

**HOUSING AND BUSINESS CHOICE – PART 3:
RESIDENTIAL SUB-CHAPTER EVALUATION REPORT**

This evaluation report has been prepared to support the residential component of the Intensification Planning Instrument (IPI), known as Plan Change 14. The Plan Change proposes to implement Medium Density Residential Standards (MDRS) and the applicable intensification direction of Policy 3 of the National Policy Statement on Urban Development (2020) (NPS-UD), in accordance with s77G of the Resource Management Act 1991. The evaluation of qualifying matters is captured in Part 2 of the overarching evaluation report.

MDRS set minimum standards and objectives and policies that are required to be applied to all relevant residential zones, with Policy 3 of the NPS-UD requiring further intensification at a scale commensurate with activities and services provided within commercial centres, with intensification around the City Centre specifically specified in the NPS. For the purposes of this evaluation, MDRS has therefore been considered as the minimum baseline for assessment as density standards automatically override commensurate Plan controls in relevant residential zones. Analysis has been completed that the following operative District Plan zones are considered to be within scope of Plan Change 14, being representative of relevant residential zones:

- Residential Suburban
- Residential Banks Peninsula (Lyttelton Township, only)
- Residential Suburban Density Transition
- Residential Medium Density
- Residential Central City

The residential response to s77G is to apply MDRS through National Planning Standards by rezoning applicable areas (not subject to scale qualifying matters) to being either Medium Density Residential Zone (MRZ) or High Density Residential Zone (HRZ). Greater levels of intensification are provided for within HRZ as a response to the Policy 3 direction, with various Precincts proposed to manage building heights. A single Precinct is also used within MRZ to provide for a lesser response for smaller commercial centres. Overall building heights are proposed as follows:

- MRZ: as per MDRS, being 11m + 1m for roofing;
- MRZ, with Local Centre Intensification Precinct: 14m;
- HRZ, with Large Local Centre Intensification Precinct or Town Centre Intensification Precinct: 14m permitted and up to 20m enabled via resource consent;
- HRZ, with no Precinct: 14m permitted and up to 32m enabled via resource consent.

Applying MDRS and the NPS-UD has also resulted in a number of operative Plan features from being removed due to their inconsistency with this intensification direction. This includes changes and deletions to zoning, objectives, policies, notification clauses, and standards.

The proposal has also sought to introduce additional related provisions in accordance with s80E and more lenient provisions in accordance with s77H. The proposed approach seeks to better achieve the intended outcomes across both MDRS and the NPS-UD, acting as means to: be complimentary to newly-introduced standards; provide for incentives for improved outcomes; better integrate typologies across and within developments; and to ensure density outcomes are achievable.

This evaluation report has been drafted in accordance with s32 and s77G of the Resource Management Act.

Table of contents

1	Introduction	4
1.1	Purpose of this report	4
2	Resource management issues.....	4
2.1	Council’s legal obligations and strategic planning documents	4
2.2	Problem definition - the issues being addressed.....	13
3	Development of the Plan Change 14.....	16
3.1	Background.....	16
3.2	Current Christchurch District Plan provisions.....	18
3.3	Description and scope of the changes proposed.....	20
3.4	Community/Stakeholder engagement.....	37
3.5	Consultation with iwi authorities.....	40
4	Scale and significance evaluation.....	42
4.1	The degree of shift in the provisions.....	42
5	Evaluation of the proposal.....	45
5.1	Statutory evaluation.....	45
5.2	Evaluation of options to address issues	45
5.3	Evaluation of objectives	89
5.4	Reasonably practicable options for provisions.....	96
5.5	Evaluation of options for provisions	98
6	Evaluation of the preferred option for provisions	102
6.2	Assessment of costs and benefits of policies	106
6.3	Assessment of costs and benefits of the proposed rules.....	109
6.4	The most appropriate option	116
7	Conclusions	117

1 Introduction

1.1 Purpose of this report

- 1.1.1 This report has been prepared in accordance with section 32 (**s32**) of the Resource Management Act 1991 (**RMA / Act**) to support proposed Plan Change 14 – Housing and Business Choice (**Plan Change 14**) to the Christchurch District Plan (**Plan**). Plan Change 14 is an Intensification Planning Instrument (**IPI**), which the Council is required to progress to provide for urban intensification pursuant to the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. This report relates to the residential provisions proposed by Plan Change 14.
- 1.1.2 The overarching purpose of s32 of the RMA is to ensure that plans are developed using sound evidence and rigorous policy analysis, leading to more robust and enduring provisions.
- 1.1.3 Section 32 requires that Christchurch City Council (**the Council**) prepares an evaluation report of the changes proposed in Plan Change 14 to the Plan. This report must examine whether the proposed objectives are the most appropriate way to achieve the purpose of the RMA, and whether the proposed provisions are the most appropriate way to achieve the objectives. This report must also consider other reasonably practicable options for achieving the objectives, and assess the efficiency and effectiveness of the provisions in achieving the objectives. This will involve identifying and assessing the benefits and costs of the environmental, economic, social, and cultural effects anticipated from implementing the provisions. The report must also assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.
- 1.1.4 Section 77J of the RMA contains additional requirements for evaluation reports prepared in respect of IPIs. These requirements relate to qualifying matters in the IPI, and the implementation of the medium density residential standards (**MDRS**) set out in Schedule 3A of the RMA. These matters are addressed as relevant in this report and in Part 2 of the s32 report on qualifying matters.
- 1.1.5 The purpose of this report is to fulfil the s32 requirements for proposed Plan Change 14, in respect of the residential provisions. In addition, the report examines any relevant directions from the statutory context including higher order documents.

2 Resource management issues

2.1 Council's legal obligations and strategic planning documents

- 2.1.1 Sections 74 and 75 of the RMA set out Council's obligations when preparing a change to its District Plan. The Council has a responsibility under section 31 of the RMA to establish, implement and review objectives and provisions for, among other things, achieving integrated management of the effects of the use, development, or protection of land and associated resources. One of the Council's functions is to control the actual and potential effects of land use or development on the environment, and to do so in accordance with the provisions of Part 2 of the RMA. Critical to Plan Change 14 is section 77G of the Act, which directs the Council to progress an IPI to incorporate the objectives, policies and MDRS set out in schedule 3A of the RMA and to give effect to Policy 3 of the National Policy Statement for Urban Development (**NPS-UD**).
- 2.1.2 As required by s74 and s75 of the RMA, a plan change must give effect to any national policy statements, New Zealand coastal policy statement, national planning standard and regional policy

statement, must not be inconsistent with a regional plan, and must take into account any relevant planning document recognised by an iwi authority. The following “higher order” documents are relevant to Plan Change 14:

- a. **NPS-UD**;
- b. Canterbury Regional Policy Statement (**CRPS**):
 - i. Objective 6.2.1 – Recovery framework;
 - ii. Objective 6.2.1a – Targets for sufficient, feasible development capacity for housing;
 - iii. Objective 6.2.2 – Urban form and settlement pattern;
 - iv. Objective 6.2.3 – Sustainability;
 - v. Objective 6.2.4 – Integration of transport infrastructure and land use;
 - vi. Policy 6.3.1 – Development within the Greater Christchurch Area;
 - vii. Policy 6.3.2 – Development form and urban design;
 - viii. Policy 6.3.4 – Transport effectiveness;
 - ix. Policy 6.3.7 – Residential location, yield, and intensification;
- c. Christchurch Central Recovery Plan (**CCRP**) – *have regard to*:
 - i. The Blueprint Plan
- d. Mahaanui Iwi Management Plan (**IMP**) – *have regard to*:
 - i. Issue P3;
 - ii. Policy P3.1;
 - iii. Policy P3.2;
 - iv. Issue P4; and
 - v. Policy P4.1.

2.1.3 As explained above, Plan Change 14 is the Council’s IPI under s77G of the Act. As such, there are a number of bespoke sections of the Act that Plan Change 14 seeks to address. These are summarised below:

IPI-related Sections of the Act	Direction to Council
Section 77G	<ul style="list-style-type: none"> • Incorporate MDRS into relevant residential zones in an urban environment and give effect to policy 3. • The equivalent residential zones that should incorporate the MDRS are: Low density residential; General residential; Medium density residential; High density residential – as permitted standards across all zones. • Must use the IPI (defined under s80E) and intensification streamlined planning process (ISPP) to implement Plan Change 14. • Must insert the MDRS regardless of any inconsistency with relevant regional policy statement.

IPI-related Sections of the Act	Direction to Council
Section 77H	<ul style="list-style-type: none"> • In order to allow greater development, Council may choose to make MDRS controls more lenient or omit any of the MDRS density standards (but cannot implement a supplementary standard that would prevent a specified density standard from being achieved). • Any additional control does not have immediate legal effect under s86BA.
Section 77I	<ul style="list-style-type: none"> • Can choose to restrict MDRS intensification or Policy 3 intensification under the NPS-UD to accommodate specified "qualifying matters".
Section 77T	<ul style="list-style-type: none"> • The IPI can include provisions requiring financial contributions.
Section 80E	<ul style="list-style-type: none"> • Defines the scope of an IPI. • Provides that an IPI must incorporate the MDRS and Policies 3 and 4 of the NPS-UD. • Provides that an IPI may include provisions relating to financial contributions, to enable papakāinga housing, and "related provisions" that support or are consequential on the MDRS or Policies 3, 4, and 5 of the NPS-UD. • Specifies, in a non-exhaustive list, several matters which may be provided for as "related provisions".
Section 80H	<ul style="list-style-type: none"> • The IPI must show how MDRS and objectives and policies are incorporated.
Section 86BA	<ul style="list-style-type: none"> • Directs that any MDRS density standard included in the IPI will have immediate legal effect upon notification. • Exemptions are where an area is newly zoned as a residential zone or within a qualifying matter area (currently or proposed). • Any rule in the operative Plan that is inconsistent with a rule permitting an MDRS-compliant development ceases to have legal effect.

IPI-related Sections of the Act	Direction to Council
	<ul style="list-style-type: none"> Any proposed controls that would be more lenient or omit MDRS will not have immediate legal effect.
Schedule 3A	<p>Contains MDRS, specifically providing for:</p> <ul style="list-style-type: none"> Requirement for plans include the MDRS Subdivision standards Activity status requirements Objectives and policies Residential density standards

2.1.4 MDRS

2.1.5 The higher order documents broadly identify the resource management issues relevant to the district and provide direction in resolving these issues. The most wide-reaching of these for the residential component of Plan Change 14 are those contained in the MDRS, as set out in Schedule 3A of the RMA. Section 77G of the RMA requires the Council to include these objectives and policies in its IPI. These are discussed in the table below:

MDRS: Objectives and policies included in Plan Change 14	Direction
<p>Objective 1 <i>A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future:</i></p>	<p>Provides a link to the "well-functioning urban environment" terminology used in the NPS-UD, which directs that the housing market should have options and diversity, be accessible to services and amenities, and climate resilient.</p>
<p>Objective 2 <i>A relevant residential zone provides for a variety of housing types and sizes that respond to—</i></p> <ul style="list-style-type: none"> <i>(i) housing needs and demand; and</i> <i>(ii) the neighbourhood's planned urban built character, including 3-storey buildings.</i> 	<p>Defines the outcome sought that MDRS implement for all relevant residential zones in urban environments, resulting in an enabling framework that provides for choice and is responsive to market demands. Housing should also be seen to provide for a form anticipated by planning direction, namely three storey development as a permitted level of enablement.</p>
<p>Policy 1 <i>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:</i></p>	<p>Sets the direction of how Objective 2 is to be achieved, as a basis for MDRS density standards, which implement an enabling regime to allow the housing market to respond to different densities and typologies.</p>

MDRS: Objectives and policies included in Plan Change 14	Direction
<p>Policy 2 <i>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):</i></p>	<p>Provides policy direction that MDRS is required except in response to qualifying matter constraints identified through the IPI.</p>
<p>Policy 3 <i>Encourage development to achieve attractive and safe streets and public open spaces, including by providing for passive surveillance:</i></p>	<p>Implemented by density standards that enable development close to the front boundary, set a requirement for street-facing glazing, and a requirement for outlook space that can be over public areas.</p>
<p>Policy 4 <i>Enable housing to be designed to meet the day-to-day needs of residents:</i></p>	<p>Allows territorial authorities to provide for additional standards that respond to the requirements of residents, such as waste management and the general functionality of units.</p>
<p>Policy 5 <i>Provide for developments not meeting permitted activity status, while encouraging high-quality developments.</i></p>	<p>Sets the framework for assessing non-compliances with density standards, implemented in part by the restricted discretionary activity status limit for residential units established in clause 4 of the MDRS. The term ‘encourage’ reflects this limit on the degree of additional matters of discretion territorial authorities can apply through a consenting response.</p>

2.1.6 NPS-UD

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

2.1.8 The principal directive of the NPS-UD (Objectives 1-3) is to enable urban intensification around centres and other amenities, services, and transport corridors. The intention is to provide for a sustainable intensification response (Objective 8) that improves housing supply, choice, and in doing so, increasing housing affordability (Objective 2). The outcomes of the NPS-UD facilitate a paradigm shift in housing delivery across larger urban centres, which is recognised to be transformative in nature and will require a step change in how people perceive infill development (Objective 4).

2.1.9 Several policies under the NPS-UD are relevant to the IPI and can be categorised as follows:

- Providing direction on the form and density of intensification (Policies 1, 3, 10)

- Supply-driven direction (Policies 1, 2)
- Factors relevant to decision making processes (Policies 4, 6, 9)

2.1.10 Form and density-based policies establish what local conditions need to be considered for intensification and the scale and extent of intensification. Policy 1 sets the overarching framework by defining a well-functioning urban environment, with housing choice being a key pillar. The policy anticipates that different densities and building heights will be enabled throughout the urban environment, particularly when in close proximity to areas of employment, containing services, amenities, open space, and connectivity to public or active transport in an effort to reduce impacts on the climate.

2.1.11 Policy 3 has a strong and specific direction for intensification. This anchors on a 'centres-based approach' where intensification is directed within and around specific centres and rapid transport stops, aligning with national planning standards terminology for centres, or those that are seen to be their equivalents. Of particular relevance, Policy 3 directs that at least 6 storey building heights should be enabled within at least a walkable catchment from the edge of the city centre and metropolitan centre zones (c). This is a highly directive policy that is complemented by the last part of the policy 3(d), which requires a similar response to specific suburban centres, at a scale that is proportionate to the level of commercial activity and community services provided within each centre. While directive, both policies require a degree of evaluation to determine the scale of intensification. For Policy 3(c), this centres on whether Christchurch has "metropolitan centre zones", and 'at least' for both height and extent (walkable catchment), meaning that territorial authorities must consider the other spatial and form directive policies of the NPS-UD. For Policy 3(d), it means that each suburban commercial centre must be evaluated in accordance with the hierarchy of centres through national planning standards and an intensification response provided accordingly. Lastly, the requirement in Policy 10 is to ensure that any intensification response is consistent across the urban environment, recognising opportunities for infrastructure optimisation and relative land development opportunities.

2.1.12 Policies 1 and 2 contain the supply-driven directions of the NPS-UD. Policy 1(a), (b) and (d) establish a direction to provide for a diversity of housing choices. Policy 2 directs that all Councils must provide sufficient development capacity to meet expected demand for housing and for business land over the short, medium, and long term. This aligns with other directives in the NPS-UD to monitor housing and business development capacity through assessments (HBAs) every three years, and the requirement to include housing bottom lines within district plans and regional policy statements (Policy 7). There is an underlying strong direction to increase housing supply through both the policy and the monitoring requirements of the NPS-UD.

2.1.13 Policies 4, 6, and 9 establish what kinds of constraints can be considered through the required intensification response. The NPS-UD introduces the concept of 'qualifying matters' (as defined through Clause 3.32) that detail specific features that can be considered to modify any intensification directed by Policy 3 (Policy 4). The Act now continues this directive through s77I for when applying MDRS standards across the urban environment, meaning that it extends beyond those intensification areas directed through Policy 3. Policies 6 and 9 specify specific matters that territorial authorities must have regard to or take account of. Policy 6 highlights the change that should be anticipated through the wider intensification direction (which is not considered in itself an adverse effect), its benefits of delivering further housing, and how development may impact the climate. In giving effect to the intensification direction, authorities must also develop in accordance with any future development strategies (FDSs), the values and aspirations of local hapū and iwi, involving them in policy development.

2.1.14 CRPS

- 2.1.15 Chapter 6 of the CRPS is relevant to the residential component of Plan Change 14. Of particular significance are objectives 6.2.1 and 6.2.2.
- 2.1.16 Objective 6.2.1 establishes priority areas for development, specifying that Key Activity Centres (KACs) should be the area of focus and other development should seek to concentrate around strategic and other infrastructure to help optimise the existing network.
- 2.1.17 While the CRPS generally envisions that higher densities will be concentrated around KACs and areas sufficiently supported by infrastructure, the MDRS is applied across all urban residential zones in Christchurch irrespective of whether sufficient supporting infrastructure or supporting services and amenities exist in an area. This approach relies on qualifying matters to identify areas where incorporation of the MDRS is not appropriate.
- 2.1.18 Objective 6.2.2 takes a similar approach, specifying the centres where higher densities should occur. This objective provides that sufficient development land should be provided for rebuild and recovery needs, focusing new areas of development within greenfield priority areas (as shown in Map A of the CRPS). Intensification through infill development is also referred to. Objective 6.2.2 aims that between 2022 and 2028, infill development will make up the majority of all development (55%). Several aspects of this objective are supported by the requirements of the MDRS and the NPS-UD. However, the MDRS and NPS-UD require intensification to occur at an increased scale.
- 2.1.19 Objective 6.2.3 of the CRPS sets out the sustainability outcomes that development should seek to achieve. This emphasises the integration of development as a priority, thereby promoting active and public transport use and reducing dependence on private vehicle use and the generation of emissions. This direction is strongly supported under the NPS-UD.
- 2.1.20 Policies 6.3.1 and 6.3.7 of the CRPS support the centres direction contained in objective 6.2.2. These policies reiterate the importance of mapped areas for development (as shown in Map A of the CRPS), by referring to these areas in respect of the maximum extent of urban development for Greater Christchurch, and the location of KACs and associated development. The direction of the MDRS, to leverage existing residential zones, therefore supports development within the urban boundaries shown on Map A of the CRPS. As is the case with objective 6.2.2, the MDRS and NPS-UD are largely in line with these policies, except that they require a greater degree of intensification and in additional centres, noting the qualifiers of Policy 3(d) of the NPS-UD. Policy 6.3.7 also states that developments should achieve specific yields based on being in either a greenfield area (15 households/ha¹), central city area (50 households/ha) or infill development elsewhere (30 household/ha). Such developments are likely to be provided for under Plan Change 14, with the MDRS expected to achieve a gross of 100 households/ha in some areas and six storey developments (as per the NPS-UD) capable of achieving a gross density of 200 households/ha in areas.
- 2.1.21 Policy 6.3.2 of the CRPS directs that residential development gives effect to good urban design protocols in redevelopment, with a specific focus on local place making, reflecting historic heritage, character and quality of the existing built and natural environment, and cultural values of an area. Other residential development matters to be given effect to under this policy include Crime Prevention Through Environmental Design (CPTED). Requiring these matters be "given effect to" in residential development may not be in line with the MDRS and NPS-UD. However, the direction of the NPS-UD to concentrate development strongly aligns with directions in the CRPS. Therefore, the high-density development framework proposed under Plan Change 14 is strongly aligned with CRPS (albeit that the approach under Plan Change 14 is at a different scale), with medium density response through MDRS across the urban environment, rather than higher densities within select areas.

¹ Households per hectare (seen as gross)

- 2.1.22 Other parts of policy 6.3.2 of the CRPS are supported by the MDRS and NPS-UD, being the focus to barrier free multimodal transport (linked to policy 6.3.4), and the increasing choice and diversity of housing types to adapt to changing housing needs. Policy 6.3.2 also notes that residential development should reflect the appropriateness of the development to its location including by reference to local features and character.
- 2.1.23 **Christchurch Central Recovery Plan (CCRP)**
- 2.1.24 The CCRP (2012) provides a spatial framework for the recovery and rebuild of central Christchurch. It describes the form in which the central city is to be rebuilt, and defines the locations of ‘anchor’ projects, proposed to stimulate further development and investment.
- 2.1.25 Of particular relevance, the CCRP set building heights and density controls as part of a package of amendments to the Christchurch District Plan, to support recovery of the central city and promote a low rise city form. This included a central city height plan and provisions which limited the type and size of commercial tenancies in the commercial zones outside of the Central City Business Zone (CCBZ), to support the recovery and role of the CCBZ as the principal commercial centre for the City.
- 2.1.26 The key focus of the CCRP was the inclusion of the ‘blueprint’ which sought to consolidate commercial activity in a central area of the Central City so that it would function more effectively. The spatial blueprint was produced based on design principles that addressed the specific challenges posed in a post-natural disaster urban setting, including the significant areas of vacant land in an already ‘oversized’ commercial zone, public preferences for a lower rise (perceived as safer) city, development feasibility and the desire for a high amenity central city.
- 2.1.27 Key elements of the CCRP included:
- An overall design concept for development of a greener, more accessible city with a compact core, more greenspace and a stronger built identity.
 - Identification of a new central city “core”, where a high quality of design and active frontages was sought through specific urban design controls.
 - Introduction of the “frame” concept, to reshape central Christchurch with its three components – East, South and North – each having its own distinct character and serving to contain the commercial area. It was considered that containing the available land area in this way would address the issue of too much development capacity and potentially unconstrained development, whilst also adding high quality urban open space to the centre.
 - Incorporation of five key changes emanating from the community’s responses during the ‘Share an Idea’ campaign, including stronger built identity and a compact CBD. Recast as aspirations, these five key changes ultimately translated into the concept of a lower-rise city with safe, sustainable buildings that look good and function well.
 - Key to the CCRP’s recovery response to the central city were the principles of ‘compress’ and ‘contain’; ‘compressing’ the size and scale of expected development to generate a critical mass in the Core, and ‘containing’ the core to the south, east and north with a frame.
- 2.1.28 The CCRP states that, *“the Frame in tandem with zoning provisions, reduces the extent of the central city commercial area to address the oversupply of land. This is purported to help increase the value of properties generally across the central city in a way that regulations to contain the central core, or new zoning decisions, could not. The Frame helps to deliver a more compact core while diversifying opportunities for investment and development. The Frame allows the Core to expand in the future if there is demand for housing or commercial development”*².

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

- 2.1.29 The Plan states that, “*lower buildings will become a defining central city feature in the medium term and that a lower rise city fits in with the community’s wishes and takes into account of the economic realities and market demand for property in the Core. It also recognises the character and sensitivity of certain areas, such as New Regent Street, and reduces wind tunnels and building shade*”³.
- 2.1.30 A key part of the CCRP was an appendix which set out statutory directions for amendments to the then Christchurch City Plan, to give effect to the CCRP. This was given effect to, and the provisions carried over into the operative District Plan, relatively unchanged. The operative provisions for the central city commercial zones therefore derive directly from this recovery planning process, led by central government.
- 2.1.31 When the District Plan was reviewed in 2017, the CER Act required that the District Plan must not be inconsistent with the CCRP. That legislation has since been revoked with the effect that lesser weight is now afforded to the Recovery Plan. PC14 must still *have regard to* the directions of the CCRP under s74(2)(b)(i) of the RMA.
- 2.1.32 **IMP**
- 2.1.33 Issues P3 and P4 of the IMP are most relevant to Plan Change 14. These issues relate to the planning, development, and subdivision of urban areas. Associated policies highlight the importance for Ngāi Tahu whānui and Papatipu Rūnanga to continue to be part of planning to ensure the protection of areas of cultural significance and other interests. Plan Change 14 has been developed alongside Mahaanui Kurataiao.
- 2.1.34 **Other plans**
- 2.1.35 No other management plans or strategies prepared under other Acts are relevant to the resource management issue identified.
- 2.1.36 As outlined above, the RMA prescribes certain requirements for how district plans align with other planning instruments. Whether the District Plan objectives and provisions relevant to residential development achieve this alignment is discussed in section 3.2 of the report.

³ Ibid, page 40.

2.2 Problem definition - the issues being addressed

2.2.1 ISSUE 1 – General application of MDRS to the operative District Plan

2.2.2 This is an issue because the framework and integration of MDRS within the existing district plan needs to ensure that MDRS controls are readily able to be utilised and how MDRS density standards are applied to relevant residential zones within the urban environment. This needs to be done in a manner where relevant policies of the NPS-UD are also given effect to and existing Plan provisions do not restrict their use or function.

2.2.3 Simply inserting Schedule 3A of the RMA into the current Plan is not an appropriate option. Notwithstanding the complexity of duplicating these standards across the seven residential chapters of the Plan that make up the Christchurch residential urban environment, Schedule 3A also lends itself to a full or partial integration of national planning standards.

2.2.4 ISSUE 2 – Residential intensification response around City Centre Zone – Policy 3 (c) under the NPS-UD

2.2.5 The issue is how to give effect to Policy 3(c) of the NPS-UD and to enable the most appropriate height limits within a suitable walking catchment.

2.2.6 Policy 3(c) of the NPS-UD states:

In relation to tier 1 urban environments, regional policy statements and district plans enable: building heights of at least 6 storeys within at least a walkable catchment of the following:

- (i) existing and planned rapid transit stops*
- (ii) the edge of city centre zones*
- (iii) the edge of metropolitan centre zones; and [to (d)]*

2.2.7 It has been concluded that rapid transport stops and metropolitan centres are not applicable to the Christchurch context and are not further considered here. This means that only the distance from the city centre zone is of relevance.

2.2.8 This is an issue because consideration needs to be given to what is the appropriate intensification response within the Christchurch context. Factors that influence this are dominated by:

- 2.2.8.1 the accessibility of services, employment, and multi-modal transport (both current and planned) surrounding the city centre;
- 2.2.8.2 the propensity to walk in a given urban environment;
- 2.2.8.3 demand for housing in the area surrounding the city centre;
- 2.2.8.4 the urban form outcomes to help deliver a well-functioning urban environment.

2.2.9 For 2.2.8.1, important factors to consider are: the continuous rebuild efforts within the central city, including the influence of substantial anchor projects; the significance of the city centre and its surrounds as a focal point for both employment and multi-modal transport; and the degree to which development will be further enabled within the city centre through giving effect to Policy 3(a).

2.2.10 For 2.2.8.2, consideration needs to be given to the serviceability of the active transport routes; connectivity across city blocks and to other public transport corridors; local interest in active transport modes; accessibility and integration of public open space areas.

- 2.2.11 For 2.2.8.3, consideration needs to be given to population projections at a local level; the degree to which viable development opportunities exist; and how an intensification response can best respond to such housing demand within a specified catchment.
- 2.2.12 For 2.2.8.4, consideration needs to be given to the spatial relationship between walking catchments and existing urban form layout; how that relationship enhances (or otherwise) the connectivity of services and amenities; consolidation of urban form to achieve coherence; and responses to surrounding environmental features.
- 2.2.13 **ISSUE 3 – Suburban commercial centres response – Policy 3 (d) of the NPS-UD**
- 2.2.14 This issue relates to how areas adjacent to centres described in Policy 3(d) of the NPS-UD should be managed. It contemplates the relationship between the outcomes of the commercial evaluation of suburban centres (see commercial section of this evaluation report) and how residential intensification is applied around centres.
- 2.2.15 This requires consideration of the extent to which an intensification response is provided. The two concepts that need to be addressed are:
- 2.2.15.1 The distance that ‘adjacent to’ implies;
 - 2.2.15.2 How to scale various centres.
- 2.2.16 Case law⁴ indicates that the phrase "adjacent to" may be extended beyond meaning places adjoining other places, to include places close to or near other places. In interpreting and applying Policy 3(d), it is reasonable for the intensification requirements to apply to areas (not necessarily entire zones) that are immediately adjoining the listed zones, but also areas that do not have a common boundary with the listed zones.
- 2.2.17 The degree and distance of any intensification should therefore be seen as an interrelated concept: both the scale of any intensification and its distance from the applicable centres should increase based on a commensurate response to the level of commercial activities or community services anticipated/ planned in a centre (rather than what exists in the centre now). The application at a parcel level should be seen through a similar policy lens as the considerations under Policy 3(c), taking into account the local urban form, walkability, and achievement of a well-functioning urban environment.
- 2.2.18 **ISSUE 4 – Enabling residential intensification whilst providing for high quality residential environments**
- 2.2.19 The issue is how to provide for development of housing that is well-designed and provides for a variety of typologies to support different generational needs through an enabling framework.
- 2.2.20 This issue is influenced by the following matters that Council must consider when giving effect to s77G (MDRS and Policy 3 of the NPS-UD) and how these influence residential environments:

⁴ *Allen v Auckland City* (Planning Tribunal 3/5/1991); *Bisson & Ors v Queenstown Lakes District Council* (EnvC Christchurch 4 April 2003).

