engagement. Common to all options is consideration about the most appropriate approach to building heights. Economic advice was received on a range of building height options for the City Centre Zone from Property Economics Limited (PEL), including 28m, 32m, 50m, 90m and unlimited. PEL advises that in economic terms, there are general benefits and costs associated with increased height, and the extent of these costs and benefits increase as height increases. It is useful therefore to summarise this up front for succinctness, reflecting that the listed economic impacts will be more or less, depending on the height limit of the proposed option. This applies equally to assessments of different heights in other zones. Zone-specific costs and benefits are referenced in the relevant centre's option evaluation.

Issue 1 Table: General Economic Costs and Benefits of Increased Height

Benefits	
• More flexibility for land uses / building tenants	• Catalyses development
• Increased internalisation of retail spend and centre spend	• Increases the impetus for more intensive, consolidated activity
• Reduced transport costs and associated emissions	• Enhances housing affordability
• Adds profile as a commercial hub	• Increases employment opportunities
• Generates views and enhanced building profile	• Increases vibrancy through greater activity
• Provides greater market certainty	• Potential for less land / greenspace take up
• Higher level of specialisation and productivity	• More efficient use of scarce land resource
Costs	
[noting that costs associated with public safety and amenity can be mitigated to some degree]	
• Increased congestion of road / footpath network	• Increased pollution / waste

Options	Efficiency	Effectiveness
<p>Option1 – Status Quo</p> <p>Current district plan provisions would continue to apply. In summary these include:</p> <ul style="list-style-type: none"> • Maximum permitted building height 28m (other than New Regent Street and Art Centre where lower height limits apply). • Breaches of height classified as fully discretionary. • Maximum road wall height of 21 metres. • Recession planes applying above road wall height. • Building setbacks from residential zones. • Urban design assessment required if located in the ‘core’ as a controlled activity via certification or RDA via standard pathway. • Other built form and activity standards • Policies and assessment matters seeking high quality design. 	<p>Costs:</p> <ul style="list-style-type: none"> • Potentially less development capacity enabled than other options (which enable skyscrapers), although noting that similar ‘floor area ratios’ (FARs) can be achieved on low to mid-rise buildings, as taller buildings, because taller buildings typically need more space around them to provide adequate daylight and sunlight and avoid visual dominance as shown below:  <ul style="list-style-type: none"> • Reduced flexibility to accommodate different activities that benefit from being in taller buildings (e.g. hotels); • Potentially greater costs borne by the individual landowner / developer from less development enabled (with the benefits accrued to the general public from greater amenity and to other landowners from distributed commercial activity). • Potential for poor urban design outcomes in non-core parts of the city centre on account of the urban design assessment requirement not applying there. • PEL’s economic advice is that this option is the least economically efficient. In their view, any height option of 50 metres and below would result in a significantly reduced level of development enablement (relative to a 90m limit and no height limit) and would reduce the economic efficiency and productivity of the city centre long term. This would generate long term economic costs to the community 	<p>This option is most effective for implementing the CCRP which established a set of provisions aimed at achieving an expedited recovery (see Technical Report: Background to Central City Heights and Density controls Appendix 1). However, it is not most effective for implementing the NPSUD because the operative limits on building height do not accord with the direction in Policy 3, which anticipates that in city centre zones, Councils enable building heights and densities to realise as much development capacity as possible, to maximise the benefits of intensification. Furthermore, Objectives 6 and 4 anticipate that Council decisions are responsive, particularly in relation to proposals that would add significant development capacity and that recognition is had that urban environments change over time in response to changing needs of people, communities and future generations.</p> <p>Whilst the lower rise city concept appears to be less enabling than an approach that allows tall buildings, the development controls enable a greater intensity of use of the site (greater site coverage) which is achievable when buildings are lower rise. For the ‘Core’, the CCRP changed a FAR of 5 (1995 City Plan) to a FAR of 0, but reduced the height limits (see Technical Report: Urban Design – Commercial Zones - Appendix 6).</p> <p>However, the current ‘discretionary activity status’ for breaching the permitted height standard would not implement the NPSUD directions to be enabling.</p> <p>The status quo option would not be the most appropriate for implementing the purpose of the plan change and amended objectives, including strategic objective 3.3.7, that anticipates “<i>The pre-eminence of the city centre built form, supported by enabling the highest buildings</i>”.</p> <p>Furthermore, there are known deficiencies with existing district plan provisions that have been identified through RMA s35 monitoring of plan effectiveness; the status quo option would perpetuate those issues.</p>

	<p>relative to the 90m and no height limit options. A zone wide cap on height enablement of 50m and below introduces significant economic costs that would compromise the long-term development of the city centre.</p> <ul style="list-style-type: none"> Standards for residential activity are more restrictive than MDRS e.g. Minimum unit size, adding costs to development and consenting. <p>Benefits:</p> <ul style="list-style-type: none"> The status quo is the District Plan provisions decided in the District Plan Review process, which carried through the CCRP provisions which were justified by the government as the most appropriate in the post-earthquake environment having regard to: <ul style="list-style-type: none"> the cost of building on liquefiable soils; most likely to be built - development feasibility; forecast demand over the recovery period; the need to distribute commercial activity to avoid activity gaps on vacant sites; built environment amenity in public spaces. [refer to Technical Report: Background to current Height and Density Controls Appendix 1] Recognition of the heritage value of the Arts Centre and New Regent Street through lower height controls Provides sufficient capacity to meet forecast needs to 2051 and beyond. 	<p>The current standards for residential activity are not consistent with MDRS as prescribed in part 3 of Schedule 3A of the RMA. However, MDRS is not applicable to commercial zones and the standards contribute to the well-being of residents and are an important element of good design, therefore contributing to a well-functioning urban environment as sought by Objective 1 in clause 6 of Schedule 3A.</p>
<p>Option 2 – Restricted discretion, no height limit</p> <ul style="list-style-type: none"> No prescribed upper height limit. All development classified as RDA. No other built form rules apply where the RDA assessment does apply. 	<p>Risks of Acting/Not Acting: There has not been any quantification of the development capacity enabled under the status quo option compared with other options to enable a clear understanding of actual differences in plan enabled development capacity. It is therefore unclear to what extent the management approach for development in the central city developed by the CCRP, maximises the benefits of intensification in the way or to the extent anticipated by the NPSUD or in comparison with other options.</p> <p>Costs:</p> <ul style="list-style-type: none"> Lack of certainty of outcome for developers and neighbours as there are no built form standards and all development is RDA. More likely to have inconsistent decision-making with only a qualitative assessment. 	<p>Effectiveness:</p> <p>PEL raises concern with the unlimited height option because the extent of the CCBZ/City Centre Zone is large and may encourage dispersed rather than consolidated development. Consequentially, they recommend a more refined area where the unlimited heights would be focused. They state that “to maximise enablement and efficiency from an economic perspective, identification of a precinct within the City Centre</p>

- Assessment matters defined to enable consideration of whether the development achieves a well-functioning urban environment.
- Amendments to policies to support approach and inform decision making.
- No height control areas around Cathedral Square, New Regent Street, Arts Centre and Victoria Street.



