

PLAN CHANGE 14 – Housing and Business Choices – Implementation of the National Policy Statement on Urban Development 2020 (NPS-UD) and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021

Overview

This report has been prepared to support Plan Change 14 to the Christchurch District Plan. Plan Change 14 is an Intensification Planning Instrument (IPI), which the Council is required to progress in order to provide for urban intensification pursuant to the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. Plan Change 14:

- i. includes new objectives and policies relating to a well-functioning urban environment and providing for a variety of housing types and sizes; and
- ii. incorporates Medium Density Residential Standards (MDRS) in most existing residential areas across the city, enabling the development of up to three residential units per site, where each building must not exceed 11 metres in height with some additional height enablement for sloped roofs; and
- iii. gives effect to policy 3 and 4 of the National Policy Statement on Urban Development 2020 (NPS-UD), as also set out in Schedule 3B to the RMA.

In giving effect to policy 3, Plan Change 14 enables:

- iv. in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification:
- v. building heights of at least 6 storeys within at least a walkable catchment of the edge of the city centre zone; and
- vi. 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 activities and community services.

Pursuant to policy 4, Plan Change 14 modifies those enabled building heights and requirements as needed to accommodate 'qualifying matters'.

Plan Change 14 proposes a financial contribution to address adverse effects of development (intensification) on the tree canopy cover in the urban environment. Christchurch's tree canopy survey shows that the cover is falling with the most significant drop on private land.

The Plan Change seeks specifically to:

- a) Change height limits in and within walking distance of the central city, with the greatest height proposed to be enabled in the city centre (90m) and Central City Mixed Use zones (32m).
- b) Enable increased building heights in most suburban commercial centres, ranging from 12 metres in the smallest neighbourhood and local centres to 22 metres in the larger Town

- Centre zones. Precincts around these centres will also enable increased building heights for housing (14-32 metres).
- c) Change and add rules within commercial zones to ensure that they achieve high quality urban environments and to permit small buildings that meet certain criteria to be established without the need for resource consent in some zones.
 - d) Apply MDRS, and in some situations more lenient provisions than the MDRS, across all urban residential areas, including (but not limited to) Lyttelton and residential Port Hill areas, through new medium and high density residential zones.
 - e) Enable MDRS on the residential hills, while retaining the minimum allotment size of 650m² and adopting the same earthwork controls as in the operative Residential Hills Zone.
 - f) Change the zoning and associated policies and rules for some industrial areas located within walking distance of the central city and introduce a brownfield overlay for some industrial areas within walking distance of large commercial centres. This is to enable redevelopment for housing and mixed-use activities if certain criteria are met.
 - g) Introduce Qualifying Matters areas where the scale and density of buildings enabled by the MDRS and NPS-UD is reduced. These include matters of national importance (RMA s6), being Outstanding and Significant Natural Features and Landscapes; areas of Significant Ecological Value; sites of Wahi Tapu; Wahi Taonga, Silent Files, Nga Turanga Tupuna; Nga Wai; areas at risk of rockfall, cliff collapse and mass movement (Slope Hazard Areas); High Flood Hazard Management Areas; Flood Ponding Management Areas; Heritage items and settings; Heritage Areas, areas that interface with heritage areas and significant public open space including surrounding Cathedral Square, New Regent Street, Arts Centre and the Styx River; and Waterbody Setbacks.
 - h) Introduce further Qualifying Matters including: Residential Character Areas; Electricity Transmission corridors and structures; Airport Noise Influence Area; Significant and Other Trees; Lyttelton Port Influences Overlay; sites adjoining the railway network; Coastal Hazard Management Areas and Tsunami Risk Management Areas; Radio Communication Pathways; Vacuum Sewer Wastewater Constraint Areas; reduced height limits along Victoria Street; Outline Development Plan features; Low Public Transport Accessibility; Sunlight Access; City Spine Transport Corridor setback; and Residential-Industrial Interface Areas; and
 - i) Change objectives, policies and other provisions throughout the District Plan that support or are consequential to the above changes.

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Part A

1 Introduction

1.1 Purpose and structure of the section 32 evaluation

- 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 Section 32 requires that the Council provides an evaluation of the changes proposed in Plan Change 14 to the Christchurch District Plan (**the Plan**).
- 1.1.3 Beyond the general requirements of section 32, there is a specific statutory context for PC14 and therefore this report. Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021¹ (**the Act**) includes specific directions on what must be included in the District Plan as part of this plan change, including specific objectives, policies and rules/density standards, and other minimum requirements.
- 1.1.4 This report therefore examines the new policy directions and requirements under the Amendment Act, and the related National Policy Statement on Urban Development (NPS-UD) 2020 (NPS-UD), which is referred to directly in the Amendment Act. In doing so, the report takes account of other higher order documents (as discussed in the relevant specific parts of this report).
- 1.1.5 The Act includes specific directions on what must be included in the District Plan as part of this plan change, including specific objectives, policies and rules/density standards, and other minimum requirements. This report does not provide any evaluation of these directed changes, except may be referenced as far as where they have been incorporated into a provision that is sought to be included and/or changed under this Plan Change.
- 1.1.6 Where new (additional) objectives are proposed to support the Medium Density Residential Standards (MDRS) and intensification required by Policies 3 and 4 of the NPS-UD, the evaluation examines whether the proposed objectives are the most appropriate way to achieve the purpose of the RMA.² The report then considers all reasonably practicable policy and rule options, and assesses the efficiency and effectiveness (benefits and costs of the environmental, economic, social and cultural effects) of those provisions in achieving the proposed new objectives.³ The report also assesses the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.

¹ Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 is available online at: <https://www.legislation.govt.nz/bill/government/2021/0083/latest/LMS566049.html>. The Amendment Act has inserted new provisions into the RMA, which are referred to in this report.

² As required by section 32(1)(a) of the RMA. The exception is the compulsory objectives and policies set out in Schedule 3A of the RMA, as discussed below.

³ As required by section 32(1)(b) of the RMA.

1.1.7 The section 32 report is structured as follows:

- Part 1: Overview, High Level District Issues and Chapter 3-Strategic Directions (this report)
- Part 2: Qualifying matters (District Plan Chapters 8, 9, 14)
- Part 3: Residential (District Plan Chapter 14)
- Part 4: Commercial (District Plan Chapter 15 and Industrial Chapter 16)
- Part 5: Transport (District Plan Chapter 7)
- Part 6: Subdivision, Development and Earthworks (District Plan Chapter 8)
- Part 7: Tree Canopy Cover - Financial Contributions (District Plan Chapters 2, 3 and 8)
- Part 8: Planning Map, overlays and zone boundary changes

2 Legal general matters and obligations in respect of changes to the District Plan

2.1 Council's general legal obligations in respect of changes to the District Plan

- 2.1.1 Sections 74 and 75 of the RMA require plan changes to give effect to, not be inconsistent with, take into account, or have regard to higher order documents.
- 2.1.2 The NPS-UD is central to Plan Change 14 with key sections referred to throughout this report, with other relevant higher order documents addressed in more detail within the relevant parts (i.e Parts 2 to 7) of the section 32 report.
- 2.1.3 The NPS-UD (2020) recognises the national significance of achieving a well-functioning urban environment to enable people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. It requires Councils to provide sufficient development capacity to meet the different needs of people and communities; plan well for growth (short to long term) particularly in locations that have good access to existing services, public transport networks and infrastructure; rules are not unnecessarily constraining growth; and that urban development occurs in a way that takes into account the principles of the Treaty of Waitangi (te Tiriti o Waitangi).
- 2.1.4 Detail about the how the NPS-UD has been given effect to through the proposed zone-specific objectives, policies, rules and other methods is contained in the various parts of the s32 report, in particular Part 1 on Strategic Objectives, Part 3 on Chapter 14 Residential, and Part 4 on Chapter 15 Commercial.

2.1.5 Clause 6 Schedule 3A of the Act, directs the inclusion of the following new objectives and policies in the District Plan.

Objective 1 - 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:

Objective 2 - a relevant residential zone provides for a variety of housing types and sizes that respond to— (i) housing needs and demand; and (ii) the neighbourhood’s planned urban built character, including 3-storey buildings.

Policy 1 - enable a variety of housing types with a mix of densities within the zone, including 3-storey attached and detached dwellings, and low-rise apartments:

Policy 2 - apply the MDRS across all relevant residential zones in the district plan except in circumstances where a qualifying matter is relevant (including matters of significance such as historic heritage and the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga):

Policy 3 - encourage development to achieve attractive and safe streets and public open spaces, including by providing for passive surveillance:

Policy 4 - enable housing to be designed to meet the day-to-day needs of residents:

Policy 5 - provide for developments not meeting permitted activity status, while encouraging high-quality developments.

2.1.6 These objectives and policies are compulsory, and cannot be altered by the Council.

2.1.7 Section 77G(1) of the RMA requires that every relevant residential zone of a specified territorial authority must have the MDRS incorporated into that zone. Schedule 3A of the RMA (also incorporated by the Amendment Act) sets out those requirements in more detail. It directs the incorporation of the MDRS as part of every ‘relevant residential zone’⁴, including in relation to; number of units per site; building height; height in relation to boundary; setbacks; building coverage; outdoor living space; outlook space; windows to street; and landscaped area.

2.1.8 The MDRS are to be incorporated irrespective of any inconsistency with a regional policy statement (s77G(8)). If there are any other inconsistencies between the regional policy statement and the requirements of the Act (or the NPS-UD and other higher order

⁴ Section 77G(1) sets requirement for the incorporation of MDRS. A relevant residential zone means all residential zones, except for:

- A large lot residential zone:
- Any area predominately urban in character that the 2018 census recorded has having a resident population of less than 5,000, unless a local authority intends the area to become part of an urban environment:
- An offshore island:
- To avoid doubt, a settlement zone.

documents), the plan change must give weight to those higher order directions to the extent required by the Act. Any such other inconsistencies with higher order documents are addressed within the individual parts (Part 2-8) of this s32 report.