- 2.2.20.1 Clause 10 of the MDRS density standards sets a threshold of up to 3 residential units per site as a permitted activity. Council must consider how development is managed beyond this threshold and how the activities are managed through the framework directed through Clauses 2-4 of the MDRS (activity status).
 - 2.2.20.2 Section 77H(1) permits Council to modify the MDRS to make controls more lenient by permitting an activity that the MDRS would restrict, including through Section 77G(5)(b) consequential objectives and policies. In addition, Section 80E(1)(b) also allows for the consideration of additional controls that *support or are consequence on the MDRS or policies 3...of the NPS-UD*. Lastly, Clause 2(2) of Schedule 3A states that there are to be no other 'density standards' included in a Plan that are additional to those in Part 2 of Schedule 3A. Council must consider how any additional provisions that sit alongside MDRS density standards do not directly or indirectly modify or affect a matter that density standards address, or prevent a density standard from being achieved.
 - 2.2.20.3 In achieving policy 4 of the MDRS, Council must consider how development standards ensure residential unit development is serviceable and practicable. The way in which prospective residential units are used on a daily basis should not be encumbered through their design; the functionality of daily use on offer should be the same within a higher density living environment as it is within a lower density equivalent at present. This means how servicing spaces are designed, their integration, and how they respond to development is important. This matter is particularly important because of the scale of intensification that will be provided for across the residential urban environment and therefore the likelihood of poorly designed developments negatively impacting on day-to-day living.
 - 2.2.20.4 The contrast of most residential zones in the Plan to those contemplated by the MDRS and NPS-UD highlights the significant incentives at play in a rule framework intended to provide for a transition from a (broadly) lower density environment to a medium and high density residential environment. Rule incentives to encourage developments of greater height while still creating attractive residential environments that suitably manage sunlight access, privacy, habitable areas, and safety therefore play an important role.
 - 2.2.20.5 Clause 4 of Schedule 3A directs that any residential activity where the MDRS would apply must not be considered beyond a restricted discretionary activity. This ceiling means careful consideration of how matters of discretion are applied is required, particularly considering matters for excessive building heights. Not doing so risks not achieving the well-functioning urban environment described in MDRS objective 1 and Policy 1 of the NPS-UD. The focus here should be on how distinguishable urban environments can be achieved that respond to the accessibility of services and transport whilst achieving a diversity in housing types and sizes.
 - 2.2.20.6 Lastly, the building heights that provisions enable should practically provide for the number of storeys various zone controls and overlays seek to achieve in responding to Policy 3 of the NPS-UD. The baseline of 11+1m should be applied accordingly, which is generally intended to provide for three storey development.
- 2.2.21 The Act requires this plan change to implement the MDRS permitted standards across all relevant residential zones. The desired outcome of Plan Change 14 is that both the MDRS and NPS-UD are implemented, streamlining the enablement of intensification to better assist in the transition to a higher density living environment and provide for housing choice. To achieve this, a substantial revisit of the residential framework is required, applying the direction in Clause 1(3) of Schedule 3A that

National Planning Standards definitions apply. This means that new residential zones must be introduced. It is likely that a large amount of policy direction within Chapter 14 of the Plan will become redundant or be seen to conflict with the new direction. The final residential framework should therefore be able to accommodate the application of medium density development across the urban environment, enabling greater levels of intensification within and around commercial centres to address the Policy 3 direction of the NPS-UD, and modify outcomes to implement qualifying matters where appropriate.

2.2.22 ISSUE 5 – How to recognise operative density overlays in the District Plan through the IPI

2.2.23 The Plan current contains a series of density overlays that seek to manage site specific development outcomes, and with the introduction s77G, consideration must be given to what the equivalent underlying zoning should be alongside whether these act as qualifying matters.

3 Development of the Plan Change 14

3.1 Background

3.1.1 The resource management issues set out above have been identified through the following sources following legislative changes to the RMA through the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 in December 2021 and the NPS-UD in 2020.

3.1.2 The Council has commissioned technical advice (or considered existing technical advice) from various internal and external experts to assist with assessing the potential effects of the proposal on the environment, as well as the potential options for mitigating the adverse effects. This advice includes the following:

Table 1: Technical Reports informing Plan Change 14

Report type	Author	Title	S32, Part 3, Appendix Number
Monitoring report	CCC	Evaluation of RMD/RSDT outcomes, incl. implications of MDRS ⁵	1
Provision assessment	CCC	Analysis of the MDRS against existing built form standards for residential zones in the Christchurch District Plan	2
Urban design report	CCC	Residential urban design assessment	3
Economic feasibility	The Property Group	New Medium Density Residential Standards (MDRS) – Assessment of Housing Enabled – January 2022	4

⁵ See Residential Urban Design Technical report

Report type	Author	Title	S32, Part 3, Appendix Number
Economic feasibility	The Property Group	High Density Residential Feasibility Assessment – May 2022	5
Provision assessment	Urban Edge Planning	Consent Testing: Plan Change 14	6
Walkability assessment	University of Waikato	A Summary of a National Survey on Living Locally in Aotearoa, New Zealand - White, I., Serrao-Neumann, S., Edwards, K., Mackness, K., Fu, X., & Reu Junqueira, J. (2022)	7
Wind assessment	Meteorology Solutions	Technical Advice for Wind Assessments in Christchurch City	8
Economic assessment	Property Economics	Christchurch City residential zones & intensification precincts economic cost benefit analysis	9
Government guidance	Waka Kotahi	Aotearoa Urban Street Planning & Design Guide	10
Government guidance	Ministry for the Environment	Understanding and implementing intensification provisions for the National Policy Statement on Urban Development	11
Analysis of walkable catchments	CCC	Map - PC14 Spatial overview of walking catchments and accessibility	12
Accessibility assessment	CCC	Density enablement model	13

3.1.3 The above areas are all considered relevant to the evaluation of the residential component of Plan Change 14. These areas are briefly summarised below:

- 3.1.3.1 **Urban design and provision advice:** considerable resources have been expended by the Council to better understand the implications of the MDRS/NPS-UD intensification direction and how well prepared the current residential framework is to cope with these changes. Council reporting on urban design, monitoring of zone outcomes, and a comparison of RMD (Residential Medium Density Zone) and MDRS have all helped to frame the issues. Reporting from The Property Group and from Urban Edge Planning have helped to detail the feasibility of proposed controls and their application in comparison to the framework under the current Plan.
- 3.1.3.2 **Technical advice:** wind impacts were considered by Meteorology Solutions to help evaluate the current wind environment and appropriate thresholds to consider for residential development. Reporting from Waikato University and Council accessibility modelling has also helped to evaluate how walkability and the access to services and facilities can be considered when evaluating appropriate areas for intensification. The suitability of centres has been evaluated by Council, with input from consultants including The Property Group, Boffa Miskell, and Property Economics.
- 3.1.3.3 **Central Government guidance:** a large amount of central government guidance relating to implementation of the MDRS and the NPS-UD is now available. The Council has considered this guidance in developing Plan Change 14. The publications by the Ministry for the Environment and Waka Kotahi NZ Transport Agency listed in the table above in particular have had a substantive influence on the residential provisions of Plan Change 14.

3.2 Current Christchurch District Plan provisions

- 3.2.1 Residential development in the Plan is framed through Strategic Directions in Chapter 3 and the various residential zone/overlay outcomes in Chapter 14, with Chapter 8 outlining the subdivision elements across the territorial area. Chapter 3 - Strategic Directions sets out the overarching outcomes to be expressed and achieved when preparing, changing, interpreting, and implementing the District Plan. Chapter 14 sets the residential outcomes described in Chapter 3 at zone level, prescribing the methods used across sub-chapters to meet these intended outcomes.
- 3.2.2 Read alongside each other, the objectives and policies seek the following outcomes:
 - Clarity and concise language in preparation of District Plan provisions, and minimisation of the transaction costs, prescriptiveness, and notification requirements associated with the resource consent process (Plan Objective 3.3.2);
 - All people and communities are enabled to provide for their wellbeing through the provision of a well-functioning urban environment that always provides for sufficient housing (Plan Objectives 3.3.1, 3.3.4, 3.3.7 and 14.2.1, and Policy 14.2.1.1; MDRS Objectives 1 and 2);
 - Housing is intensified around areas with a high degree of accessibility to services and transport, aligning with the direction under the CRPS (Objective 6.2.2, Policies 6.3.1 and 6.3.7);
 - An integrated residential form that provides for consolidated residential development which is distinctive and reflects the local heritage and cultural values of the city (Plan Objective 3.3.7, Objective 14.2.1, Policy 14.2.1.1, Policy 14.2.4.1)
 - Recognition that amenity values will develop to meet the changing needs of future generations (Plan Objectives 3.3.7, 14.2.1 and 14.2.4; NPS-UD Objective 4).
- 3.2.3 The objectives in Chapter 3 have been reviewed as part of Plan Change 14 to ensure consistency with the framing of MDRS and NPS-UD objectives, including consequential changes required. The

evaluation of these objectives is considered separately in this evaluation report. As a result of those proposed changes to Chapter 3 objectives, the following objectives are considered relevant to residential development:

- Objective 3.3.1: applies the well-functioning urban environment principles of MDRS and the NPS-UD, including the housing sufficiency measures through housing bottom lines, to ensure the rate of development matches housing demand.
- Objective 3.3.3: outline the relationship between the Council and Ngāi Tahu mana whenua, including how Ngāi Tahu mana whenua are supported through residential development.
- Objective 3.3.7: establishes how the built form shall be managed to provide areas of consolidation, distinction, and to ensure it remains relevant for current and future generations. This includes the concentration of development around centres to ensure people remain connected to services and public transport routes.
- Objective 3.3.8: details the priorities for revitalising the city centre to increase inner city population and create an attractive and prosperous city centre.

3.2.4 Residential objectives and policies in Chapter 14 focus on the supply and distribution of housing across the district, detailing the different densities and characteristics that should be considered for specific localities. A total of nine zones are used to spatially manage various residential forms, including some commercial elements (such as Residential Guest Accommodation).

3.2.5 Existing Plan residential objectives and policies can therefore be seen to take a nuanced spatial approach to the distribution of densities across the urban environment and different housing types. For instance, Policy 14.2.1.2 in the Plan specifies that medium density housing should be focused in walking catchments around specific Key Activity Centres (KACs) and other commercial centres, with Objective 14.2.8 and associated policies specifying that high density (three to four storeys) shall only be focused within the central city, with heights varying based on local characteristics and amenity values. Various other policies specifically target certain housing types, such as older persons housing, minor residential units, social housing, workers accommodation and temporary housing relief for earthquake-related repairs.

3.2.6 Overall, several objectives and policies are contrary to achieving the direction of MDRS (enabling medium density and all residential housing types across the urban environment) and Policy 3 of the NPS-UD (enabling at least six storeys around significant centres and transport stops, with a commensurate intensification response around other larger commercial centres). In particular, the following specific objectives and policies are contrary to achieving the direction of the MDRS and NPS-UD, or are seen as redundant due to the new direction of higher order documentation:

- Policy 14.2.1.2 – Establishment of new medium density residential areas
- Policy 14.2.1.3 – Residential development in the Central City
- Policy 14.2.1.6 – Provision of social housing
- Policy 14.2.1.8 – Provision of housing for an aging population
- Objective 14.2.2 – Short-term residential recovery needs
- Policy 14.2.2.1 – Short-term recovery housing
- Policy 14.2.2.2 – Recovery housing – high density comprehensive redevelopment
- Policy 14.2.2.3 – Redevelopment and recovery of community housing environment

- Policy 14.2.4.3 – Character of low and medium density areas
- Policy 14.2.4.4 – Character of residential development on the Port Hills
- Objective 14.2.8 – Central City residential role, built form and amenity
- Policy 14.2.8.1 – Building heights
- Policy 14.2.8.2 – Amenity standards

3.2.7 The above would therefore be removed and subsequently remaining objectives and policies reviewed for integrity and alignment with higher order direction. The proposals for these changes are detailed in the following section.

3.3 Description and scope of the changes proposed

3.3.1 The purpose of Plan Change 14 is to implement MDRS and the Policy 3 intensification direction of the NPS-UD, as directed by s77G of the Act. Plan Change 14 is an Intensification Planning Instrument (IPI), as described in the Act. Plan Change 14 gives partial effect to National Planning Standards through the introduction of zones described in standards.

3.3.2 Plan Change 14 also seeks to introduce related provisions in accordance with s77G(5)(b) and s80E of the Act, introducing additional standards that respond to the introduction of MDRS density standards. The proposed changes to the residential chapter seek to:

- Amalgamate relevant residential zones under two core residential zones: medium density residential zone (MRZ); and high density residential zone (HRZ). This would result in changes to sub-chapters 14.4 (Residential Suburban Zone and Residential Suburban Density Transition Zone) and 14.7 (Residential Hills)⁶. Sub-chapter 14.12 (Residential New Neighbourhood Zone) would be transitioned to a Future Urban Zone (FUZ), which is discussed Part 6 this evaluation report. Sub-chapters 14.5 and 14.6 would be updated to the MRZ and HRZ sub-chapters, respectively.
- Remove sub-chapter 14.14 (Community Housing Redevelopment Mechanism).
- Implement MDRS density standards across MRZ and HRZ zones.
- Apply a consenting regime that gives effect to Clauses 2, 4, and 5 of Schedule 3A, increasing permitted level of development, limiting consenting assessment to a restricted discretionary activity status and using clause 5 notification thresholds.
- Give effect to the NPS-UD's intensification direction (Policy 3) to enable intensification around applicable commercial centres across the urban environment.
- Update associated definitions to align with terminology used in the National Planning Standards and MDRS, where applicable, including several new definitions.
- Address qualifying matter controls in accordance with s77I of the Act, noting this is addressed in Part 2 of the s32.
- Remove Plan objectives, policies, and provisions that are inconsistent with MDRS or NPS-UD intensification.

⁶ Reference should be made to Part 2 of the section 32 report, particularly in regards to proposals to use residential zoning as a means to apply a qualifying matter.

3.3.3 Alongside the above changes, the IPI will also implement those MDRS objectives and policies contained in Clause 6 of Schedule 3A, in accordance with s77G(1).

3.3.4 Consequently, changes are proposed to the following existing objectives:

Existing & New Objectives	Reason(s) for Proposed Change
14.2.1 Objective – Housing Supply	<ul style="list-style-type: none"> Minor changes to wording to better align with outcomes sought from MDRS and the NPS-UD.
14.2.2 Objective – Short term residential recovery needs	<ul style="list-style-type: none"> Remove objective. Implementation of MDRS means that the outcomes that are sought are no longer relevant.
14.2.4 Objective – high quality residential environments	<ul style="list-style-type: none"> Minor changes to wording to better align with outcomes sought from MDRS and the NPS-UD.
14.2.8 Objective – Central City residential role, built form and amenity	<ul style="list-style-type: none"> Remove objective. This objective is inconsistent with the NPS-UD and inconsistent with MDRS as it seeks to maintain local character through targeted building heights and protection of existing amenity values, while only targeting high density areas surrounding the central city.
New Objective (14.2.2) – MDRS Objective 2	<ul style="list-style-type: none"> MDRS Objective 2 of Schedule 3A, inserted as required by s77G of the Act.
New Objective (14.2.5) – Medium density residential zone	<ul style="list-style-type: none"> Inserted as a response to MDRS implementation and alignment with National Planning Standards. The objective outlines the purpose of MRZ and intended outcomes, linking to the implementation of MDRS and the phrasing used in MDRS Policy 1 (which sits beneath the objective).
New Objective (14.2.6) – High density residential zone	<ul style="list-style-type: none"> Defines the purpose and outcomes sought for the HRZ under which Policy 3 of the NPS-UD sits.

3.3.5 Changes are also proposed to the following existing policies to achieve the above new or modified objectives:

Existing & New Policies	Proposed Change
14.2.1.1 Policy - Housing distribution and density	<ul style="list-style-type: none"> Modify policy wording to be consistent with outcomes sought through MDRS and the NPS-UD, including removing of density targets for specific zones. Update Table 14.2.1.1a to reflect changes to specific zones and the extent of the urban environment and provide references to applicable zone purpose objectives. MRZ and HRZ descriptions linked with objective and National Planning Standard descriptions. Additions to Residential Large Lot Zone description to cover use of new area-specific precincts.

Existing & New Policies	Proposed Change
14.2.1.2 Policy - Establishment of new medium density residential areas	<ul style="list-style-type: none"> • Remove policy. • Inconsistent with MDRS and NPS-UD.
14.2.1.3 Policy - Residential development in the Central City	<ul style="list-style-type: none"> • Remove policy. • Elements (14.2.1.3.a.ii) are contrary to the NPS-UD; replaced by new Policy 3 response for HRZ.
14.2.1.6 Policy - Provision of social housing	<ul style="list-style-type: none"> • Remove policy. • MDRS density standards mean these are no longer needed as this liberalises housing development across the urban environment.
14.2.1.8 Policy - Provision of housing for an aging population	<ul style="list-style-type: none"> • Remove Policy. • MDRS density standards mean these are no longer needed as this liberalises housing development across the urban environment.
14.2.2.1 Policy – Short term recovery housing	<ul style="list-style-type: none"> • Remove Policy. • MDRS density standards mean these are no longer needed as this liberalises housing development across the urban environment.
14.2.2.2 Policy - Recovery housing - higher density comprehensive redevelopment	<ul style="list-style-type: none"> • Remove Policy. • MDRS density standards mean these are no longer needed as this liberalises housing development across the urban environment.
14.2.2.3 Policy - Redevelopment and recovery of community housing environments	<ul style="list-style-type: none"> • Remove Policy. • MDRS density standards mean these are no longer needed as this liberalises housing development across the urban environment.
14.2.4.1 Policy - Neighbourhood character, amenity and safety	<ul style="list-style-type: none"> • Update wording to align with MDRS and NPS-UD direction, particularly in reference to changes in amenity values and character. • Provide greater clarity for the achievement of high quality residential environments.
14.2.4.2 Policy - High quality, medium density residential development	<ul style="list-style-type: none"> • Minor wording changes to ensure alignment with MDRS and NPS-UD direction.
14.2.4.3 Policy - Character of low and medium density areas	<ul style="list-style-type: none"> • Remove policy. • Contrary to the NPS-UD.
14.2.4.4 Policy - Character of residential development on the Port Hills	<ul style="list-style-type: none"> • Remove policy. • Contrary to the implementation of MDRS, through inclusion within the urban environment and being a relevant residential zone.
14.2.8.1 Policy - Building heights	<ul style="list-style-type: none"> • Remove policy. • Contrary to the NPS-UD.
14.2.8.2 Policy - Amenity standards	<ul style="list-style-type: none"> • Remove policy. • Contrary to the NPS-UD.

Existing & New Policies	Proposed Change
<p>New Policies (14.2.2.1 to 14.2.2.4, 14.2.5.1):</p> <ul style="list-style-type: none"> • MDRS Policy 2 • MDRS Policy 3 • MDRS Policy 4 • MDRS Policy 5 	<ul style="list-style-type: none"> • MDRS Policies 1-5 of Schedule 3A, inserted as required through s77G of the Act.
<p>New Policy (14.2.4.3) Quality large scale developments</p>	<ul style="list-style-type: none"> • New policy inserted to express how the existing objective 14.2.4 is achieved, detailing how larger scale, more comprehensive, developments should be developed. • This builds on the threshold established in MDRS whereby any development of three units or less (on a single site, subject to standards) is a permitted activity. Greater than this is a Restricted Discretionary activity.
<p>New Policy (14.2.4.4) On-site waste and recycling storage</p>	<ul style="list-style-type: none"> • New policy inserted to provide direction for expected levels of waste management, servicing, and storage space. • The policy is in response to the significant degree of intensification enabled throughout the urban environment and the increased priority of adequate management of waste and storage in a more intensified urban environment.
<p>New Policy (14.2.4.5) – Assessment of wind</p>	<ul style="list-style-type: none"> • New policy inserted to address the increased potential for adverse wind effects within increased building heights around commercial centres.
<p>New Policy (14.2.4.9) – Managing site-specific residential large lot development</p>	<ul style="list-style-type: none"> • New policy inserted to address how to manage specific sites newly zoned as residential large lot and the use of precincts to better address issues requiring a site or area specific response.
<p>New Policy (14.2.2.5) – Framework for building heights in medium and high density areas</p>	<ul style="list-style-type: none"> • New policy inserted as a consequence of MDRS and Policy 3 of the NPS-UD, specifically addressing Clause 4 of Schedule 3A. • Sets out how the RDA limit shall be applied and the two tiers of enablement that is applied in the framework (links to 14.2.2.6).
<p>New Policy (14.2.2.6) – Management of increased building heights</p>	<ul style="list-style-type: none"> • New policy inserted as a consequence of MDRS and Policy 3 of the NPS-UD, specifically addressing Clause 4 of Schedule 3A. • Seeks to direct how building heights beyond those readily enabled in MRS and HRZ should be considered, applying enablement framework of the NPS-UD, including consideration of economic impacts on city centre in response to economic reporting.
<p>New Policy (14.2.4.7) – Firefighting water capacity</p>	<ul style="list-style-type: none"> • New policy inserted to reinforce standards contained within Chapter 14 to better strengthen the need for firefighting capacity to be met in light of enabled intensification across the urban environment.
<p>New Policy (14.2.5.2) – Local Centre Intensification Precinct</p>	<ul style="list-style-type: none"> • New policy inserted to detail how development around specific local centres shall be undertaken • Policy is in response to intensification enabled under Policy 3(d) of the NPS-UD.

Existing & New Policies	Proposed Change
New Policy (14.2.6.1) – Provide for a high density urban form	<ul style="list-style-type: none"> • New policy inserted to provide direction for how and where high density areas should be developed. • Responds to a large degree to direction in Policy 3(c) and (d) of the NPS-UD.
New Policy (14.2.6.2) – High density location	<ul style="list-style-type: none"> • New policy inserted to detail how walking catchments will be used as an input to directing where HRZ areas will be enabled around centres in response to Policy 3 (d) of the NPS-UD.
New Policy (14.2.6.3) Heights in areas surrounding the central city	<ul style="list-style-type: none"> • New policy inserted that provides for greater HRZ densities immediately surrounding CCZ. • The policy responds to Objectives 1 and 3 of the NPS-UD and Policies 1(c), 2, and 3(c).
New Policy (14.2.6.4) – Large Local Centre Intensification Precinct	<ul style="list-style-type: none"> • New policy inserted to detail how development around specific larger local centres shall be undertaken • Policy is in response to direction under Policy 3(d) of the NPS-UD.
New Policy (14.2.6.5) – High Density Residential Precinct	<ul style="list-style-type: none"> • New policy inserted to detail how high density heights surrounding CCZ will be managed in response to accessibility and the intended outcomes of Objectives 1 and 3 of the NPS-UD and Policies 1(c), 2, and 3(c).
New Policy (14.2.6.6) – High Density Residential development	<ul style="list-style-type: none"> • New policy inserted to describe the types of developments that should be incentivised through the HRZ provision framework and Residential Design Principles.

3.3.6 The introduction of MDRS density standards means that there are substantial changes to residential standards contained within Chapter 14. S77G requires that MDRS density standards and associated activity status and notification controls are implemented across all relevant residential zones. Changes may only be made to make controls more lenient (s77H) or where they are in response to a qualifying matter identified through s77I. In addition, controls must be seen to provide for an enabling framework that responds to the specific intensification direction under Policy 3 and associated policy directions under the NPS-UD. Key changes are therefore summarised as follows:

- Implementation of MDRS density standards under Part 2 of Schedule 3A of the Act across MRZ and HRZ;
- Modification of some density standards to be more lenient;
- Permitted building heights in HRZ increased to 14m, 20m around larger commercial centres and 17m immediately surrounding CCZ;
- Introduction of various intensification precincts to manage intensified development around centres enabled through Policy 3 of the NPS-UD.
- Implementation of an activity status ceiling at restricted discretionary for residential activities, in accordance with Clause 4 of Schedule 3A;
- Inserting site-specific precinct controls for new Residential Large Lot Zone precincts (86 Bridle Path Road, Redmund Spur, and Rural Hamlet); and
- Adapting Residential Guest/Visitor Accommodation Zone built form standards to correspond with associated MRZ or HRZ surrounding environs (Policy 3 (c) response).

3.3.7 Specific changes are addressed below, noting that this does not address changes from the Plan, but rather changes from MDRS density standards and the supporting rule framework proposed.

Rule Category	Proposed Change
<p>More lenient MDRS standards (MRZ and HRZ only)</p>	<ul style="list-style-type: none"> • Building height: <ul style="list-style-type: none"> ○ MRZ: exemption for within Local Centre Intensification Precinct to permit up to 14m in height. ○ HRZ: increasing permitted height to 14m. ○ Applying a more lenient permitted building height is a direct response to meeting the requirements to further enable development under the NPS-UD, particularly around areas and areas of high accessibility. • Height in relation to boundary: <ul style="list-style-type: none"> ○ In accordance with the outcomes of the assessment in Part 2 of this Evaluation Report, recession planes giving effect to the proposed Sunlight Access qualifying matter have been proposed. Reference should be made to this part of the Evaluation Report. ○ Only in HRZ and Local Centre Intensification Precinct (MRZ), are there more lenient controls proposed. Exceptions here focus on encouraging development along the front of a site and readily providing for height under specific conditions. ○ When constructing three or more residential units, recession planes will not apply along the first 20 metres of site depth, or 60% of a site – whichever is lesser. The rule is designed as an incentive to encourage a strong presence along the street frontage, retaining the rear of the site for private amenity space. Buildings must also be no greater than 14m in height to be considered for the exemption, aligning with the more lenient permitted building standard approach in HRZ and the Local Centre Intensification Precinct in MRZ. ○ Buildings above 12m that are setback at least 6, 7, or 8 metres from side and rear boundaries (depending on boundary orientation) are exempt from height in relation to boundary controls⁷. This provides a balance between openness and privacy expectations in the HRZ and Local Centre Intensification Precinct (MRZ) environment and the ready ability to develop to anticipated heights. Doing so better ensures that heights envisioned by the zone are possible, rather than relying on recession planes. Aligning with site boundaries with ‘development site’ also incentivises amalgamation of adjoining sites, largely seen as a necessity to see a ready transition to a HRZ living environment⁸. • Setbacks: <ul style="list-style-type: none"> ○ MRZ and HRZ: exemption of setbacks for accessory buildings and internally-accessed garages when building no greater than 10.1m in length and is less than 3 metres in height, and for eaves and roof overhangs of a specific dimension that protrudes into the front boundary setback.

⁷ See Residential Urban Design report, Appendix 3.

⁸ See report by The Property Group, Appendix 5.

Rule Category	Proposed Change
	<ul style="list-style-type: none"> • Building coverage: <ul style="list-style-type: none"> ○ MRZ and HRZ: exemption for eaves and roof overhangs of a specific dimension. ○ HRZ: pathway has been provided to allow 60% site coverage when: no vehicle parking is provided; greater landscaping is provided; ground floor communal living space is provided; and a minimum site size is available. The provision responds to the NPS-UD direction to create more incentives for development around commercial centres, whilst recognising that in many instances this may only be possible through site amalgamation due to many of these areas already having undergone redevelopment. • Outdoor Living Space per unit: <ul style="list-style-type: none"> ○ HRZ: Smaller studio and single bedroom units are permitted to have a reduced outdoor living space, being 5m² lesser at the ground floor and 2m² lesser above ground. ○ MRZ: Existing exemption for smaller units modified to not conflict with MDRS. • Outlook space: <ul style="list-style-type: none"> ○ MRZ and HRZ: clarity provided that doors opening into an outlook space from the principal living room are not considered to obstruct outlook space, as per j.i. of the standard (MDRS Clause 16(9)(a)). • Windows to street: <ul style="list-style-type: none"> ○ MRZ and HRZ: exemption made for calculating glazing requirements, removing the area of the gable above upper floor ceiling height from the area calculation. Clarity is also provided that unglazed doors can contribute to area calculation, including specific exemption for a reduced glazing requirement of 17.5% when specific glazing is provided to habitable rooms and 20% of the ground floor is glazed. ○ The rule is further clarified through a sub-clause which directs that the rule will only be applicable to the first 12m of parcel depth from the road boundary or furthest point from a roading designation. This avoids unnecessary application of the rule where multiple units are proposed on a site, further clarified through restricting its application where facades are blocked by other residential units. The purpose of the latter is to avoid circumstances where increased glazing is needed between residential units on the same site (reflecting the MDRS permitted status of three units per site), which may give rise to greater privacy and amenity issues between residential units See below for proposed new definition for street-facing façade.
<p>Additional permitted standards (MRZ and HRZ only)</p>	<ul style="list-style-type: none"> • Building height: <ul style="list-style-type: none"> ○ HRZ only: a requirement for residential units to be constructed at a height of no less than 7m in height has been added to the MDRS building height control. This seeks to ensure that at least two storey development provided in HRZ, providing a minimum density to better achieve NPS-UD objectives to increase accessibility to centres. • Building separation: <ul style="list-style-type: none"> ○ HRZ only: standard controlling the separation buildings above 12m, aligning with the MDRS height threshold. • Fencing standard:

Rule Category	Proposed Change
	<ul style="list-style-type: none"> ○ MRZ and HRZ: standard for when fencing is provided for developments, addressing heights across specific frontages. Builds upon existing Plan fencing standard. ○ Fencing standard is specifically targeted to the front boundary, requiring that at least 50% of the fenced frontage is no greater than 1m in height. Greater fencing heights are permitted alongside and rear boundaries and on frontages along arterial roads. ● Landscaped area <ul style="list-style-type: none"> ○ A link has been provided to proposed Chapter 6 controls for tree canopy cover. Please refer to Part 7 (Financial Contributions) of this Evaluation Report for analysis. ● Garaging and carport building location: <ul style="list-style-type: none"> ○ MRZ and HRZ: when establishing four or more units, standard for the placement of any detached garage or carport (accessory building) to be located behind the façade of residential units. Only in MRZ is this at a specified distance of 1.2m. ● Ground floor habitable room: <ul style="list-style-type: none"> ○ MRZ and HRZ: standard for the location of ground floor habitable rooms when fronting a road or public open space. Builds upon existing RMD habitable room standard. ○ Requirement only applies to ground floor units, ensuring habitable rooms front public areas and cover at least 50% of the ground floor space. However, an exemption is made in HRZ when 25% of the development is above 14m in height. This better responds to the typology of that scale and the need for occupation at the ground level. ● Service, storage, and waste management: <ul style="list-style-type: none"> ○ MRZ and HRZ: standard to require each residential unit to be provided with adequate waste management areas, servicing and storage space, when proposing four or more residential units. This aligns with the 'scale development' threshold throughout provisions. ○ Waste management standards direct minimum areas and dimension requirements, including screening. The standard ensures that areas can be serviced, appropriate for each unit, and recognise that such an area can be provided communally. ○ Controls for washing line areas are maintained, requiring a 3m² area with a minimum dimension of 1.5 metres. ○ Storage standards prescribe a minimum volume of storage required based on the number of bedrooms each unit provides. Flexibility is also afforded in how this is provided, with up to 50% of storage space able to be provided external to the unit. ● Water supply for fire fighting: <ul style="list-style-type: none"> ○ This is an established Plan standard that has been carried over into the MRZ and HRZ framework. ● Building reflectivity: <ul style="list-style-type: none"> ○ Within MRZ only in the Residential Hills Precinct, rule restricting roof reflectivity to 30% light reflectance value (LRV). This carries over current Plan controls for the Residential Hills Zone, which the new precinct intends to capture.

