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|   | <p>Resource Management Act 1991<br/>Christchurch District Plan<br/>Plan Change 14<br/><b>Section 32 Evaluation</b></p> | <p><b>14</b></p> |
| <p align="center"><b>PLAN CHANGE 14 – HOUSING AND BUSINESS CHOICE</b></p> <p align="center"><b>REVISED PROVISIONS FOR SPECIFIC PURPOSE SCHOOL AND HOSPITAL ZONES</b></p> <p><b>Overview</b></p> <p>The following report has been prepared to support Plan Change 14 to the Christchurch District Plan. This part of the proposed plan change updates the provisions of Chapter 13 Specific Purpose Zones for the School and Hospital zones, to ensure that they are appropriate under the National Policy Statement on Urban Development (NPS-UD) in enabling development which is consistent with the more enabling provisions introduced into the District Plan for residential and commercial zones through Plan Change 14.</p> <p>There are only a small number of schools and hospitals located in the larger commercial zones, so the intensification policies of the NPS-UD primarily apply to those Specific Purpose (SP) zones which are located within the High Density Residential zones proposed around these centres. The focus of the changes to the Specific Purpose zones is to ensure that the zone rules enable further intensification of development on the SP sites in these areas. The main changes are to the heights provided for, enabling larger buildings. Some changes have been made to other rules to align with this and to mitigate the potential effects of greater intensification, and some rule provisions have been simplified, particularly for the SP Hospital zone. Plan Change 14 does not allow for a full review of Specific Purpose School and Hospital zones across the City, because only the NPS-UD applies, and not the Medium Density Residential Standards (MDRS), with its consequent proposed changes to the Medium Density Residential zone.</p> <p>Only very minor changes are proposed to the relevant objectives and policies in Chapter 13, as the purposes of these zones remain the same.</p> <p>An additional change is the exclusion of those parts of school and hospital sites occupied by heritage items and settings, from the built form rules for schools and hospitals, as heritage is a Qualifying Matter under the NPS-UD. The built form of these sites or parts of sites is controlled by Chapter 9.3 Historic Heritage.</p> |  |                  |

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## 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 school and hospital zone provisions proposed by Plan Change 14.
- 1.1.2 The overarching purpose of section 32 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 the Council provides an evaluation of the changes proposed in Plan Change 14 to the Plan. The evaluation must examine whether the proposed objectives are the most appropriate way to achieve the purpose of the RMA, and whether the proposed provisions are the most appropriate way to achieve the objectives of the Plan. The report must consider reasonably practicable options, and assess the efficiency and effectiveness of the provisions in achieving the objectives. This will involve identifying and assessing the benefits and costs of the environmental, economic, social and cultural effects anticipated from implementing the provisions. The report must also assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.
- 1.1.4 The purpose of this report is to fulfil the s32 requirements for proposed Plan Change 14, in respect of the provisions for schools and hospitals. 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.
- 2.1.2 Critical to the school and hospital elements of Plan Change 14 is section 77G of the Act. Council is directed to give effect to Policy 3 of the National Policy Statement for Urban Development (**NPS-UD**). Policies 3 (a), 3(c) and 3(d) of the NPS-UD as amended in 2021, results in Plan Change 14 needing to provide for commercial and residential intensification within and around the City Centre zone, large town centres such as Papanui, Riccarton and Hornby, town centres such as Linwood/Eastgate and Shirley/Palms and large local centres such as Bush Inn, and Merivale.
- 2.1.3 There is no limitation in the NPS-UD intensification directive to residential zones, and thus intensification is also required for zones such as Specific Purpose (School) zones and Specific

Purpose (Hospital) zones, located within areas which are being intensified under Policy 3 of the NPS-UD (generally in the Central City and around larger commercial centres). This means that the Plan provisions for schools and hospitals should be aligned with the provisions of the zones around them, in respect of the proposed High Density Residential zones in Plan Change 14. These are a response to the requirement in Policy 3 (c) to provide for building heights of at least 6 storeys within the walkable catchments of the edge of city centre zones (the proposed City Centre zone in PC14) and within the walkable catchments of town centre, local centre and neighbourhood centre zones. This is reinforced in section 77N of the RMA (duty of specified territorial authorities to give effect to Policy 3 (or Policy 5) in non-residential zones).