- 2.1.9 Section 77G(2) requires every residential zone in an urban environment⁵ to give effect to Policy 3 of the NPS-UD, which specifies the parameters for the level of density and building height enablement in specific spatial locations, principally commercial centres.
- 2.1.10 Council may choose to make the MDRS less enabling of development if authorised under section 77I which relates to 'qualifying matters' specified by the Act⁶. Section 77G(7) clarifies that existing provisions in a district plan that allow the same of a greater level of development than the MDRS do not need to be amended or removed from the district plan. Section 77H enables council to modify the MDRS to enable a greater level of development by not including a density standard.
- 2.1.11 Sections 77J sets out further requirements for the evaluation of a qualifying matter, including assessing the impact that limiting development capacity, building height, or density will have on the provision of development capacity, and the costs and broader impacts of imposing those limits. Section 77K provides an alternative evaluation process of existing qualifying matters that are contained in the operative Christchurch District Plan. Under Section 77L 'other qualifying matters' (being those that may be identified under s77I(j)) must be justified by way of a site-specific analysis including in regard to the specific characteristics of the matter.
- 2.1.12 Section 77N relates to giving effect to Policy 3 in urban non-residential zones, such as commercial and industrial. Similar to MDRS, intensification may be less enabling of the policy requirement of Policy 3 if a qualifying matter is to be accommodated (the evaluation of which is set out under section 77P and alternative process for existing qualifying matters under 77Q and 77R).
- 2.1.13 Section 77T provides for Councils to include financial contributions in support of an Intensification Planning Instrument (IPI).
- 2.1.14 In addition to considering the Act and the NPS-UD the proposed plan change partially incorporates the National Planning Standards (NPS) (where this supports or is consequential on the MDRS and Policy 3). The NPS seek to ensure, among other things, nationally consistent structure, format and definitions in district, regional and combined plans. The standards include set zone naming and classification for residential zones and commercial centre zones. The Christchurch City Council is required to incorporate the standards by 2026. However, since Policy 3 of NPS-UD uses the names set out in the National Planning Standards, it has become necessary to incorporate the standardised zone names in order to give effect to the NPS-UD.

⁵ An urban environment is defined as being any area of land (regardless of size, and irrespective of territorial authority or statistical boundaries) that—

- is, or is intended by the relevant specified territorial authority to be, predominantly urban in character; and
- is, or is intended by the relevant specified territorial authority to be, part of a housing and labour market of at least 10,000 people. RMA s77F

⁶ RMA S. 77I

2.1.15 These standardised zone names and some of their defining characteristics differ from the current zones described in the Christchurch District Plan. The hierarchy and description of the different zones/centres in the NPS, as adopted by the NPS-UD, have been applied to equivalent centres in the current District Plan. For example, the City Centre Zone will replace the Commercial Central City Business Zone.

2.2 Scope and level of discretion in implementing the Amendment Act

2.2.1 Sections 77F and 80E provide direction as to what is able to be included within the scope of Proposed Plan Change 14. Section 77F defines an 'urban environment' as follows:

urban environment means any area of land (regardless of size, and irrespective of territorial authority or statistical boundaries) that—

(a) is, or is intended by the specified territorial authority to be, predominantly urban in character; and

(b) is, or is intended by the specified territorial authority to be, part of a housing and labour market of at least 10,000 people

urban non-residential zone means any zone in an urban environment that is not a residential zone.

2.2.2 Section 80E directs what may be considered as an Intensification Planning Instrument (IPI) to incorporate the MDRS and give effect to policy 3, and subsequently included under an Intensification Streamlined Planning Process (ISPP).

80E Meaning of intensification planning instrument

(1) In this Act, intensification planning instrument or IPI means a change to a district plan or a variation to a proposed district plan—

(a) that must— (i) incorporate the MDRS; and (ii) give effect to,—(A) in the case of a tier 1 territorial authority, policies 3 and 4 of the NPS-UD;

(b) that may also amend or include the following provisions:

(i) provisions relating to financial contributions, if the specified territorial authority chooses to amend its district plan under [section 77T](#):

(ii) provisions to enable papakāinga housing in the district:

(iii) related provisions, including objectives, policies, rules, standards, and zones, that support or are consequential on—

(A) the MDRS; or

(B) policies 3, 4, and 5 of the NPS-UD, as applicable.

(2) In subsection (1)(b)(iii), related provisions also includes provisions that relate to any of the following, without limitation:

(a) district-wide matters: (b) earthworks: (c) fencing:(d) infrastructure:(e) qualifying matters identified in accordance with [section 77I](#) or [77O](#):(f) storm water management (including permeability and hydraulic neutrality):(g) subdivision of land.

2.2.3 Policies 3 and 4 of the NPS-UD (as amended by the Amendment Act) are as follows:

Policy 3: In relation to tier 1 urban environments, regional policy statements and 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 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 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 density of urban form commensurate with the level of commercial activities and community services.

Policy 4: Regional policy statements and district plans applying to tier 1 urban environments modify the relevant building height or density requirements under Policy 3 only to the extent necessary (as specified in subpart 6) to accommodate a qualifying matter in that area.

2.2.4 In the Christchurch District context, the scope of this plan change is defined as follows:

In Scope	Out of Scope
All urban residential zones, including associated potential qualifying matters	Any changes to Rural Zones, including the rezoning of new additional greenfield areas
All commercial centre zones, including the surrounding area within a walkable catchment and potential qualifying matters	Changes to any zones within Banks Peninsula being outside of the definition of an 'urban environment', except for Lyttelton which is included within scope.
Changes to provisions controlling industrial land related to residential development commensurate with the level of accessibility to public transport, and range of commercial and community activities, and relative demand in the location.	Changes to provisions controlling industrial land outside commensurate intensification area enabled under Policy 3.
	Changes to zones and provisions controlling commercial zones that are not commercial centres, such as Large Format and provisions for office development, where this is not part of a centre.

2.2.5 Whilst many of the objectives, policies and standards to enable development are set by the Act and the NPS-UD, Council has some discretion in how certain aspects of these are applied. Where this discretion is available, it has been applied to ensure that enabled intensification responds to the needs of the people of Christchurch, and what bests achieves a 'well-functioning urban environment'. This discretion is however limited to the following areas:

- a. *Scope of the urban environment:* While the Act requires that MDRS are applied to every relevant residential zone, the Act does not fully define the extent of these zones. Instead

Council has some discretion to define what constitutes a “relevant residential zone” in the Christchurch District. This is discussed in more depth in Part 3 of the section 32 report.

- b. *Qualifying matters:* The Act and the NPS-UD provide grounds for certain areas to be less enabling of development if they exhibit specific characteristics identified in the Act as qualifying matters. Part 2 of this section 32 report sets out the justification for where Council consider a lesser enablement is more appropriate, including within identified heritage and character areas, wāhi tapu and wāhi taonga, infrastructure constraints, coastal hazards, tree protection, and airport noise contours.
- c. *Density and height in excess of the MDRS:* The NPS-UD Policy 3 empowers Council to enable development in excess of the MDRS for density and height in certain areas. Minimum heights for metropolitan centres and walkable catchments are prescribed, but maximum heights are left to Council discretion. In the City Centre Zone Council must maximise the benefits of intensification. For neighbourhood, local centres and town centres Council has discretion to allow a maximum building height commensurate with the level of activity in those centres. Accordingly, Council has undertaken modelling to determine the spatial extent of residential and business zones, and the associated appropriate heights and densities enabled (as either a permitted, controlled or restricted discretionary activity).
- d. *The extent of walkable catchments:* The Act and the NPS-UD require councils to enable development to at least 6 stories within the walkable catchments of the edge of city and metropolitan centre zones and rapid transit stops. However neither document offers a definition of walkable catchment. Council therefore has taken a deliberate approach to delimiting the extent of walkable catchments around the various types of centre. (see Parts 3 and 4 of the s32 report).
- e. *Commercial centres:* The requirements of NPS-UD and the Act vary for different centres and it is for the Council to apply the centres categorisation (refer to Part 4 of the s32 report). Council has determined that Christchurch City does not, at this time, have any zone that can be interpreted as a metropolitan centre. A metropolitan centre is a zone that forms the focal point for sub-regional urban catchments, and there is no current commercial area or zone that meets this definition.
- f. *Financial Contributions:* Under the Act (sections 77E and 77T) the Council has discretion to charge financial contributions, where there is a specified purpose, and these may be notified in the IPI. The community has given clear feedback about the importance of retaining tree canopy cover in the face of development, or offsetting any negative impacts on tree canopy cover. The payment of financial contributions in certain situations is proposed as part of a suite of tree canopy cover provisions. This is discussed in Part 6 - Tree Canopy Cover and Financial Contributions of the PC14 section 32 assessment.
- g. *Supporting and consequential provisions* - Proposed Plan Change 14 and the supporting section 32 evaluation, has given careful regard to the level of discretion enabled through section 80E(1)(b)(iii) which enables Council to amend or include “*related provisions, including objectives, policies, rules, standards, and zones, that support or are consequential on the MDRS or policies 3, 4 of the NPS-UD*”. A number of supporting and consequential provisions are proposed, which are discussed in more detail under other parts of the section

32 relating to Chapter 14 Residential (see Part 4 of the s32), Chapter 15 Commercial and Chapter 16 Industrial (see Part 5 of the s32). In determining the scope with regard to ‘supporting’ provisions, Council has had particular regard to what contributes to a “well-functioning urban environment” under NPS-UD Policy 1, specifically that as a minimum [our emphasis]:

- (a) *have or enable a variety of homes that:
(i) meet the needs, in terms of type, price, and location, of different households; and
(ii) enable Māori to express their cultural traditions and norms;*
- (b) *have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*
- (c) *have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and*
- (d) *support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*
- (e) *support reductions in greenhouse gas emissions; and are resilient to the likely current and future effects of climate change.*

Matters (a) to (e) above are not an exhaustive list⁷ and may include other matters such as quality urban form and design. A fuller and more comprehensive consideration of what contributes to a well-functioning urban environment, has underpinned the proposed inclusions of a new Strategic Objective 3.3.7(b) and primarily the supporting provisions under Chapters 14 and 15 where increased scale and density of urban form is enabled.

2.3 Level of Enablement

- 2.3.1 In giving effect to NPS-UD Policy 3, Council has had regard to what is ‘enablement’ and the different degrees or thresholds of enablement, as well as the appropriateness of the enablement to “...enable more people to live in, and more businesses and community services to be located in, areas of an urban environmentnear a centre or other area with employment opportunities....well-serviced by existing or planned public transport....high demand for housing or for business” (NPS-UD Objective 3).
- 2.3.2 While the NPS-UD is directive as to **what** is to be “enabled” (such as in Policy 3), the document does not clarify **how** local authorities are to “enable” these outcomes. Instead, the approach to “enabling” is one for Council to determine, where there may be a range of methods available to “enable” certain outcomes, with activity status being one such method. The dictionary definition of “enable” means to “to provide with the means or opportunity” or to “to make possible, practical or easy⁸”.
- 2.3.3 There are two aspects to level of enablement, the first being around the spatial extent of enablement, principally given effect through zoning and associated provisions relating to density and height. The second aspect of enablement is in relation to the requirement for resource consent (or not, as the case may be).