Rule Category	Proposed Change
	<ul style="list-style-type: none"> • Location of outdoor mechanical ventilation: <ul style="list-style-type: none"> ○ Within MRZ and HRZ: the location of external ventilation units (i.e. heat pump units) limited to not be located within 3 metres of a boundary of a street or communal accessway. ○ This ensures that the street appeal is retained in a built form where building setbacks along boundaries and the street interface are reduced. • Minimum unit size: <ul style="list-style-type: none"> ○ MRZ and HRZ: this requires a minimum net floor area to be achieved for each residential unit, scaled to the number of bedrooms provided. ○ This adopts an existing approach in the Plan, extending this to HRZ. The standard seeks to ensure that residential units have a practical liveability and reduces the chances for internal conflict between occupiers.
<p>Restricted discretionary controls (MRZ and HRZ only)</p>	<p>Breaches of the following permitted standards are treated as restricted discretionary activity (as required by cl.4 of the MDRS in Schedule 3A of the Act):</p> <ul style="list-style-type: none"> • Number of units: <ul style="list-style-type: none"> ○ MRZ and HRZ: requires an assessment against the residential design principles. This builds upon the existing Plan framework as part of the RMD matters of discretion. The design elements that the residential design principles consider is to ensure an adequate degree of residential amenity, attractiveness, and safety is possible for developments of four or more units. The baseline for assessment is the planned urban built character for each zone, as represented in associated objectives. • Building height breach: <ul style="list-style-type: none"> ○ Matters of discretion for height breaches across MRZ and HRZ are very similar. The main differences are the thresholds at which they apply and the specific design standards that are included. ○ In MRZ, height is in breach when beyond 11m (or 12m for the part of the building where a pitched roof of at least 22 degrees is provided) in height (or when in breach of MDRS roof standards), except where in the Local Centre Intensification precinct, which anticipates a taller urban form. As previous, HRZ heights are permitted up to 14m, therefore RDA standards apply for height controls between 14-20m and then additional standards when between 20-32m in height. ○ Matters of discretion for breaches beyond permitted heights across MRZ and HRZ focus on bulk, dominance, privacy, need for extra height for more efficient site occupation, design and building modulation features, ground floor habitable rooms, and heritage features. ○ In HRZ, standards for building up to 20m require ground level communal areas to a scale that corresponds to the scale of residential units. Beyond 20m and up to 32m, HRZ standards require the building to be set back 6m from side and rear boundaries and the proportion of the building above 20m setback 3m from the street-facing building face. ○ A breach of these standards, or heights above 14m in MRZ is also treated as RDA. It requires assessment against much of the same matters previously, but also focuses on consideration of alignment

Rule Category	Proposed Change
	<p>with planned urban character, residential design principles, provision for greater housing choice, association with papakāinga / kāinga housing, accessibility to local amenities and services, and how the site contributes to (or provides for) a sense of place or place making.</p> <ul style="list-style-type: none"> ○ In HRZ, the final RDA tier of controls focus on the effects associated with the breach of prescribed standards, amongst the aforementioned matters of discretion. ○ Lastly, a specific matter of discretion has been added for breach of the HRZ minimum building height standard. Matters focus on the ability to still readily provides for a more intensified urban form, otherwise anticipated in HRZ. It also considers whether vehicle parking is removed from the site, and instead, whether pedestrian mobility is enhanced. <ul style="list-style-type: none"> ● Wind standard: <ul style="list-style-type: none"> ○ MRZ and HRZ: A threshold of 20 metres is adopted in the residential environment, with any residential unit above this level requiring to demonstrate that wind effects do not adversely impact on surrounding areas of public and private space, retaining their overall safety and pleasantness. The height threshold is bespoke to the residential environment due to its level of residential occupation and degree of private amenity space. ○ A catchment of 100 metres surrounding a development site is adopted to evaluate wind effects. More sensitive environments, such as open spaces, outdoor living areas, and footpaths are more stringently considered at 4m/s. This compares to areas where safety is more of a concern, being roadways and carparks, which have a 6m/s threshold. Any of these spaces must not exceed wind speeds for 5% annually (about 18 days a year). ○ Those areas immediately surrounding a building set a wind gust threshold of 15m/s that must not be exceeded more than 0.3% annually (about two days a year). ○ Any measurement must be demonstrated by a suitably qualified professional to ensure technical requirements are able to be demonstrated. ○ Breach of wind standards in both MRZ and HRZ are addressed through a new wind assessment matter of discretion. This assesses how safety and amenity is impacted due to wind changes, how landscaping is used to mitigate wind effects, and wind effects anticipated over those already present. The latter reflects that in some instances, the urban environments may already be at the thresholds described in the standard, therefore the degree of change is a matter of discretion. ● Height relation to boundary breach: <ul style="list-style-type: none"> ○ MRZ and HRZ: breaches are addressed through a new height in relation to boundary matter of discretion. This primarily focuses on effects on adjacent properties, in terms of how bulk and dominance can adversely impact on privacy and shading, particularly on habitable rooms and outdoor living spaces. Effects on heritage values are also recognised. ● Building separation (HRZ only):

Rule Category	Proposed Change
	<ul style="list-style-type: none"> ○ Breaches in building separation are considered under the height in relation to boundary matter of discretion. ○ An additional matter is added, focusing on access ways, addressing some of the CPTED and privacy issues that may arise at a closer proximity. ● Setback breach: <ul style="list-style-type: none"> ○ MRZ and HRZ: breaches of setbacks are considered under the Impacts on neighbouring property matter of discretion. ○ While the assessment matters evaluate bulk and dominance effects on adjoining properties, the standard also considers whether the non-compliance is necessary to enable more efficient or cost effective use of the site, including any building design features used to manage visual impacts. The rule anticipates that breaches may be unavoidable in some circumstances. ○ Impacts on heritage values and the protection of significant trees or natural features are also considered. ○ Lastly, the rule also recognises how the configuration of a building can negate some of the adverse impact of setback breaches through the location of habitable rooms at the ground level. ● Building coverage breach: <ul style="list-style-type: none"> ○ MRZ and HRZ: breaches of setbacks are considered under the Site density and site coverage rule. ○ This is an existing rule that is proposed to be modified to better address MDRS standards. Alongside building dominance and privacy effects, it also considers effects on character and amenity values for the local environment. ○ Specific design elements are now also considered, being how landscaping is used or site layout or building designed to mitigate effects. The practical use of the site is also considered, in terms of access ways or onsite outdoor living spaces, and how their configuration provides opportunities for planting. ● Outdoor living space breach: <ul style="list-style-type: none"> ○ MRZ and HRZ: breaches in outdoor living space are considered under a modified outdoor living space rule already contained in the District Plan. ○ Changes have been proposed to evaluate how residual spaces provide sunlight access and their connection between internal and outdoor living areas, and the usability of the space, as to whether other facilities are occupied within the remaining space. ● Outlook space breach: <ul style="list-style-type: none"> ○ MRZ and HRZ: breaches in outlook space are considered under a new outlook space occupation rule. ○ Matters of discretion focus on the degree to which openness is still achieved across the site, creating the sense of spaciousness that would otherwise be provided. Consideration is given to whether the area remains unobstructed, provides for daylight to windows of the primary living room, including any loss of privacy or amenity within these spaces.

Rule Category	Proposed Change
	<ul style="list-style-type: none"> • Breach of street-facing glazing: <ul style="list-style-type: none"> ○ MRZ and HRZ: breaches in glazing are considered under a new Street-facing glazing non-compliance rule. ○ Matters of discretion largely focus on design and CPTED measures, such as: whether glazing is for habitable rooms; passive surveillance opportunities that remain; and other building design features that add to the visual interest at the street-facing façade. • Landscaping breach: <ul style="list-style-type: none"> ○ MRZ and HRZ: breaches in landscaping are considered under a new Residential landscaping rule. ○ The rule considers similar matters contained in 14.15. It evaluates the type of landscaping provided, its contribution to amenity, and whether it would be suitable for the local climatic conditions. ○ Positive effects are also considered, including whether planting could act to soften building effects and how it could enhance onsite and neighbouring amenity, or improve the overall safety and accessibility of a site with lesser landscaping. ○ Consideration is also given to the practicalities of planting, whether a lesser amount of landscaping is needed for a more cost effective development form, where sites of cultural significance are not compromised, and whether a maintenance programme has been proposed to manage landscaping. • Fencing breach: <ul style="list-style-type: none"> ○ MRZ and HRZ: this is now considered through a separate Residential fencing rule. The rule evaluates whether taller fencing is needed in the specific roading context, materials used, and whether passive surveillance is still possible. ○ Amenity and privacy effects of increased fencing is also considered and whether height would detract from the openness and coherence of the street scene. • Garaging location breach: <ul style="list-style-type: none"> ○ MRZ and HRZ: any garaging is considered under the matters specific to the breach in Residential Design Principles, being 'Relationship to the street and public open spaces' and 'Safety'. • Breach of ground floor habitable rooms: <ul style="list-style-type: none"> ○ MRZ and HRZ: any ground floor habitable room breach is simply considered under the matters specific to the breach in Residential Design Principles, being 'Relationship to the street and public open spaces' and 'Safety'. • Waste, servicing, or storage breach: <ul style="list-style-type: none"> ○ MRZ and HRZ: any breach of this standard is considered under a modified Service, storage and waste management spaces rule. ○ Changes to the rule mean that consideration is also given to communal outdoor living spaces and how landscaping may instead be used as a form of screening.

Rule Category	Proposed Change
	<ul style="list-style-type: none"> • Building reflectivity breach: <ul style="list-style-type: none"> ○ Only in Residential Hills Precinct: Control is the same as per the current Plan breach within the Residential Hills Zone. ○ Matter of discretion is limited to the specific matters for small settlements and hilled areas within Residential Design Principles. • Breach of outdoor mechanical ventilation unit location: <ul style="list-style-type: none"> ○ MRZ and HRZ: any garaging is considered under the matters specific to the breach in Residential Design Principles, being 'Relationship to the street and public open spaces' and 'Built form and appearance'. • Breach of minimum unit size: <ul style="list-style-type: none"> ○ The existing plan matter of discretion is retained. This considers the relationship between floor space and the amenity of occupants; any compensatory factors; scale of the breach; any particular social housing tenant needs.
New Residential Large Lot Zone built form standards	<ul style="list-style-type: none"> • Site density: <ul style="list-style-type: none"> ○ Insert bespoke controls for new Residential Mixed Density Precinct – 86 Bridle Path Road, Residential Mixed Density Precinct – Redmund Spur, and Rural Hamlet Precinct. ○ These carryover Plan controls for these specific zones from the associated density overlays. • Site coverage: <ul style="list-style-type: none"> ○ Insert bespoke controls for new Residential Mixed Density Precinct – 86 Bridle Path Road, Residential Mixed Density Precinct – Redmund Spur, and Rural Hamlet Precinct. ○ These carryover Plan controls for these specific zones from the associated density overlays. • Minimum building setbacks from internal boundaries: <ul style="list-style-type: none"> ○ Insert bespoke controls for new Residential Mixed Density Precinct – 86 Bridle Path Road, Residential Mixed Density Precinct – Redmund Spur, and Rural Hamlet Precinct. ○ These carryover Plan controls for these specific zones from the associated density overlays. • Road boundary building setback: <ul style="list-style-type: none"> ○ Insert bespoke controls for new Residential Mixed Density Precinct – 86 Bridle Path Road, Residential Mixed Density Precinct – Redmund Spur, and Rural Hamlet Precinct. ○ These carryover Plan controls for these specific zones from the associated density overlays. • Building reflectivity and colour: <ul style="list-style-type: none"> ○ Add exemption that the rule does not apply within the Rule Hamlet Precinct. • Minimum setback for living area windows and balconies facing internal boundaries: <ul style="list-style-type: none"> ○ New standard inserted to only apply to new precincts, reflective of existing Plan controls.

Rule Category	Proposed Change
	<ul style="list-style-type: none"> • Service, storage and waste management spaces: <ul style="list-style-type: none"> ○ New standard inserted to only apply to new precincts, reflective of existing Plan controls. • Street Scene amenity and safety – fences: <ul style="list-style-type: none"> ○ New standard inserted to only apply to new precincts, reflective of existing Plan controls. • Tree and garden planting: <ul style="list-style-type: none"> ○ New standard inserted to only apply to new precincts, reflective of existing Plan controls. • Outdoor living space: <ul style="list-style-type: none"> ○ New standard inserted to only apply to new precincts, reflective of existing Plan controls.
New Residential Large Lot Zone (RLL) restricted discretionary activities	<ul style="list-style-type: none"> • RD15 – updating naming of agency to ‘Fire and Emergency New Zealand’. • Breach of setbacks for living area windows and balconies facing internal boundaries: <ul style="list-style-type: none"> ○ Inserted in response to new RLL site-specific precinct standards. ○ This carries over the matter of discretion from the equivalent zone for the site specific standard in the Plan. • Breach of service, storage and waste management spaces: <ul style="list-style-type: none"> ○ Inserted in response to new RLL site-specific precincts. ○ This carries over the matter of discretion from the equivalent zone for the site specific standard in the Plan. • Breach of fencing standard: <ul style="list-style-type: none"> ○ Inserted in response to new RLL site-specific precinct standards. ○ Breach matters of discretion are the same as breaches under MRZ and HRZ. • Breach of tree and garden planting standard: <ul style="list-style-type: none"> ○ Inserted in response to new RLL site-specific precinct standards. ○ Breach matters of discretion are the same as landscape area breaches under MRZ and HRZ. • Breach of outdoor living space: <ul style="list-style-type: none"> ○ Inserted in response to new RLL site-specific precinct standards. ○ This carries over the matter of discretion from the equivalent zone for the site specific standard in the Plan.
Residential Guest/Visitor Accommodation Zone – Built form standards	<ul style="list-style-type: none"> • Maximum site coverage: <ul style="list-style-type: none"> ○ Alignment with MDRS building coverage standard of 50% across all groups. • Maximum building height: <ul style="list-style-type: none"> ○ Alignment with MRZ and HRZ permitted building heights • Minimum building setback from road boundaries <ul style="list-style-type: none"> ○ Alignment with front yard standards under MDRS.

Rule Category	Proposed Change
	<ul style="list-style-type: none"> Daylight recession planes: <ul style="list-style-type: none"> Alignment with MDRS standards and re-directing standards to align with MDZ and HRZ.
Residential Guest/Visitor Accommodation Zone – Restricted discretionary activities	<ul style="list-style-type: none"> RD6 – Buildings that do not meet the maximum building height: <ul style="list-style-type: none"> Clarification added within standard and matter of discretion that the applicable MRZ or HRZ rule, as listed in Appendix 14.16.11 for each group, shall apply as if it were within that zone. RD10 – Updated reference to the new residential fencing matters of discretion. Applies same considerations as residential activities. Various rule references updated with changes made to sub-chapter 14.14.

3.3.8 The residential component of Plan Change 14 also proposes to modify existing, or add additional, definitions to Chapter 2 of the Plan. This are addressed below:

Definition(s)	Proposed Changes
<ul style="list-style-type: none"> ❖ Accessory building ❖ Building ❖ Building coverage ❖ Building footprint ❖ Ground level ❖ Height ❖ Residential unit ❖ Site 	<ul style="list-style-type: none"> Addendum added to existing chapter, applying the corresponding National Planning Standards definition. Changes only apply to MRZ and HRZ due to the application of MDRS.
<ul style="list-style-type: none"> ❖ Residential unit 	<ul style="list-style-type: none"> While the National Planning Standard definition has been inserted as per MDRS, further clarification of the definition has also been added. This ensures that activities captured in the operative definition are captured (emergency or refuge) and does not artificially increase expected levels of household occupation of residential sites. The addition states: <p><u>For the purpose of this definition:</u></p> <ul style="list-style-type: none"> a. <u>a building used for emergency or refuge accommodation shall be deemed to be used by a single household;</u> b. <u>where there is more than one kitchen on a site there shall be deemed to be more than one residential unit; and</u> c. <u>a residential unit may be used for hosted visitor accommodation or unhosted visitor accommodation.</u>

Definition(s)	Proposed Changes
<ul style="list-style-type: none"> ❖ Habitable room ❖ Height in relation to boundary 	<ul style="list-style-type: none"> • New definition inserted, as per corresponding National Planning Standards definition.
<ul style="list-style-type: none"> ❖ Net site area ❖ Outdoor living space 	<ul style="list-style-type: none"> • New definition inserted, as per corresponding National Planning Standards definition. • This replaces the existing Plan definition.
Principal living room	<ul style="list-style-type: none"> • New definition inserted, in response to MDRS density standard for outlook space (Clause 16, Schedule 3A) • Definition states: <u>means the largest living room in a residential unit.</u>
Larger commercial Centres	<ul style="list-style-type: none"> • New definition inserted to reinforce phrasing used in objective and policies, and to reflect the outcomes of centres analysis. • Definition states: <u>Means those areas zoned as:</u> a. <u>Local Centre Zone;</u> b. <u>Town Centre Zone; or</u> c. <u>City Centre Zone.</u> <u>Within:</u> d. <u>Central City;</u> e. <u>Riccarton;</u> f. <u>Church Corner;</u> g. <u>Hornby;</u> h. <u>North Halswell;</u> i. <u>Linwood;</u> j. <u>Shirley;</u> k. <u>Merivale;</u> l. <u>Papanui;</u> m. <u>Riccarton.</u>
Street-facing facade	<ul style="list-style-type: none"> • New definition inserted to improve the clarity for how the MDRS windows to street density standard (Clause 17) is applied. The definition provides a description of the physical elements of a residential unit that would contribute to the total area used to estimate the proportion of glazing required. This works in tandem with the modifications proposed to the MDRS standard (as above). • Definition states: <u>Means the exterior wall or walls of a building oriented at an angle of 45 degrees or less to any part of the road boundary or boundaries of the site; and includes any projections from that/those wall(s) regardless of their orientation to the boundary.</u>
Breezeways	<ul style="list-style-type: none"> • New definition inserted to describe building elements often used in scale multiunit developments. The new definition assists in the assessment of their effects, including, but not limited to, the Residential Design Principles. • Definition states:

Definition(s)	Proposed Changes
	<u>Means an architectural feature of a building that provides external access passage on or between the upper floor(s).</u>
Landscaped area / Landscaping	<ul style="list-style-type: none"> • Modifies existing Plan definition to exempt MRZ and HRZ area in response to MDRS density standard for landscaped area (Clause 18, Schedule 3A)
Community housing unit	<ul style="list-style-type: none"> • Removed due to proposal to remove Community Housing Redevelopment Mechanism, as MDRS makes this redundant.
Development site	<ul style="list-style-type: none"> • A new definition is inserted to reflect that development may take place across multiple legal parcels. The definition is in response to the inclusion of this term in MDRS density standards. • The definition is used within some proposed residential provisions, but has been introduced as part of the Financial Contributions assessment. Reference should therefore be made to Part 7 of this Evaluation Report.

3.3.9 Plan Change 14 does not propose to insert any discretionary or non-complying activity. The approach aligns with Clause 4 of Schedule 3A of the Act, which restricts any residential activity where MDRS density standards would apply to restricted discretionary activity status. The approach also accords with the direction in the NPS-UD under Clause 3.2(2), and consequently, Clauses 3.4(1) and 3.4(2).

Notification

3.3.10 Clause 5 of Schedule 3A establishes the threshold for notification of residential activities where MDRS applies. It directs that resource consent applications for the construction of four or more residential units that comply with the other density standards are precluded from public and limited notification. A proposal for 1-3 residential units that breaches MDRS density standards may only be limited notified and is precluded from public notification.

3.3.11 In addition to the above, and in accordance with s77D, Plan Change 14 proposes that the breaches of the following standards are also precluded from limited notification:

- Front boundary setback standard;
- Building coverage;
- Windows to street;
- Landscaping;
- Outdoor living space;
- Outdoor mechanical ventilation;
- Minimum unit size;
- Minimum building height;
- Garaging and carport building location; and
- Ground floor habitable rooms.

3.3.12 While Plan standards for water supply for fire fighting specify that written approval shall be required from the Fire Service regardless of whether they are identified as an affected party under s95E of the

Act, such an approach would be seen as being ultra vires to the requirements under s95B of the Act and are no longer carried over for MRZ or HRZ controls.

3.4 Community/Stakeholder engagement

3.4.1 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 Newline articles, and social media posts.
- Hard copies of the consultation flyer provided to all Christchurch City Council libraries and service centres.
- Have your Say online consultation webpage.
- Staff engagement directly with the public via webinars and attending specific organisation or association meetings.

3.4.2 Council received feedback from about 700 respondents. Council heard from a wide range of organisations, including:

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

3.4.3 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)*

3.4.4 A summary of the feedback received was completed, and made publicly available on Council's plan change webpage⁹. Whilst the pre-notification summary of feedback report provides a synthesis of comments received, this section of the report provides a further review of that with regards to the residential provisions. It states what changes have been made to the draft provisions as a result of feedback received.

3.4.5 When reviewing the specific feedback received in relation to proposed changes to the Residential Chapter of the District Plan, these related to:

⁹ See: Housing and Business Choice PC14 Public Engagement, Synthesis Report (Global Research, June 2022), available at: <https://www.ccc.govt.nz/assets/Documents/Consultation/2022/07-July/Plan-Change-14-Early-Feedback-Report.pdf>

- Medium Density Residential Standards (MDRS)
- High Density Residential Zone (HRZ)
- Precincts (Greenfield, Centres Intensification)

3.4.6 General comments on residential matters were concerned about the following matters:

- Application of the Medium Density Residential built form standards – 169 comments

For all current residential areas in the city, the proposed Medium Density built form standards would apply. Most of the feedback received on the application of these standards opposed this increase in density as a wholesale approach for Christchurch. Reasons for opposition related to negative impacts on the community. This included impacts of shading and loss of sunlight on neighbouring properties, poor building design outcomes of permitted development, loss of privacy, loss of tree canopy as sites were cleared for developments, and the impact on quality of life and community functioning due to scale (i.e. bulk and location), and increased number of residential dwellings.

There was also support for the application of the Medium Density built form standards that would provide for more housing opportunities in the city.

While the majority of the feedback on the application of these built form standards was in opposition, these were based on building design and impacts on neighbouring properties, if all sites developed were realised to the permitted built form standards.

- The right areas have been identified for development over 12m – 950 comments.

For residential development over 12m, there are two areas that would have these further height enabled areas; High Density Residential Zone, and the use of the centres intensification precinct. Of the 390 people who answered the yes/no question, 68% (i.e. 265 people) said no – the right areas had not been identified. When reviewing comments, feedback sought to have a reduced height due to negative impacts on the community. This included impacts on shading of larger buildings on neighbouring properties, concerns about parking and traffic congestion, and general loss of amenity as a result of higher buildings. In contrast, there was also support for increasing residential development near the city centre and other commercial centres, which would have the benefits of access to services and facilities, such as public transport, community facilities and retail/commercial activities, which these centres provide for nearby residents.

While the feedback around reduced heights received supported the use of other planning methods to control heights and density, such as the use of Qualifying Matters or Precincts, to protect character and amenity of residential areas, these will be discussed in part 2 of this report.

3.4.7 The following table provides a summary of the changes made to the residential chapter as a result of the feedback received:

Feedback received	Resulting change to the draft proposal
Application of the Medium Density Residential zone built form standards	<ul style="list-style-type: none"> • No changes to zoning extent; requirement of s77G.

	<ul style="list-style-type: none"> • Removal of exemption of height to boundary control along front of sites. • Insert new standard for outdoor ventilation units. • Removed stormwater controls. • Improved clarity of windows to street exemptions. • Changed threshold for controls for garaging and servicing for four or more units. • Significant overhaul of objectives and policies to align with Plan framework and increase ease of use. • Refinement of height breach control to increase specificity and clarity.
<p>Areas identified for further intensification (i.e. over 12m in building height) through land use zoning of High Density Residential</p>	<ul style="list-style-type: none"> • Changes made to improve and simplify the application of Residential Design Principles. • Better specify the application of wind standards. • Insert new standard for outdoor ventilation units. • Removed stormwater controls. • Significant overhaul of objectives and policies to align with Plan framework and increase ease of use. • Changed threshold for controls for garaging and servicing for four or more units. • Added exemption to ground floor habitable room controls to better align with operative Plan approach. • Modification of requirement for communal ground level outdoor living space to insert size threshold. • Refinement of height breach control to increase specificity and clarity. • Add notification exemptions to specific provisions

<p>Areas identified for further intensification (i.e. over 12m in building height) through Centre intensification Precinct</p>	<ul style="list-style-type: none"> • Large reduction in the extent of 10-storey enablement, concentrating only around City Centre, in response to economic evidence. • Insert consideration of economic impact on the city centre when in breach of height. • Change intensification response around some centres in response to further evidence. • Small scale precinct extent modifications: increasing in most instances; and reducing around the Shirley Centre along southern aspect. • Add notification exemptions to specific provisions.
--	--

3.4.8 Further evaluation work was completed following the conclusion of public pre-notification engagement, culminating in officers seeking to notify the plan change on 8 September 2022. Council voted against the resolution to notify the plan change, instead writing to the Environment Minister, Hon David Parker, expressing the Council's concerns that the direction to intensify was not bespoke to a Christchurch's context¹⁰. An alternative PC14 proposal was drafted, which also included public webinar sessions in mid-December 2022 and mid-February 2023 to inform the public on the contents of the alternative proposal and address any questions raised.

3.5 Consultation with iwi authorities

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

- Strategic Directions development (Chapter 3);
- Scope of relevant residential zones;
- Scope of considerations for papakāinga / kāinga nohoanga development as part of MDRS;
- Types of cultural significance features that should be considered as qualifying matters; and
- Broader strategic outcomes of Plan Change 14.

3.5.2 Following the release of the full draft proposal in April 2022, Council met with representatives from MKT to further discuss the above. Support was expressed for the approach undertaken thus far, and reiterated the importance of adequate qualifying matters to be captured in the proposal.

¹⁰ See letter at: <https://newsline.ccc.govt.nz/assets/GeneratedPDFs/Letter-from-Mayor-Lianne-Dalziel-to-Hon-David-Parker-Minister-for-the-Environment-re-Proposed-Plan-Change-14-Housing-and-Business-Choice-2022-09-20.pdf>

3.5.3 Draft evaluation reports and draft changes to residential sub-chapters were provided to representatives on 22 July 2022 prior to notifying the plan change, and we have had particular regard to their feedback in accordance with Clause 4A of Schedule 1 of the Act. A summary of the changes that we have made to residential reporting and provisions as a result of that consultation is provided below:

Summary of MKT requested changes / comments	How proposal has responded / adjusted
Evaluation Report: <ul style="list-style-type: none"> Minor wording changes for references to iwi / Rūnanga 	Implemented, as requested.
Evaluation Report: <ul style="list-style-type: none"> Changes to section 4.1 – scale and significance Modifying ‘Degree of impact on or interest from iwi/Māori’ from ‘Low’ to ‘High’, noting issues around housing affordability/accessibility, waterway impacts, and the proposed policy basis for Kāinga nohoanga/Papakāinga housing. 	Apply narrative as provided, as it applies to the residential proposal. Retain a ‘medium’ level of significance to this criterion as MDRS is considered part of the status quo, and while qualifying matters are not considered as part of this sub-section, qualifying matters of interest to mana whenua are those within the operative district plan that would be carried over.
Evaluation Report: <ul style="list-style-type: none"> Changes to summary of cultural costs and benefits of provisions in section 5.5. 	Implemented, with some modification to better reflect that MDRS is the status quo.
Evaluation Report: <ul style="list-style-type: none"> Changes to summary of cultural costs and benefits of provisions in section 6.3. 	Implemented, as requested.
Sub-chapter 14.15: <ul style="list-style-type: none"> Modification of 14.15.1c.ii.G to maintain the operative wording, also inserting ‘removes’ at the start before identifying features, including Sites of Ngāi Tahu significance. 	Retain the draft proposed changes to the matter of discretion. This better recognises the (separate) weighting of qualifying matters elsewhere in the plan, the purpose of the matter of discretion, and the limits to recognising existing character in light of the intensification direction of MDRS and Policy 3 of the NPS-UD.

3.5.4 As previous, due to an alternative PC14 proposal being drafted, MKT were again approached for feedback in February 2023 new additions made to the original plan change from September 2022.

MKT expressed broad support for the alternative, particularly land use that better supported efficient public transport and further reduced carbon emissions.

4 Scale and significance evaluation

4.1 The degree of shift in the provisions

4.1.1 The level of detail in this evaluation of the proposal has been determined by the degree of shift of the proposed objectives and provisions from the status quo and the scale of effects anticipated from the proposal. To this end, it is important to consider the unique position that the ISPP process under the Act places Council in, when considering the obligations under s77G and s80E of the Act to incorporate MDRS. In particular, under s77G and s86BA(1) a rule in an IPI "that authorises as a permitted activity a residential unit in a relevant residential zone in accordance with the density standards set out in Part 2 of Schedule 3A" must be included in the District Plan and has immediate legal effect. A rule that meets the criteria in s86BA(1) will therefore take effect from notification of the IPI¹¹ and any operative District Plan rule that is inconsistent with the new rule thereafter ceases to have legal effect.¹² It means that for the purposes of the status quo consideration, all applicable objectives, policies, and provisions under Schedule 3A of the Act are considered to be the status quo, rather than the comparable operative district plan.