PwC, Commercial Bay, Auckland

<https://www.precinct.co.nz/properties/pwc-at-commercial-bay>

- May require extensive matters of discretion that have the effect of a discretionary activity.
- Does not recognise the built environment, including the transition in scale to the mixed-use zones and the adjacent residential zones, especially along Victoria Street.
- Greatest chance of activity gaps remaining on vacant sites and consequential amenity and recovery impacts as many years of commercial demand could be taken up by one building that only covers part of a site (see discussion about PwC building under ‘Effectiveness’).
- Potential to undermine existing city identity and urban form by enabling the introduction of over-dominant and potentially obtrusive structures and foregoing the ‘low rise city’ concept previously promoted by government and the community.
- Taller buildings will result in adverse impacts including shading on important public spaces including Cathedral Square, New Regent Street and Arts Centre, and their heritage values due to the dominant built form. Refer to separate evaluation of effects of taller buildings on Cathedral Square and Victoria Street in Appendix 27 of part 2 (Qualifying matters) to the s32 evaluation.
- Provides capacity well in excess of demonstrated demand for building heights. Less than 1% of homes built in City in year to 2021 were apartments, highlighting the limited demand for apartment style living³¹. Only 170,000sqm of office floorspace forecast to be needed by 2051³².
- Unless the extent of an area with no height limit is further limited by a precinct, there is potential for dispersed rather than consolidated development, given the large size of the City Centre Zone and limited demand, and which will detract from agglomeration benefits etc³³.
- Lack of built form standards likely to result in increased transaction costs associated with resource consent applications and Council negotiating minimum standards.

Benefits:

- Greatest flexibility for a variety of uses.

with no height limit to encourage the highest possible land use and intensified activity would represent the most efficient economic outcome. Identification of a precinct could maximise business and employment value generators and provide the most benefit from agglomeration and centralisation of business activity”³⁴.

Staff have considered the potential for a more localised precinct to consolidate a ‘no height limit’ area but have been unable to identify an appropriate area. This has regard to the extent of redevelopment that has recently occurred in key areas, the need to protect important public spaces and promote a coherent and logical urban form.

Without a smaller precinct, there is a risk associated with this option of sporadic development occurring within the zone, given the size of the City Centre Zone and lack of demand for many tall buildings. This is also supported by empirical evidence, with Lincoln University economist David Dyason concluding that there is sufficient existing plan enabled capacity in the central city to meet forecast demand for business activities to 2051²⁷.

Given the lack of demand in Christchurch for residential apartment towers, tall buildings in the foreseeable future are most likely to be for offices or hotels. Forecasting demand for hotels rooms / development is fraught because it is so dependent on a range of factors (e.g. migration settings, aviation fuel costs, global issues). However, office demand can be forecast more reliably and Lincoln University’s modelling projects demand for an additional 170,000sqm of office floorspace in the central city by 2051. To put this in context, the recently constructed PwC Tower at Commercial Bay in Auckland (left image), comprises 130,000sqm over 38 floors (180m).

A potential scenario arising is that one or two large buildings could be developed at significant height, absorbing years or decades of capacity in one development. Whilst the probability of this occurring is low, the impacts on character and

³¹ REINZ (2021), Residential Market Demand Report, page 3. **Appendix 9**

³² Lincoln University (2022), Business Land Capacity Assessment for Central City.

³³ Property Economics (2022), Economics Cost Benefit Analysis – Commercial Centres.

³⁴ Property Economics Limited (2022), Christchurch Central City and Suburban Centres (PC14) Economic Cost Benefit Analysis.

	<ul style="list-style-type: none"> • Supports city centre’s economic competitiveness. • May increase development viability on a site-by-site basis for some types of activities relative to other options (e.g., hotels); • Greatest efficiency in use of infrastructure. • Potential to support greater transport choice and accessibility. • Lack of built form standards could lead to more varied and interesting buildings. 	<p>appearance of the still regenerating city, could be significant. As a consequence, this option is likely to be less appropriate for achieving a high quality environment and legible urban form appropriate in its context, attractive to residents, businesses and visitors, and for recognising areas of special character and amenity value, as required by Strategic Objective 3.3.7. Nor would it support a city form that contributes to an urban environment that is visually attractive and responds positively to anticipated local character and context, as sought by Objective 15.2.4. It cannot be seen therefore to achieve the NPS objective for well-functioning urban environments.</p> <p>There is potential for adverse effects on heritage values of important public spaces including Cathedral Square and New Regent Street as well as on the setting of the Arts Centre. This is inconsistent with Objective 9.3.2.1.1 of maintaining the contribution of historic heritage to the City’s character and identity.</p> <p>Whilst this option has significant benefits for enabling capacity and providing certainty to the market, overall, it is considered that the disbenefits of intensifying in this way mean that this option is not the most appropriate for achieving the objectives of this plan change or the district plan.</p>
	<p>Risks of Acting/Not Acting: as above.</p>	
<p>Option 3 – Most Enabling</p> <ul style="list-style-type: none"> • No prescribed upper height limit, and • Development permitted up to 28m subject to built form standards. • RDA above 28m (no built form standards). • Assessment matters to address matters to achieve a well-functioning urban environment. • Amendments to policies to reflect approach and inform decision making. 	<p>Costs:</p> <ul style="list-style-type: none"> • As for Option 2 above. <p>Benefits:</p> <ul style="list-style-type: none"> • As for Option 2 but with more certainty for proponents of developments below 28m in height. 	<p>Effectiveness:</p> <p>As above.</p>
	<p>Risks of Acting/Not Acting: as above.</p>	