- 2.1.4 Alignment is not required with the zone provisions for the proposed Medium Density Residential zones, as the Medium Density Residential Standards introduced into the Resource Management Act in late 2021, which provide for a “baseline” of 3 storey development, specifically state that they are limited to residential zones only. Hence they are not able to be applied to the Specific Purpose School or Hospital zones. Consequently Plan Change 14 is only able to revise the “to be rezoned to HRZ” parts of the current Specific Purpose School zone and Specific Purpose Hospital zone provisions, rather than all of the current provisions.
- 2.1.5 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 section 32 report for residential zones for PC14 sets out relevant higher order documents and draws attention to specific objectives and policies, and these are also relevant to intensification in school and hospital zones so are not repeated here.
- 2.1.6 As noted above, Plan Change 14 is an Intensification Planning Instrument (IPI) which in respect of the MDRS (residential zones) will have immediate legal effect on notification, unless a qualifying matter applies<sup>1</sup>. The “qualifying matter” exception can also apply to intensification requirements under the NPS-UD which go beyond the MDRS; however these intensification requirements do not have immediate legal effect on notification as for the MDRS, and must proceed through the submission and hearing process before they gain statutory weight.
- 2.1.7 The section 32 report for residential zones for PC14 discusses the purpose and effect of the NPS-UD in more detail from section 2.1.6 onwards. 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 are intended to 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). Significant or at least more infill development than has already been occurring in Christchurch, means there will inevitably be increases in population, especially in High Density Residential zones, resulting in increasing demand on existing schools and hospitals.
- 2.1.8 Policies 4, 6, and 9 establish what kinds of constraints are able to be considered through the required intensification response. The NPS-UD also provides for ‘qualifying matters’ (Policy 4 and as defined through Clause 3.32) that detail specific features that are able to be considered to

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<sup>1</sup> Note that Council has now proposed a sunlight access qualifying matter that applies to all medium and high density residential zones, which means that they will not be in legal effect until after an IHP hearing and recommendation by the IHP to Council on those rules.

modify any intensification directed by Policy 3, referred to at the start of this section. Policy 6 highlights that the changes that should be anticipated through the wider intensification direction are not considered in themselves to be an adverse effect.

- 2.1.9 Section 2.1.14 onwards and section 2.1.23 onwards of the section 32 report for residential zones, discuss objectives and policies and the direction of the Canterbury Regional Policy Statement (RPS) and the Christchurch Central Recovery Plan (CCRP) respectively. Objectives 6.2.1 and 6.2.2 state that Key Activity Centres should be the focus for development, but new areas of greenfield development are also provided for in Map A. In the RPS infill development is intended to be the majority (55%) of development between 2022 and 2028. While the NPS-UD supports some aspects of these objectives, and also promotes active and public transport use in line with the RPS, it requires intensification in and around additional centres. As well, densities required to be able to be achieved under the six storey development in and around centres under the NPS-UD would achieve more like 200 households per ha, versus 100 households per ha with three storey development under the MDRS (across the urban residential environment) respectively, both of which are considerably higher than the RPS target densities of a maximum of 50 households per ha in the central city, and 30 households per ha with infill development elsewhere in the City.
- 2.1.10 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 and with less vacant land. A central city height plan with varying heights, with a more compact core contained by a frame, were intended to provide a lower rise central city, while providing for the core to expand in future if required. Again the NPS-UD provides for greater intensity than this, requiring building heights and density of urban form to realise as much development capacity as possible, to maximise intensification. Plan Change 14 provides for up to 10 storied residential development within a 15 minute walking catchment of the City Centre zone and 6 storied residential development beyond this within a 10 minute walking catchment of other large commercial centres. There are only a few schools and larger health facilities within the 10 storey part of the proposed High Density Residential zone. Provisions for these parts of the Specific Purpose School and Hospital zones are discussed later in this report. Lesser weight is now afforded to the CCRP since the legislation behind it has been revoked, but PC14 must still have regard to the directions of the CCRP under section 74 of the RMA.
- 2.1.11 In regard to the Iwi Management Plan, paragraph 2.1.33 of the section 32 report for the residential zones notes that PC14 has been developed alongside Mahaanui Kurataiao.
- 2.1.12 No other management plans or strategies prepared under other Acts are relevant to the resource management issue identified.
- 2.1.13 As mentioned above, the RMA prescribes certain requirements for how district plans are to align with other instruments. Whether the proposed District Plan objectives and provisions relevant to the development of schools and hospitals in Specific Purpose zones which are surrounded by High Density Residential zones will achieve this alignment is discussed later in this report.

## **2.2 Problem definition - the issues being addressed**

- 2.2.1 **ISSUE 1 – How should Policies 3(a), 3(c) and 3(d) of the NPS-UD be applied to the Specific Purpose School zone**
- 2.2.2 Council is required in its District Plan to give effect to Policy 3(a), 3(c) and 3(d) of the NPS-UD by providing for increased development capacity in walkable catchments eg within and around city centre zones and within and adjacent to large commercial centres. As already noted there is no

limitation of this NPS-UD intensification directive to residential zones, meaning that intensification in Specific Purpose zones within these areas is also required.