4.1.2 Based on this, the scale and significance of anticipated effects associated with this proposal are identified below:

Criteria	Scale/Significance			Comment
	Low	Medium	High	
Basis for change			x	<ul style="list-style-type: none"> Give effect to the MDRS and National Policy Statement for Urban Development 2020 requirements.
Addresses a resource management issue		x		<ul style="list-style-type: none"> This addresses four resource management issues identified to give effect to s77G. This applies the MDRS direction across the urban environment, providing for greater housing choice (for both typology and supply), increasing accessibility to housing. Further intensification is also proposed around larger commercial centres, helping to deliver the well-functioning urban environment described in Policy 1 of the NPS-UD

¹¹ Note that s86BA(1) does not apply to rules applying in either a new residential zone or a qualifying matter area.

¹² Under s86BA(2).

Criteria	Scale/Significance			Comment
	Low	Medium	High	
				and delivering upon the Policy 3 direction.
Degree of shift from the status quo		x		<ul style="list-style-type: none"> The status quo provides for 12m high development across all urban residential areas (subject to qualifying matters), due to the implications of MDRS. Only in areas surrounding larger commercial centres is this anticipated to change beyond this, giving effect to direction in Policy 3 on intensification. Many of these areas already enable an increased level of density in response to direction in the CRPS and in recognition of the benefits of concentrating development around centres. Further development centres is therefore somewhat anticipated or expected.
Who and how many will be affected / geographical scale of effects		x		<ul style="list-style-type: none"> The status quo (MDRS) will apply across all relevant residential zones, being a large geographic extent. However, greater levels of intensification beyond MDRS will be focused around larger centres, where there is a greater (by contrast) impact relative to the status quo.
Degree of impact on or interest from iwi/ Māori		x		<ul style="list-style-type: none"> The proposed provisions are of high interest to mana whenua who are concerned with housing affordability and accessibility. Whilst the proposed changes do not concern the development potential of Māori land, additional housing within urban areas is supported. This is subject to ensuring the protection of water quality and avoiding encroachment on waterbodies.

Criteria	Scale/Significance			Comment
	Low	Medium	High	
				<ul style="list-style-type: none"> • Kāinga nohoanga/Papakāinga housing is recognised in strategic directions, providing a policy basis for urban kāinga nohanga and in matters of discretion for residential height breaches.
Timing and duration of effects		x		<ul style="list-style-type: none"> • Effects will be ongoing, with rules permitting MDRS-compliant developments applying at the time of notification. Other provisions will take effect from decisions, before 20 August 2023.
Type of effects		x		<ul style="list-style-type: none"> • Changes to the built form, over time, are likely to be the most apparent changes. With greater degrees of intensification enabled, the contrast between MDRS development and further enabled development will increase. • Increased intensification will also lead to greater concentrations of populations. This increases social connection in the public realm, market share for businesses with a greater residential catchment (including additional agglomeration benefits), increased street surveillance opportunities, whilst also having the potential for greater social conflict. • Increased intensification has the potential to diminish the amenity and privacy in some residential settings, including potential for reduced private sunlight access. • A greater supply of housing supply and choice is likely to mean greater social and economic stability through the reduction in housing cost and

<i>Criteria</i>	<i>Scale/Significance</i>			<i>Comment</i>
	<i>Low</i>	<i>Medium</i>	<i>High</i>	
				better alignment with housing needs through different generations.
Degree of risk and uncertainty	x			<ul style="list-style-type: none"> The proposed changes have a low risk and low uncertainty. The proposed changes are consistent with the expectations set within higher order documents.

4.1.3 The degree of shift in the objectives and provisions in Plan Change 14 from the status quo is not significant and seeks to give effect to both MDRS and relevant direction under the NPS-UD (notably Policy 3).

4.1.4 Overall, the scale and significance of the proposed provisions are assessed as a medium level. This is largely due to the requirements of the Act to implement MDRS across all relevant residential zones, which is therefore part of the status quo. The greatest change beyond this is the permitted 14m height limit that is proposed in high density areas around larger commercial centres. While only 2m higher than MDRS, proposed provisions do enable development of between 20m and 32m (the latter only around Central City Zone). This represents the most significant change beyond the status quo. The considerations for applications to breach height limits also differ, being different limitations on restricted discretionary activities. In some circumstances therefore, greater heights beyond those enabled in the medium and high density residential zones could be possible.

4.1.5 Given that the proposed changes to the mandatory direction under the Act are not significant, a high level evaluation of these provisions has been identified as appropriate for the purposes of this evaluation report.

5 Evaluation of the proposal

5.1 Statutory evaluation

5.1.1 A change to a district plan should be designed to accord with ss74 and 75 of the Act to assist the territorial authority to carry out its functions, as described in s31, so as to achieve the purpose of the Act. The aim of the analysis in this section of the report is to evaluate whether and/or to what extent Plan Change 14 meets the applicable statutory requirements, including the Plan objectives. The relevant higher order documents and their directions are outlined in section 2.1 of this report. Plan Change 14 has been prepared to give effect to the requirements arising from the implementation of the MDRS and the National Policy Statement for Urban Development.

5.2 Evaluation of options to address issues

5.2.1 The residential component of Plan Change 14 seeks to address four issues, as identified in section 2.2 above. The following tables provide an evaluation of the options, costs, and benefits for each of these issues, highlighting the preferred option to address the issue in the most efficient and effective manner.

Issue 1 – General application of MDRS District Plan framework

The integration of MDRS within the existing District Plan needs to ensure that MDRS controls are readily able to be utilised. This needs to be done in a manner where relevant policies of the NPS-UD are also given effect to and existing elements of the District Plan do not restrict their use or function.

Simply inserting Schedule 3A within the current framework is not considered an option. Notwithstanding the complexity of duplicating these standards across the seven residential chapters that make up the Christchurch residential urban environment, Schedule 3A lends itself to a full or partial integration of national planning standards through Clause 1(3) of the schedule. As per s77G, MDRS must apply to all ‘relevant residential zones’ which is defined in s2 of the Act as:

(a) means all residential zones; but

(b) does not include—

(i) a large lot residential zone:

(ii) an area predominantly urban in character that the 2018 census recorded as having a resident population of less than 5,000, unless a local authority intends the area to become part of an urban environment:

(iii) an offshore island:

(iv) to avoid doubt, a settlement zone

Section 2 of the Act also defines “residential zone” as “*means all residential zones listed and described in standard 8 (zone framework standard) of the national planning standard or an equivalent zone*”.

The earlier assessment in this evaluation has demonstrated that this applies to all residential zones captured in Chapter 14 of the Plan, excluding Residential Banks Peninsula Zone (save for Lyttelton area), Residential Small Settlement Zone, Residential Guest Accommodation, and Residential Large Lot Zone.

<p>Option 1 - Status Quo (MDRS), with modification of zone structure to align with National Planning Standards (being MRZ) across all relevant residential zones</p>	<p>Option 2: Applying MDRS to two new zones, MRZ and HRZ, responding to centres approach of NPS-UD and applying restricted discretionary rule framework (preferred option)</p>
<p>Benefits:</p> <ul style="list-style-type: none"> • MRZ framework best aligns with MDRS controls, objectives, and policies • Significant degree of housing is further enabled across urban residential areas. <p>Costs:</p> <ul style="list-style-type: none"> • Over-simplification of rule framework is likely to miss several additional controls needed to manage development in the residential environment. This includes those matters contained in s80E of the Act that can be inserted as part of the IPI. • There is no consideration of breaches beyond the development standards contained within Schedule 3A, i.e. only permitted activities are provided for with no clear pathway for breaches. • The zone framework does not consider Policy 3 intensification under the NPS-UD, which anticipates a built environment distinct from MRZ outcomes. <p>Efficiency:</p> <ul style="list-style-type: none"> • The permitted standards that are legislatively directed are inserted in a framework that also considers Clause 1(3) of Schedule 3A, being an efficient solution. However, it is inefficient at responding to breaches of permitted standards, related residential provisions, or the intensification direction of the NPS-UD. • This would greatly add to the complexity of the rule framework, since ‘at least six storey’ areas would not be spatially defined by the zone. 	<p>Benefits:</p> <ul style="list-style-type: none"> • Alignment with National Planning Standards descriptions for zone outcomes. • Rules are better able to respond to the intended intensification outcomes of MDRS and the NPS-UD through the methods prescribed. • A full framework increases the ease of consenting, increasing the propensity of uptake. • Related residential provisions are inserted to better respond to residential requirements and features. <p>Costs:</p> <ul style="list-style-type: none"> • Some complexity with localised nuance for zoning, however this is still considered simpler than the current spread of residential zones in the Plan. • Some additional controls inserted as a result of related provisions being inserted. <p>Efficiency:</p> <ul style="list-style-type: none"> • Providing a full framework means that the efficiency of consenting is improved, with a clear cascade of rules for non-compliances. • Using the National Planning Standards zone framework means that efficiencies are gained for developments across territorial boundaries through consistency in approach. <p>Effectiveness:</p>

Option 1 - Status Quo (MDRS), with modification of zone structure to align with National Planning Standards (being MRZ) across all relevant residential zones	Option 2: Applying MDRS to two new zones, MRZ and HRZ, responding to centres approach of NPS-UD and applying restricted discretionary rule framework (preferred option)
<ul style="list-style-type: none"> Adapting to the National Planning Standards zone framework means that efficiencies are gained for developments across territorial boundaries through consistency in approach. <p>Effectiveness:</p> <ul style="list-style-type: none"> Ease for plan users to understand where MDRS would apply upon notification of IPI. The approach would not be an effective means to address the application of a full MDRS framework, including breaches of standards. Additional intensification as directed by the NPS-UD would not be well captured within a MRZ zone and would set false expectations for plan users. <p>Risk of acting, not acting:</p> <ul style="list-style-type: none"> Acting this way would mean that additional intensification methods would be poorly captured within the zone framework. Intensification opportunities may not be realised. <p>Recommendation:</p> <ul style="list-style-type: none"> This option is not recommended as it is ineffective at addressing the issue of suitably adapting the Plan to apply MDRS and the NPS-UD. 	<ul style="list-style-type: none"> Having a bespoke framework that is expressed spatially means that the provisions are more effective at addressing area-specific intended outcomes. A more logical framework of defining areas for medium and higher densities is also likely to improve understanding of the framework and result in greater uptake of intensification opportunities. <p>Risk of acting, not acting:</p> <ul style="list-style-type: none"> Not acting is likely to result in greater complexity and a lack of adoption to the intended urban form. <p>Recommendation:</p> <ul style="list-style-type: none"> This option is considered to be the most efficient and effective at addressing the issue of applying the MDRS framework and NPS-UD.

Issue 2 – Central city residential intensification response (Policy 3(c) NPS-UD)

This issue addresses how to give effect to Policy 3(c) of the NPS-UD and to enable the most appropriate heights within a suitable walking catchment. Policy 3(c) of the NPS-UD states:

In relation to tier 1 urban environments, regional policy statements and district plans enable: building heights of at least 6 storeys within at least a walkable catchment of the following:

- (iv) existing and planned rapid transit stops*
- (v) the edge of city centre zones*
- (vi) the edge of metropolitan centre zones; and [to (d)]*

Previous reporting¹³ has concluded that rapid transport stops and metropolitan centres are not applicable to the Christchurch context and are not further considered here. This means that only the distance from the city centre zone is of relevance.

While Policy 3(c) is highly directive, this is not considered part of the ‘status quo’ as MDRS is. Applying the objectives and policies of the NPS-UD presents a different legislative scenario; provisions are not inserted into the District Plan. Council must instead change its District Plan “in accordance with” (s74(1)), and to “give effect to” policy 3 (s77G(2)). They are directive policies, but there are judgements required by Council on how to implement its direction.

The application of the policy is therefore an issue with consideration needed for what is the appropriate intensification response within the Christchurch context. Factors that influence this are dominated by:

- A. the accessibility of services, employment, and multi-modal transport (both current and planned) surrounding the city centre;
- B. the propensity to walk in a given urban environment;
- C. demand for housing in the area surrounding the city centre;
- D. the urban form outcomes to help deliver a well-functioning urban environment.

For A, important factors to consider are: the continuous rebuild efforts within the central city, including the influence of substantial anchor projects; the significance of the city centre and its surrounds as a focal point for both employment and multi-modal transport; and the degree by which development will be further enabled within the city centre through giving effect to Policy 3(a).

¹³ See commercial centres assessment reports and the commercial section of the s32.

For B, consideration needs to be given to the serviceability of the active transport routes; connectivity across city blocks and to other public transport corridors; local interest in active transport modes; accessibility; and integration of public open space areas.

For C, an appreciation for population projection at a local level is needed; the degree to which viable development opportunities exist; and how an intensification response can best respond to such housing demand within a specified catchment.

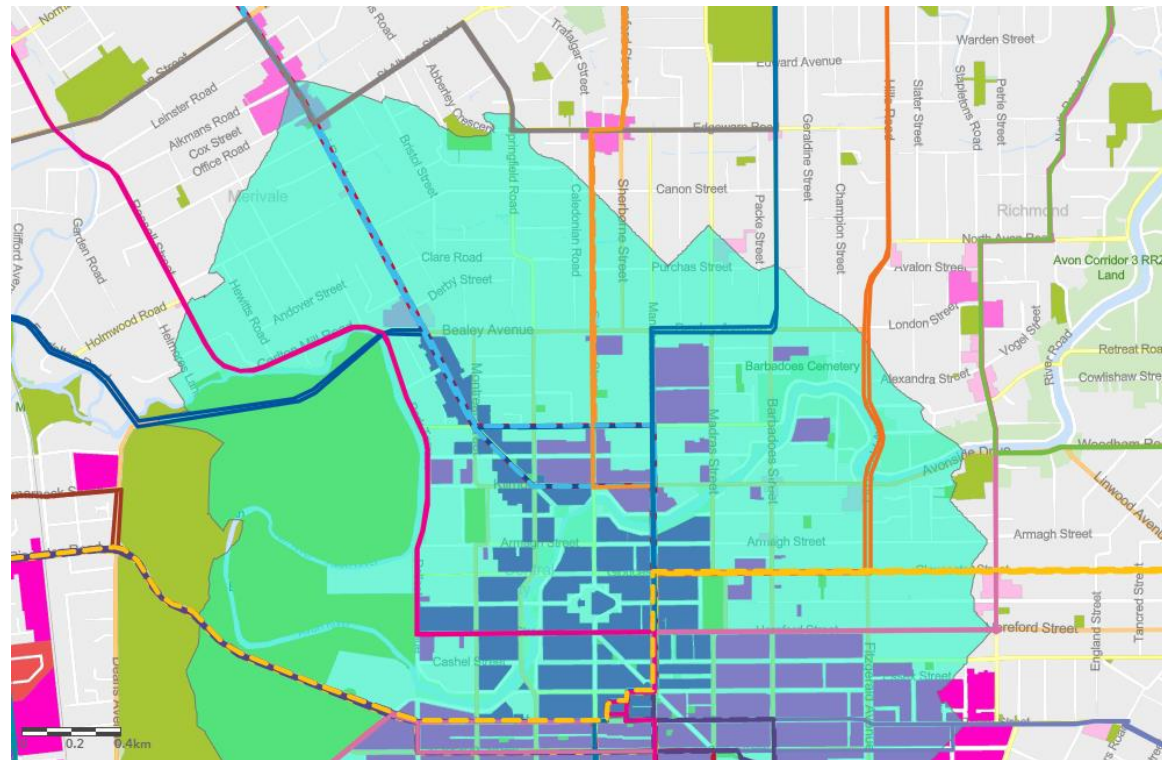
For D, consideration needs to be given to the spatial relationship between walking catchments and existing urban form layout; how it enhances (or otherwise) connectivity of services and amenities; consolidation of urban form to achieve coherence; and responses to surrounding environmental features.

In terms of defining an extent, guidance material on Policy 3(c) implementation from both Ministry for the Environment¹⁴ and Waka Kotahi¹⁵ state that 800m should be taken as a minimum for Tier 1 Councils. For larger centres, the walkable catchment should expand beyond this with consideration of other factors that could necessitate a greater walking catchment, as detailed above.

Walking propensity in Aotearoa New Zealand has been estimated to be up to 18.2 minutes (or about 1.5km) to local amenities, increasing in distance based on the mode of active transport, up to 4.9km. Amenities that attract the highest propensity in Christchurch were considered to be local shops and services, public open space, and public transport stops. There is a strong correlation between a walking catchment of 1.2km and the density of bus routes, with a strong concentration of both commercial activity and open space within the central city, the latter being exemplified by Hagley Park and the Avon River Precinct/Te Papa Ōtākaro that bisects the central city (see below).

¹⁴ Ministry for the Environment, 2020. Understanding and implementing intensification provisions for the National Policy Statement on Urban Development. ISBN: 978-1-99-003313-1

¹⁵ Waka Kotahi, 2021. Aotearoa Urban Street Planning & Design Guide: He Whenua, He Tangata. ISBN 978-1-99-004434-2



Bus routes and walking catchment: lines representing bus routes, dark blue is CCZ, and shaded blue area showing 1.2km walking catchment from CCZ, including other commercial zones.

Height has been considered alongside the other objectives and policies of the NPS-UD that influence an intensification response:

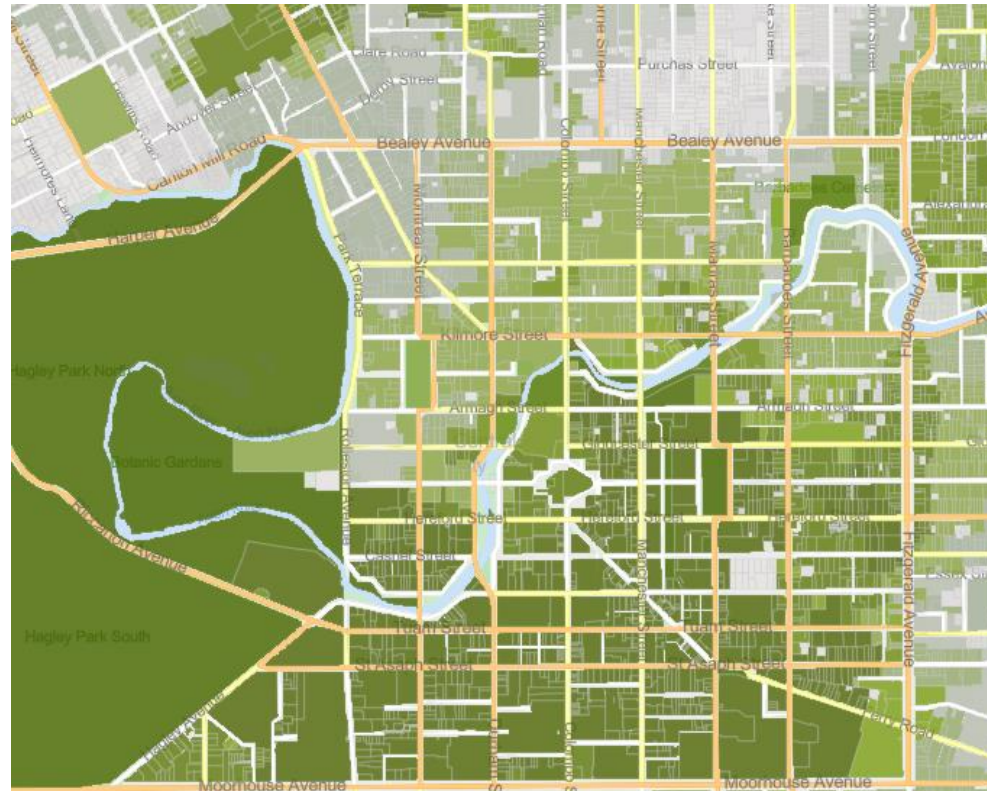
- Objective 1 – a well-functioning urban environment
- Objective 3 – Proximity to employment, public transport; housing demand
- Policy 1(c) - *good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport*
- Policy 2 – providing for sufficient housing
- Policy 3(c) – heights of at least six storeys within at least a walkable catchment

Policy 3(c), the subject of this assessment, directs that district plans enable, at minimum, six storey developments within at least a walkable catchment (which, using Ministry of the Environment's and Waka Kotahi's guidance, is considered 800m) of the edge of the city centre zone. The use of 'at least' also contemplates that this baseline level of development could be expanded upon when achieving the overall direction of the NPS-UD.

Council has completed work to capture accessibility to local services, employment, and transport at a parcel level across the urban environment and used that information from the model to derive the appropriate number of storeys within a walkable catchment of the CCZ. Put simply, this has taken a scoring for accessibility within an area to derive the number of storeys, with six storeys representing the baseline (or zero) score, and an increase in the number of storeys as a response to the scoring of accessibility as a percentage. This approach has a natural limit, as 100% of the score - meaning, the highest rating for the modelled accessibility - would equate to 12 storeys of development. It highlights that this cannot happen in isolation and consideration of other factors is required, such as housing demand and urban form.

BASELINE (Storeys)	Score as percentage	Multiplier	Theoretical building height (storeys)
6	10%	1.1	6.6
6	20%	1.2	7.2
6	30%	1.3	7.8
6	40%	1.4	8.4
6	50%	1.5	9
6	60%	1.6	9.6
6	70%	1.7	10.2
6	80%	1.8	10.8
6	90%	1.9	11.4
6	100%	2	12

Evaluating the 2,133 residential parcels within a 1.2km walking catchment surrounding the CCZ produces an average accessibility score of 50.1%, which when calculated against the 6 storey baseline, suggests a 9 storey height limit (based on row 5 of the table above). It is worth noting that this assessment only evaluates current levels of accessibility, and with further development as well as further investment in public transport, one can anticipate the degree of accessibility to increase over time. Average scoring largely remains the same when focusing on 800m surrounding CCZ (433 residential parcels), being at 51%, a small increase in average accessibility.



Accessibility scoring in central city: darker sites represent those with greatest accessibility

In terms of demand, estimated population growth across Christchurch for the next 30 years shows that Central Christchurch has a high proportion of growth with almost 30% as per the table below. That is the single highest area of growth in Christchurch, and provides support for the increased height above the baseline.

Lastly, consideration must be given to how this intensification response would align with the current and future urban form. As noted earlier, the increasing development opportunities within the central city zone (as directed by Policy 3(a)) are likely to promote greater degrees of intensification and height.

Area	Summed Statistical Area (SA2) areas	Proportion of total growth
Christchurch Central	Christchurch Central-East; Christchurch Central-North; Christchurch Central-West; Christchurch Central-South.	28.5%
Southern Greenfields	Halswell West; Kennedys Bush; Halswell North.	12.1%
Northern Greenfields	Marshlands; Prestons; Regents Park.	10.0%

The concentration of services within the central city zone, and the likelihood of greater intensification within this zone, suggest that a proportionate response for the surrounding residential area is appropriate.

While the translation of accessibility scoring adopted a simplistic translation of score to number of storeys, that output supports these factors of housing demand and the concentration of increased development within the central city. The latter factors indicate that an increase in height beyond 9 storeys (the average score described above) is warranted.

In relation to the options provided below, refer to the appended spatial overview of different walking catchments.

<p>Option 1 – Applying the minimum direction from the NPS-UD, enabling six storey development within 800m from the city centre</p>	<p>Option 2 – Increasing walking catchment to 1.8km, with six storeys enabled throughout and 10 storeys within the first 800m from CCZ</p>	<p>Option 3 – Increasing walking catchment to 1.2km, with six storeys enabled throughout and 10 storeys within the central city boundary and surrounding top end of Victoria Street</p>	<p>Option 4 – Increasing walking catchment to 1.2km, with six storeys enabled throughout (increasing extent based on accessibility and form), with 10 storeys only enabled in a concentrated form around the CCZ (Preferred option)</p>
<p>Benefits:</p> <ul style="list-style-type: none"> • Large degree of additional capacity is enabled, improving housing choice and conditions to improve affordability. • Additional housing is provided in close proximity to the city centre. • Would capture almost all of the current Residential Central City zone, building upon areas where intensified residential living is expected. • Housing would be provided within an easily walkable environment, both in terms of propensity and walkable environment. This could have positive flow-on effects in 	<p>Benefits:</p> <ul style="list-style-type: none"> • Significant degree of additional capacity is enabled, improving housing choice and conditions to improve affordability. • Providing 10 storeys in proximity to CCZ shows a strong response to the significance of the Christchurch CCZ area as a focal point (both currently and planned) for employment, the centre of public transport connectivity, accessibility to public open space and active transport. The Christchurch CCZ can be seen as a focal point of commerce and employment at a South Island scale. 	<p>Benefits:</p> <ul style="list-style-type: none"> • Significant degree of additional capacity is enabled, improving housing choice and conditions to improve affordability. • A catchment of 1.2km (about 15 minute walking distance) aligns well with walking propensity of 1.5km, better ensuring the chances of uptake within this area. • Providing 10 storeys in proximity to CCZ shows a strong response to the significance of the Christchurch CCZ area as a focal point (both currently and planned) for employment, the centre of public transport connectivity, 	<p>Benefits:</p> <ul style="list-style-type: none"> • Significant degree of additional capacity is enabled, improving housing choice and conditions to improve affordability. • A catchment of 1.2km (about 15 minute walking distance) aligns well with walking propensity of 1.5km, better ensuring the chances of uptake within this area. Furthermore, this is only used as an input for considering where six storey areas should extend to: the periphery should be adapted to the local context in terms of established urban form and accessibility. This means that the intensification extent is

<p>Option 1 – Applying the minimum direction from the NPS-UD, enabling six storey development within 800m from the city centre</p>	<p>Option 2 – Increasing walking catchment to 1.8km, with six storeys enabled throughout and 10 storeys within the first 800m from CCZ</p>	<p>Option 3 – Increasing walking catchment to 1.2km, with six storeys enabled throughout and 10 storeys within the central city boundary and surrounding top end of Victoria Street</p>	<p>Option 4 – Increasing walking catchment to 1.2km, with six storeys enabled throughout (increasing extent based on accessibility and form), with 10 storeys only enabled in a concentrated form around the CCZ (Preferred option)</p>
<p>terms of reduced private vehicle use, reducing emissions, and improving climate resilience. Having more people at the street level also improves public safety, surveillance, social connection, and the potential for social capital within neighbourhoods.</p> <p>Costs:</p> <ul style="list-style-type: none"> • The transitional effects of developing to this form are likely for a longer period as established sites become feasible to be developed and those which are developed are alongside established (lower density) sites. The flow-on consequences of this could be inconsistent and dislocated urban form. • An increase in building height is likely to result in reduced sunlight access, privacy, 	<ul style="list-style-type: none"> • 10 storey areas will be provided within an easily walkable catchment and is strongly correlated to the location of public and active transport corridors. This could have positive flow-on effects in terms of reduced private vehicle use, reducing emissions, and improving climate resilience. Having more people at the street level also improves public safety, surveillance, social connection, and the potential for social capital within neighbourhoods. • Providing a height of 10 storeys means there is a stronger chance that development opportunities will be taken up. Reporting by The Property Group shows that only at 10 storeys does development return a profit. Although this is 	<p>accessibility to public open space and active transport. The Christchurch CCZ can be seen as a focal point of commerce and employment at a South Island scale.</p> <ul style="list-style-type: none"> • 10 storey areas will be provided within an easily walkable catchment that are well-connected to public and active transport corridors. This could have positive flow-on effects in terms of reduced private vehicle use, reducing emissions, and improving climate resilience. Having more people at the street level also improves public safety, surveillance, social connection, and the potential for social capital within neighbourhoods. • The areas identified for 10 storeys under this option correlates well to areas of 	<p>extended to nearby edges of main roads, nearby commercial areas, and areas with strong access to public open space and active transport (such as around Hagley Park). Lastly, the extent is also better integrated with areas identified for higher densities within a walkable catchment of local centres, being Merivale, Riccarton, and Sydenham.</p> <ul style="list-style-type: none"> • Providing 10 storeys in proximity to CCZ shows a strong response to the significance of the Christchurch CCZ area as a focal point (both currently and planned) for employment, the centre of public transport connectivity, accessibility to public open space and active transport. The Christchurch CCZ can be seen

<p>Option 1 – Applying the minimum direction from the NPS-UD, enabling six storey development within 800m from the city centre</p>	<p>Option 2 – Increasing walking catchment to 1.8km, with six storeys enabled throughout and 10 storeys within the first 800m from CCZ</p>	<p>Option 3 – Increasing walking catchment to 1.2km, with six storeys enabled throughout and 10 storeys within the central city boundary and surrounding top end of Victoria Street</p>	<p>Option 4 – Increasing walking catchment to 1.2km, with six storeys enabled throughout (increasing extent based on accessibility and form), with 10 storeys only enabled in a concentrated form around the CCZ (Preferred option)</p>
<p>overshadowing, and building dominance.</p> <ul style="list-style-type: none"> • A walkable catchment of 800m is considered to be a minimum approach. This scale does not adequately consider significance of the Christchurch CCZ area as a focal point (both currently and planned) for employment, the centre of public transport connectivity, accessibility to public open space and active transport. The Christchurch CCZ can be seen as a focal point of commerce and employment at a South Island scale. • This does not provide a proportionate response to population growth. The central city is modelled to account for over a quarter of all population growth in the district for the next 30 years, and requires a 	<p>below the commercial viable threshold of 20% profit, it is considered that much of this is due to current market conditions (building supply shortages, labour shortages, uncertainty in costings, inflation), which are temporary in nature.</p> <ul style="list-style-type: none"> • This option is a better response in urban form relative to building heights of 60m and 90m enabled in CCZ by providing a distinction of the central city from its surrounds and reducing the interface issues otherwise present at six storeys. • Provides for a strong response to projected population projection within the central city. • The catchment represents a good physical walking 	<p>intensification zoned RCC, aligning spatially with where higher density residential intensification areas are expected. This may achieve a consistent and higher density form of living.</p> <ul style="list-style-type: none"> • Providing a height of 10 storeys means there is a stronger chance that development opportunities will be taken up. Reporting by The Property Group shows that only at 10 storeys does development return a profit. Although this is below the commercial viable threshold of 20% profit, it is considered that much of this is due to current market conditions (building supply shortages, labour shortages, uncertainty in costings, inflation), which are temporary in nature. 	<p>as a focal point of commerce and employment at a South Island scale.</p> <ul style="list-style-type: none"> • The location of 10 storey areas reflects a symbiotic relationship between the adjoining CCZ and the residential environment. Interface issues between the two zones are better addressed through a more comparable height differential (representing a proportionally better response to building heights of 45m and 90m enabled in CCZ). Also, the extent of the area defined for 10 storeys can act as a contributor to the viability and vitality of the CCZ, rather than competing against opportunities provided within the CCZ. At this scale the

<p>Option 1 – Applying the minimum direction from the NPS-UD, enabling six storey development within 800m from the city centre</p>	<p>Option 2 – Increasing walking catchment to 1.8km, with six storeys enabled throughout and 10 storeys within the first 800m from CCZ</p>	<p>Option 3 – Increasing walking catchment to 1.2km, with six storeys enabled throughout and 10 storeys within the central city boundary and surrounding top end of Victoria Street</p>	<p>Option 4 – Increasing walking catchment to 1.2km, with six storeys enabled throughout (increasing extent based on accessibility and form), with 10 storeys only enabled in a concentrated form around the CCZ (Preferred option)</p>
<p>proportionate response to support further investment and development within the centre.</p> <ul style="list-style-type: none"> While under the Plan, building heights within the Commercial Central City Business Zone are enabled to 28m (about nine storeys), the direction through Policy 3(a) of the NPS-UD means this is likely to substantially increase. The proposal through Plan Change 14 is for heights within CCZ (equivalent zone) to increase to 90m for much of the centre, with sites in the Cathedral Square surrounds and Victoria Street at 45m. It is considered that a 20m height control adequately provides for six storey residential development. As a contrast to proposed CCZ heights, this 	<p>environment, being mostly flat and even grade, with good physical infrastructure.</p> <p>Costs:</p> <ul style="list-style-type: none"> Increasing height further increases sunlight access issues, dominance, overshadowing, and privacy. The height is also considered to be at the limits of human scale, diminishing the residential appeal and characteristics of these areas. Providing 10 storeys in the first 800m from the CCZ does not suitably respond to local context and accessibility. This would extend into suburban areas north of Bealey Avenue, representing a significant change and contrast to the existing environment. Bealey Ave is also a strong contributor to severance, with the 	<ul style="list-style-type: none"> This option is a better response in urban form relative to building heights of 60m and 90m enabled in CCZ by providing a distinction of the central city from its surrounds and reducing the interface issues otherwise present at six storeys. Provides for a strong response to projected population projection within the central city. The catchment represents a good walkable physical environment, being mostly flat and even grade, with good physical infrastructure. <p>Costs:</p> <ul style="list-style-type: none"> Increasing height further increases sunlight access issues, dominance, overshadowing, and privacy. 	<p>impact on the CCZ is not significant.</p> <ul style="list-style-type: none"> Providing for an area up to 10 storeys means there is a stronger chance that development opportunities will be taken up. Reporting by The Property Group shows that only at 10 storeys does development return a profit. Although this is below the commercial viable threshold of 20% profit, it is considered that much of this is due to current market conditions (building supply shortages, labour shortages, uncertainty in costings, inflation), which are temporary in nature. Provides for a strong response to projected population projection within the central city.