<ul style="list-style-type: none"> No height control areas around Cathedral Square, New Regent Street, Arts Centre and Victoria Street 		
<p>Option 4 – Hybrid</p> <ul style="list-style-type: none"> Mostly as per option (3) above but height above 90m classified as a discretionary activity; and New policy to promote the clustering of tall buildings within the City Centre Zone. Additional built form rules comprising: <ul style="list-style-type: none"> Retain status quo road wall heights (21 m) and certification pathway for urban design assessment (to 28m only); A recession plane applying from the road up to 28 / 32m; Additional upper floor setbacks of 10% of the building height above 28m; Maximum site coverage of 50% above height limits; Separation of building towers by 12m; Wind management requirements; Introduction of a new permitted pathway for small buildings (prescribed standards); Other built form and activity standards No height control areas around Cathedral Square, New Regent Street, Arts Centre and Victoria Street 	<p>Costs:</p> <ul style="list-style-type: none"> Less development capacity potentially enabled than Options 2 and 3 (although noting that 90m is higher than any building ever built in Christchurch to date and there is limited demand for residential and office towers); Does not recognise the existing built environment, including the transition in scale to the mixed-use zones and the adjacent residential zones, especially in Victoria Street; Continues to have the potential to erode existing city identity and built urban form by introducing over dominant and potentially visually obtrusive structures distributed sporadically, given lack of demand but less so than the unlimited height options; Significant chance of activity gaps remaining on vacant sites and consequential amenity and recovery impacts as years of commercial demand could be taken up by one or two buildings that only covers part of a site (noting this is low risk for schemes requiring bank finance – a bank requirement being presales which would be difficult in a low demand environment); Taller buildings will result in adverse impacts including shading on important public spaces including Cathedral Square, New Regent Street and Arts Centre, and their heritage values due to the dominant built form. Refer to separate evaluation of effects of taller buildings on Cathedral Square and Victoria Street in Appendix 27 of part 2 (Qualifying matters) to the s32 evaluation.. Additional transaction costs and uncertainty associated with discretionary activity status for buildings exceeding 90m. However, the probability of a large number of 90m+ high buildings being developed in Christchurch’s city centre given the size of the city’s commercial and residential market is considered low³⁵. Also, the transactional costs associated with seeking consent for a taller building with a discretionary activity status is not considered material in the overall 	<p>Effectiveness:</p> <p>This option is more appropriate than the options above, for achieving the objective of the plan change to enable development capacity to realise as much development capacity as possible to maximise the benefits of intensification. It does this by introducing a management framework that seeks to be as enabling of height and density as possible, whilst managing the potential for adverse effects on the people and communities who work, live and visit the City Centre.</p> <p>The set of proposed provisions has been thoroughly assessed to be the most appropriate for achieving a high quality urban environment as sought by Strategic Objective 3.3.7 and to achieve the urban form, scale and design outcomes sought by Objective 15.2.4. [Refer to Technical Report – Urban Design – Commercial – Appendix 6].</p> <p>The one significant exception to this is for the sensitive areas around Cathedral Square, Victoria Street, New Regent Street and the Arts Centre where a 90m height limit is not considered to be the most appropriate option for achieving those objectives of a high quality urban environment. There is potential for adverse effects on heritage values of these important public spaces and heritage setting. This is inconsistent with Objective 9.3.2.1.1 of maintaining the contribution of historic heritage to the City’s character and identity.</p> <p>The current standards for residential activity are not consistent with MDRS as prescribed in part 3 of Schedule 3A of the RMA. However, MDRS is not applicable to commercial zones and the standards contribute to the well-being of residents and are an important element of good design, therefore contributing to a well-functioning urban environment as sought by Objective 1 in clause 6 of Schedule 3A.</p>

³⁵ Property Economics (2022), Economics Cost Benefit Analysis – Commercial Centres, page 21.

	<p>context of the likely building cost and associated risk (ibid) and would be limited to few developers who seek to develop.</p> <ul style="list-style-type: none"> Standards for residential activity are more restrictive than MDRS e.g. Minimum unit size, adding costs to development and consenting. <p>Benefits:</p> <ul style="list-style-type: none"> Very significant development capacity enabled; however it is noted that the latest assessment of business land capacity in the central city³⁶ concludes that even the status quo scenario provides more than sufficient plan enabled development capacity to meet forecast demand to 2048. Effects between 28m and 90m in height can generally be anticipated (so can be subject to RDA); Additional built form standards provide additional certainty to developers and neighbours. Additional built form standards support achieving appropriate outcomes in relation to visual impact, visual interest, sunlight and outlook access, and wind management. May further increase development viability on a site-by-site basis for some types of activities (e.g. hotels). Is greater than the maximum height of a building ever built in Christchurch so provides significant scope for tall buildings to occur. More efficient use of infrastructure than lower height options. Can support transport choice and accessibility. 	
<p>Options with lower height control areas</p> <ul style="list-style-type: none"> 2A; 3A; 4A (preferred option) <p>As for Options 2, 3 and 4 above but with a height limit of 45 metres around Cathedral Square and</p>	<p>Risks of Acting/Not Acting: As above.</p> <p>Costs:</p> <ul style="list-style-type: none"> As for Options 2, 3 and 4 as relevant. Reduced development potential around Cathedral Square, New Regent Street, Arts Centre and Victoria Street due to lower maximum height limit. [refer to Qualifying Matters Assessment of Lower Height Limits for Commercial Zones, Part 2 of section 32 report³⁷]. In the context of the significant plan enabled capacity (existing and proposed), limiting development in these specific areas is not likely to 	<p>Effectiveness:</p> <p>More appropriate sub option because it provides for a very enabling level of intensification over most of the central city business zone yet manages shading effects on Cathedral Square, effects on the urban form in Victoria Street and heritage values and context of New Regent Street and Arts Centre. In doing so, this option contributes to a Well-functioning urban environment as sought by Objective 3.3.7 and maintaining the contribution of historic heritage to the</p>

<p>along Victoria Street and height limit of 28 metres around New Regent Street and Arts Centre.</p>	<p>materially impact on plan-enabled development capacity, noting also that a designation (with no height controls) exists anyway³⁸ and there is a lack of forecast demand for largescale office and residential apartment towers.</p> <ul style="list-style-type: none"> • Additional transaction costs and uncertainty for developers of proposals over 45m around Cathedral Square and along Victoria Street; noting however that this is significantly above the current 28m height limit for these areas. • Additional costs and uncertainty arise for any development in the area surrounding New Regent Street and on the east side of Montreal Street, opposite the Arts Centre, where building heights would be limited to 28m <p>Benefits</p> <ul style="list-style-type: none"> • As for Options 2, 3 and 4 as relevant; • Greater recognition of the special characteristics of Cathedral Square as an important public open space and heritage item in its own right, as well as the heritage values and context of New Regent Street and Arts Centre. 	<p>City’s character and identity, consistent with Objective 9.3.2.1.1.</p> <p>Strikes an appropriate balance to maximise the benefits of intensification and therefore more appropriately gives effect to the NPSUD.</p> <p>This option is the most appropriate for achieving the purpose of the plan change (to give effect to Policy 3a of the NPSUD) than options 2, 2A, 3, 3A and 4 and is therefore the preferred option.</p>
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³⁶ Lincoln University (2022), Business Land Capacity Assessment for Central City.