- 2.2.3 Policy 3(a) focuses on building heights in relation to the edge of city centre zones, whereas Policy 3(d) in relation to larger commercial centres mentions both building heights and densities. There are choices in how the provisions of the Specific Purpose School zone can be amended to be more consistent with the development potential now being afforded to the areas in which the schools are located.
- 2.2.4 The District Plan already provides a significant degree of enablement and flexibility in how schools can use their sites. It must also be noted that all state schools and most state integrated schools are designated by the Minister of Education. Redevelopments of designated sites or buildings can therefore go beyond the built form rules set out in the SP zone (albeit that designations may have conditions attached which may limit the form of built development on the site<sup>2</sup>). Zone provisions in this case act essentially as guidance on the specific outcomes that the community would wish to see. Built forms of private schools, which do not have designating authority, are more directly controlled by District Plan rules.
- 2.2.5 Schools are generally made up of a number of buildings including some large buildings such as halls, gymnasiums and arts and music performance centres, and classroom blocks, as well as playing fields and other open space. Many but not all of them are located on relatively large sites. With school reorganisation and rebuilding since the Canterbury Earthquakes there has already been a trend to more intensive use of sites including more buildings on existing sites, e.g. with school clustering, schools catering for a wider range of years of schooling on the same site, larger buildings for collaborative learning, and some schools providing shared or specialist facilities. There is also significant community use of school facilities, including outside of school hours, with schools often acting as community hubs.
- 2.2.6 Schools can be differentiated in form and function from residential uses around them because of the scale and form of their buildings. Over time, perhaps over decades, the NPS-UD is likely to prompt intensification in surrounding residential areas and will likely lead to increases in school rolls. At the same time it appears that the size of school sites may be becoming slightly smaller on average over time. Background work for the District Plan review revealed that private schools and state-integrated schools were already on smaller sites than state schools, on average, meaning that intensification of built development of those schools may become a challenge more quickly than for schools with larger sites.
- 2.2.7 Note that review of the provisions for schools with Medium Density Residential zones surrounding them is outside the scope of Plan Change 14. This is because only the NPS-UD applies to schools in the SP (School) zone, and not the MDRS, which only applies to relevant residential zones.
- 2.2.8 **ISSUE 2 – How should Policies 3(a), 3 (c) and 3 (d) be applied to Specific Purpose Hospital zones?**
- 2.2.9 Paragraphs 2.2.2 and 2.2.3. above also apply to hospitals. There are choices in how the provisions of the Specific Purpose Hospital zone (insofar as those hospitals which are located within High Density Residential zones) can be amended/intensified to be more consistent with the development potential now being afforded, as a result of the application of the NPS-UD to the areas in which the hospitals are located.

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<sup>2</sup> Note that section 77M (5) and (6) of the RMA states that schools with education designations in a relevant residential zone or adjacent to one, can rely on the MDRS density standards (meaning built form rules) if they are more lenient than those in the designation.

- 2.2.10 It is important to note that this review does not extend to reviewing or intensifying the planning provisions applying to Christchurch Hospital, since this hospital already has a permitted maximum building height of 60 metres (other than at the road boundary setback), which is well beyond the NPS-UD Policy 3 maximum height Council have proposed of 32m. This therefore already meets the intent of Policy 3(c).
- 2.2.11 However hospitals are somewhat different to schools in that they are less directly related to the areas within which they are located in terms of “catchments”. The catchments of most of the hospitals or facilities zoned SP Hospital are City wide (with the possible exception of the Wesley Care Hospital site) as they are to some extent specialised in function. Nevertheless intensification across the City and especially near the City Centre and other commercial centres will over time, increase the population of people who need to be served by hospitals. Hospitals are often already differentiated in form and function from residential uses around them, because of the larger scale and form of their buildings.
- 2.2.12 The primary aim of the review is to provide for increased building heights of up to 20m or 6 storeys for all of the hospitals within High Density Residential zones, except the former Christchurch Women’s Hospital site, which is within a 32m or 10 storey High Density Residential zone. Even if this site was ultimately used and/or rezoned for residential purposes, it would still have a height limit of 32m as it is within 15 minutes walking distance of the City Centre zone. Increasing building heights has been supplemented by adjustments to other plan provisions to ensure that any significant adverse effects of intensification on adjoining areas can be adequately mitigated.
- 2.2.13 The District Plan already provides considerable enablement about how hospitals can use their sites, by focusing primarily on site interfaces with surrounding areas (often residential) and roads, rather than the sites as a whole. For example there are currently no coverage rules for hospitals. However, alignment with plan provisions in residential zones being introduced in response to the NPS-UD requires that allowable heights be increased.
- 2.2.14 It must be said that the provisions, even in relation to the inner urban sites which are the subject of this review (including the former Christchurch Women’s Hospital site and Montreal House, which will be part of this group in the revised provisions), are unnecessarily complex and differentiated between each of the sites, so a secondary aim of this review has been to simplify these SP (Hospital) rules. The provisions for the remainder of the SP (Hospital) zoned sites – hospitals located in suburban areas and the Christchurch Hospital itself – are also unnecessarily complex, but review of these provisions is outside the scope of Plan Change 14. This is because only the NPS-UD applies, and not the MDRS, which only applies to relevant residential zones and therefore not to the SP (Hospital) zone in suburban areas.