<p>Option 1 – Applying the minimum direction from the NPS-UD, enabling six storey development within 800m from the city centre</p>	<p>Option 2 – Increasing walking catchment to 1.8km, with six storeys enabled throughout and 10 storeys within the first 800m from CCZ</p>	<p>Option 3 – Increasing walking catchment to 1.2km, with six storeys enabled throughout and 10 storeys within the central city boundary and surrounding top end of Victoria Street</p>	<p>Option 4 – Increasing walking catchment to 1.2km, with six storeys enabled throughout (increasing extent based on accessibility and form), with 10 storeys only enabled in a concentrated form around the CCZ (Preferred option)</p>
<p>represents a proportionately smaller response (between about a fifth to a half), diminishing the potential for a distinguishable transition from the core. At the interface of the boundary, the adverse effects of dominance, overshadowing, and loss of privacy would be exacerbated when developments are built to their full potential.</p> <p>Efficiency:</p> <ul style="list-style-type: none"> • A height limit of six storeys reduces the amount of new development that may occur relative to what may be enabled by other options, reducing the efficiency of being able to provide for greater housing choice and variety. This means that many of the intended outcomes of Policy 1 	<p>potential to diminish the propensity to walk from north of Bealey Ave. This could result in sporadic development opportunities being taken up, reducing the cohesion with other 10 storey areas.</p> <ul style="list-style-type: none"> • Economic analysis by Property Economics of development scenarios surrounding the central city has demonstrated that economic investment and development within the CCZ is sensitive and there could be an adverse impact on the CCZ, of opportunities for development being taken up outside the CCZ. • The walking catchment is beyond the boundary of average walking propensity (1.5km). This means that there is potential for uptake at the fringes of the catchment to be 	<p>The height is also considered to be at the limits of human scale, diminishing the residential appeal and characteristics of these areas.</p> <ul style="list-style-type: none"> • Economic analysis by Property Economics of development scenarios surrounding the central city has demonstrated that economic investment and development within the CCZ is sensitive and there could be an adverse impact on the CCZ, of opportunities for development being taken up outside the CCZ. • The location of 10 storey areas does not adapt well to areas of lower accessibility, increasing the chances of inconsistent development uptake. • The transitional effects of developing to this form are likely for a longer period as 	<ul style="list-style-type: none"> • The catchment represents a good physical walking environment, being mostly flat and even grade, with good physical infrastructure. <p>Costs:</p> <ul style="list-style-type: none"> • Increasing height further increases sunlight access, dominance, overshadowing, and privacy. The height is also considered to be at the limits of human scale, diminishing the residential appeal and characteristics of these areas. • The transitional effects of developing to this form are likely for a longer period as established sites become feasible to be developed and those who do develop do so alongside established (lower density) sites. The flow-on consequences of this could

<p>Option 1 – Applying the minimum direction from the NPS-UD, enabling six storey development within 800m from the city centre</p>	<p>Option 2 – Increasing walking catchment to 1.8km, with six storeys enabled throughout and 10 storeys within the first 800m from CCZ</p>	<p>Option 3 – Increasing walking catchment to 1.2km, with six storeys enabled throughout and 10 storeys within the central city boundary and surrounding top end of Victoria Street</p>	<p>Option 4 – Increasing walking catchment to 1.2km, with six storeys enabled throughout (increasing extent based on accessibility and form), with 10 storeys only enabled in a concentrated form around the CCZ (Preferred option)</p>
<p>of the NPS-UD are unlikely to be met.</p> <p>Effectiveness:</p> <ul style="list-style-type: none"> • Much of the RCC area is established and this means that there needs to be a worthwhile opportunity to redevelop with new provisions to see uplift. This can be measured in the relative difference between what is enabled in some areas (3 - 4 storey development) and the six storey development this option would provide for. The relative difference is not a sufficient incentive to redevelop, reducing the overall effectiveness of the option. • Economic feasibility reporting from The Property Group demonstrates that the scale of six storeys residential development is unlikely to 	<p>sporadic, further increasing localised issues of sunlight access, dominance, overshadowing, and privacy. The walking catchment is therefore considered as a poor singular input to considering areas for intensification.</p> <ul style="list-style-type: none"> • The location of 10 storey areas is not consistent with the lower levels of accessibility, increasing the chances of inconsistent development uptake. • The transitional effects of developing to this form are likely for a longer period as established sites become feasible to be developed and those who do develop do so alongside established (lower density) sites. The flow-on consequences of this could 	<p>established sites become feasible to be developed and those who do develop do so alongside established (lower density) sites. The flow-on consequences of this could produce an inconsistent and dislocated urban form.</p> <p>Efficiency:</p> <ul style="list-style-type: none"> • A wider degree of enablement increases efficiency of delivery through provision of a larger number of opportunities, however this expanse of intensification could result in some dislocation of communities through sporadic uptake and enablement in areas with lower levels of current accessibility. <p>Effectiveness:</p>	<p>lead to an inconsistent and dislocated urban form.</p> <p>Efficiency:</p> <ul style="list-style-type: none"> • Concentrating development in areas with the greatest degree of accessibility to services is likely to increase uptake in housing development opportunities. Areas beyond this are still proposed to have greater heights enabled as a result of being within a walkable catchment, meaning there still remains a high degree of housing enablement. • Greater concentration also means there is greater potential for a more distinguishable transition from the CCZ that helps to identify and respond to the CCZ. <p>Effectiveness:</p>

<p>Option 1 – Applying the minimum direction from the NPS-UD, enabling six storey development within 800m from the city centre</p>	<p>Option 2 – Increasing walking catchment to 1.8km, with six storeys enabled throughout and 10 storeys within the first 800m from CCZ</p>	<p>Option 3 – Increasing walking catchment to 1.2km, with six storeys enabled throughout and 10 storeys within the central city boundary and surrounding top end of Victoria Street</p>	<p>Option 4 – Increasing walking catchment to 1.2km, with six storeys enabled throughout (increasing extent based on accessibility and form), with 10 storeys only enabled in a concentrated form around the CCZ (Preferred option)</p>
<p>cover the cost of development, meaning such development is unlikely to progress in the short to medium term. Site amalgamation is necessary to adequately develop at scale, therefore the level of enablement needs to be proportionate to the costs of land investment to make such development viable.</p> <p>Risk of acting, not acting:</p> <ul style="list-style-type: none"> Acting this way may mean that only few development opportunities are realised, leading to an ad hoc urban form with isolated areas of intensification. <p>Recommendation:</p> <ul style="list-style-type: none"> This option is not recommended as it fails to provide for an intensification 	<p>lead to an inconsistent and dislocated urban form.</p> <p>Efficiency:</p> <ul style="list-style-type: none"> The spatial extent of 10 storeys is a blunt response, with little to no consideration of local accessibility to services. The degree of accessibility is not considered uniform throughout this area, reducing the efficiency of this approach. A static walkable 1.8km catchment also fails to respond to areas of greater accessibility, reducing the efficiency of development through development in areas with lower accessibility. A wider degree of enablement increases efficiency of delivery through a large degree of opportunities, however this expanse of intensification 	<ul style="list-style-type: none"> Intensification areas align well to areas of good to high accessibility, public and active transport corridors (including planned), however the enablement of housing across a larger area may reduce the effectiveness of business outcomes associated with a high concentration of population around business. <p>Risk of acting, not acting:</p> <ul style="list-style-type: none"> Potential for transition benefits to be diminished and for continued reduced viability of CCZ. Not acting may mean lesser options for housing, but increased vitality of CCZ. There is a risk that housing intensification is unequal and irregular across development extent. 	<ul style="list-style-type: none"> Intensifying in the most viable areas is likely to see tangible housing outcomes that both respond to accessibility and housing demand, and reduce the potential for adverse effects on business outcomes within the CCZ. Concentrating development of 10 storeys adjacent to the CCZ means greater market exposure for businesses with an increased populous in close proximity to city centre businesses. <p>Risk of acting, not acting:</p> <ul style="list-style-type: none"> Some degree of enablement beyond 6 storeys around the CBD may reduce economic viability of CBD recovery. Potential that current parcel fragmentation and form reduces chances of

<p>Option 1 – Applying the minimum direction from the NPS-UD, enabling six storey development within 800m from the city centre</p>	<p>Option 2 – Increasing walking catchment to 1.8km, with six storeys enabled throughout and 10 storeys within the first 800m from CCZ</p>	<p>Option 3 – Increasing walking catchment to 1.2km, with six storeys enabled throughout and 10 storeys within the central city boundary and surrounding top end of Victoria Street</p>	<p>Option 4 – Increasing walking catchment to 1.2km, with six storeys enabled throughout (increasing extent based on accessibility and form), with 10 storeys only enabled in a concentrated form around the CCZ (Preferred option)</p>
<p>response that reflects the significance of the Christchurch CCZ, levels of current and planning accessibility, or anticipated housing demand. This does not adequately respond to the intensification direction of the NPS-UD.</p>	<p>could result in greater dislocation of communities through sporadic uptake and enablement in areas with lower levels of current accessibility.</p> <p>Effectiveness:</p> <ul style="list-style-type: none"> • Responds well to intensifying in areas with good to high degree of accessibility, public and active transport corridors (including planned), however the enablement of housing across a larger area may reduce the effectiveness of business outcomes associated with a high concentration of population around business. <p>Risk of acting, not acting:</p> <ul style="list-style-type: none"> • Potential for transition benefits to be diminished and for 	<ul style="list-style-type: none"> • Some degree of enablement beyond 6 storeys around the CBD may reduce economic viability of CBD recovery. Potential that current parcel fragmentation and form reduces chances of intensification coming to fruition. <p>Recommendation:</p> <ul style="list-style-type: none"> • This option provides for a level of intensification that does not respond to local context, degrees of current or planned accessibility, or the sensitivity of commercial development in the CCZ, and is therefore not recommended. 	<p>intensification coming to fruition.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> • This option is recommended as it provides for a level of development that responds to the significance of the Christchurch CCZ at a scale that is supportive of the centre, and responds to current and future degrees of accessibility. This is seen to be the most appropriate means to address the intensification direction of the NPS-UD, having regard to the range of factors including urban form, accessibility, demand while having regard to the effect on the CCZ.

<p>Option 1 – Applying the minimum direction from the NPS-UD, enabling six storey development within 800m from the city centre</p>	<p>Option 2 – Increasing walking catchment to 1.8km, with six storeys enabled throughout and 10 storeys within the first 800m from CCZ</p>	<p>Option 3 – Increasing walking catchment to 1.2km, with six storeys enabled throughout and 10 storeys within the central city boundary and surrounding top end of Victoria Street</p>	<p>Option 4 – Increasing walking catchment to 1.2km, with six storeys enabled throughout (increasing extent based on accessibility and form), with 10 storeys only enabled in a concentrated form around the CCZ (Preferred option)</p>
	<p>continued reduced viability of CCZ.</p> <ul style="list-style-type: none"> • Not acting may mean lesser options for housing, but increased vitality of CCZ. There is a risk that housing intensification is unequal and irregular across the development extent, causing sporadic uptake of development and a poorly functioning urban form. • Some degree of enablement beyond 6 storeys around the CBD may reduce economic viability of the CBD's recovery. Potential that current parcel fragmentation and form reduces chances of intensification coming to fruition. • It result in an ad hoc uptake of high density housing in the HRZ, reducing outcomes 		

<p>Option 1 – Applying the minimum direction from the NPS-UD, enabling six storey development within 800m from the city centre</p>	<p>Option 2 – Increasing walking catchment to 1.8km, with six storeys enabled throughout and 10 storeys within the first 800m from CCZ</p>	<p>Option 3 – Increasing walking catchment to 1.2km, with six storeys enabled throughout and 10 storeys within the central city boundary and surrounding top end of Victoria Street</p>	<p>Option 4 – Increasing walking catchment to 1.2km, with six storeys enabled throughout (increasing extent based on accessibility and form), with 10 storeys only enabled in a concentrated form around the CCZ (Preferred option)</p>
	<p>intended through Policy 1 of the NPS-UD.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> • This option provides for a level of intensification that does not respond to local context, degrees of current or planned accessibility, or the sensitivity of commercial development in CCZ, and is therefore not recommended. 		

Issue 3 – Policy 3(d) – Suburban Centres residential response (Policy 3(d) of NPS-UD)

This issue addresses how areas adjacent to centres described in Policy 3(d) of the NPS-UD should be managed. Policy 3(d) states:

In relation to tier 1 urban environments, regional policy statements and district plans enable:

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

Note that the Centres chapter will cover off the extent and height component of the Policy 3(d) response.

This requires consideration of the extent to which an intensification response is provided. The two concepts that need to be addressed are:

- A. The distance that 'adjacent to' implies;
- B. The height and density enabled around various centres.

Case law¹⁶ indicates that the phrase "adjacent to" may be extended beyond meaning places adjoining other places, to include places close to or near other places.

The degree and distance of any intensification should be seen as an interrelated concept: both the scale of any intensification and its distance from the applicable centres should increase based on a commensurate response to the level of commercial activities or community services which is plan-enabled in a centre. This means that both current and planned services and facilities must be considered. The application at a parcel level should be seen through a similar policy lens as the considerations under Policy 3(c), taking into account the local urban form, walkability, and achievement of a well-functioning urban environment.

Accessibility and proximity are key concepts through the NPS-UD, with a strong correlation to walkability. Policy 3(c) is specific in referring to walkable catchments from the city centre and metropolitan centres (Policy 3(c)), with accessibility a key element to achieve well-functioning urban environments under Policy 1 of the NPS-UD. While not a Policy 3(d) requirement, we use the concept of 'walkable catchments' as a helpful reference for considering the scale of appropriate intensification responses for the various centres required under Policy 3(d).

¹⁶ *Allen v Auckland City* (Planning Tribunal 3/5/1991); *Bisson & Ors v Queenstown Lakes District Council* (EnvC Christchurch 4 April 2003).

A centre evaluation has been completed as part of the commercial centres analysis and is not reiterated here (see section 3.1.2 of this report). It has translated the current centre hierarchy to equivalent planning standards definitions. In doing so, it has been concluded that there is still gradation in centre types, having regard to the level of commercial activity and community services as follows:

1. Neighbourhood Centres – no commensurate response warranted;
2. 'Smaller' Local Centres - no commensurate response warranted;
3. 'Medium' Local Centres – a small degree of intensification surrounding centres is warranted;
4. 'Larger' Local Centres – a moderate degree of intensification surrounding centres is warranted;
5. 'Standard' Town Centres – a moderate degree of intensification surrounding centres is warranted;
6. 'Large' Town Centres – a larger degree of intensification warranted.

Walkable catchments defined in the Waka Kotahi guidance¹⁷ are divided into 200m increments, growing based on the scale of centres. Based on this approach, the following walking catchments have been identified as suitably responding to each type of centre:

1. Medium Local Centres – 200m walking catchment;
2. Larger Local Centres and Standard Town Centres – 400m walking catchment;
3. Larger Town Centres – 600m walking catchment.

When viewed against the minimum walking catchment requirements of larger centres (recommended by the MfE as 800m), the above approach is seen to align well with this gradation of intensification response. The response for larger town centres reflects the significant scale and level of commercial activity and community services, albeit being less than the intensification that is warranted around a metropolitan centre.

It is important to remember that the above walking catchments need to be adjusted based on the specific local urban form context to ensure a consistent and cohesive application around the centre. In practice, this usually means that the extent of intensification is larger than the specified walking catchment, in some cases by several hundred metres (depending on the centre type). The extension of these intensification areas should therefore give rise to improved outcomes including uniformity of development patterns, having regard to physical infrastructure (severance, accessibility, pedestrian crossings, cycle infrastructure, safety, etc), availability of public transport, and the commercial function of the centre, including levels of employment.

¹⁷ Aotearoa Urban Street planning & Design Guide, Waka Kotahi (2021, ISBN 978-1-99-004434-2), p45

Option 1 – Apply HRZ around all applicable centres, adapting extent commensurate with centre classification	Option 2 – Apply a precinct around all applicable centres (over MRZ), adjusting enabled height and extent commensurate with centre classification	Option 3 – Provide for a degree of intensification that corresponds to the level of commercial activity and community services identified in centres assessment, except for Belfast centre. (preferred option)
<p>This option would be applied as follows:</p> <ul style="list-style-type: none"> • Town centres: 20m height enabled to at least 600m walking catchment; • Local centres: 20m height enabled to at least 400m walking catchment; • Neighbourhood centres: 20 height enabled to at least 200m walking catchment. <p>Benefits</p> <ul style="list-style-type: none"> • Large proportion of housing enabled, in most cases more than doubling development capacity, providing for increased housing choice. At a local level, this is likely to have a positive influence on affordability. • A six storey height is considered by the urban design assessment as residential in nature, being of a human scale and accessible in a residential environment. The form is similar to that which is required to be enabled surrounding the CCZ, so will have a sense of familiarity and consistency once areas are developed. • The extent used for each centre provides an escalating cascade of intensification in correspondence to the level of activities and services in each commercial centre. 	<p>This option would be applied as follows:</p> <ul style="list-style-type: none"> • Town centres: 20m height enabled to at least 600m walking catchment; • Local centres: 17m height enabled to at least 400m walking catchment; • Neighbourhood centres: 14m height enabled to at least 200m walking catchment. <p>Benefits</p> <ul style="list-style-type: none"> • Large proportion of housing enabled, in most cases more than doubling development capacity, providing for increased housing choice. At a local level, this is likely to have a positive influence on affordability. • A six storey height is seen as residential in nature, being of a human scale and accessible in a residential environment. The form is similar to that which is required to be enabled surrounding CCZ, so will have a sense of familiarity and consistency once areas are developed. Developing to this scale for the town centres is therefore likely to be experienced as a consistent urban form. • Both heights and extents are adjusted to respond to each commercial centre. This 	<p>This option would be applied as follows:</p> <ul style="list-style-type: none"> • Large town centres: 20m height enabled to at least 600m walking catchment (HRZ with Precinct); • ‘Standard’ Town centres: 20m height enabled to at least 400m walking catchment (HRZ with Precinct), except for Belfast, being treated the same as ‘Medium local centres’ at a 400m walking catchment; • Large local centre: 20m height enabled to at least 400m walking catchment (HRZ with Precinct); • Medium local centre: 14m height enabled to at least 200m walking catchment (MRZ with Precinct); and • Other local centres and neighbourhood centres: no intensification proposed beyond MRZ. <p>Benefits</p> <ul style="list-style-type: none"> • A large proportion of housing is enabled in most cases more than doubling development capacity, providing for increased housing choice. At a local level, this is likely to have a positive influence on affordability. • A six storey height limit is seen as residential in nature, being of a human scale and accessible in a residential environment. The

Option 1 – Apply HRZ around all applicable centres, adapting extent commensurate with centre classification	Option 2 – Apply a precinct around all applicable centres (over MRZ), adjusting enabled height and extent commensurate with centre classification	Option 3 – Provide for a degree of intensification that corresponds to the level of commercial activity and community services identified in centres assessment, except for Belfast centre. (preferred option)
<ul style="list-style-type: none"> For most centres, a large quantum of housing will be enabled in areas accessible to commercial activities and services, public and active transport connections, and open space availability. This helps promote localised living, which in-turn helps improve economic prosperity and viability of the centre, whilst also reducing dependence on private vehicle use and any associate greenhouse gas emissions. <p>Costs</p> <ul style="list-style-type: none"> Increasing building heights for much of these centres represents a large change from the MDRS status quo or enabled heights under operative zones. The effects of this are most likely felt within smaller centres, where medium density opportunities are less likely to be taken up, resulting in a strong contrast between higher heights around centres and suburban surrounds. The transitional effects of developing to this form are likely for a longer period as established sites become feasible to be developed and those which are developed do so alongside established (lower density) sites. The flow-on consequences of this 	<p>provides for a response, more commensurate to each centre, including the commercial activities and services, public and active transport connections, and open space availability. This helps promote localised living, which in-turn improves economic prosperity and viability of the centre, whilst also reducing dependence on private vehicle use and any associate greenhouse gas emissions.</p> <ul style="list-style-type: none"> This option may better reflect the degree of intensification anticipated within and around centres. This helps to address transitional effects to a higher form of residential living and to build distinction between centres while creating a recognisable urban form. <p>Costs</p> <ul style="list-style-type: none"> The uplift in development potential within established (lower density) areas may mean there is a disproportionate degree of feasible opportunities to intensify. This could mean that the temporary effects of overshadowing, dominance, and privacy are increased for adjoining lower density sites as the area transitions from a lower to higher density residential living 	<p>form is similar to that which is required to be enabled surrounding CCZ, so will have a sense of familiarity and consistency once areas are developed. Developing to this scale for the town centres is therefore likely to be experienced as a consistent urban form.</p> <ul style="list-style-type: none"> Both heights and extents are adjusted to respond to each commercial centre. This provides for a response, more commensurate to each centre, including the commercial activities and services, public and active transport connections, and open space availability. This helps promote localised living, which in-turn improves economic prosperity and viability of the centre, whilst also reducing dependence on private vehicle use and any associate greenhouse gas emissions. This means that larger local and town centres are treated differently to other equivalent centres, with smaller local and neighbourhood centres not having any additional intensification response over and above that directed by MDRS. For the Belfast centre, a bespoke approach is adopted to better respond to the level of services provided for within the centre, i.e.

Option 1 – Apply HRZ around all applicable centres, adapting extent commensurate with centre classification	Option 2 – Apply a precinct around all applicable centres (over MRZ), adjusting enabled height and extent commensurate with centre classification	Option 3 – Provide for a degree of intensification that corresponds to the level of commercial activity and community services identified in centres assessment, except for Belfast centre. (preferred option)
<p>could lead to an inconsistent and dislocated urban form.</p> <ul style="list-style-type: none"> • An increase in building height is likely to result in reduced sunlight access, loss of privacy, overshadowing, and building dominance. • Only the extent of intensification is considered, without any change in building heights. For a number of the local centres and all of the neighbourhood centres, this would enable a building heights greater than that provided for within the centre itself. This would amplify issues associated with overshadowing and dominance at the centre-residential interface, whilst also creating an urban form that would be seen as out of sequence from its surrounds. • Retaining a static building height for all centres may result in undue pressure on smaller (local and neighbourhood) centres, with an increased local population in close proximity placing high demand on local businesses. This would reduce levels of accessibility to the services and amenities anticipated by the local population i.e. the level of demand is not met by the offer. In addition, many of these smaller centres lack the other services, such as public 	<p>environment. The flow-on consequences of this could result in an inconsistent and dislocated urban form.</p> <ul style="list-style-type: none"> • An increase in building height is likely to result in reduced sunlight access, privacy, overshadowing, and building dominance. • While providing for a more nuanced response to centres, the 17m height limit proposed for local centres does not provide for a strong distinction in heights and sits awkwardly between heights enabled for town and neighbourhood centres. The addition of a single storey is also unlikely to make a material difference since the feasibility and development beyond three storeys is more influenced by increased cost of building compliance and economies of scale. • For the Belfast centre, consent has been granted to develop the majority of the land south of Radcliffe Road for a retirement village, which would severely diminish the viability of the centre and ability for it to respond to the intended outcomes of a town centre zone. In addition, there are severance issues with Main North Road separating the centre from its residential catchment. If developed to six storeys, new 	<p>accessibility to services and facilities, whilst also still recognising large housing development opportunities over nearby vacant land.</p> <ul style="list-style-type: none"> • The scale of intensification correlates with the anticipated feasibility of development, improving the chances of uptake and transition to a higher form of residential living. <p>Costs</p> <ul style="list-style-type: none"> • The uplift in development potential within established (lower density) areas may mean there is a disproportionate degree of feasible opportunities to intensify. This could mean that the temporary effects of overshadowing, dominance, and privacy are increased for adjoining lower density sites as the area transitions from a lower to higher density residential living environment. The flow-on consequences of this could lead to an inconsistent and dislocated urban form. • An increase in building height is likely to result in reduced sunlight access, privacy, overshadowing, and building dominance.

Option 1 – Apply HRZ around all applicable centres, adapting extent commensurate with centre classification	Option 2 – Apply a precinct around all applicable centres (over MRZ), adjusting enabled height and extent commensurate with centre classification	Option 3 – Provide for a degree of intensification that corresponds to the level of commercial activity and community services identified in centres assessment, except for Belfast centre. (preferred option)
<p>transport or community facilities, that would support intensification at this scale around each of these smaller centres.</p> <ul style="list-style-type: none"> For the Belfast centre, consent has been granted to develop the majority of the land south of Radcliffe Road for a retirement village, which would severely diminish the viability of the centre and ability for it to respond to the intended outcomes of a town centre zone. In addition, there are severance issues with Main North Road separating the centre from its residential catchment. If developed to six storeys, new developed areas would have a poor degree of access to services, notwithstanding the strong private vehicle dependence the centre currently experiences with its dislocation from the city centre and lack of walking/cycling infrastructure. Reporting¹⁸ has highlighted that while centres zoning may be the same across some centres, the ability of each centre to provide services and facilities is not equal. This is especially so for town centre zones and local zones, with some stronger centres, such as Riccarton, Papanui, 	<p>developed areas would have a poor degree of access to services, notwithstanding the strong private vehicle dependence the centre currently experiences with its dislocation from the city centre and lack of walking/cycling infrastructure.</p> <ul style="list-style-type: none"> Reporting on Centres has highlighted that while centres zoning may be the same across some centres, the ability to provide for services and facilities is not equal. This is especially so for town centre zones and local zones, with some stronger centres, such as Riccarton, Papanui, Hornby, Bush Inn, Merivale, and Sydenham North. The static approach of responding based on centre types alone to provide a commensurate response does not acknowledge these differences, potentially discounting development opportunities within and around these centres. Reporting on Centres has also highlighted that smaller local centres and neighbourhood centres lack the degree of services to warrant a suitable intensification response over and above that directed through MDRS. Intensifying beyond this 	<p>Efficiency</p> <ul style="list-style-type: none"> Providing for a more nuanced intensification response correlates with the degree of accessibility anticipated to be provided now and into the future. This efficiently responds to accessibility through aligning the intensification response in areas where this would likely be most viable and provides for walkable high density living environments <p>Effectiveness</p> <ul style="list-style-type: none"> This approach strongly aligns with the centres assessment undertaken as part of Plan Change 14. It is therefore an effective response to the degree of services provided for and enabled within each centre. Providing a more nuanced intensification response to centres (rather than linear response) could add to confusion for Plan users, however the use of precincts to manage/direct intensification is likely to assist. <p>Risk of acting, not acting</p> <ul style="list-style-type: none"> Not acting to respond to identified differences between centres may lead to

¹⁸ Commercial Centres: Approach to Alignment with National Planning Standards

Option 1 – Apply HRZ around all applicable centres, adapting extent commensurate with centre classification	Option 2 – Apply a precinct around all applicable centres (over MRZ), adjusting enabled height and extent commensurate with centre classification	Option 3 – Provide for a degree of intensification that corresponds to the level of commercial activity and community services identified in centres assessment, except for Belfast centre. (preferred option)
<p>Hornby, Bush Inn, Merivale, and Sydenham North. The static approach of responding based on centre types alone to provide a commensurate response does not acknowledge these differences, potentially discounting development opportunities within and around these centres.</p> <p>Efficiency</p> <ul style="list-style-type: none"> The application of this height response is simplistic, increasing understanding and efficiency of its application. <p>Effectiveness</p> <ul style="list-style-type: none"> The degree of intensification has a direct correlation to the type of centre under the zoning classification. However, reporting¹⁹ on centres has shown that the nature and type of services that each centre is able to provide does not directly correlate to centre type. This would therefore lead to an ineffective outcome by intensifying around centres with lower levels of accessibility to services and facilities. 	<p>within these centres may therefore result in a low degree of accessibility to services, facilities, and public and active transport connections.</p> <p>Efficiency</p> <ul style="list-style-type: none"> The approach provides for a scaled response to centre types, however does not address the differences in anticipated outcomes for each centre in terms of the activity, services and access to public and active transport. Enabling intensification in this systematic linear fashion is likely to result in greater understanding for plan users, which improves the chances of development opportunities being realised. <p>Effectiveness</p> <ul style="list-style-type: none"> This option provides a proportionate response to each centre type, however the level of effectiveness is reduced through not providing for an intensification response that reflects local nuance in terms of accessibility to services and facilities. 	<p>areas being sporadically developed as opportunities become available, rather than providing a concentrated, cohesive, intensification response around each centre. As a consequence, there could be increased populations around lower order centres that cannot access the services and amenities they need in walking distance.</p> <ul style="list-style-type: none"> For the Belfast centre, acting means that future intensification is provided around a centre that there are limited development opportunities around. Despite granting of consent for an alternative use, further enabling intensification may promote investment in the centre overall, including public transport options. <p>Recommendation:</p> <ul style="list-style-type: none"> This option is recommended as it will provide for a scaled response to each centre based on local context and will lead to an efficient and effective means to address Policy 3(d) of the NPS-UD.