³⁷ Note that whilst an assessment of the impact of lower height controls on development capacity has been undertaken consistent as if these heights required an assessment under 3.32 of the NPSUD (as qualifying matters), we do not consider that lower heights in the City Centre Zone require justification as qualifying matters; rather they can, and should, be assessed under s32 in the usual way. That is, unlike Policy 3c, Policy 3a does not set a minimum height that must be achieved, setting a baseline for assessing impact below that baseline.

³⁸ Convention Centre Precinct Designation, reference V6 in Chapter 10 of the Christchurch District Plan.

Issue 2 – Policy 3c(ii) –Intensification response within a walkable catchment of edge of City Centre Zone (commercial zones)

Refer to **section 2.3** of this report for discussion on this issue.

Also see under Issue 2, section 5.3 of Part 3 (Residential) of this evaluation report in regard to the strategic assessment of heights and densities appropriate within the walkable catchments of the City Centre Zone. That assessment concludes that this policy should be applied to zones within *at least* 1200m of the City Centre Zone, and that a 21 metre height limit is the most appropriate, having regard to a range of metrics including accessibility and demand.

Relevant technical reports:

CCC - Background to City Centre Building Heights and Densities (2022) **Appendix 1**

Property Economics – Cost Benefit Analysis (2022) **Appendix 3**

Lincoln University – Central City Business Capacity Assessment (2022) **Appendix 5**

CCC – Technical Report – Urban Design – Commercial Zones (2022) **Appendix 6**

Options	Efficiency	Effectiveness
<p>Option 1 – Status Quo Current District Plan provisions would continue to apply for the CCMU and CCMU (South Frame) Zones.</p> <ul style="list-style-type: none"> • 17m height limit in most parts of the CCMU and CCMU(SF) Zones. • Controls on type and tenancy size of commercial activity. • No urban design assessment requirement. • Limited built form controls, especially for residential activity. • Other built form and activity standards 	<p>Costs:</p> <ul style="list-style-type: none"> • Less development capacity enabled in the mixed use zones compared to other options, limiting land values and potential feasibility for some developments. • Poor urban design outcomes continue to arise due to the absence of an urban design assessment. • Standards for residential activity are more restrictive than MDRS e.g. Minimum unit size, adding costs to development and consenting. <p>Benefits:</p> <ul style="list-style-type: none"> • Strongly directs greater levels of intensified development into the City Centre, where the district plan seeks the bulk of ‘tall buildings’ to occur. This would help entrench the City Centre Zone as the primary location for commercial activity and intensification, given its primacy in the hierarchy of the city’s network of centres (PEL). • Breaches of the 17m/21m height limits are classified as RDA i.e. still enabling. 	<p>This option would be most effective for implementing the CCRP which established a set of provisions aimed at achieving an expedited recovery (see “Technical Report: Background to Central City Height and Density Controls” for background – Appendix 1).</p> <p>Whilst this option could be seen to already give effect to the NPSUD Policy 3(c)(ii), (by enabling heights of at least 6 storeys via RDA pathway), it is not the most appropriate method.</p> <p>Section 35 monitoring of plan effectiveness has identified issues with the quality of some development in the CCMU (refer to “Technical Report, Urban Design – Commercial Zones” – Appendix 6), that is detracting from achievement of the quality outcomes sought by district plan objectives. This option would therefore not be the most appropriate for achieving intensification that contributes to a well-functioning urban environment as anticipated by the NPSUD. Nor would it achieve district plan Objectives 15.2.7 and 15.2.10 that promote vibrant, high quality urban areas in the zones.</p>

		<p>The current standards for residential activity are not consistent with MDRS as prescribed in part 3 of Schedule 3A of the RMA. However, MDRS is not applicable to commercial zones and the standards contribute to the well-being of residents and are an important element of good design, therefore contributing to a well-functioning urban environment as sought by Objective 1 in clause 6 of Schedule 3A.</p>
<p>Option 2 – Proposed option</p> <ul style="list-style-type: none"> • 21m height limit for both zones (Permitted up to 17m, Restricted Discretionary up to 32, and discretionary above this). • Amended policies to support taller buildings and improve outcomes (particularly for urban design / amenity). • Urban design assessment introduced for proposals of 4 residential units or more in the CCMU and for development over the current permitted height (17m). • Additional / amended standards comprising: <ul style="list-style-type: none"> - Permitted standards for residential activity relating to outdoor service spaces, outdoor living space, glazing requirements, outlook spaces, road boundary setbacks, site coverage; - front and side boundary setbacks; - Landscaping and trees; - Building height; - Fencing and screening structures; - Screening of outdoor storage areas; - Height in relation to boundary; - Residential zone boundary setbacks; - Minimum number of floors; - Building setbacks from road boundary 	<p>Costs:</p> <ul style="list-style-type: none"> • Economic costs associated with more height (as described generally above in the Introduction below the heading for Issue 1) and relative to the status quo). • Potential for more development costs including opportunity costs from the introduction of additional built form requirements. • Option is less directive of intensification of commercial activity in the City Centre as the primary commercial centre for the City and some displacement of activity from the City Centre Zone as a result. However, Property Economics Limited considers that this cost would be minimised by retaining the current tenancy controls that apply in these zones. (office and retail tenancy limits)³⁹ • Some economic inefficiencies due to the significant increase in capacity that the extent of CCMU/CCMUSF represents (PEL p35). • The level of development that would be enabled may draw some higher density development out of the city centre to more fringe locations where access to infrastructure and amenity is inferior and the negative externalities associated with intensification are more difficult to manage over a wider area. 	<p>This option is the most appropriate option for giving effect to the NPSUD direction to increase building heights to at least 6 storeys within the walkable catchment of the city centre and ensures that quality urban environments are achieved consistent with a well-functioning urban environment. This option more appropriately achieves the outcome of a high quality environment sought by the CRPS (Objective 6.2.1 and Policy 6.3.2 in particular) and district plan objectives 3.3.7, 15.2.4, 15.2.7 and 15.2.10.</p> <p>Moreover, the introduction of urban design controls represents an approach to managing activities and development that is more consistent with other central city commercial zones which results in a more level playing field. That is, a more liberal management approach adopted immediately outside the CCBZ/City Centre Zone, is likely to incentivise development in the mixed use zones to the detriment of the City Centre Zone. A more consistent approach to district plan rules is therefore more likely to better achieve the recovery and primacy outcomes sought by Objective 15.2.2 – Centre’s-based Framework, for the City Centre Zone.</p> <p>The proposed standards for residential activity are not consistent with MDRS as prescribed in part 3 of Schedule 3A of the RMA. However, MDRS is not applicable to commercial zones and the standards contribute to the well-being of residents and are an important element of good design, therefore contributing to a well-functioning urban</p>

³⁹ Property Economics Limited (2022), Christchurch Central City and Suburban Centres (PC14) Economic Cost Benefit Analysis.