⁷ See Ministry for the Environment's guideline on Well-functioning urban environments - [Well-functioning-urban-environments.pdf](#)

⁸ <https://www.merriam-webster.com/dictionary/enable>.

- 2.3.4 The greatest level of enablement is as a permitted or controlled activity, given no consent is required, or consent is unable to be refused. Restricted discretionary activity status (and in some limited circumstances discretionary activity status) is also considered to be enabling when set within a positively geared framework, justified as required to achieve a well-functioning urban environment. The Council has been mindful to ensure the specification of matters of discretion (and supporting objectives and policies) are not solely focused on managing adverse effects, but also promote and facilitate positive benefits, and potentially the grant of consent.
- 2.3.5 Policy 1 of the NPS-UD require that planning decisions contribute to well-functioning environments, that as a minimum have or enable a variety of homes to meet needs and have or enable sites suitable for different business sectors. Policy 1(d) also requires as a minimum, *“...support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets”*. Policy 2 requires Tier 1 local authorities to at all times provide at least sufficient development capacity to meet expected demand for housing and business, over the short, medium and long term. Policy 3 directs where building heights and density should be greater, based around accessibility to centres and existing and planned rapid transit stops.
- 2.3.6 In the Christchurch context, the required direction under Policy 3 in terms of directed intensification, goes well beyond needing to meet needs as directed under Policy 1 and 2 of the NPS-UD. Prior to the Enabling Act, the sufficiency of housing and business areas to meet needs over the short, medium and long term, was assessed as not being a significant district issue.
- 2.3.7 With the expansive further housing enablement through the MDRS, housing choice and variety is even further increased (refer to the Updated Christchurch Housing Capacity Assessment contained in Part 1, Appendix 1 of this report). The level of enablement being considered under PC14, is likely to provide for a population well exceeding projected long term growth rates⁹. Therefore, a ‘needs’ driven response is not required for PC14. Rather the options evaluated have been formulated based on accessibility and achieving the most appropriate urban form.

⁹ Updated mid-range plan-enabled capacity is estimated at 883,000 dwellings, which equates to just under a population capacity for an additional two million people based on a more conservative household size of 2.2 persons per household.

3 Resource management issues relevant to strategic directions and achieving a well-functioning urban environment

3.1 Achieving a well-functioning urban environment through good urban form and quality urban environments

- 3.1.1 There are many elements that contribute and work together to achieve a well-functioning urban environment. Enabling a variety of housing choice is important, but equally so is achieving a high quality urban environment and an urban form appropriate to the Ōtautahi Christchurch cultural, environment and landscape context.
- 3.1.2 A purely economic justification for enabling city growth (density and height) is unlikely to achieve better social and economic outcomes. Density needs to be done well to avoid negative outcomes such as overcrowding and diminished amenity values, and detracting from the attributes that support city vitality. It is acknowledged that Policy 6 of the NPS-UD (see below) states that changes to the built form may be significant and may detract from amenity values appreciated by some people. Further, that such change is not in itself an adverse effect.

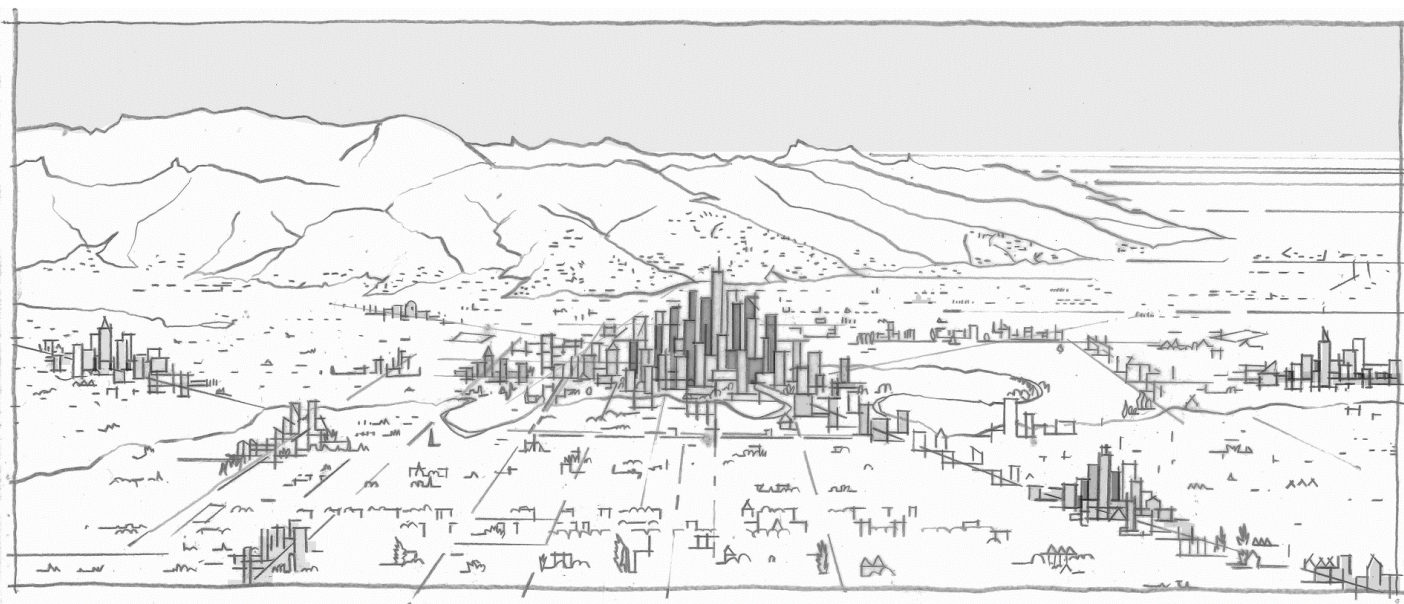
Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:

- (a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement*
- (b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:*
 - (i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and*
 - (ii) are not, of themselves, an adverse effect.*

- 3.1.3 Policy 6 however also notes that detracting from amenity values appreciated by some people may “...improve amenity values appreciated by other people”. Notwithstanding future intensification, there is still a strong community expectation for overall improvement in amenity values (as noted throughout this report, by reference to summaries of community feedback). As building heights and densities increase, without some level of planning and policy direction and management of activities, there is potential for living and business desired outcomes and opportunities to be undermined. This includes failing to achieve the uptake of density enabled as the result of a lack of demand.
- 3.1.4 Council has considered the appropriateness of plan provisions (policies, zoning and rules including assessment matters) such to provide both flexibility and certainty for the market, but balanced with necessary consenting thresholds to ensure surety of urban form outcomes. The proposal, specifically the combined objectives, policies and matters of control or discretion under Chapters 3, 14 and 15, have been designed to work together to ensure intensification is not undermined, but those specifically in relation to height and density, will deliver good urban outcomes appropriate to the locale.

- 3.1.5 The city’s urban form, identity, and sense of place, evolves from the physical relationship between people occupying the city over time: the physical patterns of its layout; and the way in which we recognise, protect, maintain and restore environmental and cultural values. The growth and development of a city can have many benefits, but if not well directed, could miss opportunities to positively contribute to the cityscape, strengthen the experience of the city for residents and visitors alike, improve the way that we live and do business, and create a distinctive city form.
- 3.1.6 An overarching design principle fundamental to any of these scales in respect to urban form, is ensuring that any response is appropriate within the context and intrinsic values of the wider natural, cultural and urban landscape¹⁰. In Ōtautahi Christchurch Te Poho-o-Tamatea Port Hills are of particular significance in respect to urban form. Both an Outstanding Natural Landscape (ONL) and significant cultural landscape¹¹, Te Poho-o-Tamatea Port Hills form the skyline and backdrop to the city, particularly to the central and eastern city, and to parts of the Canterbury plains¹².
- 3.1.7 The contrast between the flat land of the city and plains, contributes further to the identity of the city and to legibility of the experience within the city. Again, the location, scale, form and massing of building, can contribute to, or detract from, people’s experience as a result and can impact upon the associated values. Urban form is often difficult to express well in words. The illustration below (Diagram 1) better depicts a potential long term Ōtautahi Christchurch cityscape that could, if well-managed, eventuate to be not just well-functioning, but a thriving city, regarded nationally and globally as a city that attracts people to do business, invest, study and live.

Diagram 1 – An illustrative depiction of Ōtautahi Christchurch future urban form



¹⁰ National Medium Density Design Guide, Ministry for Environment 2022

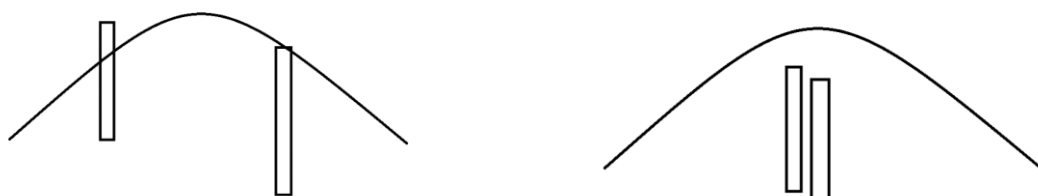
¹¹ Ōtautahi Christchurch City Landscape Study, Boffa Miskell 2015

¹² Ōtautahi Christchurch City Landscape Study (pg 84), Boffa Miskell 2015

3.1.8 Given the significant level of potential enablement directed under the NPS-UD, the Council considers it needs to provide greater direction on desired urban form outcomes is increased. As noted earlier, context is an important contributor to city values. The clustering of development, particularly high-rise building development, is important to ensure the resultant development form sits within the cultural and natural context of Te Poho-o-Tamatea Port Hills, and this development is sympathetic to rather than incongruent with them.

3.1.9 One or two very high buildings (Diagram 2) could potentially detract from the cityscape, particularly if at some distance apart, where they would fail to 'read' visually read as one element, or within the context of the natural form. To demonstrate this, a building at 90m in height, which is higher than any of the existing city centre buildings, is approximately 20% of the height of the highest peaks of the Te Poho-o-Tamatea Port Hills. As seen at a variety of angles, locations and distance, the height will vary in respect to its impact.