¹⁹ Commercial Centres: Approach to Alignment with National Planning Standards

Option 1 – Apply HRZ around all applicable centres, adapting extent commensurate with centre classification	Option 2 – Apply a precinct around all applicable centres (over MRZ), adjusting enabled height and extent commensurate with centre classification	Option 3 – Provide for a degree of intensification that corresponds to the level of commercial activity and community services identified in centres assessment, except for Belfast centre. (preferred option)
<p>Risk of acting, not acting</p> <ul style="list-style-type: none"> Acting in this way is likely to promote higher densities of development in areas that have been shown to have a lower level of access to services. This may contribute to an environment where increased populations cannot access the services and amenities they need in walking distance. For the Belfast centre, acting means that future intensification is provided around a centre that there are limited development opportunities around. Despite granting of consent for an alternative use, further enabling intensification may promote investment in the centre overall, including public transport options. <p>Recommendation:</p> <ul style="list-style-type: none"> This option is not recommended as it does not provide for an efficient or effective means to enabling intensification around suburban centres. 	<p>Risk of acting, not acting</p> <ul style="list-style-type: none"> Acting in this way is likely to promote development in areas that have shown to have a lower level of access to services. This means that there is a greater chance of ad hoc development being undertaken across centres that may contribute to an environment where increased populations cannot access the services and amenities they need in walking distance. For the Belfast centre, acting means that future intensification is provided around a centre that there are limited development opportunities around. Despite granting of consent for an alternative use, further enabling intensification may promote investment in the centre overall, including public transport options. <p>Recommendation:</p> <ul style="list-style-type: none"> This option is not recommended as it does not provide for an efficient or effective means to address intensification around suburban centres. 	

Issue 4 – Enabling residential intensification whilst providing for high quality residential environments

The development of housing that is well-designed and provides for a variety of typologies to support different generational needs through an enabling framework.

This issue is captured through the following elements within residential environments:

- The permitted MDRS threshold is 3 units; how to appropriately manage development beyond this;
- Different scales of development requires different responses;
- Provisions that sit alongside MDRS controls (related provisions) need to be carefully considered so that they do not control a matter that density standards address, or prevent a density standard from being achieved;
- The servicing and practicality of residential units;
- Management of incentives to stimulate height and uptake of development opportunities, while still creating attractive residential environments that suitably manage sunlight access, privacy, habitable areas, and safety;
- The requirement that breach of the MDRS standards must be not more onerous than restricted discretionary activity status (Clause 4 of Part 1 of Schedule 3A) requires careful consideration of restrictions on discretion when in breach of permitted standards and for excessive building heights;
- Legible and cohesive urban form, delivering well-functioning urban environments (Policy 1, NPS-UD); and
- What height should be applied to achieve the minimum storeys of development specified under the NPS-UD.

Council has considered a number of internal and external reports to help consider this issue. These are (see section 3.1.2):

- CCC PC14 Residential Urban Design Analysis, focusing on:
 - Site layout
 - Landscaping
 - Number of residential units per site
 - Building form and function
 - Crime Prevention Through Environmental Design (CPTED)

- Street-facing glazing
- Residential fencing
- Private and communal living areas
- Site access and movement
- Building dominance and privacy
- Servicing and storage
- Bulk and location
- Building height
- CCC RMD/RSTD monitoring report:
 - Shows what current controls are operating well in the RMD zone and influences what controls are considered suitable to carryover from the current framework
- CCC Cross-evaluation of DP controls with MDRS:
 - Review of which controls are compatible with MDRS density standards
- Feasibility of MDRS (The Property Group):
 - Testing of provisions has shown how and where this will promote a viable development product.
- Feasibility of HRZ controls (The Property Group):
 - Tested package of draft controls to consider suitability to deliver intended high density form
 - Demonstrates the difficulty of achieving feasibility, fundamentally due to market conditions
- Wind impact assessment (Meteorological Solutions)
 - Has evaluated existing wind environment in Christchurch and recommended building height thresholds
- Consideration of storey and building correlation (part of Residential Urban Design Analysis):
 - Calculating height based on an allocation of 3m per storey, plus 2m for roof elevation;
 - Minimum ceiling height is 2.4m, with up to 2.7m seen as desirable. The approach allows for a maximum of 0.3m for floor separation and insulation. Based on this, adopting the minimum ceiling height means that MDRS could achieve 4 storey development.

- However, adopting the above metric (and for the sake of consistency), four storeys is a total of 14m (including roof space), being 3x4m, plus 2m for the roof space.
- Six storeys is therefore set at 20m and ten storeys at 32m. In some instances a greater ceiling height at the ground floor will be desirable, which could total 3.5m. Such a development could still reasonably achieve six storeys, since options exist for a flat roof profile. Such an approach is seen as more desirable in a commercial or mixed use development, therefore slightly greater heights have been proposed in applicable zones.

Option 1 – Continue to apply RMD Residential Design Principles (14.15.1) to all residential zones where MDRS applies, at four or more units, and not make MDRS provisions more lenient or provide related provisions.	Option 2 – Re-evaluate existing Residential Design Principles, only applying this to four or more units, and apply a number of controls to be more lenient and related to, MDRS (preferred option).
<p>Benefits</p> <ul style="list-style-type: none"> • Reporting²⁰ has identified that the Residential Design Principles have largely been successful at ensuring positive urban design outcomes within the RMD zone. Development controls in the RMD zone are comparable to those provided for in MDRS. Applying the same principles is likely to continue to provide a positive urban design outcome for larger medium density developments. • Carrying over an established framework means that there is little change to the development model of local practitioners. • Not introducing any additional related provisions means there is less compliance costs. <p>Costs</p> <ul style="list-style-type: none"> • The design principles have been designed primarily to manage the development of two or more medium density residential units of up to three storeys. Plan Change 14 proposes to enable a variety of 	<p>Benefits</p> <ul style="list-style-type: none"> • Modification of design principles means that the matter of discretion is better targeted to urban design matters as a result of the MDRS and Policy 3 of the NPS-UD. This means that potential adverse effects as a result of such development are better addressed and unnecessary compliance cost is avoided. • Reduces overall compliance cost, whilst ensuring that an appropriate degree of residential amenity is attainable, when viewed against the MDRS baseline. • Modifications to MDRS density standards mean increasing the propensity of intensification opportunities being realised. Modifications to the likes of height in relation to boundaries and outdoor living space improve the chances of delivery of an intensified urban form in a way that supports improved urban design outcomes (e.g, perimeter block development, greater street interface, greater privacy and amenity of outdoor living areas).

²⁰ See Residential Urban Design technical reporting.

<p>Option 1 – Continue to apply RMD Residential Design Principles (14.15.1) to all residential zones where MDRS applies, at four or more units, and not make MDRS provisions more lenient or provide related provisions.</p>	<p>Option 2 – Re-evaluate existing Residential Design Principles, only applying this to four or more units, and apply a number of controls to be more lenient and related to, MDRS (preferred option).</p>
<p>building heights beyond those provided for in RMD (14m, 20m, 32m) and the design principles may not therefore be able to adequately address high density development, artificially inflating compliance costs and complexity.</p> <ul style="list-style-type: none"> • Evaluations undertaken by Council²¹ note that some of the greatest areas of impact are not adequately addressed through principles or through the management of site layout. Carrying over the existing principles to address this means an opportunity to address these issues is lost. • Requiring urban design input for four or more units adds to the cost of developing, potentially reducing the propensity to develop. • Simply carrying over the established framework means that the opportunity to consider more lenient provisions than MDRS is lost, including any opportunity to further increase the ease of which intensified developments are undertaken. • Applying the RMD Residential Design Principles could act as a disincentive for larger scale high density developments, since bespoke controls to support and further enable their development are not included. This means that there may be a greater propensity to develop lower scale medium density developments, resulting in less housing yield and housing choice. 	<ul style="list-style-type: none"> • Additional standards for buildings at height improve overall urban form, sunlight access, improved social outcomes, and ensures that buildings retain a residential scale. • Economic feasibility reporting from The Property Group²² and consent testing of draft provisions from Urban Edge Planning²³ has demonstrated that the provisions themselves are not a limit on the feasibility of development (HRZ only), with new controls able to be complied with or easier to achieve in zones that anticipate similar forms of intensification under operative controls. <p>Costs</p> <ul style="list-style-type: none"> • Introducing related provisions as permitted standards will increase consenting costs, potentially reducing propensity to develop. This may also be influenced by the potential complexity of new controls. • Additional standards for higher density development may act as a disincentive to develop up to, or above, six storeys. • Changes to make some MDRS standards more lenient will further increase transitional effects, reducing sun light access. This is particularly so for building height and height in relation to boundary controls in HRZ. <p>Efficiency</p> <ul style="list-style-type: none"> • Adapting the existing design controls to intensification enabled by MDRS and the NPS-UD means that consenting is improved and better responds to associated effects. More lenient controls further improve

²¹ See Residential Urban Design technical reporting.

²² Christchurch City residential zones & intensification precincts economic cost benefit analysis. Property Economics, 2022.

²³ Consent Testing: Plan Change 14

<p>Option 1 – Continue to apply RMD Residential Design Principles (14.15.1) to all residential zones where MDRS applies, at four or more units, and not make MDRS provisions more lenient or provide related provisions.</p>	<p>Option 2 – Re-evaluate existing Residential Design Principles, only applying this to four or more units, and apply a number of controls to be more lenient and related to, MDRS (preferred option).</p>
<p>Efficiency</p> <ul style="list-style-type: none"> Continuing with an established framework means that Plan users and the community are familiar with its mechanisms, increasing the efficiency of its application in a medium density setting. Applying a framework that is intended for medium density development may disincentivise high density development, in turn resulting in a less efficient use of urban land. <p>Effectiveness</p> <ul style="list-style-type: none"> While the principles have been largely successful at managing RMD development, continuing with this framework does not recognise the further increased level of development that is enabled beyond that directed by MDRS density standards. Such an approach would therefore be ineffective at managing (and further enabling) high density development. <p>Risk of acting, not acting</p> <ul style="list-style-type: none"> Acting in accordance with this option potentially jeopardises high density development, adds to the overall cost of consenting, and does not respond well to the new baseline of development across urban residential zones as a result of MDRS. Not acting in this manner means there remains an opportunity to streamline design principles, add additional incentives and more lenient MDRS controls, alongside those required to be inserted through s77G. 	<p>this, with many of the controls acting as an incentive to better realise opportunities for intensification. The introduction of additional controls ensures that the residential areas are able to adequately function in the face of greater intensification.</p> <ul style="list-style-type: none"> A new regime for urban design controls will be new to Plan users and practitioners alike, however this is seen as minor when contrasted with the overall changes proposed through Plan Change 14. Many of the related provision controls build upon existing controls in the Plan, meaning that there is a degree of familiarity with proposed standards. <p>Effectiveness</p> <ul style="list-style-type: none"> The result of modifying design controls means they are better able to respond to the intensification directions in the MDRS and Policy 3 of the NPS-UD. This improves overall effectiveness of applying associated provisions and the ability to develop to a higher form of residential living. <p>Risk of acting, not acting</p> <ul style="list-style-type: none"> Not acting in this way would mean that the rule framework would be cumbersome and unwieldy, increasing complexity and reducing opportunities for intensification what would otherwise be apparent. Acting this way may lead to greater transitional effects as lower density areas are developed. <p>Recommendation:</p> <ul style="list-style-type: none"> This option is recommended since more lenient and new related provisions enable a balanced outcome between enablement and

<p>Option 1 – Continue to apply RMD Residential Design Principles (14.15.1) to all residential zones where MDRS applies, at four or more units, and not make MDRS provisions more lenient or provide related provisions.</p>	<p>Option 2 – Re-evaluate existing Residential Design Principles, only applying this to four or more units, and apply a number of controls to be more lenient and related to, MDRS (preferred option).</p>
<p>Recommendation:</p> <ul style="list-style-type: none"> • This option is not recommended as it is unlikely to efficiently or effectively respond to the new height direction in either the MDRS or Policy 3 of the NPS-UD. 	<p>quality urban environments that provides for current and future generations.</p>

Issue 5 – How to recognise operative density overlays in the District Plan through the IPI

The Plan current contains a series of density overlays that seek to manage site specific development outcomes, and with the introduction s77G, consideration must be given for what the equivalent underlying zoning should be alongside whether these act as qualifying matters.

Density overlays and their relevance can be summarised as follows:

Density Overlay Title	Consideration & Applicability
Kainga Overlay Area 1	<i>Not applicable; not in a relevant residential zone / outside urban environment.</i>
Kainga Overlay Area 2	<i>Not applicable; not in a relevant residential zone / outside urban environment.</i>
Spencerville Overlay	<i>Not applicable; not in a relevant residential zone / outside urban environment.</i>
Moncks Spur/Mt Pleasant Density Overlay	<ul style="list-style-type: none"> Underlying zone is Residential Hills. Density required per residential unit is 850m². This site is stated as having been subject to the LHA zoning (deferred) under the previous plan, which had a minimum net site area of 850m² and a minimum average of 1500m². It was recommended that the site be zoned RH with a density overlay.²⁴ It therefore appears that the 850m² minimum area was rolled over from the previous Plan. In the previous District Plan, the densities for this area are described as being applied <i>“to minimise the visual effects of urban development and maintain the character of the adjacent residential area.”</i>²⁵ Criteria used does not align with sub-sections a) to g) of s77I, therefore cannot be a qualifying matter without meeting the tests under s77J.
Shalamar Drive Density Overlay	<ul style="list-style-type: none"> Underlying zone is Residential Hills.

²⁴ Stage 2 Residential Chapter Section 32 Report, Appendix 22, page 7, Area number 13 “Living HA Deferred on Planning Map 55A (Moncks Spur/Mt Pleasant)”.

²⁵ Part 2 Living Zones, 16.2.4 Residential site density – critical standard.

	<ul style="list-style-type: none"> • Subject to a minimum net site area of 850m² and a minimum average of 1500m². The reassessment of this under the District Plan review noted that while the average was similar to the Living HA Zone, the minimum was closer to that of the LH Zone. Therefore it was recommended that the site be zoned RH with a density overlay.²⁶ It therefore appears that the 850m² minimum area was rolled over from the previous Plan. • In the previous District Plan, the densities for this area are described as being applied <i>“to minimise the visual effects of urban development and maintain the character of the adjacent residential area.”</i>²⁷ • Criteria used does not align with sub-sections a) to g) of s77I, therefore cannot be a qualifying matter without meeting the tests under s77J.
<p>Upper Kennedys Bush Density Overlay</p>	<ul style="list-style-type: none"> • Underlying zone is Residential Hills. • Subject to a minimum net site area of 850m² and a minimum average of 1500m². The reassessment of this under the District Plan review noted that subdivision had been completed in accordance with the relevant ODP, and that an overall allotment limit of 100 was registered on the title. It was recommended that the site be zoned RH with a density overlay.²⁸ It therefore appears that the 850m² minimum area rolled over the previous Plan. • The ODP, which was not rolled over, largely determined the layout of roads and reserve areas. • In the previous District Plan, the densities for this area are described as being applied <i>“to minimise the visual effects of urban development and maintain the character of the adjacent residential area.”</i>²⁹ • Criteria used does not align with sub-sections a) to g) of s77I, therefore cannot be a qualifying matter without meeting the tests under s77J.

²⁶ Stage 2 Residential Chapter Section 32 Report, Appendix 22, page 5, Area number 3 “Living HA on Planning Map 53A (Cashmere - Shalamar Drive)”.

²⁷ Part 2 Living Zones, 16.2.4 Residential site density – critical standard.

²⁸ Stage 2 Residential Chapter Section 32 Report, Appendix 22, page 6, Area number 8 “Living HA on Planning Map 59A and defined in Appendix 3d, Part 2 (Upper Kennedys Bush)”.

²⁹ Christchurch City Plan, Volume 3, Part 2 Living Zones, 16.2.4 Residential site density – critical standard.

Akaroa Hillslopes Density Overlay	<i>Not applicable; not in a relevant residential zone / outside urban environment.</i>
Allandale Density Overlay	<i>Not applicable; not in a relevant residential zone / outside urban environment.</i>
Samarang Bay Density Overlay	<i>Not applicable; not in a relevant residential zone / outside urban environment.</i>
Residential Large Lot Density Overlay	<i>Not applicable; not in a relevant residential zone.</i>
Residential Mixed Density Overlay – 86 Bridle Path Road	<ul style="list-style-type: none"> • Underlying zone is Residential Hills. • Number of lots capped at 9, with additional coverage controls for sites greater than 1,000m² - 25% or 250m² of ground floor area to a maximum of 350m² in total floor area. • The overlay appear to be as a result of a submission made on the Replacement District Plan, where the reporting officer notes a request for rezoning from RLL to ‘Residential Hill Mixed Density’. The officer considered the requested zoning to be generally appropriate, but noted that the specific standards that should be applied need further consideration.³⁰ It is presumed that the limitation to 9 allotments and coverage controls resulted from this general recommendation. From a landscape perspective, the Council’s expert considered that the <i>“mixed density approach will achieve a more abrupt and preferred transition between the urban and rural environments.”</i> • This site potentially has specific characteristics, in that it is more closely related to the main surrounding zoning – being RLL. Removal of the overlay would enable development of a scale and density that would be out of character within the surrounding area – because more intensive development under the EHS Act is not enabled in this surrounding zone.
Residential Mixed Density Overlay – Redmund Spur	<ul style="list-style-type: none"> • Underlying zone is Residential Hills. • Overlay caps site to 400 lots maximum, and 30% of sites must have minimum net site area of 1,500m². Coverage controls for sites greater than 1,000m² - 25% or 250m² of

³⁰ Residential Stage 2 Hearing, Second statement of evidence of Sarah Oliver, Attachment B ‘Evidence on Site Specific Rezoning’, page 34.

	<p>ground floor area to a maximum of 350m² in total floor area. For sites less than 450m² the maximum site coverage is 45%.</p> <ul style="list-style-type: none"> • The majority of the overlay area is adjacent to Rural Urban Fringe Zoning (1-4ha density), with some at the western edge adjoining Residential Large Lot (RLL) and land across the road to the north zoned Residential New Neighbourhood. • The IHP decision notes that the zone would result in a similar net yield to the LHA – being the equivalent of the RLL Zone.³¹ The discussion on the submission in the context of the District Plan review also notes that while a submitter requests a change from RLL to a new Residential Hills Mixed Density Zone, the proposed zone “would result in a similar net yield to the Residential Large Lot.”³² • This site potentially has specific characteristics, in that the framework under the overlay is more closely related to RLL, which also reflects the transitional nature of this site between the Rural Urban Fringe Zone and the start of the denser urban area. Removal of the overlay would therefore enable development of a scale and density that would potentially be out of character within the surrounding area.
Residential Medium Density Lower Height Limit Overlay	<ul style="list-style-type: none"> • Underlying zone is Residential Medium Density. • Height is restricted within the overlay to 8 metres. But on sites of 1500m² or greater, it can be increased to 11m, except where within 10m of RS or RSDT. It is 8m in all cases in Riccarton. • It appears that the lower 8m height restriction relates to any areas where the transition into the Residential Medium Density Zone is from a Living 1 or Living 2 Zone (in Plan as Residential Suburban or Residential Suburban Density Transition) – to remove potential for inconsistency between sides of a street.³³ • Criteria used does not align with sub-sections a) to g) of s77I, therefore cannot be a qualifying matter without meeting the tests under s77J. The introduction of medium density across the residential urban areas means the overlay is redundant.

³¹ Independent Hearings Panel, Christchurch Replacement District Plan – Decision 17: Residential (Part) (And Relevant Definitions and Associated Planning Maps), 11 March 2016, para [250].

³² Residential Stage 2 Hearing, Second statement of evidence of Sarah Oliver, Attachment B ‘Evidence on Site Specific Rezoning’, page 33.

³³ Residential Chapter Stage 1 Section 32 report, Appendix 4 – Medium Density Analysis, page 10.

Diamond Harbour Density Overlay	<i>Not applicable; not in a relevant residential zone / outside urban environment.</i>
Existing Rural Hamlet Overlay	<ul style="list-style-type: none"> • Underlying zone is Residential Suburban and overlaps with the Airport Noise Contour. • Density is restricted to a minimum of 2000m². Site coverage restricted to the lesser of 40% or 300m². • Within the previous District Plan, the overlay (then the Living 1E (Rural Hamlet – Gardiners Road) Zone) is described as having a semi-rural character, with the intention being to provide for some limited residential development at low densities, to develop a hamlet around a core base of existing dwellings.³⁴ It is also noted that the lower density in the western part of the zone (i.e. 2000m²) is intended “<i>to send a clear signal about the importance of protecting the uncurfewed operation at the airport.</i>” • The site potentially has specific characteristics, in that the framework under the overlay is more closely related to RLL – the density restriction (2,000m²) is actually more restrictive than that of the RLL Zone (1500m²). The hamlet is also in an isolated location that is not surrounded or adjoining any other residential zone. Removal of the overlay would therefore enable development of a scale and density that would potentially be out of character within the hamlet and the surrounding area.
Medium Density (Higher Height Limit) Overlay	<ul style="list-style-type: none"> • Underlying zone is Residential Medium Density. • Provides for a higher height limit of 20m (Deans Ave) 30m (Carlton Mill Road), 14m (North Beach) and 20m (central New Brighton). • Each of these areas are proposed to be treated separately through new MRZ and HRZ standards and associated precincts, as applicable, or through identified qualifying matters. The overlay is therefore considered redundant.
Peat Ground Condition Constraint Overlay	<ul style="list-style-type: none"> • Restricts density and other bulk and location controls based on peat extent. • Criteria used does not align with sub-sections a) to g) of s77I, therefore cannot be a qualifying matter without meeting the tests under s77J.

³⁴ Christchurch City Plan, Volume 3, Part 2 Living Zones, 1.2.4 Living 1E (Rural Hamlet - Gardiners Road) Zone.

Riccarton Wastewater Interceptor Catchment Overlay	<ul style="list-style-type: none"> • Wastewater infrastructure upgrades have been completed and overlay is no longer applicable. • Cannot apply as qualifying matter; should be removed.
Stormwater Capacity Constrain Overlay	<ul style="list-style-type: none"> • This affects an isolated area on the northern corner of Sparks and Hendersons Roads. • Vacant allotment size is restricted and number of units limited. • Criteria used does not align with sub-sections a) to g) of s77I, therefore cannot be a qualifying matter without meeting the tests under s77J. However, control of vacant allotment sizes can be retained under Schedule 3A. • Intersects with identified flood hazard area.
Community Housing Redevelopment Mechanism (CHRM)	<ul style="list-style-type: none"> • Provides for greater enablement of intensification within established community housing areas; specifically designed for the revitalisation of community housing stock following the 2010/2011 Canterbury Earthquakes. • Scale redevelopment has taken place over several years and the vast majority of areas where this is located are proposed to be zoned MRZ. This zone would provide for greater levels of intensification and the overlay is therefore seen as redundant. This acts as a greater incentive to concentrate any outstanding or future redevelopment within MRZ areas, which offer a greater degree of accessibility, and therefore attractiveness, to redevelop within these areas.

To summarise, those shown in **bold** are considered to be within a relevant residential zone where progressing with the density overlay would have an influence upon density (and are not considered redundant). These can be categorised as follows:

Overlays that lack justification as a qualifying matter (qualifying matter sites):

- Monks Spur/Mt Pleasant Density Overlay
- Shalamar Drive Density Overlay
- Upper Kennedys Bush Density Overlay

Overlays (and associated controls) that have specific characteristics that align with Residential Large Lot Zone (specific characteristic sites):

- Residential Mixed Density Overlay – 86 Bridle Path Road
- Residential Mixed Density Overlay – Redmund Spur
- Existing Rural Hamlet Overlay

<p>Option 1 – Continue to apply all density overlays identified as relevant to residential zones.</p>	<p>Option 2 – Only apply controls where specific characteristics have been identified that align with a compatible zone under National Planning Standards (Residential Large Lot), not being a relevant residential zone – 86 Bridle Path Road; Redmund Spur; Rural Hamlet. [preferred option]</p>	<p>Option 3 – Not managing development over any of the identified overlay areas.</p>
<p>Benefits</p> <ul style="list-style-type: none"> • All identified areas continue to be managed as per the operative controls, aligning with community expectations. • Previously identified characteristics are protected. <p>Costs</p> <ul style="list-style-type: none"> • Lesser development opportunities would be possible across these areas, reducing housing choice and accessibility within local areas. • It is unlikely that qualifying matter sites would meet the statutory tests under 	<p>Benefits</p> <ul style="list-style-type: none"> • Identified areas continue to be managed as per the operative controls, aligning with community expectations for specific areas. • Only those sites that have been identified as having specific characteristics are protected, limiting the impacts of capacity loss. • The sum of controls for sites with specific characteristics mean that their equivalent zone better aligns with the intended outcomes for Residential Large Lot areas. • The management of density over identified sites aligns with the density that would be progressed through the IPI for surrounding sites. 	<p>Benefits</p> <ul style="list-style-type: none"> • Development is able to be progressed under the MRZ controls. • Increased yield for development in these areas means both housing choice and accessibility are likely to increase. <p>Costs</p> <ul style="list-style-type: none"> • Removing all density controls would mean that localised area characteristics would likely be lessened through intensified development. • For sites with specific characteristics, development at the MRZ scale would not align with the zoning of surrounding areas

<p>Option 1 – Continue to apply all density overlays identified as relevant to residential zones.</p>	<p>Option 2 – Only apply controls where specific characteristics have been identified that align with a compatible zone under National Planning Standards (Residential Large Lot), not being a relevant residential zone – 86 Bridle Path Road; Redmund Spur; Rural Hamlet. [preferred option]</p>	<p>Option 3 – Not managing development over any of the identified overlay areas.</p>
<p>s77J, justifying the same level of protection.</p> <ul style="list-style-type: none"> For qualifying matter sites, controlling development to the level the operative Plan seeks to apply would result in development that would not align with the MRZ zoning that would apply. Sites lack specific characteristics that would distinguish them from their neighbouring Residential Hill counterparts. <p>Efficiency</p> <ul style="list-style-type: none"> It is considered that only some of the overlay areas are likely able to be protected, and that restricting density in some areas would not align with the intensification that would be enabled for surrounding areas under the IPI. <p>Effectiveness</p> <ul style="list-style-type: none"> It is unlikely that this approach will likely meet the requirements under the Act (for all areas) and therefore not effective. <p>Risk of acting, not acting</p>	<p>All of the sites with specific characteristics are located within an area that is surrounded by a peri-urban zoning (Rural Urban Fringe or Residential Large Lot), which are not considered to be relevant residential zones.</p> <p>Costs</p> <ul style="list-style-type: none"> Lesser development opportunities would be possible across these areas, reducing housing choice and accessibility within local areas. <p>Efficiency</p> <ul style="list-style-type: none"> By limiting the extent of restrictions to only those sites identified with specific characteristics, more sites are able to be developed (compared to Option 1), with those identified sites aligning with their surrounds. This continues current protections and naming conventions, improving the understanding or Plan users. <p>Effectiveness</p>	<p>and fail to align with what the equivalent zoning would be when factoring the sum of current controls.</p> <ul style="list-style-type: none"> Allowing intensification across some of these sites would likely increase the urban footprint of Christchurch, reducing the appeal of rural areas and increasing the dependency of private vehicle use. <p>Efficiency</p> <ul style="list-style-type: none"> The benefits of this proposal are not considered to be uniform across density overlay areas, with sites that have specific characteristics being developed to a level that is consistent with the surrounding density that would be progressed through the IPI. Intensifying within rural areas will result in greater demand on infrastructure and other services on the periphery of urban Christchurch. This would only service select areas and would be an inefficient use of resources. <p>Effectiveness</p>

<p>Option 1 – Continue to apply all density overlays identified as relevant to residential zones.</p>	<p>Option 2 – Only apply controls where specific characteristics have been identified that align with a compatible zone under National Planning Standards (Residential Large Lot), not being a relevant residential zone – 86 Bridle Path Road; Redmund Spur; Rural Hamlet. [preferred option]</p>	<p>Option 3 – Not managing development over any of the identified overlay areas.</p>
<ul style="list-style-type: none"> Acting this way is likely to result in a degree of uncertainty due to the limited merits of the option under the Act for reduced density. <p>Recommendation:</p> <ul style="list-style-type: none"> This option is not recommended as it is unlikely to efficiently or effectively respond to the criteria to reduce density under the Act. 	<ul style="list-style-type: none"> Rezoning sites to Residential Large Lot ensures their ongoing protection. <p>Risk of acting, not acting</p> <ul style="list-style-type: none"> Not acting in this manner would mean that sites with specific characteristics would be able to be intensified to a degree that does not align with their respective settings post-IPI. This would have the potential to erode the rural or peri-urban appeal of surrounding areas, potentially leading to increased sprawl and private vehicle dependency. <p>Recommendation:</p> <ul style="list-style-type: none"> This option is recommended as it provides for a balanced response to only limiting density in areas that are within a peri-urban setting and the sum of controls are not considered to represent a relevant residential zone. It is recommended that overlay controls are transferred to a precinct to align with National Planning Standards. 	<ul style="list-style-type: none"> The effectiveness of enabling medium density development in rural areas is reduced by the likely impacts on some surrounding rural areas and the lack of agglomeration benefits to service only select areas. <p>Risk of acting, not acting</p> <ul style="list-style-type: none"> Acting in this manner would mean that sites with specific characteristics would be able to be intensified to a degree that does not align with their respective settings post-IPI. This would have the potential to erode the rural or peri-urban appeal of surrounding areas, potentially leading to increased sprawl and private vehicle dependency. <p>Recommendation:</p> <ul style="list-style-type: none"> This option is not recommended as it is unlikely to efficiently or effectively respond to the criteria to reduce density under the Act.