<ul style="list-style-type: none"> - Building tower setback from internal boundaries; - Additional upper floor setbacks of 10% of the building height above 28m; - Building tower site coverage; - Glazing to street front; and - For the CCMU(SF) – introduction of new small buildings permitted activity. <ul style="list-style-type: none"> • Retain other existing provisions including activity and tenancy limits. 	<ul style="list-style-type: none"> • Standards for residential activity are more restrictive than MDRS e.g. Minimum unit size, adding costs to development and consenting. <p>Benefits:</p> <ul style="list-style-type: none"> • Economic benefits associated with more height (as described generally above in the Introduction below the heading for Issue 1 and relative to the status quo). • Improved environmental and social outcomes resulting from introduction of urban design controls. • Introduction of new small buildings permitted activity provides a more enabling pathway for development, providing benefits in terms of development certainty, pace and less transaction costs for developers. 	<p>environment as sought by Objective 1 in clause 6 of Schedule 3A.</p>
<p>Option 3 (various alternatives considered)</p> <p>Other key options considered include:</p> <ul style="list-style-type: none"> • Removing current density controls (tenancy limits) • Different height limits (22m, 50m, 90m, unlimited) • Various derivations of urban design controls and policies. 	<p>Removing density controls</p> <p>Costs: refer to Property Economics CBA</p> <p>Benefits: refer to Property Economics CBA</p> <p>Different height limits</p> <p>Costs: refer to Property Economics CBA</p> <p>Benefits: refer to Property Economics CBA</p> <p>Various urban design controls and policies</p> <p>Costs: refer to Technical Report - Urban Design: Commercial – Appendix 6</p> <p>Benefits: refer to Technical Report - Urban Design: Commercial – Appendix 6</p>	<p>Efficiency</p> <p>Property Economics specifically considers the need to retain existing density controls in place for commercial zones outside the City Centre / CCB zone. They conclude that these tenancy limits are still needed to support primacy and recovery of the CCBZ/City Centre and therefore remain the most appropriate option for giving effect to the CRPS and district plan objectives that promote primacy and recovery of the City Centre.</p> <p>Various other height limit options have also been considered for the CCMU and CCMU(SF) Zones. Property Economics state that whilst a lower height limit may be more appropriate for giving primacy to the City Centre Zone, a 32m limit with tenancy controls would not detract significantly from the outcomes sought for the city’s principal centre. However they strongly advise against any additional height enablement in the CCMU/CCMUSF on the basis that it could diminish the role and function of the CCB/City Centre Zone⁴⁰.</p>

		The urban design issues and options assessment considers a range of options for managing intensification in commercial zones, concluding that the proposed package is the most appropriate for giving effect to objectives of the district plan.
	Risk of acting/not acting: The additional capacity proposed to be enabled in suburban centres has not been modelled so there has been no assessment of the impact of the additional capacity enabled, on the wider network of centres.	

⁴⁰ Property Economics Limited (2022), Christchurch Central City and Suburban Centres (PC14) Economic Cost Benefit Analysis.

Issue 3 – Policy 3d – Intensification response within suburban centre zones

Refer to section 2.3 of this report for discussion on this issue.

Relevant technical reports:

CCC – Centres Alignment with National Planning Standards (2022) **Appendix 2**

Property Economics – Cost Benefit Analysis (2022) **Appendix 3**

CCC – Technical Report – Urban Design – Commercial Zones (2022) **Appendix 6**

Options	Efficiency	Effectiveness
<p>Status Quo (– for equivalent centres)</p> <p>Town Centres – 20m height limit Local Centres – 12m height limit Neighbourhood centres – 8m height limit With site or area-specific bespoke height limits</p> <p>Existing package of development controls.</p>	<p>Costs:</p> <ul style="list-style-type: none"> • Less development capacity enabled than other options • Incoherent zoning pattern (where centre heights in some cases would be lower than surrounding residential neighbourhoods) e.g. reduced height limit of 12 m in a District Centre within 30 m of an adjoining residential zone. • Poorer environmental outcomes, particularly for future residents as a result of amenity controls that are less prescriptive than other zones. • Recession plane rules more stringent than surrounding residential zones – perverse outcome of shading and built form effects from residential development in adjoining zones than from commercial development adjacent. • Standards for residential activity are more restrictive than MDRS e.g. Minimum unit size, adding costs to development and consenting. <p>Benefits:</p> <ul style="list-style-type: none"> • Some area-specific height limits may provide a more place-based response to built form, more sympathetic to surrounding built and natural form and aligned with anticipated growth demands. • A reduced height limit within 30 m of a residential zone in the Town Centre zone (equiv. District Centre) provides for a 	<p>The status quo option would be less appropriate for achieving the directions of Policy 3(d) because it fails to provide for intensification (building heights and density of urban form) commensurate with the level of commercial and community services.</p> <p>Some of the centre heights in the district plan are also no longer appropriate as a result of the greater enablement of heights in residential zones surrounding centres (MDRS provisions) having regard to objectives 3.3.7(b) and 15.2.4 and policy 15.2.4.1 which specifically refers to achieving a legible urban form and the concept of a sensible zoning pattern⁴¹.</p> <p>The current standards for residential activity are not consistent with MDRS as prescribed in part 3 of Schedule 3A of the RMA. However, MDRS is not applicable to commercial zones and the standards contribute to the well-being of residents and are an important element of good design, therefore contributing to a well-functioning urban environment as sought by Objective 1 in clause 6 of Schedule 3A.</p>