Diagram 2 – Diagrammatic illustration of buildings set apart and clustered within the context of a natural form



3.1.10 Many aspects contribute to a resilient and well-functioning urban environment¹³. Such attributes impact at a range of scales: the sub-region; the city; the neighbourhood; the street, block and site. By relating buildings to each other they in themselves form a feature, and in contrast to the plains give greater legibility to the city. The policy framework proposed through Plan Change 14, has been developed to provide appropriate direction through the elements that comprise urban form, including:

- context to important natural and cultural landscapes, landscape features and open spaces at each city scale;
- the scale and layout of networks spaces, streets, blocks and sites;
- precinct and site layout and design;
- the massing, scale, form, orientation and design of buildings; and
- the places and spaces where people congregate, and the activities associated with all of the above.

3.1.11 From another perspective, the elements of urban form are also important to help address the impacts of climate change. National targets to reduce emissions and respond to climate risks and challenges, are now gaining greater influence in the design of Ōtautahi Christchurch. At the city scale climate change is already influencing the drive for a more compact city form and

¹³ National Policy Statement on Urban Development 2020 – well-functioning urban environments fact sheet

reducing the risk from hazards, and protection of the natural environment. At a more localised level of the layout of the block, the street and the site, it recognises the need to enable more walkable environments, and to protect well-being, to ensure the comfort and use of our public and private spaces, whether to mitigate heat or provide sunny, sheltered streets and squares, and the mitigate effects of wind.

3.1.12 Ngāi Tahu mana whenua’s interests¹⁴ in the rebuild and future development of Ōtautahi and its surroundings are broad. They encompass a significant role and interest in the rebuilding and ongoing development of the city and the ability of Ngāi Tahu mana whenua to provide for their economic and social wellbeing through access to affordable housing, appropriate education activities and community facilities, and economic opportunities.

3.1.13 Ngāi Tahu mana whenua also see an unprecedented opportunity to rediscover and incorporate Ngāi Tahu heritage and identity, alongside that of colonial Christchurch in the rebuild and future development of Ōtautahi and its surroundings. The narratives and aspirations of the people of Ōtautahi Christchurch are being interwoven and embedded within the 21st century context. The urban form and resultant identity of Ōtautahi Christchurch is as a city is evolving into something much stronger, more inclusive, and more unique, reflective of a well-functioning environment.

3.2 Providing sufficient housing capacity with greatest enablement in focused locations

3.2.1 The purpose of the Amendment Act (Enabling Housing Supply and Other Matters) is to increase housing supply in Aotearoa New Zealand’s main urban areas, by removing barriers to development to allow for a variety of housing¹⁵. One of the main methods being the incorporation of the Medium Density Residential Standards applied to all relevant residential zones. The effect of this direction on housing supply, specifically plan-enabled and feasible capacity, within Ōtautahi Christchurch, is to substantially increase enablement.

3.2.2 Prior to the Amendment Act there is no issue with the provision of sufficient feasible development capacity to meet expected long term demand for Christchurch. The Greater Christchurch Housing Capacity Assessment of 2021, assessed Christchurch as having a surplus of 83,000 dwellings over the medium term (2021-2031) and 60,000 dwellings over the long term (2021-2051).

3.2.3 The enablement achieved through MDRS and application of Policy 3 of the NPS-UD is significantly greater, as summarised in Table 1 below and set out within Council’s updated Housing Capacity Assessment in Appendix 1 of this report. The estimates in Table 1 below apply all proposed qualifying matters as notified under Plan change 14 and will need to be reassessed following decisions on Plan Change 14, specifically in regard to underlying zoning (densities and height) and where qualifying matters are to apply. Depending on what qualifying matter applies, the level plan-enabled and feasible development capacity changes. Notwithstanding this, the evaluation contained in Part 2 of the section 32 report indicates the impact on the development capacity with all (notified) qualifying matters in place, will still result in a significant dwelling surplus.

¹⁴ Christchurch District Plan – Chapter 3, 3.2 Context

¹⁵ [Understanding-the-RMA-EHS-General-overview-July-2022.pdf \(environment.govt.nz\)](#)

Area	Short-Medium Term 2021-2031	Long Term 2031-2051
Housing bottom lines (dwelling demand plus competitiveness margins)	18,300	23,000
Plan-enabled/development capacity with all qualifying matters applied as notified under Plan Change 14 (adopting mid-range estimates).	544,000 intensification 6,000 greenfield	531,700 intensification Note - no remaining greenfield beyond 2031
Surplus plan-enabled capacity	531,700	508,700
Feasible capacity with all qualifying matters applied as notified under Plan Change 14 (adopting mid-range estimates), exclusive of potential typologies above 6-storey (not being assessed under Councils feasibility model).	88,000 intensification 6,000 greenfield ¹⁶	57,400
Surplus feasible capacity	75,700	34,000

- 3.2.4 The proposed “Low Public Transport Accessibility” qualifying matter does have a significant impact on development capacity, reducing the plan-enabled capacity by approximately 25%. Whilst this is still likely to maintain downward pressure on the housing market (i.e ensuring supply well exceeds demand), it does reduce the degree of resilience to events, particularly over the longer term, that may shift demand settings to a higher than projected growth rate. Climate refugees, changes to immigration and urban growth policies, may require Ōtautahi Christchurch to accommodate significantly greater numbers than projected by Stats NZ, noting that many assumptions underpin these projections which may not prevail overtime.
- 3.2.5 Further, the direction of the draft Greater Christchurch Spatial Plan¹⁷ is to consider a scenario for a population of one million across the Greater Christchurch area (beyond 30 years), again to ensure we plan well for the longer term. Assessments undertaken to inform the development of the draft Greater Christchurch Spatial Plan conclude that achieving a more compact urban form is the most sustainable growth option. Accommodating a significant proportion of long term demand within Ōtautahi Christchurch will achieve a more compact urban form and help avoid the need for further urban expansion into rural areas. The possible cost of applying the proposed Low Public Transport Accessibility qualifying matter, is that demand that would otherwise be accommodated in these more suburban locations, will be met elsewhere, but not necessarily within more desired locations (i.e. Central City, Medium and High Density zones). There is potential for such demand to be met, drawn to, neighbouring districts and greenfield areas, resulting in a less compact urban form (this is discussed further below).

¹⁶ The total remaining greenfield plan-enabled and feasible capacity has been estimated at 10,000 dwellings. For the purpose of this assessment the plan-enabled and development capacity has been allocated to 8,000 for the next ten years and remaining 2,000 dwelling capacity take up in the long term, on the basis of likely staged land release.

¹⁷ [Greater Christchurch Spatial Plan : Greater Christchurch](#)

- 3.2.6 The housing market is dynamic and highly competitive within the Greater Christchurch sub-region. Many of the housing issues and challenges for Christchurch City are beyond the ability of the District Plan to address or resolve, such as:
- actual realisation of the plan-enabled and feasible capacity, particularly in locations that better support the efficiency and effectiveness of core public transport routes, and to maximise agglomeration benefits of key centres;
 - market delivery of a broader range of housing types, specifically apartments within the central city and around town centres; and
 - increased market delivery of more affordable housing options.
- 3.2.7 Whilst medium density development, particular 2-3 storey townhouses, is reported as being feasible across the city, the significant enablement for apartment living (as directed by the NPS-UD), may struggle to be realised. The Property Group Limited (TPG) assessment of high density residential feasibility (refer to Part 3, Appendix 5) conclude that *“...under current market conditions it remains challenging for development of buildings above six storey to be feasible in the range of suburban locations explored”*. Further *“...The impact of medium density, and lower density housing prices means it would be unlikely that potential buyers would purchase a high density premium product for more than a standalone or terrace dwelling within the same suburb.”*
- 3.2.8 The Property Group do however advise, that *“Into the future, as the Christchurch residential market changes and the construction sector stabilises the viability of high density residential development at 10-12 stories in the city centre may improve. The price points achievable would need to increase similar to those achieved in Wellington market alongside high levels of amenity provided for inner city residents. Based on this analysis it is however considered unlikely that high density residential development (4 stories and above) within the cities local or metropolitan centres will be feasible without a significant shift in the market or significant government intervention.”*
- 3.2.9 The housing market in Ōtautahi Christchurch is not just influenced by factors within its boundaries, but also the Greater Christchurch sub-region. There continues to be significant housing choice and enablement within the sub-region, including through substantial greenfield developments in the districts of Selwyn and Waimakariri. Whilst over the long term greenfield developments in Ōtautahi Christchurch will become near fully developed, demand may well be increasingly drawn away from the city into the districts. Without a major change in housing preferences and choice (potentially influenced by other government initiatives to incentivise and dis-incentivise choice and preference), the increased enablement for higher density is unlikely to give rise to the desired and necessary market shift to realise a more compact urban form. Further, given the required price points for apartments to become feasible, it is difficult to foresee the private development market delivering substantially more affordable housing options.
- 3.2.10 In terms of housing affordability, for some decades now, Christchurch City has adequately meet demand through a balance of new greenfield developments and enabling intensification

around centres. This enablement has maintained a reasonable level of housing affordability¹⁸ comparative to other major cities¹⁹. Housing affordability is however declining, particularly for financially stressed renter households and entry level homeowners. The number of renter households earning less than the median household income being the highest proportion of stressed households. Other trends include a disproportionate increase in the number of stressed “retired” and “one parent” renter households. The number of financially stressed renters is expected to continue to increase at a faster rate than the growth in greater Christchurch’s underlying population. With pressure building in the housing market as a result of growing supply and demand imbalances, housing need from financially stressed households is likely to increase significantly in the short term²⁰.

- 3.2.11 Whilst the level of enablement achieved through PC14 is substantial, effectively addressing the housing affordability will be challenging without government intervention. A number of reports support this statement, including the “Greater Christchurch Partnership Social and Affordable Housing Action Plan Report 2020”. Some of the conclusions were that Councils *“...should explore with developers and community housing providers why low value smaller homes are not being built. It will be important to monitor the effect of their district plan provisions and make adjustments should the desired actions not result (page 4 of the report) They do not see a large shift in the number of smaller homes built and commented these are mainly in Christchurch and not affordable for lower income renters (page 15 of the report).* The report also noted that whilst the Christchurch City Council was interested in exploring an affordable housing planning requirement (i.e. inclusionary zoning), that this could have a perverse outcome if it were not applied across the Greater Christchurch market. It may just encourage development in Selwyn and Waimakariri rather than the city.
- 3.2.12 In summary, the market is not currently, nor in the very long term, majorly constrained to meet demand. Further, any increased enablement is unlikely to significantly improve housing affordability for entry level homeowners and those most financially stressed. Housing affordability issues are complex, with many potential mechanisms to address affordability being beyond the realm of a District Plan. What is within the influence of the District Plan, is where the highest densities are enabled, to what spatial extent, and the appropriate design controls to ensure matters of quality, not just quantity, are well addressed.