5.3 Evaluation of objectives

- 5.3.1 Section 32 requires an evaluation of the extent to which the objectives³⁵ of the proposal are the most appropriate way to achieve the purpose of the Act (s 32(1)(a)).
- 5.3.2 The residential chapter of Plan Change 14 proposes to amend and add new objectives to the Plan. This section of the report, therefore, examines whether the proposed objectives in the residential chapter are the most appropriate way to achieve the purpose of the Act. It is again noted that s77G of the Act requires Council to incorporate the MDRS (Schedule 3A) and give effect to Policy 3 of the NPS-UD, and in doing so, Council is required, under s77G(5), to insert the objectives contained in Clause 6 of Schedule 3A of the Act. These specific objectives are therefore not considered any further as part of this evaluation.
- 5.3.3 For the purposes of changing the Plan, Rule 3.3.a (Interpretation) of the Plan imposes an internal hierarchy for the Plan objectives. Strategic Directions objectives 3.3.1 and 3.3.2 have relative primacy whereby all other Strategic Directions objectives are to be expressed and achieved in a manner consistent with those objectives. Furthermore, objectives and policies in all other chapters of the Plan are to be expressed and achieved in a manner consistent with the Strategic Directions objectives. In this case, select changes are proposed to strategic objectives and policies to ensure consistency with new higher order direction through MDRS and the NPS-UD. Consideration of these changes is addressed separately in this evaluation under 'Strategic Directions'. The residential component of Plan Change 14 proposes to introduce four objectives, modify two existing objectives, and remove two existing objectives.

Objective	Summary of Evaluation
Objective on Housing Supply	
<p>14.2.1 Objective – Housing Supply – Option 1 – changed objective (preferred option)</p> <p>1. An increased supply of housing that will:</p> <ol style="list-style-type: none"> 1. enable a wide range of housing types, sizes, and densities, in a manner consistent with Objectives 3.3.4(a) and 3.3.7; 2. meet the diverse <u>and changing</u> needs of the community <u>and future generations in the immediate recovery period and longer term, including social housing options</u>; and 3. assist in improving housing affordability. 	<ol style="list-style-type: none"> a. The intent of this change to objective 14.2.1 is to enable the increased supply of housing in a manner that aligns with the built form anticipated by Objective 2 of MDRS, Objectives 2 and 4 of NPS-UD, Objective 6.2.1a and Objective 6.2.2 of the CRPS. b. The objective could be seen as being inconsistent with the amenity direction of Objective 6.2.3.2 of the CPRS. c. This objective provides for both supply and variety in housing typologies that responds to housing demands and changing needs of the community. d. The proposed amendment to this objective seeks to address the following resource management issues:

³⁵ Section 32(6) defines "objectives" and "proposal" in terms specific to sections 32 – 32A. "Objectives" are defined as meaning:
 (a) for a proposal that contains or states objectives, those objectives;
 (b) for all other proposals, the purpose of the proposal.

	<ul style="list-style-type: none"> i. Issue 1 – General application of MDRS; ii. Issue 2 – Surrounding City Centre response; and iii. Issue 3 – Suburban Centres residential response. <p>e. Option 1 (Proposed amended Objective 14.2.1 would (in the context of Part 2 matters):</p> <ul style="list-style-type: none"> i. Ensure sufficient housing is enabled to meet the housing needs for current and future generations, providing for people’s social and economic well-being; ii. Provide for different housing types and styles to provide for different cultural and social needs within the community; and iii. Seek to ensure sufficient housing choice at various price points are available, improving or maintaining economic well-being.
<p>14.2.1 Objective – Housing Supply – Option 2 – Status quo</p> <p>Retention of the existing objective as presently contained within the Plan.</p>	<ul style="list-style-type: none"> a. The objective in the Plan seeks to: <ul style="list-style-type: none"> i. Improve the supply of housing and housing of diverse types; ii. Improve accessibility to the housing market; iii. Stimulate the post-earthquake recovery; iv. Provide for social housing options. b. The objective will not address the greater provision of housing enabled by the 2021 Amendment and the NPS-UD, generally, and will retain a focus on post-earthquake housing when the housing market has largely recovered. The objective also makes reference to specific housing types, whereas the framing in higher order documentation seeks to enable all types of housing across the urban environment, rather than prioritising specific housing types. c. Accordingly, this option is not the most appropriate way to achieve the purpose of the Act.

<p>14.2.2 [New] Objective – Housing Variety</p> <p>a. <u>A relevant residential zone provides for a variety of housing types and sizes that respond to:</u></p> <ul style="list-style-type: none"> i. <u>housing needs and demands; and</u> ii. <u>the neighbourhood’s planned urban built character, including 3-storey buildings</u> 	<ul style="list-style-type: none"> a. This objective is provided in Clause 6(1)(b) of Schedule 3A (MDRS) and is required to be inserted by s77G(5) of the Act. It is therefore most appropriate. b. The objective applies to MRZ and HRZ, which have applied MDRS.
<p>Objective for Medium Density Residential Zone</p>	
<p>14.2.5 [new] – Medium Density Residential Zone – Option 1 – insert a new objective</p> <p><u>Medium density residential areas of predominantly MDRS-scale development of three- or four-storey buildings, including semi-detached and terraced housing and low-rise apartments, with innovative approaches to comprehensively designed residential developments, whilst providing for other compatible activities.</u></p>	<ul style="list-style-type: none"> a. The intent of proposed new objective 14.2.5 is to provide for medium density development across MRZ, and is consistent with objective 2 of MDRS and the Zone Framework (8) and Format Standard (10) of National Planning Standards, Objective 2 of the NPS-UD, and Objective 6.2.1a of the CRPS. b. The objective can be seen as being inconsistent with the direction of Objective 6.2.2 of the CRPS for consolidation around centres. c. This objective provides for medium density development across the urban environment in areas with a lesser proximity to commercial centres. It builds on the existing Residential Medium Density Zone (RMD). d. Proposed objective 14.2.5 seeks to address the following resource management issues: <ul style="list-style-type: none"> i. Issue 1 – General MDRS Application ii. Issue 4 – Enabling residential intensification whilst providing for high quality residential environments e. Option 1 (Proposed objective 14.2.5) would (in the context of Part 2 matters): <ul style="list-style-type: none"> i. Provide a consolidated urban form by focusing intensification within the existing urban footprint, delivering an efficient and sustainable development form; ii. Enable large –scale residential development across existing urban areas, improving social

	<p>well-being through the provision of additional housing; and</p> <p>iii. Improve housing supply across Christchurch, likely reducing costs and improving economic well-being.</p>
<p>14.2.5 – Medium Density Residential Zone – Option 2</p> <p>Retention of the existing Residential Medium Density Zone framework as presently contained within the Plan under Table 14.2.1.1a (not an objective):</p> <p>Located close to the Central City and around other larger commercial centres across the city. The zone provides a range of housing options for people seeking convenient access to services, facilities, employment, retailing, entertainment, parks and public transport.</p> <p>The zone provides for medium scale and density of predominantly two or three storey buildings, including semi-detached and terraced housing and low-rise apartments, with innovative approaches to comprehensively designed, high quality, medium density residential development also encouraged.</p> <p>Residential intensification is anticipated through well-designed redevelopments of existing sites, and more particularly through comprehensive development of multiple adjacent sites. Zone standards and urban design assessments provide for new residential development that is attractive, and delivers safe, secure, private, useable and well-landscaped buildings and settings.</p>	<p>a. Table 14.2.1.1a in the Plan describes the Residential Medium Density zone as to:</p> <p>i. Provide for medium density housing only in areas surrounding commercial centres;</p> <p>ii. Enable a typology of two to three storey buildings with a strong emphasis on landscaping and design to create attractive environments.</p> <p>b. Existing Plan objectives will not address medium density housing being provided across the urban environment at a density and height anticipated by MDRS. Design details are also not well supported across higher order documents. Accordingly, this option is not the most appropriate way to achieve the purpose of the Act.</p>
<p>14.2.5 [new] – Residential New Neighbourhood Future Urban Zone</p> <p>a. Co-ordinated, sustainable and efficient use and development is enabled in the <u>Residential New Neighbourhood Future Urban Zone</u>.</p>	<p>Refer to Subdivision s32</p>
<p>Objective for High Density Residential zone</p>	

<p>14.2.6 [new] – High Density Residential Zone – Option 1 – insert new objective</p> <p><u>High density residential development near larger commercial centres, commensurate with the expected demand for housing in these areas and the nature and scale of commercial activities, community facilities, and multimodal transport networks planned or provided in the commercial centres.</u></p>	<ul style="list-style-type: none"> a. The intent of proposed new objective 14.2.6 is to provide for high density development surrounding larger commercial centres, and is consistent with objective 1 of MDRS, Objectives 1, 2, 3, 4, and 8 of NPS-UD, Objective 6.2.1 and Objective 6.2.2 of the CRPS. b. This objective provides for high density development across the urban environment in proximity to larger commercial centres that provide for (or plan to provide for) a variety of services. c. Proposed objective 14.2.6 seeks to address the following resource management issues: <ul style="list-style-type: none"> i. Issue 2 – Surrounding City Centre response; and ii. Issue 3 – Suburban Centres residential response. d. Option 1 (Proposed objective 14.2.6) would (in the context of Part 2 matters): <ul style="list-style-type: none"> i. Provide a consolidated urban form by focusing intensification within the existing urban footprint, delivering an efficient and sustainable development form; ii. Enable intensified development surrounding larger commercial centres, improving social and economic well-being through a focused development form near established and planned businesses and community services; and iii. Improve housing supply across Christchurch, likely reducing costs and improving economic well-being.
<p>14.2.6 [new] – High Density Residential Zone – Option 2</p> <p>Retention of the existing Residential City Centre Zone objective as presently contained within the Plan under 14.2.8:</p> <ul style="list-style-type: none"> a. A predominantly residential environment offering a range of residential opportunities, including medium to high density 	<ul style="list-style-type: none"> a. Objective in the Plan seeks to: <ul style="list-style-type: none"> i. Provide for high density housing within and surrounding the central city, only; ii. Enabling a typology of three to four storeys, with a height response that reflects localised character and maintains amenity values.

<p>living, within the Central City to support the restoration and enhancement of a vibrant city centre;</p> <p>b. A form of built development in the Residential Central City Zone that enables change to the existing environment, while contributing positively to the amenity and cultural values of the area, and to the health and safety, and quality and enjoyment, for those living within the area.</p>	<p>b. Existing Plan objectives will not address the requirement through the NPS-UD to provide for high density housing of at least six storeys surrounding the city centre, nor the need to intensify around relevant commercial centres to a degree commensurate to services provided or enabled (which may be larger than the medium density outcomes the Plan envisions). The objectives maintain current amenity values, which are instead anticipated to fluctuate under the NPS-UD in order to respond to the changing community needs for housing.</p>
<p>Objective for High Quality Residential Environments</p>	
<p>14.2.4 – High quality residential environments – Option 1 – change objective 14.2.4 as follows:</p> <p>High quality, sustainable, residential neighbourhoods which are well designed; have a high level of amenity, enhance local character and reflect <u>to reflect the planned urban character</u> and the Ngāi Tahu heritage of Ōtautahi.</p>	<p>a. The intent of objective 14.2.4 is to provide for quality residential development to be achieved that supports the planned urban character of areas, and is consistent with objective 1 of MDRS, Objectives 1, 4, 5, and 8 of NPS-UD, and Objective 6.2.1 of the CRPS.</p> <p>b. This objective provides for a residential environment that develop to meet current and future housing needs in a manner that is sustainable and achieves quality living environments that consider the cultural heritage of Ōtautahi.</p> <p>c. Proposed objective 14.2.4 seeks to address the following resource management issue:</p> <ul style="list-style-type: none"> i. Issue 4 – Enabling residential intensification whilst providing for high quality residential environments <p>d. Option 1 (Proposed objective 14.2.7) would (in the context of Part 2 matters):</p> <ul style="list-style-type: none"> i. Provide a development form that is future-focused, providing long-term housing sufficiency that will improve social and economic well-being of local communities; ii. Make efficient use of physical resource to deliver housing; and

	<ul style="list-style-type: none"> iii. Create housing in a manner that respects cultural values within the urban environment.
<p>14.2.4 – High quality residential environments – Option 2 – retain objective 14.2.4 unchanged</p>	<ul style="list-style-type: none"> a. Retaining objective 14.2.4 unchanged seeks to: <ul style="list-style-type: none"> i. Provide for high quality residential environments that prioritise the delivery of local amenity, character, and cultural heritage; ii. Protect local neighbourhood character by ensuring conformance for new developments. b. Retaining the objective unchanged will not address the requirement through the NPS-UD or MDRS to provide for an urban development that delivers a housing typology that corresponds to the anticipated future housing needs of communities, including future amenity needs. Maintaining the current objective would be inconsistent with the amenity outcomes of the NPS-UD. Accordingly, this option is not considered to be the most appropriate.
<p>Objectives proposed to be removed</p>	
<p>14.2.2 Objective - Short term residential recovery needs</p> <ul style="list-style-type: none"> a. Short-term residential recovery needs are met by providing opportunities for: <ul style="list-style-type: none"> i. an increased housing supply throughout the lower and medium density residential areas; ii. higher density comprehensive redevelopment of sites within suitable lower and medium density residential areas; iii. medium density comprehensive redevelopment of community housing environments; iv. new neighbourhood areas in greenfield priority area; and v. temporary infringement of built form standards as earthquake repairs are undertaken. 	<p><i>Implementation of MDRS means that the outcomes that are sought are no longer relevant.</i></p>
<p>14.2.8 Objective - Central City residential role, built form and amenity</p>	<p><i>This objective is inconsistent with the NPS-UD and inconsistent with MDRS as it seeks to maintain protection of local character through targeted</i></p>

<p>a. A predominantly residential environment offering a range of residential opportunities, including medium to high density living, within the Central City to support the restoration and enhancement of a vibrant city centre;</p> <p>b. A form of built development in the Residential Central City Zone that enables change to the existing environment, while contributing positively to the amenity and cultural values of the area, and to the health and safety, and quality and enjoyment, for those living within the area.</p>	<p><i>building heights and protection of existing amenity values, while only targeting high density areas surrounding the central city.</i></p> <p><i>Objective is replaced by HRZ objective and supporting framework.</i></p>
---	--

5.3.4 The above analysis indicates that the proposed changes to objectives and new objectives in the residential chapter of Plan Change 14 are consistent with the Plan objectives and higher order directions and therefore is the most appropriate way to achieve the purpose of the Act. In particular, it achieves this through aligning the framework with the intensification direction of both MDRS and the NPS-UD by recognising a wholesale medium density response, and high density response around commercial centres, which seeks to achieve the future planned character of areas, rather than preserving neighbourhood amenity and character. By comparison, retaining the status quo would not be consistent with higher order directions to provide for a future-focused enabling framework, and would not achieve the purpose of the Act.

5.3.5 It is therefore considered that the new and amended objectives of the residential chapter of Plan Change 14 are the most appropriate way to achieve the purpose of the Act.

5.4 Reasonably practicable options for provisions

5.4.1 In establishing the most appropriate provisions for the proposal to achieve the objectives of Plan Change 14, reasonably practicable options for provisions were identified and evaluated.

5.4.2 In considering reasonably practicable options for achieving the objectives of the Plan Change and the relevant higher order directions, the following options for policies and rules have been identified. Taking into account the environmental, economic, social and cultural effects, the options identified were assessed in terms of their benefits and costs. Based on that, the overall efficiency and effectiveness of the alternative options was assessed.

5.4.3 **Option 1** – Status quo. As previously discussed, the ‘status quo’ option includes the MDRS because s86BA provides that rules permitting MDRS-compliant developments have immediate legal effect upon notification, and inconsistent rules to cease to have legal effect.

5.4.4 **Option 2** – Alternative Plan Change – Implement MDRS across existing residential zones, increase permitted building heights in the Residential Central City Zone (RCCZ) to 20m (six storeys). The existing Plan zones and boundaries would continue, however the density standards of MDRS would simply be inserted into the provisions of each relevant residential zone, alongside the objectives and policies of Clause 6 of Schedule 3A. Only heights for RCCZ would be updated from the current 11/14m maximums.

5.4.5 **Option 3** – Proposed Plan Change – Amalgamation of relevant residential zones within the urban environment to MRZ, with all intensified areas being zoned as HRZ. MDRS density

standards would apply across both zones, with HRZ being further enabled to respond to NPS-UD height limits and centre responses, managed through a series of precincts. This would result in the following provision changes:

- Amend Policy 14.2.1.1 to modify policy wording to be consistent with outcomes sought through MDRS and the NPS-UD, including zone descriptions changes in associated tables, aligning HRZ and MRZ with National Planning Standards and associated objectives;
- Insert Policy 14.2.2.5 to state how the overall residential enablement framework intends to operate, as a response to the restricted discretionary limit through MDRS;
- Insert Policy 14.2.2.6 to provide criteria to manage increased building height in MRZ and HRZ areas, aligning with MDRS and Policy 3 NPS-UD outcomes;
- Insert Policy 14.2.2.7 to better strengthen the need for firefighting capacity in light of enabled intensification across the urban environment;
- Insert Policy 14.2.6.1 to provide direction for how and where high density areas should be developed and align with the HRZ development response promoted through Policy 3(c) and (d) of the NPS-UD.
- Insert Policy 14.2.6.2 to detail how walking catchments will be used as an input to directing where HRZ areas will be enabled around centres in response to Policy 3(d) of the NPS-UD.
- Insert Policy 14.2.6.3 to provide for greater HRZ densities immediately surrounding the central city commercial area to address Objectives 1 and 3 of the NPS-UD and Policies 1(c), 2, and 3(c);
- Amend Policy 14.2.4.1 to update wording to align with MDRS and NPS-UD direction, particularly in reference to changes in amenity values and character, and provide greater clarity for the achievement of high quality residential environments;
- Amend Policy 14.2.4.2 to ensure references to amenity and character align with MDRS and NPS-UD direction;
- Insert Policy 14.2.4.3 to build upon the existing objective 14.2.4, detailing how larger scale, more comprehensive, developments around the City Centre Zone should be developed;
- Insert Policy 14.2.4.4 to provide direction for expected levels of waste management, servicing, and storage space in response to the significant degree of intensification enabled throughout the urban environment and the increased priority of adequate management of waste and storage in a more intensified urban environment;
- Insert Policy 14.2.4.5 to provide direction for how wind should be assessed to achieve pleasant and safe living and public environments;
- Insert Policy 14.2.4.9 to address specific sites newly zoned as residential large lot and the use of precincts to better address site specific development.
- Insert Policy 14.2.5.2 to detail how development around specific local centres shall be undertaken in response to intensification directed by Policy 3(d) of the NPS-UD;
- Insert Policy 14.2.6.3 to detail how high density heights surrounding the city centre zone will be managed in response to accessibility and the intended outcomes of Objectives 1 and 3 of the NPS-UD and Policies 1(c), 2, and 3(c).
- Insert Policy 14.2.6.4 to detail how development around specific larger commercial centres shall be undertaken in response to Policy 3(d) of the NPS-UD.
- Insert Policy 14.2.6.5 to detail how high density heights surrounding the CCZ will be managed in response to accessibility and the intended outcomes of Objectives 1 and 3 of the NPS-UD and Policies 1(c), 2, and 3(c).

- Insert Policy 14.2.6.6 to describe the types of developments that should be incentivised through the HRZ provision framework and Residential Design Principles.
- Create a medium and high density residential zone rule framework that:
 - Implements MDRS density standards across zones.
 - Provides for more lenient MDRS controls for the following standards: building height; height in relation to boundary (HRZ only); setbacks; building coverage; outdoor living space per unit (HRZ only); outlook space; windows to street.
 - Inserts additional development standards: building separation above 12m (HRZ only); fencing standards; garaging and carport building location; ground floor habitable room; service, storage, and waste management; water supply for fire fighting; wind standards; external ventilation units.
 - Introduces two tiers of enabled building heights in HRZ, being 20m (six storeys) and 32m (ten storeys), the latter only applying immediately surrounding the city centre zone.
 - Provides for any residential activity at no greater than restricted discretionary activity status.
 - Makes consequential amendments, including amending numbering and referencing, updating zone references, and minor changes for clarity or consistency with higher order documents not otherwise listed above.
 - Introduces new National Planning Standard definitions in Chapter 2 of the Plan where required to better give effect to MDRS, and other supporting amendments.
- Modify the Residential Large Lot Zone sub-chapter to give effect to new site specific controls for new precincts.
- Modify the Residential Guest/Visitor Accommodation Zone to better address the changes to residential zones and give effect to Policy 3(c) of the NPS-UD.

5.5 Evaluation of options for provisions

- 5.5.1 The policies of the proposal must implement the objectives of the Plan (s75(1)(b)), and the rules are to implement the policies of the Plan (s75(1)(c)).
- 5.5.2 In addition, each proposed policy or method (including each rule) is to be examined as to whether it is the most appropriate way for achieving the purpose of Plan Change 14 (s32(1)(b)).
- 5.5.3 Before providing a detailed evaluation of the policies and rules proposed in Plan Change 14, the alternative options identified have been considered in terms of their potential costs and benefits and overall appropriateness in achieving the objectives of the Plan and the relevant directions of the higher order documents.
- 5.5.4 The tables below summarise the assessment of costs and benefits for each option based on their anticipated environmental, economic, social, and cultural effects. The assessments are supported by the information obtained through technical reports and consultation (see 3.1.2).
- 5.5.5 The overall effectiveness and efficiency of each option has been evaluated, as well as the risks of acting or not acting.

Provisions Costs and benefits evaluation		
Option 1 - Status Quo	Option 2 – Alternative Plan Change	Option 3 – Proposed Plan Change (Plan Change 14)
<p>Benefits</p> <ul style="list-style-type: none"> • Environmental: increased development capacity provided for across much of the urban environment. • Economic: lower consenting costs with an increased level of development enabled. Increased housing supply has potential to reduce local housing costs. Potential for reduced local housing purchase prices. • Social: multiple residential units enabled over single parcels increases the ability for residents to provide for their housing needs. Improvements in well-being with potentially greater housing competition reducing costs and improving permanent housing tenure. • Cultural: There are limited benefits for cultural housing options through MDRS development standards and existing district plan definitions of market driven housing typologies and combinations of activities. <p>Costs</p> <ul style="list-style-type: none"> • Environmental: lack of localised control to respond to identified features and accessibility. No consideration in framework of developments that do not comply with MDRS density standards. • Social: lack of consideration for any associated controls to support day-to-day needs of residents. A more dispersed urban form reduces incidence social interaction and walking propensity, reducing personal and health well-being, 	<p>Benefits</p> <ul style="list-style-type: none"> • Environmental: increased development capacity provided for across much of the urban environment. Enablement of high density housing opportunities improves housing choice. Increasing intensification around the city centre has the potential to reduce private vehicle use and associate emissions. • Economic: lower consenting costs with an increased level of development enabled. Potential for reduced local housing purchase prices. Additional level of development opportunities provided. • Social: multiple residential units enabled over single parcels increases the ability for residents to provide for housing needs. Improvements in well-being with potentially greater housing competition, reducing costs and improving permanent housing tenure. Opportunities provided in the city centre for people to live close to places of employment and other services, reducing household transport costs. • Cultural: culturally based housing options are subject to limited policy support and are only possible through expensive and contestable resource consent processes, providing a barrier for urban Māori housing options. <p>Costs</p> <ul style="list-style-type: none"> • Environmental: little to no consideration of amenity impacts of higher densities: 	<p>Benefits</p> <ul style="list-style-type: none"> • Environmental: increased development capacity provided for across much of the urban environment. Enablement of high density housing opportunities improves housing choice. Intensifying within and around all larger commercial centres aligns with public and active transport corridors, providing low- or zero-emission transport options. Greater amounts of higher intensification also means that there is potential for economies of scale for development projects, reducing waste. • Economic: lower consenting costs with an increased level of development enabled. Potential for reduced local housing purchase prices. A focused area for higher (and minimum) densities around the city centre better responds to the economic recovery needs of the city centre, without taking away significant development opportunities. Intensifying around larger local centres provides for agglomeration benefits and captive local markets. • Social: multiple residential units enabled over single parcels increases the ability for residents to provide for multigenerational housing needs. Improvements in well-being with potentially greater housing competition, reducing costs and improving permanent housing tenure. Providing intensification around places of high accessibility means that

Provisions Costs and benefits evaluation		
Option 1 - Status Quo	Option 2 – Alternative Plan Change	Option 3 – Proposed Plan Change (Plan Change 14)
<ul style="list-style-type: none"> • Cultural: culturally based housing options are subject to limited policy support and are only possible through expensive and contestable resource consent processes, providing a barrier to urban Māori housing option <p>Efficiency Inefficient as it only provides for development at a permitted level. There is a lack of a supporting framework and little to no ability to address breaches beyond what is provided in MDRS. The establishment of MDRS across the existing zone framework also leads to a vast degree of repetition across the seven residential zones considered to be relevant residential zones.</p> <p>Effectiveness This option is considered to have a low degree of effectiveness. It is not effective at providing for developments greater than MDRS, failing to address the NPS-UD direction for high density. Additionally, inserting MDRS within the existing zone framework is likely to increase confusion for Plan users, reducing overall functionality and uptake of new development opportunities.</p> <p>Risk of acting, not acting Progressing MDRS in isolation has the risk of not addressing obligations under Policy 3 of the NPS-UD. Only applying MDRS across relevant residential zones means that local nuance is not possible, which risks diminishing local centres. Retaining the provisions as per Schedule 3A means that the opportunity for</p>	<p>overshadowing; dominance; outdoor living; privacy; building design (attractiveness).</p> <ul style="list-style-type: none"> • Economic: The scale of enablement across RCCZ has the potential to detract from relative opportunities within the central city. • Social: adverse effects on privacy and private amenity in high density areas. Lack of environmental design considerations to manage the effects on populations in close proximity. • Cultural: culturally based housing options are subject to limited policy support and are only possible through expensive and contestable resource consent processes, providing a barrier for urban Māori housing options. <p>Efficiency This option is not considered to be effective, primarily because only the surrounds of the city centre would have higher densities. The degree of intensification also does not reflect this being a significant focal point for the city and South Island. Efficiency could also be improved if relevant residential zones were amalgamated to simplify how the framework was applied.</p> <p>Effectiveness The effectiveness of this approach is reduced due to the retention of the existing zone framework, which could lead to confusion for Plan users. Only enabling higher densities around the city centre is also considered to be an ineffective means to facilitate intensification close to</p>	<p>people have greater immediate access to services from their place of residence, increasing walking propensity and improving well-being and health outcomes. A design focus with scale intensification ensures social capital is maintained or enhanced.</p> <ul style="list-style-type: none"> • Cultural: culturally based housing options are subject to explicit policy support, facilitating the possibility of mana whenua housing opportunities. <p>Costs</p> <ul style="list-style-type: none"> • Environmental: intensification is likely to result in reduced privacy and onsite amenity, with a long transition period before intensification has wholesale adoption. • Economic: some economic impact due to requirements of additional provisions, with some potential for intensification to remove developments otherwise progressed within commercial centres. Minimum building form and design standards for scale developments may increase some development costs as developers adjust to new controls. • Social: increased density and proximity of populations has the potential to increase social conflict. Poorly designed, low tenure housing can lead to social isolation. The transition period to an intensified urban form has the potential to cause conflict between high and

Provisions Costs and benefits evaluation		
Option 1 - Status Quo	Option 2 – Alternative Plan Change	Option 3 – Proposed Plan Change (Plan Change 14)
<p>incentives through more lenient controls is not made possible, reducing the prospects of transitioning the existing urban environment to a MRZ/HRZ setting.</p>	<p>employment, services and amenities, with larger commercial centres missing out on such a response.</p> <p><u>Risk of acting, not acting</u> The risk of this option means that the prosperity of suburban centres is reduced, by not considering enablement of higher densities around those centres. Not applying National Planning Standard zoning types alongside MDRS and the NPS-UD also means that real opportunities to intensify may not be apparent, with zoning references miss-aligned to the intensification outcomes that higher order documents direct.</p>	<p>low density areas as developments begin.</p> <ul style="list-style-type: none"> • Cultural: barriers to culturally based housing options are reduced. <p><u>Efficiency</u> The amalgamation of relevant residential zones into MRZ and HRZ is likely to increase the efficiency of applying intensification direction. Modification of MDRS controls will increase the efficiency of its application. The HRZ response best aligns with degrees of accessibility across the larger commercial centres and the services provided within them.</p> <p><u>Effectiveness</u> The application of two zones is likely to increase the effectiveness of achieving an intensified urban form, better articulating outcomes and readily defining development opportunities. HRZ intensification within areas of high accessibility, and within walkable catchments, means that opportunities are provided within the most feasible urban areas, improving the overall effectiveness.</p> <p><u>Risk of acting, not acting</u> Not acting may mean that opportunities around commercial centres are not realised, potentially reducing viability and the ready transition to an intensified urban environment, and increasing emissions. Acting also means that there is a chance of only sporadic take-up of new opportunities, responding to local feasibility.</p>

Provisions Costs and benefits evaluation		
Option 1 - Status Quo	Option 2 – Alternative Plan Change	Option 3 – Proposed Plan Change (Plan Change 14)
<p>Recommendation: This option is not the most appropriate way to achieve the objectives of Plan Change 14, Schedule 3A or the NPS-UD as it fails to provide for a well-functioning urban environment.</p>	<p>Recommendation: This option is not the most appropriate way to achieve the objectives of Plan Change 14, or Policy 3 intensification under the NPS-UD and fails to provide for a well-functioning urban environment.</p>	<p>Recommendation: This option is the most appropriate way to achieve the objectives of Plan Change 14, the MDRS and Policy 3 of the NPS-UD.</p>

5.5.6 Summing up, Options 1 and 2 are not as efficient and effective in achieving the objectives of the Plan and the NPS-UD and MDRS as the preferred option. The costs associated with Options 1 and 2 significantly outweigh the benefits and they have greater risks from acting/not acting. The detailed evaluation of **Option 3**, the preferred option, follows.