	consistent height at the interface with the adjoining area where zoned Medium Density Residential.	
<p>Proposed option</p> <p>Town Centres – 22m height limit (for 3 largest, being Riccarton, Hornby and Papanui), all others 20m</p> <p>Local Centres – large (20m), medium (14m) and small (12m)</p> <p>Neighbourhood centres – 12m height limit outside the central city and 20/32m within the central city.</p> <p>No site or area specific controls other than at Northwood/Belfast where a Qualifying matter applies.</p> <p>Minor amendments to development controls, particularly for residential activities for consistency with MDRS and / or other commercial zones. Other standards continue to apply.</p>	<p>Costs:</p> <ul style="list-style-type: none"> • Potential for some redistribution of development capacity from higher order centres, including the central city. • Greater levels of capacity are provided for higher order centres (the strongest centres already), which may be of detriment to already declining or vulnerable centres. • Standards for residential activity are more restrictive in some instances than MDRS e.g. Minimum unit size, adding costs to development and consenting. • The height of development enabled in a Town Centre zone (equiv. to District Centre) within 30 m of a residential zone could give rise to greater effects on residential properties associated with the bulk/ mass of buildings. This is mitigated by a recession plane and the increased height limit in the adjoining residential zone (Both Medium Density Residential zone and Height Density Residential zone). <p>Benefits:</p> <ul style="list-style-type: none"> • Provides additional development capacity, particularly for housing, in appropriate locations. • Potential increased population can improve the viability and vibrancy of existing centres. • May improve feasibility for some developments. • Additional development controls likely to improve amenity for future residents and ensure a consistent approach to boundary controls with adjoining residential zones and other commercial zones. 	<p>A detailed investigation of the current composition of each centre has identified differences between centres within the same centre classification, necessitating a more nuanced approach to setting height limits, as sought by the Policy 3 direction.</p> <p>The proposed option is therefore more appropriate than the status quo option for implementing Policy 3.</p> <p>The proposed option continues to give effect to a centre’s based framework including a hierarchy of centres, as directed by the CRPS and district plan objective 15.2.2.</p> <p>The proposed standards for residential activity are not consistent with MDRS as prescribed in part 3 of Schedule 3A of the RMA. However, MDRS is not applicable to commercial zones and the standards contribute to the well-being of residents and are an important element of good design, therefore contributing to a well-functioning urban environment as sought by Objective 1 in clause 6 of Schedule 3A.</p>

⁴¹[Refer to MfE Intensification Guidance for more detail, particularly pages 28, 34 and 54.](#)

Issue 4 – Policy 3(c)(ii) and 3(d) – Intensification response for industrial zones within walkable catchment of centres

Refer to section 2.3 of this report and technical report on ‘Potential Transition of Industrial Areas’ (**Appendix 4**) for discussion on this issue.

Also see under Issue 3, section 5.3 of Part 3 (Residential) of this evaluation report in regard to the strategic assessment of appropriate walkable catchments of centres subject to Policy 3 directions. That assessment concludes that this policy should be applied to zones with at least 1200m of the City Centre Zone, and that ‘adjacent to’ in the context of suburban centres generally means 200m, 400m and 600m/800m walking distances of suburban centres depending on their role.

Relevant technical reports:

CCC – Assessment of Potential Transition of Industrial Areas’ (2022) **Appendix 4**

Sense Partners – Cost Benefit Analysis (2022) **Appendix 7**

Options	Efficiency	Effectiveness
<p>Status Quo</p> <p>Retain existing Industrial (IG) zoning and rely on existing brownfield policies and (discretionary activity) rules to consider appropriateness for redevelopment, on a site-by-site basis.</p>	<p>Costs</p> <ul style="list-style-type: none"> Financial costs and uncertainty for potential developers seeking to redevelop industrial land for comprehensive residential development in locations prioritised by the NPSUD. Societal costs for not enabling land that is well-located to employment, services and amenities to be used for its highest and best use. Opportunity costs associated with not realising development potential of suitably located sites. <p>Benefits</p> <ul style="list-style-type: none"> Existing planning method that can be utilised without any further planning intervention. Redevelopment proposals more rigorously assessed to ensure all effects are appropriately considered and managed. 	<ul style="list-style-type: none"> Redevelopment potential limited to <i>sites</i> that meet the existing brownfield overlay criteria. More limited capacity to consider ‘areas’ unless identified by an overlay. No policy direction on development form outcomes to inform and assess development proposals. May not achieve well-functioning urban environments (not currently part of existing policy criteria). Lacks land use flexibility that the NPSUD seeks for urban environments. May give rise to ad-hoc brownfield redevelopment in the absence of a strategic response
<p>Residential Zoning</p>	<p>Costs</p> <ul style="list-style-type: none"> Would introduce a planning framework that does not recognise the existing non-residential uses of the land, providing uncertainty for existing businesses and potentially 	<ul style="list-style-type: none"> This option would be less effective at achieving the intentions of the NPSUD to enable greater flexibility of land use and encourage competitive land and development markets.

<p>Introduce a RMD or RHD Zoning for all IG Zones that meet the Policy 3 locational and appropriateness criteria.</p>	<p>greater costs should they wish to undertake new activities or development that is inconsistent with the outcomes sought for residential environments.</p> <p>Benefits</p> <ul style="list-style-type: none"> • Would clearly signal the intended outcomes of the areas for landowners and future developers and ensure that redevelopment occurred wholly consistent with the provisions for the relevant medium or high-density zones. 	<ul style="list-style-type: none"> • Whilst the rezoning would be consistent with residential medium and high-density zone policy directions that encourage residential intensification in close proximity to centres, it would cause a conflict between current activities and the residential zone provisions that is undesirable and less appropriate.
<p>Brownfield Overlay</p> <p>Apply brownfield <i>overlay</i> to <i>all</i> IG zoned land that meets the Policy 3 locational and appropriateness criteria; and</p> <ul style="list-style-type: none"> • Amend Obj. 16.2.2. to clearly state the outcome for brownfield areas to transition to residential; • Amend Policy 16.2.2.2 to add additional criteria for built form outcomes. • Restricted discretionary activity status for comprehensive housing on land within the overlay. • New assessment matters based on Policy 16.2.2.2 and to better express intended built form and environmental outcomes. 	<p>Costs</p> <ul style="list-style-type: none"> • Development opportunities may not be as obvious to the development sector, resulting in lesser take up. • Longer-term outcomes for the areas not as clearly articulated and understood which may result in inconsistent outcomes and missed opportunities. • Some potential displacement of industrial activities to other zones/ locations as a result of higher land values, commercial benefits of selling more valuable land. <p>Benefits</p> <ul style="list-style-type: none"> • Enables an area-wide approach to be taken rather than a site-by-site assessment of brownfield redevelopment potential, with consequential environmental benefits. • More enabling framework than the status quo (more certainty, less transaction costs). • Improved environmental and built form outcomes. • Continues to fully support and provide certainty to industrial activities that their activities can operate without undue constraint. 	<ul style="list-style-type: none"> • This option would directly respond to NPSUD outcomes and district plan objectives and policies seeking to improve accessibility to jobs, shops and amenities by enabling greater intensification of residential activity close to centres. • However, for the larger industrial general zone within a walkable catchment of the city centre, applying an overlay over the whole area to enable housing development, may be inconsistent with Objective 16.2.2 which enables redevelopment ‘of appropriate brownfield sites’ provided it ‘does not compromise the function of the wider industrial area’. In the case of this area, enablement of housing would mean the zone would function as a mixed use rather than light industrial area; the long-term intention being to transition the area away from being a primarily industrial area. • Further, not all sites within the overlay area would presently meet the definition of ‘brownfield’ i.e., they are in active and sometimes intensive industrial use not ‘abandoned or under-utilised industrial land’. This may result in a Plan inconsistency where a brownfield overlay applies to sites that are not brownfield (by strict definition). It could however be argued that the areas <i>are</i> brownfield by way of being under-utilised / less productive than they could be, having regard to their accessible location and the highest and best use for the land. Sense Partners (2022) concludes that “land price differentials show that a more efficient use