¹⁸ In greater Christchurch and Canterbury, approximately 18 percent of people's income goes into their mortgage as compared to the Auckland region where it's almost 40 percent. Housing is considered affordable when no more than 30% of gross household income is spent on housing costs (including rent, mortgage, rates and building insurance).

¹⁹ Greater Christchurch Partnership Social and Affordable Housing Action Plan Report, 28 September 2020

²⁰ Greater Christchurch Housing Capacity Assessment 2021

3.3 Centres and the extent of enablement within walkable catchments

- 3.3.1 Providing good accessibility is a key driver for the NPS-UD and Act to achieve a well-functioning urban environment, with a clear link between good accessibility and social, economic and cultural wellbeing, and the health and safety of all people²¹. Policy 1 of the NPS UD requires that planning decisions contribute to well-functioning urban environments and good accessibility (Policy 1c), as a feature of well-functioning urban environments. Policy 3 identifies that increased densities are required around centres where a higher level of accessibility is anticipated.
- 3.3.2 Christchurch is highly walkable as most of the city is flat and there is a relatively good network of footpaths. Whilst there are some barriers to connections (e.g. busy roads with limited crossings, railway lines etc.) in general, there are few limitations to walkability. Nationally the city has a good reputation for cycling and over recent years investment into the Major Cycleway Routes (MCR's) has further supported the idea of creating safe connections across the city and within neighbourhoods.
- 3.3.3 Planning and providing for good accessibility is a driver for many Council programmes. In terms of the District Plan, there are already strong foundations to planning for good accessibility including a clear centres framework (Policy 15.2.2.1) which is supported by the enablement of medium density housing in locations close to centres. The centres and the associated spatial extent of the level of residential intensification proposed under PC14 is summarised in Table 3 and with regard to building heights within Appendix 2 of this report. This approach is considered to reflect a commensurate approach to the range of commercial activity and community facilities within centres in the commercial framework.
- 3.3.4 Council's early work in relation to the NPS-UD²² resulted in the development of a Density Enablers Model and GIS tool that provided guidance as to where greater or lesser enablement was commensurate to where there was greater and lesser accessibility to a range of services and amenities. This analysis has been a principal element to underpin the Council's proposal, specifically where the greatest heights (refer to Appendix 3 of this report) and densities are enabled.
- 3.3.5 Overall areas around larger centres score more highly as they have better accessibility to a wider range of goods and services (being larger shopping centres), with corresponding more frequent public transport services and more employment opportunities. Whilst there was a change in emphasis of Policy 3(d) in October 2021, the Density Enabler modelling work provided a sound evidence base to justify a cascading level of enablement based upon the established centres hierarchy, with greater building heights and density of urban form around larger centres. The wording of Policy 3 is now directive in terms of those areas where it requires the greatest height of development and density of urban form and therefore Council's approach adhered to this direction.
- 3.3.6 Both the city centre and metropolitan centres are highlighted as locations where development potential should be maximised (unlimited in the central city and at least 6

²¹ Understanding and implementing intensification provisions for the NPS UD

²² At this point, Policy 3d identified that building heights and density of urban form should be commensurate with the greater of: (i) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or (ii) relative demand for housing and business use in that location.

storeys in metropolitan centres) and Policy 3(c) also specifies that walkable catchments should be applied to existing and planned rapid transit stops, from the edge of central city zones, and the edge of metropolitan centre zones. Policy 3(d) is specific in terms of where further intensification should be considered but allows the individual Council to determine the scale and extent of this enablement provided it can be described as commensurate with the level of commercial activity and community services at each centre.

- 3.3.7 There has been considerable assessment undertaken in Christchurch to determine whether any District Centres meet the threshold for being a Metropolitan Centre. This was based on exploring the two limbs of the definition of a Metropolitan Centre in the National Planning Standards. Part 4 Commercial, Appendix 2 of the section 32 report, discusses the centres review, particularly the role and catchment of larger centres. There are seven district centres that have a greater depth to the range of activities enabled and established in the centre when compared with (most) neighbourhood centres.
- 3.3.8 Metropolitan centre zones, like City centre zones, are intended to be those areas used predominantly for a broad range of activities. This contrasts with a somewhat narrower range of activities that are anticipated in Town centres, the next centre down in the centres hierarchy. The 'intended catchment' arguably provides more of a point of difference. It is evident that there is a hierarchy between the centres, with the City centre zone serving the largest catchment (which could include visitors from the region and beyond), the Metropolitan centres serving a 'sub-regional urban catchment', town centres primarily serving immediate and neighbouring suburbs, and local and neighbourhood centres serving more localised needs.
- 3.3.9 It is however uncertain what a 'sub-regional urban catchment' means, which is a defining feature of a Metropolitan centre zone. The Council has taken the view that "is the focal point for sub-regional urban catchments" means that the centre in question is a main "drawcard" for people living in urban areas located in more than Christchurch (being local). This could include Akaroa, but is something less than "regional" (being all of Canterbury). Furthermore, the draw card is not just commercial and retail activities, it is for a broad range of activities including community services that serve the needs of the 'sub-regional urban catchment'.
- 3.3.10 Within Christchurch, none of our centres are more than 8km driving distance from the central city and four of the main centres (Riccarton, Papanui, Shirley and Merivale) are within 3km of the central city. The close proximity of centres in a flat, accessible city like Christchurch, results in catchments that overlap considerably. The entire Christchurch population has good accessibility to the central city and its broad range of activities and facilities such that these need not be replicated in suburban locations. The district centres²³ more closely (but not wholly) align with the definition of a 'Town Centre Zone' in the national planning standard. This is because the District centres all at least serve the needs of immediate and neighbouring suburbs (notwithstanding in some cases the catchment area is wider). Given that Christchurch has neither metropolitan centres, nor current or planned rapid transit stops, PC14 has therefore been limited to consideration of the walkable catchments related to the central city and the appropriate extent of additional enablement around commercial centres.
- 3.3.11 A walkable catchment describes an area within a specified walking distance of a destination along routes where footpaths are provided and travel by foot and bike is made easy, direct

²³ As proposed to be amended through Plan Change 5B. The current district plan doesn't describe the catchment in any way.

and safe. Catchments can be measured in terms of distance from a particular place or zone (e.g. 800m) or time (e.g. a 10-minute walk). In broad terms, an 800m walkable catchment equates to a 10-minute walk catchment and 400m is approximately a 5-minute walk. Analysis undertaken by Iain White²⁴ indicates that 20 minutes is the maximum time that people would prefer in terms of accessing amenities (regardless of the destination or mode of transport). Some 20 minutes walking equates to 1.5km walking, 5km cycling or 8km by micro-scooter. More recent work indicates that potentially people will walk further than that, whether this is because of a cultural acceptance to walking more or because walking itself has become a more attractive option (due to safety and connection improvements or the prohibitive cost/time of other travel options).

- 3.3.12 The central city has the greatest offer of goods and services, and therefore the most significant walkable catchment being a 1.2km catchment was selected (equating to a roughly 15-minute walkable distance from the edge of the central city zone). Apart from the central city, there are three centres with a significantly larger offer (Papanui, Hornby and Riccarton), where 600m was selected as an appropriate walkable catchment (noting that 800m was considered suitable for a Metropolitan Centre).
- 3.3.13 The Large Local Centres provided a similar scale of commercial activity and community facilities as the town centres (bar the 'big 3' – Papanui, Hornby and Riccarton) and in these locations a 400m catchment was applied. In recognition of their important role in providing a reasonable level of commercial activity and community services to their surrounding residential area, the Medium Local Centres were given a 200m catchment. In contrast, it was not considered that the scale of activity at the Small Local Centres or Neighbourhood Centres was commensurate with any more development than that enabled under the new Medium Density Residential Standards and therefore no catchments were applied to these centres.

²⁴ University of Waikato, Environmental Planning Programme, 20 minute city research

Table 2 – Proposed centres classification and spatial extent residential intensification enablement

Centre Category	Sub-category (if applicable)	Zoning	Location	Residential Intensification opportunity*			
				Enabled within zone	Centre Catchment	Catchment Precinct	Height enabled in Precinct
City Centre		City Centre	Central City	Y - 90m	1200m	High Density Residential Zone	10 storey (32m) or 6 storey (20m)
		Central City Mixed Use Zone	Various sites within Central City	Y - 32m	N/A	N/A	N/A
		Mixed Use Zone	Various sites	Y - 20m	N/A	N/A	N/A
		Mixed Use Zone – Comprehensive Housing Precinct	Sydenham, Addington	Y – 20m	N/A	N/A	N/A
Large Format Centre		Large Format Zone	Tower Junction, North link, Chappie Place, Supa Centre, Homebase, Northern Homebase, Moorhouse Ave	No	N/A	N/A	N/A
Town Centre	Large Town Centre	Town Centre	Hornby, Papanui, Riccarton	Y – 20m	600m	Town Centre Intensification Precinct	6 storey (20m)
	Town Centre		Shirley/Palms, Linwood/Eastgate, Belfast/Northwood & North Halswell	Y – 20m	400m	Town Centre Intensification Precinct	6 storey (20m)
Local Centre	Local Centre (large)	Local Centre	Bush Inn, Ferrymead**, Merivale & Sydenham North	Y – 20m	400m	Local Centre (large) Intensification Precinct	6 storey (20m)
	Local Centre (medium)		Barrington, Bishopdale, New Brighton** & Prestons	Y – 14m	200m	Local Centre (medium) Intensification Precinct	4 storey (14m)

	Local Centre (small)		Addington, Avonhead, Beckenham, Colombo/Beaumont, Cranford, Edgware, Fendalton, Halswell, Hillmorton, Ilam/Clyde, North West Belfast, Parklands, Redcliffs, Richmond, Linwood Village, St Martins, Sumner, Sydenham South, Wairakei/Greers, Wigram, Woolston & Yaldhurst	Y – 12m	None	N/A	12m - MDRS	
		Commercial Banks Peninsula	Lyttelton	Y – 12m	None	N/A	12m – MDRS	
Neighbourhood		Neighbourhood Centre	All commercial centres not listed above.	Y – 12m	None	N/A	None	12m - MDRS