6 Evaluation of the preferred option for provisions

6.1.1 This section of the report provides an evaluation of Plan Change 14, and as required by section 77J of the RMA, describes below how Plan Change 14 allows for the same or greater development than the MDRS. Section 77J also required description of any modifications to the MDRS to accommodate qualifying matters. This is done in the s32 evaluation of qualifying matters.

6.1.2 **Option 3** is Plan Change 14, which:

- Amends Objective 14.2.1 – Housing supply – to align wording with the terminology used to define residential outcomes in the MDRS and NPS-UD;
- Amends Objective 14.2.4 – High quality residential environments – to align wording with the terminology used to define residential outcomes in the MDRS and NPS-UD;
- Inserts new Objective 14.2.2 – Housing Variety – being Objective 2 of MDRS and being inserted as required through s77G of the Act;
- Inserts new Objective 14.2.5 – Medium density residential zone – which establishes the intended outcomes of the zone and responds to National Planning Standards;
- Inserts new Objective 14.2.6 – High density residential zone – which establishes the intended outcomes of the zone and responds to National Planning Standards;
- Amends Policy 14.2.1.1 – Housing distribution and density – to modify wording to align with the outcomes of MDRS and NPS-UD, including consequential changes to zone descriptions appended to the policy;

- Amends Policy 14.2.4.1 – Neighbourhood character, amenity and safety – provide greater clarity for how high quality living environments are achieved alongside the MDRS and NPS-UD direction;
- Amends Policy 14.2.4.2 – High quality, medium density residential development - to modify wording to align with the outcomes of MDRS and NPS-UD;
- Inserts new Policies 14.2.2.1 to 14.2.2.4 and 14.2.5.1 – being MDRS policies 1-5, required to be inserted through s77G of the Act;
- Inserts new Policy 14.2.2.5 – Framework for building heights in medium and high density areas – in response to limiting activity status as imposed by MDRS;
- Inserts new Policy 14.2.2.6 – Management of increased building heights – as a consequence of MDRS and NPS-UD to direct how increased building heights should be considered to achieve a well-functioning urban environment;
- Inserts new Policy 14.2.4.7 – Firefighting water capacity – to provide a framework for firefighting standards contained across residential zones, in light of greater intensification and pressure on the water network;
- Inserts new Policy 14.2.5.2 – Local Centre Intensification Precinct – to denote where specific local centres have an intensification response;
- Inserts new Policy 14.2.6.1 – provide for a high density urban form – to describe what conditions need to exist when high density development will be enabled;
- Inserts new Policy 14.2.6.2 – High density location – to detail how walking catchments will be used in response to Policy 3(d) of the NPS-UD;
- Inserts new Policy 14.2.6.3 – Heights in areas surrounding the central city – details how increased heights should be concentrated around the CCZ;
- Inserts new Policy 14.2.4.3 – Quality large scale developments – to provide direction for comprehensive developments in response to the MDRS direction of three units per site;
- Inserts new Policy 14.2.4.4 – On-site waste, recycling, and storage – to detail how waste management servicing should be provided, alongside how storage space for units should be accounted for;
- Inserts new Policy 14.2.4.5 – Assessment of wind – to provide direction for how the wind environment should be evaluated, in light of increased height limits;
- Inserts new Policy 14.2.4.9 – Managing site-specific residential large lot development – to detail how new site-specific controls should support localised development outcomes;
- Inserts new Policy 14.2.6.4 – Large Local Centre Intensification Precinct – to denote where larger local centres would have an intensification response;
- Inserts new Policy 14.2.6.5 – High density residential precinct – to detail where building heights in response to Policy 3(c) would differ in response to Policy 1(c) of the NPS-UD.

- Inserts new Policy 14.2.6.6 – High density residential development – to direct what developments in HRZ should be incentivised to better achieve the objectives of the NPS-UD.
- The following existing Plan objectives and policies will be removed as they are considered to be inconsistent with the direction of MDRS and the NPS-UD, or are irrelevant in light of the new intensification direction:
 - *Policy 14.2.1.2 – Establishment of new medium density residential areas*
 - *Policy 14.2.1.3 – Residential development in the Central City*
 - *Policy 14.2.1.6 – Provision of social housing*
 - *Policy 14.2.1.8 – Provision of housing for an aging population*
 - *Objective 14.2.2 – Short-term residential recovery needs*
 - *Policy 14.2.2.1 – Short-term recovery housing*
 - *Policy 14.2.2.2 – Recovery housing – high density comprehensive redevelopment*
 - *Policy 14.2.2.3 – Redevelopment and recovery of community housing environment*
 - *Policy 14.2.4.4 – Character of low and medium density areas*
 - *Policy 14.2.4.5 – Character of residential development on the Port Hills*
 - *Objective 14.2.8 – Central City residential role, built form and amenity*
 - *Policy 14.2.8.1 – Building heights*
 - *Policy 14.2.8.2 – Amenity standards*
- Creates the new MRZ and HRZ in response to MDRS and NPS-UD direction, implementing the density standards in Part 2 of Schedule 3A of the RMA in accordance with s77G of the RMA.
- Creates several new residential precincts to manage local development, being:
 - Local Centre Intensification Precinct;
 - Larger Local Centre Intensification Precinct;
 - Town Centre Intensification Precinct;
 - High Density Residential Precinct;
 - Residential Hills Precinct
 - Residential Mixed Density Precinct – 86 Bridle Path Road;
 - Residential Mixed Density Precinct – Redmund Spur;

- Rural Hamlet Precinct.
- The following MDRS standards within HRZ and MRZ sub-chapters are also made more lenient, in accordance with s77H of the RMA:
 - Building height – permitted to 14m in HRZ and within Local Centre Intensification Precinct;
 - Height in relation to boundary – in HRZ and within Local Centre Intensification Precinct, exemptions for development of three or more residential units along the front boundary or for buildings setback 6m from side and rear boundaries;
 - Setbacks – exemption of setbacks for accessory buildings and internally-access garages of no greater than 10.1m in length and for eaves and roof overhangs of a specific dimension that protrudes into the front boundary setback;
 - Building coverage – exemption for eaves and roof overhangs of a specific dimension, with a permitted pathway in HRZ for 60% site coverage;
 - Outdoor living space per unit – in HRZ, smaller studio and single bedroom units are permitted to have a reduced outdoor living space, being 5m² less at the ground floor and 2m² less above ground floor;
 - Windows to street – exemption for glazing requirement percentage required, including when doors or windows are provided that connect to ground floor habitable rooms, only applying to the first 12m of parcel depth.
- Additional permitted standards to the MRZ and HRZ are also proposed:
 - Building height – in HRZ, requirement to construct residential units to at least 7m, promoting at least two storey development and greater intensification around centres.
 - Building separation – in HRZ, standard controlling the separation of parts of buildings above 12m;
 - Fencing standard – modification to existing fencing standard to better align with outcomes anticipated, requiring that at least 50% of the fenced frontage is no greater than 1m in height, and greater fencing heights permitted alongside and rear boundaries and on frontages along arterial roads;
 - Garaging and carport location – requiring that this be setback from the façade of any residential unit facing the street, when developing four or more units;
 - Servicing, storage, and waste management – modification of existing standard to better support new urban built form, including servicing areas and introducing storage areas for residential units, when developing four or more units;
 - Water supply for firefighting – carries over existing standard within the Plan to also apply to MRZ and HRZ;
 - Wind standard – introduces new wind thresholds for buildings above 20m in height;

- Building reflectivity – in MRZ, adopts operative controls for Residential Hills Zone to the new Residential Hills Precinct.
 - Outdoor mechanical ventilation units – introduces new controls for the placement of external mechanical ventilation units.
 - Minimum unit size – carries over operative Plan approach to MRZ and HRZ to require a minimum net floor area for residential units, scaling to number of bedrooms.
- A new restricted discretionary framework is proposed for buildings in the MRZ and HRZ, which applies to:
 - Four or more residential units;
 - Any building height captured under this framework, with different thresholds set at 14m, 20m, and 32m, depending on the underlying zone or precinct.
- Within Residential large Lot Zone, new provisions added to support proposed precincts:
 - Site density, site coverage, setbacks, building reflectivity, servicing and waste management, fencing, landscaping, and outdoor living space – carryover applicable rules for Residential Suburban and Residential Hills zones for density overlay areas at 86 Bridle Path Road, Redmund Spur, and the Rural Hamlet area.
 - Activity status tables within chapter also updated in accordance with Plan controls for each site.
- Within the Residential guest/visitor accommodation zone – standards modified to reflect changes to residential zones:
 - Maximum site coverage – increased to meet MDRS standard;
 - Maximum building heights – increased to match outcomes of MRZ and HRZ;
 - Minimum building setbacks from roads – reduced to match MDRS to ensure consistent street frontage;
 - Daylight recession planes – alignment with MDRS height in relation to boundary standard.
 - Appendix 14.16.11 – groups all adjusted to reflect new zones proposed around each site.
 - Activity status tables updated within chapter to reflect new permitted controls.

6.2 Assessment of costs and benefits of policies

NOTE: new Policies 14.2.2.1 to 14.2.2.4 and 14.2.5.1 – being MDRS policies 1-5 - are not evaluated as they required to be inserted by s77G.

Benefits
<p>Environmental:</p> <ul style="list-style-type: none"> • The direction to intensify within MRZ and HRZ areas means that there is better use of finite urban land, focusing intensification within existing urban areas. This also means that the provision of servicing to those urban areas is better enhanced, reducing the dependence on new infrastructure assets. • The policy direction recognises that building design can be used to reduce significant impacts on sunlight access and building dominance. • The precinct policies provide for a greater distinction of urban areas (when compared to only applying MDRS, as per Schedule 3A), creating recognisable urban forms that better respond to levels of accessibility between areas across urban Christchurch. The direction to enable greater levels of intensification within these areas means there is a high degree of accessibility to public and active transport corridors, reducing propensity for private vehicle use and the potential for greenhouse gas emissions. This makes living environments more resilient to the current and future effects of climate change. • Policies have also recognised the need for intensified areas to be serviceable, reducing the potential for mismanagement of waste generation. • Large scale developments have greater recognition in policies, better ensuring that sites are more effectively managed and supporting sunlight access.
<p>Economic:</p> <ul style="list-style-type: none"> • Better support for housing variety and supply means that local housing sufficiency is more likely to be met, thereby decreasing or stabilising housing costs. • Developing within the existing urban area means that infill intensification is more easily able to be realised, and costs for new infrastructure to deliver housing is reduced. • Policy direction to increase intensification around centres means that there is a larger population of local residents, stimulating local economic turnover and improving agglomeration benefits. • Recognition in policies for current and future generations means that the supply and development of housing is adaptable to contemporary demand. • Proactive approach to MDRS controls to make these more lenient where positive benefits are still attainable means that the threshold for consenting is lowered, increasing the propensity to develop. Economic reporting from Property Economics³⁶ and The Property Group³⁷ demonstrate that proposed provisions are feasible and potential adverse economic effects of provisions are reduced.
<p>Social:</p> <ul style="list-style-type: none"> • The provision of greater housing choice means that access to housing is enhanced, increasing permanent tenure of housing. • Safety is recognised within the policy framework in relation to building design features.

³⁶ See: Christchurch central city and suburban centres economic cost benefit analysis; and Christchurch City residential zones & intensification precincts economic cost benefit analysis.

³⁷ High Density Residential Feasibility Assessment – May 2022

- The direction to ensure practical use of waste management areas and the provision for storage as part of residential unit design reduces the chances of social conflict within residential environments.
- The policy framework recognises the importance of managing large scale developments so that site layout is better considered and ensure the privacy and safety of residential areas.
- Policy direction to intensify around centres means there is a freer access for residents to local services and commerce.

- Cultural:
- The policy framework recognises the importance of historic heritage and the need for its protection in light of increased intensification.
 - Options for multigenerational living are made possible.

Costs
<p>Environmental:</p> <ul style="list-style-type: none"> • Despite the introduction of various precincts to manage residential development, the dilution of residential zones to two core urban zones means there is still potential for a reduced distinction between urban areas across the city (when compared to operative Plan zones). Form outcomes are similar in nature for the different zones, with the main distinction being the degree of building height that is enabled. • Greater enablement of urban intensification is likely to result in increased transitional effects as some development opportunities are taken up. This means that where high density opportunities are taken up in isolated areas, effects will be disproportionately felt when compared to areas of large scale, neighbourhood, or street level development.
<p>Economic:</p> <ul style="list-style-type: none"> • Proposed new policies set new requirements for taller buildings, this increases the cost needed to address these new matters and has the potential to act as a deterrent to develop. • The enabling framework means there is an inherent risk that commercial centres may see lesser uptake of development opportunities.
<p>Social:</p> <ul style="list-style-type: none"> • Policies do not recognise the transitional effects of increasing intensification within areas that are at a lower density. This has the potential to increase social conflict at the interface of higher and lower density areas.
<p>Cultural:</p> <ul style="list-style-type: none"> • No cultural costs have been identified.

6.2.1 Appropriateness of proposed policies to achieve higher order document directions:

Appropriateness in achieving the higher order document directions
<p>Efficiency:</p> <ul style="list-style-type: none"> • Plan Change 14 reduces the number of policies contained within the residential chapter, enabling planning evaluations to be undertaken for new developments more easily. • The proposed polices have purposefully been designed to be specific, targeting the areas of most concern when addressing development effects. This improves the overall application of the provision framework. Care has also been taken to appropriately integrate MDRS policies within the residential chapter. • The proposal to only have two urban residential zones and sub-chapters means the simplicity of applying higher order direction is improved. • While additional development controls have been introduced, including those managing high density development, no discernible economic impact has been identified that would impact their use. • Existing policies that conflict with the MDRS or the NPS-UD direction have been proposed to be removed to avoid conflict with higher order documentation.
<p>Effectiveness:</p> <ul style="list-style-type: none"> • Plan Change 14 establishes a clear framework to apply higher order documentation. This can be seen through the simplicity of the zone framework and reduced policy direction that needs to be applied to developments. It is a targeted approach that readily provides for an enabling framework to intensify development in urban areas of Christchurch.
<p>Risk of acting/not acting:</p> <ul style="list-style-type: none"> • The risk of not implementing Plan Change 14 is that the intensification direction of higher order documentation is not sufficiently enabled, and as a result the Plan conflicts with the NPS-UD. This could result in a failure to transition to a more highly intensified urban environment in Christchurch.

6.3 Assessment of costs and benefits of the proposed rules

6.3.1 Proposed rules have been drafted to support the policy direction that is intended to achieve the objectives, including those from MDRS and Policy 3 of the NPS-UD, including where Council has proposed to make rules more lenient or provide additional rules to manage development within residential areas. Reference is made to section 3.3 for an overview of the proposed framework.

6.3.2 **Note:** MDRS Density standards are not considered here as they are required to be inserted through s77G of the Act.

Benefits
<p>Environmental:</p> <ul style="list-style-type: none"> • Proposals to make rules more lenient are likely to increase the likelihood that zone outcomes will be achieved and better ease the transition to a higher density environment. This includes HRZ rules to permit up to 14m building height and the

height to boundary rule exemptions which allow for intensification along the front boundary or when setback from side and rear boundaries.

- While allowing for a more intensive urban form along the front boundary, the HRZ exemption threshold is still likely to ensure sufficient opportunity to provide for private amenity outdoor living space at the rear of sites.
- Exemptions for smaller one-bed units in HRZ's outdoor living space requirements mean that there is more efficient use of a site, providing more bespoke treatment of smaller typologies.
- Building separation and form standards in HRZ mean that potential adverse effects are addressed, specifically in relation to privacy, building dominance, and sunlight access. These controls mean buildings above 12m must be separated from one another, and the building form must be recessed inwards as height increases beyond 14m.
- Garage placement controls means that residential occupation remains the dominant form within residential areas, improving residential appeal at the street level.
- New controls on managing wind effects ensures that the enjoyment and safety of places of leisure and travel are retained.
- The combination of minimum unit sizes and minimum building heights (in HRZ, only) ensure a minimum level of density is achieved in appropriate areas, better realising the uptake of intensification. Specifically within HRZ, the permitted pathway for increased site coverage further assists in achieving this outcome, incentivising the amalgamation of sites, whilst providing for greater levels of landscaping and communal living.

Economic:

- Greater permitted height limits in HRZ and leniency of recession planes means that there is a reduced need for consenting for four or five storey residential units.
- Exemptions for smaller one-bed units within the HRZ for outdoor living space requirements enables more efficient use of sites, providing greater opportunities for development.
- Controls proposed to manage HRZ development are not seen to reduce the overall economic feasibility of development (HRZ report on Feasibility, TPG).
- Exemptions for setbacks, site coverage, glazing, and outlook, all correspond to a more practical use of residential sites, reducing the need for consents for minor non-compliances and reducing overall consenting costs.
- Additions to definitions add clarity to the application of standards and allow for consent applications to be made more easily. Many of the new definitions are also those contained within National Planning Standards, improving their ease of use for Plan users.
- The combination of minimum building heights and the permitted pathway for greater site coverage in HRZ is likely to assist in the transition to a more intensified urban form and provide for greater populations around commercial centres, improving ongoing viability.
- Economic reporting³⁸ has stated that the following standards will have little to no economic impact on development: Fencing; garaging location; water supply for fire

³⁸ See economic reporting by Property Economics listed in section 3.1.2.

fighting; building reflectivity; breaches for street-facing glazing; and breaching in landscaped area.

Social:

- Creating an enabling framework means there is greater potential for housing choice, better addressing specific housing needs within the community.
- Practicality of development is considered through the control of waste management areas and ensuring adequate storage spaces are available, thereby reducing the chances of conflict within comprehensive developments.
- Improved controls on wind effects means that the wellbeing and enjoyment of public spaces near taller residential units is better maintained.
- Building separation controls in HRZ ensure better protection of privacy for residents. This is also further enhanced across MRZ and HRZ through the management of four or more units on a single site. This ensures that layout can better address how private space is used and overall accessibility for residents.
- Crime Prevention Through Environmental Design is considered throughout provisions, particularly for fencing, habitable room controls, exemptions for doors in glazing requirements, and the trigger for four or more units.
- A more intensified urban form can lead to greater social interaction and increased degrees of accessibility to local services and facilities, increasing walking propensity and physical and mental wellbeing.
- Design standards for scale developments ensure that social cohesion and social capital of communities is maintained and enhanced.

Cultural:

- The ability to construct more than one unit per site and increases to height limits, generally, supports opportunities for multigenerational housing options with respect to the concentration of housing.
- The recognition of papakāinga/kāinga nohoanga when considering height breaches enhances the ability to provide for urban papakāinga.
- Recognition of heritage values, in light of greater intensification, means that these features are better protected.

Costs

Environmental:

- Increases in HRZ permitted height, and the greater enablement of height across urban residential zones, is likely to decrease opportunities for sunlight access. This also applies to the exemptions for recession planes along front boundaries.
- The increase in density is likely to increase exposure to noise and pollution.
- The introduction of medium or high density housing within a lower density living area is likely to increase the chances of dominance or overshadowing on adjacent sites that have not been developed to a similar density.

<ul style="list-style-type: none"> The introduction of minimum building heights in HRZ may temporarily slow the delivery of intensified housing, as about a third of all housing consented³⁹ was a single storey and would be unlikely to meet the new requirements of 7m.
<p>Economic:</p> <ul style="list-style-type: none"> Specific building design standards are likely to increase development and design costs. This includes those for building separation, recessed building form, scale developments, and wind assessment. Economic reporting⁴⁰ has stated that the impact of following standards will be likely be limited to some capacity loss: height in relation to boundary; setbacks; outdoor living space per unit; outlook space; windows to street; building separation; servicing, storage, and waste management; number of units, wind standards; and site coverage. It is noted that reporting has identified that there are no economic benefits to proposed ground floor habitable room controls.
<p>Social:</p> <ul style="list-style-type: none"> Increased density and proximity of local populations has the potential to increase social conflict and isolation. The uplift in development potential within established (lower density) areas may mean there is a disproportionate degree of feasible opportunities to intensify. The flow-on consequences of this could lead to an inconsistent and dislocated urban form.
<p>Cultural:</p> <ul style="list-style-type: none"> Intensification near sites of cultural or historic significance has the potential to degrade sites. Intensification involving encroachment on water bodies, adversely affects taonga status of water. Intensification on its own does not provide for papakāinga/kāinga nohoanga which is distinctive from market driven zoning classifications.

6.3.3 Appropriateness of proposed rules achieving the objectives:

Consistency with the policies and appropriateness in achieving the objectives	
<p>Efficiency:</p> <ul style="list-style-type: none"> There is a strong correlation between the proposed rules and proposed policies – as summarised below: 	
Proposed Policies	Proposed Provisions (built form) / spatial response
14.2.2.1 Policy - MDRS Policy 2	<ul style="list-style-type: none"> Analysis has been completed for what are considered relevant residential zones and

³⁹ Building consents issued in the Residential Medium Density Zone (RMD) between the start of 2017 to the end of 2022 showed that the number of storeys for each consent was: 38% one storey; 59% two storey; and 4% three storey. Over this period 869 building consents were issued, permitting the construction of 3,555 residential units. Most areas where HRZ is proposed is currently zoned RMD, however the zone is also located within areas proposed to be MRZ.

⁴⁰ Christchurch City residential zones & intensification precincts economic cost benefit analysis, Property Economics.

	<p>zones in accordance with National Planning Standards have been proposed.</p> <ul style="list-style-type: none"> • This has amalgamated five residential zones into two (MRZ and HRZ), both with MDRS applied and modified in accordance with zone outcomes, greatly increasing the efficiency of its application.
14.2.2.2 Policy - MDRS Policy 5	<ul style="list-style-type: none"> • In both MRZ and HRZ, non-compliances are dealt with through a restricted discretionary (RDA) consenting framework. This readily provides for development beyond permitted standards when in accordance with the associated policy framework. • Clarity has been provided about exemptions to notification triggers within activity standards. • The need for consent has been eased through multiple changes to MDRS density standards to make these more lenient (building height, height in relation to boundary, setbacks, building coverage, outdoor living space, windows to street).
14.2.2.4 Policy - MDRS Policy 4	<ul style="list-style-type: none"> • Related provisions have been introduced to ensure that developments practically provide for residential living without impacting upon MDRS controls (building separation, fencing, garaging and carport building location, ground floor habitable room, service, storage, and waste management, water supply for fire fighting, wind standard, building reflectivity).
14.2.2.5 – Framework for building heights in medium and high density areas	<ul style="list-style-type: none"> • Provides direction for the enablement framework directed by Clause 4 of Schedule 3A and Clause 3.4(2) of the NPS-UD.
14.2.2.6 – Management of increased building heights	<ul style="list-style-type: none"> • Provides a framework for building heights in MRZ and HRZ, which is achieved through the RDA provisions.
14.2.2.7 Policy – Firefighting water capacity	<ul style="list-style-type: none"> • Direction to ensure adequate water supply for fire fighting is provided which is achieved through standards.
14.2.4.1 Policy - Neighbourhood character, amenity and safety ⁴¹	<p>Provides policy direction which is achieved through :</p> <ul style="list-style-type: none"> • Residential Design Principles. • Additional exemptions for windows to street. • Ground floor habitable room controls.

⁴¹ This is an existing policy that is proposed to be substantially modified through Plan Change 14.

	<ul style="list-style-type: none"> Communal outdoor living area standards for high density living.
14.2.4.3 Policy – Quality large scale developments	<ul style="list-style-type: none"> Conforms to MDRS threshold of 3 units, by only applying at 4 or more units. Implemented through Residential Design Principle controls, which also apply to 4 or more units.
14.2.4.4 Policy – On-site waste and recycling storage	<ul style="list-style-type: none"> Achieved through on-site servicing controls in both MRZ and HRZ, and builds on MDRS focus for day-to-day needs.
14.2.4.5 Policy – Assessment of wind effects	<ul style="list-style-type: none"> Achieved through wind threshold standards used in both MRZ and HRZ.
14.2.4.9 Policy – Managing site-specific Residential Large Lot development	<ul style="list-style-type: none"> Provides link to precincts used to manage site-specific controls for Rural Hamlet, Redmund Spur, and 86 Bridle Path Road.
14.2.5.1 Policy – MDRS Policy 1	<ul style="list-style-type: none"> The enabling framework of MRZ means that a range of different housing types are possible, including beyond 3-storey development.
14.2.5.2 Policy – Local Centre Intensification Precinct	<ul style="list-style-type: none"> Provides policy response to NPS-UD of intensification around specific local centres. Provisions increase permitted heights to 14m as a response.
14.2.6.1 Policy – Provide for a high density urban form	<ul style="list-style-type: none"> A large amount of HRZ zone has been provided across urban Christchurch. This includes: around the central city, extending to Riccarton and Papanui, and around larger centres of: Linwood; North Halswell; Hornby; Church Corner; and Shirley. Rules increase the permitted building height to 14m to more easily provide for an increased building height, with an enabling framework providing development of up to 20m in most places, and 32m immediately surrounding the central city. Policy framing aligns with prerequisites used in the NPS-UD, providing a consistent policy application and consideration for additional HRZ development.
14.2.6.2 Policy – High density location	<ul style="list-style-type: none"> Provides a policy response to the NPS-UD by the application of precincts to manage developments in areas defined for higher densities.

14.2.6.3 Policy – Heights in areas surrounding the central city	<ul style="list-style-type: none"> • Policy direction achieved through rules for further HRZ enablement of up to 32m immediately surrounding the central city.
14.2.6.4 Policy – Large Local Centre Intensification Precinct	<ul style="list-style-type: none"> • Provides a policy response to the NPS-UD by the application of a precinct to manage developments in areas defined for higher densities around larger local centres (and one Town Centre). • Provisions increase permitted heights to 14m as a response and enable development of up to 20m via consent.
14.2.6.5 Policy – High Density Residential Precinct	<ul style="list-style-type: none"> • Provides a policy response to the NPS-UD by the application of a precinct to manage developments in areas defined for higher densities around the central city, to spatially denote the change from 20m to 32m being enabled in HRZ. • Provisions increase permitted heights to 14m as a response and enable development of up to 20m via consent.
14.2.6.5 Policy – High Density Residential development	<ul style="list-style-type: none"> • Provides direction for what types of development forms HRZ provisions should seek to incentivise, specifically: minimum building heights; site amalgamation; street-side building bulk. • This seeks to broadly respond to the objectives in the NPS-UD to create an enabling consenting framework, specifically in relation to those areas with the highest degrees of accessibility. HRZ is the most explicit spatial response to the NPS-UD and therefore provisions therein require minimum building heights to ensure a greater urban concentration around centres; provide a pathway to incentivise site amalgamation to assist in enabling scale development; and create a pathway for both greater on-site density and amenity through concentration of bulk along the street boundary.
Effectiveness:	
<ul style="list-style-type: none"> • Rules establish a sufficiently enabling framework that respond to Clauses 2 and 4 of Schedule 3A and Clause 3.2 of the NPS-UD. The rules create a framework whereby any breaches are dealt with under a restricted discretionary activity status. There are no discretionary or non-complying residential activities in MRZ or HRZ, when considering intensification directed by MDRS or Policy 3 of the NPS-UD that is not subject to any qualifying matters. 	

<p>Risk of acting/not acting:</p> <ul style="list-style-type: none">• The risk of not acting in implementing Plan Change 14 is that the intensification direction of higher order documentation is not sufficiently enabled, and as a result the Plan conflicts with the NPS-UD. This could result in a failure to transition to a more highly intensified urban environment in Christchurch.
--

6.4 The most appropriate option

- 6.4.1 Progressing with Plan Change 14 is considered to be the most appropriate option to achieve the purpose of the Act. It is an efficient and effective means of achieving the requirements of Schedule 3A of the Act and the intensification requirements of Policy 3 of the NPS-UD, while achieving a wide range of environmental, economic, social, and cultural benefits while limited associated costs.

7 Conclusions

- 7.1.1 This proposed element of Plan Change 14 seeks to make changes to the Residential Chapter (Chapter 14) of the Christchurch District Plan to respond and implement the MDRS and Policy 3 of the NPS-UD.
- 7.1.2 The evaluation undertakes an assessment of the proposed provisions alongside realistic alternative approaches. The evaluation has been undertaken in accordance with s32 and s77J of the RMA to identify the need, benefits and costs, in addition to the appropriateness of the proposal, having regard to its effectiveness and efficiency relative to other means in achieving the purpose of the RMA. The evaluation demonstrates that this proposal is the most appropriate option as it:
- best gives effect to higher order documents, including the national planning standards;
 - is the most effective and efficient way to achieve the purpose of the Act and the Plan's objectives; and
 - addresses the identified issues.