		<p>of land is housing, not industrial uses that are effectively receiving an implicit subsidy by not faceting true rents” in this location (page 3).</p> <ul style="list-style-type: none"> • The option wouldn’t distinguish the different outcomes sought for central (of high density residential development) vs. suburban brownfield areas (of medium density residential development) such that development may be inappropriate for its context and therefore not contribute to a well-functioning urban environment.
<p>New Mixed-Use Zone</p> <p>Combine the operative Commercial Central City Mixed Use Zone and the Commercial Mixed-Use Zone into a single Mixed-Use Zone, and apply to all areas (with amendments)</p>	<p>Costs</p> <ul style="list-style-type: none"> • Time and complexity associated with merging two zones whilst ensuring that sufficient regard is had to the Christchurch Central Recovery Plan that inserted the CCCMU provisions. • Potential incompatibility of zone outcomes, whereby the CCCMU is much more enabling of commercial activities compared to its more suburban counterpart, reflecting its location adjoining the central business district. • Should commercial activity be enabled more widely in the Mixed Use Zone, it would lead to a dispersed pattern of commercial activity and potentially undermine the economic viability of commercial centres. • Some potential for reverse sensitivity effects on existing industrial activities through introduction of higher value activities. • Some potential (voluntary) displacement of industrial activities to other zones/ locations as a result of higher land values, commercial benefits of selling more valuable land. • Standards for residential activity are more restrictive than MDRS e.g. Minimum unit size, adding costs to development and consenting. <p>Benefits</p> <ul style="list-style-type: none"> • Amendments could promote consistent outcomes and methods for the mixed-use areas, regardless of their location 	<ul style="list-style-type: none"> • This option would directly respond to NPSUD and district plan policy outcomes seeking to improve accessibility to jobs, shops and amenities by enabling greater intensification of residential activity close to centres. • The amendments would address an existing policy gap and would ensure that development occurs in a manner compatible with the intended objectives for the zone. • However, Mixed Use zoning in suburban locations may also facilitate non-housing uses permitted by the zone, thereby not realising the objectives of increasing housing supply and diversity in locations most suited for residential intensification. • Crucially, merging the zone provisions for the central city mixed use zones and the suburban mixed-use zones is likely to result in a dispersed pattern of commercial activity that would conflict with the centre’s based policy framework of the regional policy statement and district plan. • The standards for residential activity are not consistent with MDRS as prescribed in part 3 of Schedule 3A of the RMA. However, MDRS is not applicable to commercial zones and the standards contribute to the well-being of residents and are an important element of good design, therefore contributing to a well-functioning urban environment as sought by Objective 1 in clause 6 of Schedule 3A.

	<p>within the 4 avenues or not, of benefit to Plan users and the development community.</p> <ul style="list-style-type: none"> • Implements a standard zone identified by the National Planning Standard Zone Framework, designed to streamline and simplify plans for the benefit of plan users and the development community. • Provides an opportunity to remedy known Plan defects with both zones and thereby achieve improved social, economic and environmental outcomes. • Provisions would still enable most industrial activities to establish and operate unhindered. 	
<p>Mixed-Use Zoning (without amended provisions)</p> <p>Introduce MUZ zoning (as per current provisions) for all IG zoned land that meets the Policy 3 locational and appropriateness criteria.</p>	<p>Costs</p> <ul style="list-style-type: none"> • Mixed-use development may be inappropriate for suburban contexts resulting in poor urban design, amenity and urban form outcomes. • Some potential for reverse sensitivity effects on existing industrial activities through introduction of housing. • Some potential (voluntary) displacement of industrial activities to other zones/ locations as a result of higher land values, commercial benefits of selling more valuable land. • Lack of appropriate management framework would likely result in poor outcomes for the area and for future communities given that these areas currently lack the amenity appropriate for residential and mixed use areas, necessitating greater, not lesser planning intervention. • Standards for residential activity are more restrictive than MDRS e.g. Minimum unit size, adding costs to development and consenting. <p>Benefits</p> <ul style="list-style-type: none"> • Existing planning method that can be utilised without any further planning intervention and is understood by developers. • Provisions would still enable most industrial activities to establish and operate unhindered. 	<ul style="list-style-type: none"> • This option would directly respond to NPSUD outcomes and district plan objectives and policies seeking to improve accessibility to jobs, shops and amenities by enabling greater intensification of residential activity close to centres. • However, the current CMU zone provisions lack policy direction and sufficient design quality standards to ensure that the areas are well-functioning and achieve the desired outcomes. Housing is only currently permitted in CMU Zones above ground floor and to the rear of other permitted uses. • CMU zoning may also facilitate non-housing uses permitted by the zone thereby not realising the objectives of increasing housing supply and diversity, particularly for the more suburban areas where housing may be the most suitable use of the brownfield land. • The standards for residential activity in the Mixed Use zone (as per current provisions) are not consistent with MDRS as prescribed in part 3 of Schedule 3A of the RMA. However, MDRS is not applicable to commercial zones and the standards contribute to the well-being of residents and are an important element of good design, therefore contributing to a well-functioning urban environment as sought by Objective 1 in clause 6 of Schedule 3A.