3.4 Enabling papakāinga/kāinga nohoanga within the urban area as part of enabling Māori to provide for their wellbeing.

- 3.4.1 Papakāinga/kāinga nohoanga development is already provided for in the existing District Plan in four locations that are outside of the urban area and within the context of original Maori Reserve land at Rāpaki. However, it is not enabled within the wider Ōtautahi/Christchurch urban area. This does not enable Māori to express their cultural traditions and norms in urban Christchurch through traditional communal living involving housing with a mix of cultural, social and economic facilities and activities that enable whānau or hapū to provide for their well-being.
- 3.4.2 The Strategic Directions Objective 3.3.3 indirectly supports Ngāi Tahu to provide for their well-being by directing that Ngāi Tahu mana whenua’s aspirations to actively participate in the revitalisation of Ōtautahi are recognised. As part of providing for urban intensification, the Act specifically enables provision for papakāinga housing (s.80E(1)(b)). Kāinga nohoanga is the term used for such development by Te Ngāi Tūāhuriri Rūnanga, whose takiwā includes the majority of the main Christchurch urban area. The term papakāinga is the term used for such development by Te Hapū o Ngāti Wheke in relation to Rāpaki.
- 3.4.3 Objective 1 of the NPS-UD, also seeks to achieve well-functioning urban environments, which Policy 1 specifies to include housing that enables Māori to express their cultural traditions and norms. Specifically enabling papakāinga/kāinga nohoanga also gives effect to the broad direction Objective 1 of the NPS-UD of enabling all people and communities to provide for their social, economic and cultural wellbeing.
- 3.4.4 Changes are proposed to Objective 3.3.3 to specifically enable papakāinga/kāinga nohoanga and to more clearly enable Ngāi Tahu to provide for their wellbeing and more fully give effect to the Act and NPS-UD. It is noted that this plan change does not propose to introduce policies and rules into the District Plan that would enable papakāinga/kāinga nohoanga in specific urban areas. This will be dealt with in a separate plan change.

4 Community and Stakeholder (pre-notification engagement)

4.1 Overview

- 4.1.1 Pre-notification engagement and consultation on the 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 affected properties sent to all residents and businesses;
 - Public advertising placed in The Press and Star and community newspapers, along with Newsline 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;

- Public webinars – which were recorded and made available online - on the following topics; Infrastructure (including vacuum sewers), Heritage and Character Areas, Coastal Hazards, Residential intensification, and Commercial intensification; and
- Audience-specific webinars were provided to members of the New Zealand Planning Institute.

4.1.2 Council received 689 responses via the Have your Say website page and through email, hearing from a wide range of organisations including:

- Crown entities: Canterbury Regional Council (Environment Canterbury - ECan), Department of Conservation (DOC,) Earthquake Commission(EQC), Fire and Emergency New Zealand, Heritage New Zealand, Kāinga Ora, New Zealand Police, and Waka Kotahi (NZTA)
- Council entities: Community Board, Lyttelton Port Company, and Ōtautahi Community Housing Trust.
- Residents Associations: Central Riccarton Residents Association, Deans Avenue Precinct Society, Englefield Residents Association, Inner City West Neighbourhood Association (ICON), Riccarton Bush-Kilmarnock Residents Association, and Victoria Residents Association.
- Community Groups: Latimer Community House Trust, Riccarton House and Bush Trust, and Te Whare Roimata.
- Professional associations/organisations: Property Council New Zealand (PCNZ), and the Retirement Village Association of New Zealand.
- Commercial/other entities: Avon Loop Developments, Catholic Diocese of Christchurch, Carter Group, Cristo, Fuel Companies (Z Energy, BOP and Mobil), KB Contracting and Quarries, Milford Group, New Zealand Airports, Pebbles Group, Ryman Healthcare, SCentre, Transpower New Zealand, Winton Land, Wolfbrook Property and YourSection.

4.1.3 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)*

4.1.4 From these questions strong themes emerged and have been grouped into the following areas:

- The right areas to enable development above 12 metres (i.e. above what is to be the permitted Medium Density built form standards)
- Mixed use and business intensification (i.e. commercial areas)
- Proposed changes to the Central City zone

- Medium density residential zone
- Qualifying matters
- Financial contributions.

4.1.5 Within this Plan Change document further detailed analysis of the pre-notification public feedback received is provided, including what changes have been made to the draft provisions as a result of feedback received. A summary of the public and stakeholder feedback is provided below based around common themes and in response to the focused questions.

Question/Matter	Response received
The right areas where development is enabled above 12 metres?	<ul style="list-style-type: none"> • No – 68% • Yes – 32% • 950 comments were received: • 475 comments sought to reduce development above 12 metres • 120 comments supported development above 12 metres • 66 comments sought to increase development above 12 metres • 289 comments on various matters <p>The comments seeking a reduction or elimination of the areas in which development can occur over 12 metres were over three-times as many as the comments supporting what was proposed or seeking an increase in these areas. Those who sought to reduce height provided many reasons to support their opinions, often in great detail, whereas those who support height over 12 metres tended to provide fewer reasons.</p>
Mixed use and business intensification (i.e. commercial areas)	<ul style="list-style-type: none"> • 100 comments were received • In response to the question of whether the proposed plan change allow for enough business intensification (i.e. supply and extent), responses were; • Yes - 76% • No - 24% <p>A substantive number of respondents supported mixed-use commercial and residential zones. Of the comments received, just over 40 respondents made a short, generic supportive statement. The benefits were seen to be activated streetscapes and increased numbers of people on streets who would frequent businesses and add life and vitality to areas. Over three quarters of respondents agreed that the plan change allows for enough business intensification, with comments explaining that the post-earthquake and COVID19 trend of businesses moving to the suburbs and more people now working from home is reducing demand in the centre of the city.</p>
Proposed changes to the Central City zone	<ul style="list-style-type: none"> • 25 comments received <p>There was a desire for the Central City to be developed ahead of other areas, and this opportunity was seen as being different to Auckland and Wellington. Central City development was considered important to increase the vitality and success of the central city and to compete with</p>

	suburban development. An increased population in the central city was considered beneficial.
Medium density residential zone	<ul style="list-style-type: none"> • 170 comments received <p>The vast majority of comments opposed increasing Medium Density Residential Zones, expressing similar concerns about potential negative impacts to those identified in relation to building higher than 12m. Direct impacts from tall buildings on neighbours was again the most discussed issue, particularly the impacts of shading and changes to community dynamic and liveability. Seismic risks and the likely negative impacts from a future seismic event were also reasons why people were fearful of more and higher development on susceptible land.</p>
Qualifying matters	<ul style="list-style-type: none"> • 800 comments were received on this aspect, however it is worth noting that many related to matters such as protection and enhancement of heritage and residential character areas, infrastructure (vacuum sewer constraints), and coastal hazards. <p>Around four times as many comments were made suggesting qualifying matters should be increased than comments which either agreed with what is proposed or suggested reducing qualifying matters. Two thirds of the comments which discussed increasing qualifying matters discussed character or heritage items. Just under half of these comments discussed the preservation of character and heritage generally, with the majority of comments focused on specific areas. The most commonly discussed areas were Riccarton Bush, Richmond, the 15 Papanui Memorial Streets, and the Beckenham Character Area. Other factors that people wanted protected with qualifying matters were natural features, with Riccarton Bush and the Papanui Memorial Streets again identified frequently as requiring protection from development. Those who sought a reduction in qualifying matters primarily focused on particular heritage and character sites and infrastructure, with the general sentiment that development is more valuable than wide-ranging character or heritage preservation. Those who agreed with qualifying matters as they are outlined in the draft Plan focused most on heritage and character, infrastructure and, coastal hazards</p>
Financial contributions	<ul style="list-style-type: none"> • 110 comments were received. <p>Around three quarters of respondents who commented either supported the financial contributions approach or considered it too lenient. The respondents who supported the approach felt that protecting the tree canopy was important and this was a way to achieve this outcome. There was a desire for trees to be planted close to developments. Those who felt that the financial contributions were too lenient (around one quarter of respondents, or 25) felt that the approach allowed developers to pay to avoid having to protect trees</p>

	<p>which they felt should not occur. Those who felt the financial contributions were too strict argued that the scheme would be too difficult to calculate accurately and to administer – this was summarised as ‘red tape’. Overall, these respondents felt it would be too costly and that costs would be passed on to purchasers.</p>
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5 Consultation with iwi authorities

- 5.1.1 Consultation on the draft proposal was undertaken with Mahaanui Kurataiao on behalf of the papatipu rūnanga of the area. Feedback principally focused on Strategic Directions Chapter 3 and qualifying matters, and in regard to papakāinga/kāinga nohoanga. This resulted in agreed changes to the Strategic Objectives as set out in Table 4 within section 6.4 of this report. As part of a future collaborative process and separate plan change, it was indicated that the Council would be approached about including other specific plan provisions to enable additional papakāinga/kāinga nohoanga enablement. More specific feedback is discussed within this other parts of this section 32 report.

6 Chapter 3 Strategic Objectives

6.1 Background

- 6.1.1 The following section focuses on the proposed changes to Chapter 3 of the District Plan which provides the overarching direction for the district, including for developing the other chapters. Chapter 3 has primacy over the objectives and policies in the other chapters of the Plan, which must be consistent with the objectives in the Strategic Directions Chapter.
- 6.1.2 In Council’s review of the Strategic Directions, the matter of scope has been a lead determinant of what is proposed to change. The current Strategic Directions were prepared in the context of recovery from the Canterbury Earthquakes. Over ten years has passed since this devastating event, one that significantly impacted on our city’s form and function. It has however provided a unique opportunity to shape the city’s future and whilst some areas within the city are still recovering, the central city for example, much has been progressed.
- 6.1.3 The introduction and context sections to Chapter 3 (sections 3.1 and 3.2) discuss in detail the impact of the earthquakes, make reference to documents such as the Land Use Recovery Plan and the Canterbury Earthquake (Resource Management Act Permitted Activities) Order 2011. Whilst it is potentially timely to undertake a more complete review and update of the Strategic Directions chapter, Council’s preferred approach is to do that through a Schedule 1 process, or as part of the next District Plan review. The proposed changes to Chapter 3 have only focused on how the Strategic Directions Chapter may need to be amended to give effect to the requirements of the Act and the directions in the NPS-UD.

6.2 Council’s legal obligations and strategic planning documents

- 6.2.1 In addition to section 2 of this report, those sections of the Act that are particularly relevant to the Strategic Directions Chapter are section 77G relating to residential zones, MDRS, Policy

3, and qualifying matters; section 77N relating to non-residential zones also in regard to Policy 3 and qualifying matters; and section 80E regarding provision for papakāinga housing and objectives that support, or are consequential on, the MDRS or Policies 3 and 4 of the NPS-UD.

6.2.2 Of the higher order documents the Strategic Directions must give effect to/not be inconsistent with, most relevant to consideration to Chapter 3 in respect of Plan Change 14 are :

- (i) NPS-UD and in particular;
 - Objective 1 – achieving well-functioning urban environments.
 - Objective 2 – improving housing affordability by supporting competitive markets.
 - Objective 3 and Policy 3 – enabling more people to live in or near, and more businesses and community services to be located in, centres, and areas well-served by public transport.
 - Objective 4 – that urban environments, including their amenity, develop and change over time in response to diverse and changing needs.
 - Objective 5 – take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).
 - Objective 8 – reducing greenhouse gas emissions and achieving resilience to the effects of climate change
 - Policy 1 – meeting housing needs, including price and enabling Māori to express their cultural traditions and norms; good accessibility between housing, jobs, community services; limiting adverse impacts on competitive markets; reducing greenhouse gas emissions; and achieving resilience to climate change.
 - Policy 4 – provision for limiting the building height or density requirements under Policy 3 where qualifying matters apply.
 - Policy 9 – involving, and taking into account the values and aspirations of, hāpu and iwi
 - Subpart 6 – intensification in tier 1 urban environments, including qualifying matters that may justify limiting the building height or density otherwise required.
- (ii) National Planning Standards 2019 - The Strategic Directions Chapter objectives are proposed to be amended to reflect the zoning framework of the Standards, consistent with the proposed amendments in other chapters of the District Plan.
- (iii) Canterbury Regional Policy Statement 2013 (CRPS) - The CRPS contains a number of relevant objectives and policies, in particular:
 - Objective 5.1.2 (h) and Policy 5.3.4 - papakāinga/kāinga nohoanga.
 - Objectives 6.2.1 and 11.2.3, and Policy 11.3.8 - recognise, have regard to, and protect people from, unacceptable risk from natural hazards and the effects of climate change and sea-level rise.
 - Objectives 6.2.1 and 6.2.2 and Policies 6.3.1 and 6.3.7– increased urban intensification and reduced unnecessary urban sprawl

- Objectives 6.2.2 and 6.2.5 and Policy 6.3.7 - increased housing and affordability in and around the Central City and larger suburban centres, and the maintenance and enhancement of those centres as focal points.
 - Objective 6.2.3 and Policy 6.3.2 - retention of identified areas of special amenity and historic heritage value and that development reflect the character and quality of the existing built and natural environment
 - Objectives 6.2.4 and 14.2.1 and Policies 6.3.2 and 6.3.4 - support the use of, and increased viability, of public transport and reduction in greenhouse gas emissions
- (iv) Mahaanui Iwi Management Plan (MIMP) - The District Plan must take into account any relevant planning document recognised by an iwi authority, specifically Part 5.4 Papatūānuku, Policies P5.1-P5.3 – Provision for papakāinga on ancestral land.

6.3 Operative Strategic Directions and scope of the changes proposed

- 6.3.1 The current Plan’s Strategic Directions Chapter contains objectives relevant to the matters required to be included in this plan change. They are Objective 3.3.3 - Ngāi Tahu mana whenua, Objective 3.3.4 - Housing capacity and choice, Objective 3.3.5 - Business and economic prosperity, and Objective 3.3.7 -- Urban growth, form and design.
- 6.3.2 The Plan Change proposes a number of changes to the Strategic Directions objectives as reasoned in Table 4 below and set out in the issue discussion in section 3 of this report. A more detailed evaluation of the appropriateness of the proposed amendments and additions to the objectives is provided in section 6.4 of this report.

Provision	Description of the proposed change	Reason for change
3.1.a.iv Introduction	In providing for the effective functioning of the urban environment, recognises that in facilitating an increased supply of housing also require provision for a wide range of housing types and locations to give effect to the Act and NPS-UD.	To recognised the new legislative requirements
3.3.3 Objective - Ngāi Tahu mana whenua	Includes wording relating to enabling the expression of cultural traditions and norms and providing for well-being and prosperity	To better align with wording under NPS-UD Policy 2.2(a)(ii) and to support MDRS and Policy 3, having regard to NPS-UD 2.1 Objective 5
3.3.4.b Objective – Housing capacity and choice	Includes reference to kāinga nohoanga housing, and recognises the opportunity to provide for papakāinga/kāinga nohoanga housing within the urban area and on Māori land.	To better give effect to Act (section 80E(1)(b)(ii) and NPS-UD, manawhenua needs

<p>New Objective – Well-functioning urban environment</p> <p>3.3.7</p>	<p>Includes the Objective on well-functioning urban environments required to be included in the District Plan under Schedule 3A of the Act, and introduces additional matters and outcomes sought in relation to a well-functioning urban environment, specific relating to urban form and design, greenhouse gas emissions and resilience to climate change.</p>	<p>The District Plan does not currently contain the “well-functioning urban environment” objective required to be included by the Act (s.77G, Schedule 3A, Objective 1). The additional matters to this objective are proposed as support to MDRS and Policy 3 of the NPS-UD (see further rationale in section 6.4 of this report). With regard to greenhouse gas emissions and climate change, the new provisions better reflect NPS-UD Objectives 2 and 8 and Policy 1 matters.</p>
<p>Renumbered 3.3.7 to 3.3.8 Objective – Urban growth, form and design</p>	<p>Deletion of reference to ‘neighbourhood centres’ and change to referencing as ‘Town’ and ‘Local’ centres. Minor change to the wording relating to accessibility.</p>	<p>References to commercial centres have been updated to align with the categorisation under the National Planning Standards. The changed wording of the matter relating to accessibility better supports MDRS and Policy 3 and improves alignment of wording with NPS-UD Policy 2.2(c)</p>
<p>Renumbered 3.3.9 to 3.3.10 Objective – Natural and cultural environment</p>	<p>Proposes a new matter to this objective recognising the importance to maintain and enhance tree canopy.</p>	<p>Reflects the strategic significant of maintaining and enhancing tree canopy cover. See also Part 7 of this section 32 evaluation for more detailed reasoning in respect of this new provision, and the other provisions proposed to implement this part of the objective to provide for a tree canopy cover regime (including financial contributions to be paid in certain circumstances)</p>

6.4 Evaluation of objectives

- 6.4.1 Section 32 requires an evaluation of the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the Act (s32(1)(a)).
- 6.4.2 Table 5 provides an evaluation of the proposed changes to Objectives 3.3.3-Ngāi Tahu mana, 3.3.4-Housing capacity and choice, and proposed new Objective 3.3.7-Well-functioning urban environment, to have better regard to Papakāinga/kāinga nohoanga and enabling Māori to provide for their wellbeing.
- 6.4.3 In response to the extensive enablement as directed under the Act, Council proposes to add a new strategic objective “*Objective 3.3.7-Well-functioning urban environment*” to provide greater direction as to the desired urban form for Otautahi Christchurch. Table 6 provides an evaluation of proposed new objective, which focuses on the context and inter-relationship between commercial and residential zones, within the wider cityscape. It is noted that the proposed matters are in addition to Schedule 3A of the Act requirement for Council to include the following objective (refer Schedule 3A, section 6, Objective 1) “...*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*”.

Table 5 – Evaluation of Objectives 3.3.3-Ngāi Tahu mana, 3.3.4-Housing capacity and choice, and proposed new Objective 3.3.7-Well-functioning urban environment is regard to Papakāinga/kāinga nohoanga

	Option 1 - Status Quo – Not specifically enabling housing for Māori to express their cultural traditions and norms, clearly provide for their wellbeing, or specifically enabling papakāinga/kāinga nohoanga in urban Christchurch.	Option 2 – Proposed Plan Change – Specifically enabling housing for Māori to express their cultural traditions and norms and provide for their wellbeing, including enabling papakāinga/kāinga nohoanga in urban Christchurch.	Option 3 – Alternative Change 1 – Enabling housing for Māori to express their cultural traditions and norms. Not specifically provide for their wellbeing or enabling papakāinga/kāinga nohoanga in urban Christchurch.
Resource Management Act sections 5, 6 & 8/ effects	Does not specifically provide for the enablement of Māori to provide for their social, economic, and cultural well-being and for their health and safety through the expression of their cultural traditions or for papakāinga/kāinga nohoanga in urban Christchurch.	Specifically provides for Māori to provide for their social, economic, and cultural well-being and for their health and safety specifically through the expression of their cultural traditions and for papakāinga/kāinga nohoanga in urban Christchurch.	Specifically provides for Māori to provide for their social, economic, and cultural well-being and for their health and safety specifically through the expression of their cultural traditions, but not specifically through papakāinga/kāinga nohoanga in urban Christchurch.

	Would not result in changes in effects on the environment.	Enabling Ngāi Tahu to clearly provide for their wellbeing, as an amendment to Objective 3.3.3 (under s.80E(1)(b)(iii)), which will support enabling papakāinga/kāinga nohoanga and more clearly give effect to Objective 1 of the NPS-UD, in terms of enabling all people and communities to provide for their social, economic and cultural wellbeing. May result in changes in effects on the environment, depending on objectives, policies and rules in future plan changes.	May result in changes in effects on the environment, depending on objectives, policies and rules in future plan changes.
Resource Management Act s.8	Takes into account the principles of the <u>Treaty of Waitangi</u> (Te Tiriti o Waitangi) to a limited degree.	Most fully takes into account the principles of the <u>Treaty of Waitangi</u> (Te Tiriti o Waitangi).	Takes into account the principles of the <u>Treaty of Waitangi</u> (Te Tiriti o Waitangi) to a somewhat greater degree than the existing District Plan.
Resource Management Act s.80E(1)(b)	Papakāinga/kāinga nohoanga in urban areas not specifically enabled. Does not clearly enable Ngāi Tahu to provide for their wellbeing, through a supporting amendment to Objective 3.3.3 (under s.80E(1)(b)(iii)).	Papakāinga/kāinga nohoanga in urban areas enabled consistent with the urban intensification provisions of the Act. Does clearly enable Ngāi Tahu to provide for their wellbeing, through a supporting amendment to Objective 3.3.3 (under s.80E(1)(b)(iii)).	Papakāinga/kāinga nohoanga in urban areas is not specifically enabled. Does not clearly enable Ngāi Tahu to provide for their wellbeing, through a supporting amendment to Objective 3.3.3 (under s.80E(1)(b)(iii)).
National Policy Statement on Urban Development 2020 Objective 1 and Policy 1	Does not specifically provide for housing that enables Māori to express their cultural traditions and norms, which is part of the minimum requirements of Policy 1 for a well-functioning urban environment.	Provides for housing that enables Māori to express their cultural traditions and norms, which is part of the minimum requirements of Policy 1 for a well-functioning urban environment.	Provides for housing that enables Māori to express their cultural traditions and norms, which is part of the minimum requirements of Policy 1 for a well-functioning urban environment.
Canterbury Regional Policy Statement Objective	Less well meets Objective 5.2.1.2(h) which requires development to be located and designed to enable	Most fully gives effect to Objective 5.1.2 (h) and to Policy 5.3.4 which refers to papakāinga/kāinga	Only partially meets Objective 5.2.1.2(h) in that it does not facilitate