<p>Mixed-Use Zoning (with amended provisions)</p> <p>Introduce MUZ zoning (with amended provisions to promote high density residential development⁴²) for all IG zoned land that meet the Policy 3 locational and appropriateness criteria.</p>	<p>Costs</p> <ul style="list-style-type: none"> • Some potential for reverse sensitivity effects on existing industrial activities through introduction of housing (but which can be ameliorated by district plan controls). • Some potential (voluntary) displacement of industrial activities to other zones/ locations as a result of higher land values, commercial benefits of selling more valuable land. • Mixed-use development may be inappropriate for suburban contexts resulting in poor urban design, amenity and urban form outcomes. • Standards for residential activity are more restrictive than MDRS e.g. Minimum unit size, adding costs to development and consenting. <p>Benefits</p> <ul style="list-style-type: none"> • Existing planning method that can be utilised and is understood by developers. • Amended provisions would enable housing intensification to occur more widely, subject to appropriate standards. • Amended provisions would provide more consistency between zones that provide for high density housing, of benefit to plan users and the development community. • Provisions would still enable most industrial activities to establish and operate unhindered. 	<ul style="list-style-type: none"> • This option would directly respond to NPSUD and district plan policy outcomes seeking to improve accessibility to jobs, shops and amenities by enabling greater intensification of residential activity close to centres. • The amendments would address an existing policy gap and would ensure that development occurs in a manner compatible with the intended objectives for the zone. • However, MUZ zoning in suburban locations may also facilitate non-housing uses permitted by the zone, thereby not realising the objectives of increasing housing supply and diversity in locations most suited for residential intensification. • The standards for residential activity are not consistent with MDRS as prescribed in part 3 of Schedule 3A of the RMA. However, MDRS is not applicable to commercial zones and the standards contribute to the well-being of residents and are an important element of good design, therefore contributing to a well-functioning urban environment as sought by Objective 1 in clause 6 of Schedule 3A.
<p>Hybrid – Brownfield Overlay and MU Zones with amended provisions (PREFERRED OPTION)</p> <p>Apply brownfield overlay to all suburban IG zoned land that meets the criteria, and MU Zoning (with Comprehensive Housing Precinct) to appropriate Central City Industrial land only.</p> <p>Amend provisions (policies and rules) to clearly express the intended outcomes for residential intensification in these areas.</p>	<p>Costs</p> <ul style="list-style-type: none"> • Some potential for reverse sensitivity effects on existing industrial activities in the mixed use zone through introduction of housing (but which can and are proposed to be ameliorated by district plan controls). • Some potential (voluntary) displacement of industrial activities to other zones/ locations as a result of higher land values, commercial benefits of selling more valuable land. • Objectives sought for the MU zone (Comprehensive Housing Precinct) area are likely to be slow to be taken up by the market, due to the higher and more prescriptive standards and lower level of feasibility of the proposed development 	<ul style="list-style-type: none"> • This option would be most effective at responding to NPSUD and district plan objectives seeking to improve accessibility to jobs, shops and amenities by enabling greater intensification of residential activity close to centres whilst ensuring that development is well-functioning, appropriately designed and appropriately managed consistent with its particular context. • This option promotes an urban outcome that is most appropriate given its future focus by supporting a type and form of development that responds to evidence about

⁴² See Issue 2 for assessment of issues and options for amended provisions

<p>For suburban locations:</p> <ul style="list-style-type: none"> ○ Amend policies 16.2.2.1 and 16.2.2.2 to support comprehensive medium density housing consistent with the outcomes sought for r medium density zones. <p>For central locations:</p> <ul style="list-style-type: none"> ○ Amend policy 15.2.3.2 to provide direction for implementing objective 15.2.3(b) and promote transition into high quality residential neighbourhoods that supports housing diversity and affordability and the objective of reducing greenhouse gas emissions. ○ Introduce a precinct to refine the area where comprehensive residential development is appropriate and enabled (by resource consent); ○ Limit the establishment of new industrial activities most likely to generate adverse effects on residential amenity (e.g. metal product manufacturing and storage and demolition and salvage yards). ○ Introduce additional built form standards to guide the type and form of development sought, consistent with objectives that seek: <ul style="list-style-type: none"> ▪ high density, perimeter block form of development; ▪ significant provision of landscaping and trees; ▪ diversity of housing typology including proportion of (4-6 storey apartments); ▪ a high quality living environment for future residents; and 	<p>form, compared with other locations and typologies that the market is currently preferring to deliver. However, economic analysis suggests that this will shift in the medium term and even in the short term, some parties may take on more associated risk for longer-term rewards (Sense Partners page 3).</p> <ul style="list-style-type: none"> • Some opportunity costs for developers and landowners associated with the MUZ built form standards that direct a particular form of development and that preclude the establishment of metal product manufacturing and storage and demolition and salvage yards. • Standards for residential activity are more restrictive than MDRS e.g. Minimum unit size, adding costs to development and consenting. <p>Benefits</p> <ul style="list-style-type: none"> • Utilises existing planning methods (with amendment) that are used and understood by the development community (i.e. brownfield overlays and mixed use zones). • The amended provisions will promote the housing, diversity and quality objectives intended for these areas, in a way that is appropriate to their context. • Provisions would still enable most industrial activities to establish and operate unhindered. • Greater clarity for plan users and developers as to the outcomes anticipated for housing in this zone. • Improved residential amenity outcomes for future residents and improved urban amenity generally by enabling residential activity to be located along street frontages. • Provides a more consistent approach to quality and amenity outcomes anticipated between zones that provide for high density housing. • Focusing high density housing in the MUZ zone close to the central city would promote transformational change to meet the needs of future residents in a location where there is no 	<p>future housing needs and affordability and the challenges of climate change.</p> <ul style="list-style-type: none"> • It better recognises that the large central city mixed use area will be truly mixed use for the foreseeable future and most strongly recognises and supports the existing industrial and commercial activities that operate in this area. • Similarly, it encourages the suburban locations to be redeveloped into residential communities, consistent with their surrounding land uses. • The proposed standards for residential activity are not consistent with MDRS as prescribed in part 3 of Schedule 3A of the RMA. However, MDRS is not applicable to commercial zones and the standards contribute to the well-being of residents and are an important element of good design, therefore contributing to a well-functioning urban environment as sought by Objective 1 in clause 6 of Schedule 3A. <p>Overall, this hybrid approach is considered to provide the most appropriate framework for facilitating the desired land use change, and for achieving the objectives and policies appropriate for the receiving environment. The proposed package of provisions is the most appropriate for implementing the NPSUD directions to intensify in the locations specified in policy 3 and contribute to a well-functioning urban environment that supports housing supply and diversity, competitive land and development markets, and a reduction in greenhouse gas emissions (policy 1).</p>
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<ul style="list-style-type: none"> ▪ non-car dependent development that promotes active transport and supports carbon reduction goals. ▪ Add two new restricted discretionary activity rules for comprehensive housing development that meets, and does not meet, the built form standards, with relevant matters of discretion. 	<p>established residential amenity that could be adversely impacted. These areas offer significant capacity to accommodate change and improve the overall quality of the urban environment for both businesses and new residents.</p> <ul style="list-style-type: none"> • Provisions provide clarity and certainty for development community, existing land uses and future residents about the intended built form and housing diversity outcomes sought – being an area identified for transition into a high quality, high density, more sustainable form of development over the long-term, based on an internationally proven perimeter block urban form. <p>Refer to the following technical reports:</p> <ul style="list-style-type: none"> • CCC, Potential Industrial Land Transition Assessment that assesses the appropriateness of industrial zones for potential redevelopment (Appendix 4) • CCC, Urban Design – Commercial which provides an overview of urban design matters both generally and specifically in terms of this zone (Appendix 6) • Sense Partners comprehensive Cost Benefit Analysis that concludes the benefits outweigh the costs in respect to the rezoning of inner city industrial land to enable housing intensification (Appendix 7). • CCC, Urban Design Analysis of Comprehensive Housing precinct provisions that provides analysis that informed the proposed package of provisions (Appendix 8) 	
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