<p>5.2.1(2) and Policy 5.3.4</p>	<p>people and future generations to provide for their cultural wellbeing; and facilitate the establishment of papakāinga. The objective does not limit or define the location, only that the location must benefit the cultural needs of people and future generations. As the majority of Māori are urban dwellers, it is appropriate that provision is made for papakāinga/kāinga nohoanga in urban areas.</p>	<p>nohoanga on ‘ancestral land’. An informal definition of ‘ancestral land’ is offered within the Principal Reasons and Explanation to the policies as “generally land that has been owned by ancestors” and is not confined to any particular classification of land under the Te Ture Whenua Māori Act 1993. Accordingly, ancestral land may be any land within the takiwā of each Papatipu Rūnanga and may include urban areas.</p> <p>The CRPS does not explicitly preclude papakāinga/kāinga nohoanga in urban areas, but does seem to focus on the original Māori Reserves. However, more recent higher order documents anticipate a contemporary scenario of Māori seeking cultural housing options within urban areas. In particular, the inclusion of provision for papakāinga in the Act as part of this urban intensification plan change and the NPS-UD Policy 1 requirement that well-functioning urban environments include, as a minimum, housing that enables Māori to express their cultural traditions and norms.</p>	<p>papakāinga/kāinga nohoanga in urban areas.</p>
<p>Mahaanui Iwi Management Plan Part 5.4 – Papatūānuku, Policies P5.1-P5.3</p>	<p>As the Mahaanui Iwi Management Plan does not explicitly provide for papakāinga/ kāinga nohoanga in urban areas, maintaining the status quo is not contrary to it. It does however fail to give effect to the general intent or</p>	<p>Consistent with the intent of Policies P5.1 to P5.3 which refer to papakāinga on ‘ancestral land’. On the basis that ‘ancestral land’ is generally land that has been owned by ancestors, and is not confined to any particular classification of</p>	<p>A general policy approach to enable Māori to express their cultural traditions and norms, without reference to papakāinga/ kāinga nohoanga, is unlikely to result in any change to housing for Māori. It would fail to give effect to the</p>

	<p>thrust of the policies to require district plans to recognise and provide for papakāinga/ kāinga nohoanga with specific and enabling policies, and rules that avoid unduly limiting this form of housing development.</p>	<p>land, it may include any land within the takiwā of each Papatipu Rūnanga, including urban areas.</p> <p>Providing for papakāinga/ kāinga nohoanga in urban areas better reflects the contemporary priorities of mana whenua for cultural housing options, which have been heightened by housing shortages.</p>	<p>general intent and direction of Policies P5.1 to P5.3 of the Mahaanui Iwi Management Plan to enable papakāinga development.</p>
<p>Conclusion</p>	<p>Option 2 – Proposed Plan Change more fully gives effect to the purpose and other provisions of the Act, the NPS-UD, the Canterbury Regional Policy Statement, and the Mahaanui Iwi Management Plan. Enabling Māori to express their cultural traditions and norms, including enabling papakāinga/kāinga nohoanga in urban Christchurch, may lead to changes in effects on the environment. However, that will be dependant on how this is enabled and managed through policies and rules established through a future plan change. Other objectives of the District Plan will also be relevant to decisions on that plan change. Given the specific direction in the Act and the National Policy Statement on Urban Development, it is concluded that Option 2 is the most appropriate way to achieve the purpose of the Act.</p>		

Table 6 – Proposed new Objective 3.3.7-Well-functioning urban environment, specifically in regard to urban form directions for commercial and residential zones.

“3.3.7 Objective – Well-functioning urban environment

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; including by recognising and providing for:

- a. **Within commercial and residential zones, a distinctive, legible urban form and strong sense of place, expressed through:**
 - i. **Contrasting building clusters within the cityscape and the wider perspective of the Te Poho-o-Tamatea/the Port Hills and Canterbury plains; and**
 - ii. **Appropriate scale, form and location of buildings when viewed in context of the city’s natural environment and significant open spaces, providing for:**
 - A. **Larger scale development where it can be visually absorbed within the environment; and**
 - B. **Lower heights and design controls for development located in more sensitive environments;**
 - iii. **The pre-eminence of the city centre built form, supported by enabling the highest buildings;**
 - iv. **The clustering, scale and massing of development in and around commercial centres, commensurate with the role of the centre and the extent of commercial and community services provided;**
 - v. **The largest scale and density of development, outside of the city centre, provided within and around town centres, and lessening scale for centres lower in the hierarchy;**
- b. **Development and change over time, including amenity values, in response to the diverse and changing needs of people, communities and future generations;**
- c. **The cultural traditions and norms of Ngāi Tahu manawhenua; and**
- d. **The benefits of urban environments that support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change.”**

	Option 1 - Status Quo – Not including further matters on urban form as an addition to Schedule 3A objective for a well-functioning urban environment.	Option 2 – Proposed Plan Change – Inclusion of additional matters relating to urban form and desired outcomes for the cityscape
Resource Management Act section 5		Specifically provides for Māori to provide for their social, economic, and cultural well-being and for their health and safety specifically through the expression of their cultural traditions.
Resource Management Act s.6	Does not provide for the relationship of Māori and their culture and traditions with their ancestral lands.	Provides for the the relationship of Māori and their culture and traditions with their ancestral lands.

<p>Resource Management Act s.7</p>	<p>Other matters in relation to managing the use, development and protection of natural and physical resources Council shall have particular regard to, include s7(c) the maintenance and enhancement of amenity values; s7(f) maintenance and enhancement of the quality of the environment and s7(i) the effects of climate change.</p> <p>The current strategic directions provide little guidance regarding the desired outcomes for urban form such to ensure the maintenance and enhancement of amenity values and quality of the urban environment, particularly in regard to locations where higher densities and building heights are enabled.</p>	<p>The proposed objective recognises that amenity values may change over time and change in itself is not an adverse effect. The proposed objective provides for change but in a more managed way, such that there is a higher order policy framework for the preceding Residential Chapter 14, Commercial Chapter 15 and Industrial Chapter 16.</p> <p>The proposed objective provides greater direction for where lower heights and densities are appropriate, having better regard for the intrinsic values of the natural environment and areas of special character and amenity.</p>
<p>Resource Management Act s.8</p>	<p>Takes into account the principles of the <u>Treaty of Waitangi</u> (Te Tiriti o Waitangi) to a limited degree.</p>	<p>Most fully takes into account the principles of the <u>Treaty of Waitangi</u> (Te Tiriti o Waitangi).</p>
<p>National Policy Statement on Urban Development 2020 Objective 1 and Policy 1</p>	<p>Whilst the District Plan does include objectives to provide direction on urban form, none clearly articulate an aspirational outcome for the cityscape, particularly given the significant level of enablement in terms of higher density and building heights directed under the NPS-UD.</p> <p>Does not specifically provide for housing that enables Māori to express their cultural traditions and norms, which is part of the minimum requirements of Policy 1 for a well-functioning urban environment.</p>	<p>There is currently no one urban form objective, which integrates well-enough, urban form outcomes across the cityscape. Nor the built form relationship between commercial and residential developments in different locations across the city. More specifically there is considered a need for additional direction on the clustering and cascading of built forms, such to create the appropriate context, character and connections for a dynamic and evolving city.</p> <p>The proposed objective provides a stronger framework for policy considerations within the preceding chapters, particularly where higher densities and building heights are enabled.</p> <p>The proposed provision 3.3.7 (b)(vii) provides for Māori to express their cultural traditions and norms, which is part of the minimum requirements of Policy 1 for a well-functioning urban environment.</p>

<p>Canterbury Regional Policy Statement Objective 6.2.3 Sustainability, Policy 6.3.2</p>	<p>Objective 6.2.3 and Policy 6.3.2 require rebuilding that provides for quality living environments incorporating good urban design; and that is healthy, environmentally sustainable, functionally efficient and prosperous.</p> <p>The current strategic directions do provide some guidance on these matters, but not the extent considered necessary particularly to ensure higher density development is appropriate to the context of the area where it is enabled.</p>	<p>The proposed strategic objective is consistent with and aligned to Objective 6.2.3 and policy 6.3.2 providing a stronger framework for what is deemed an appropriate urban form within the Ōtautahi Christchurch cityscape, and in relation to areas of special value.</p>
<p>Mahaanui Iwi Management Plan</p>		<p>Providing for Māori to express their cultural traditions and norms, gives greater effect to a number of policies under this plan.</p>
<p>Christchurch District Plan</p>		<p>Proposed Strategic Objective 3.3.7 is not inconsistent, nor causes any conflict with Strategic Objectives 3.3.1 and 3.3.2 (that have primacy).</p>
<p>Conclusion</p>	<p>Option 2 – Proposed Plan Change more fully gives effect to the purpose and other provisions of the Act, the NPS-UD, the Canterbury Regional Policy Statement, and the Mahaanui Iwi Management Plan. Enabling Māori to express their cultural traditions and norms, and ensuring the urban form desired outcomes for the city are more explicitly expressed within the District Plan, is considered a more appropriate way to achieve the purpose of the Act, particularly given the significant level of enablement (greater densities and building heights) directed by the NPS-UD.</p>	

Appendices

Appendix 1 – Updated Ōtautahi Christchurch Housing Capacity Assessment 2022 (separate report)

Appendix 2 – Proposed relationship between building heights within centres and adjoining residential zones (see below)

Appendix 3 – Accessibility assessment and Density Enablers Model (separate report)

Appendix 2 – Proposed relationship between building heights within centres and adjoining residential zones

Urban Form - Centres