### **3 Development of the plan change**

#### **3.1 Schools - Background**

- 3.1.1 The resource management issues set out above are predominantly a result of legislative requirements to introduce increased density provisions to the District Plan and enable additional development. The current Specific Purpose School provisions and Specific Purpose Hospital provisions were drafted in the context of less permissive development frameworks and now need to be updated to better reflect the increased development capacity now to be provided for in surrounding residential zones, in particular the High Density Residential zone.



- 3.1.2 During the District Plan review from 2014-2017, the School zone provisions of the District Plan were comprehensively reviewed, including the list of schools and their alternative zones if not used for school purposes which is included in the appendices to the school zone subchapter. Significant changes were occurring in the education sector and in respect of school facilities as a result of the Ministry of Education’s “Rebuilding Christchurch Schools” programme following the 2010 and 2011 earthquakes. The MOE website indicates that the programme aimed to rebuild and repair 115 schools in greater Christchurch with the bulk of these in Christchurch City. The website states that as of December 2022, 80 schools have been refurbished, rebuilt or built with 25 in construction, with the programme planned to finish in 2025. During the post-earthquake period there has also been significant redevelopment on some private school sites including some large new buildings.
- 3.1.3 At the time of the District Plan review, the decision was made to keep the separate School zone that had been in place in Christchurch since the early 1990s, rather than schools merely being a land use provided for within residential zones, with the Minister’s designations overlying them, as in most District Plans in New Zealand. It was considered that school buildings are on average of greater scale than residential ones, and may be of greater height, building length and floor space, so standard residential built form rules are probably not appropriate. Christchurch has more private schools than most other cities in New Zealand, and there has been clear guidance from the Environment Court that there is no resource management reason for a distinction to be made between state and non-state schools in terms of effects. The School zone has worked well in practice, and the Schools zone has proved popular with communities as a statement of outcomes sought by the Council and because it clearly signals what use of the site can occur if some of all of the site is disposed of. It is not proposed to change this approach through Plan Change 14, which is only a selective review of provisions; indeed there is not the scope to undertake a city wide review of school zoning, because only the NPS-UD applies and not the MDRS.
- 3.1.4 The current District Plan was simplified to five types of built form standards for schools: building coverage as a percentage of the site; recession planes; height limits, road boundary setbacks and internal boundary setbacks. Some standards were relaxed from the previous City Plan to provide more flexibility, eg site coverage allowances were increased and height rules refined by stepping up allowable heights with distance from residential boundaries, to ensure that building scale and mass do not overly dominate surrounding land use, and to allow more building mass further from boundaries. Setbacks from road and internal boundaries were retained as they had been in the City Plan. Noise standards and hours of operation standards were dropped, relying only on general noise limits to protect aural amenity.
- 3.1.5 The Council has commissioned technical advice from its internal urban design team to assist with assessing the existing environment/issues and the potential effects of the proposal on the environment, as well as the potential options for mitigating any significant adverse effects. This advice includes the following:

**Table 1:** Technical Reports informing Plan Change 14 in regard to Schools

|    | <b>Title</b>  | <b>Author</b>          | <b>Description of Report</b>  |
|----|---|------------------------|---|
| a. | Technical analysis of Special Purpose Schools provisions. | Urban Design team, CCC | Assessment and modelling of potential options for intensification of SPS built form provisions, including options for mitigating effects. |
| b. | Designing Schools in Aotearoa New Zealand – School        | Ministry of Education  | Main document setting out design standards for state schools. This latest revision includes design principles for school property, and    |

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|  | Property Design Standards, V2.0 June 2022 |  | detailed site planning information. |
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- 3.1.6 The MOE School Property Design Standards include school design principles such as:
- Functionality – schools are primarily places for teaching and learning
  - Flexibility – flexible schools maximise multi-use spaces and minimise single use spaces
  - Adaptability – schools can cater for possible future changes in roll and adaptable buildings can be repurposed or reconfigured with minimal alteration.
- 3.1.7 With regard to site planning, the Design Standards include a number of statements about how school sites might best be designed. These can assist in considering how intensification could occur in the Specific Purpose School zone. For example:
- School design must consider a school’s context when locating buildings, infrastructure and outdoor spaces, including considering the temporal and environmental impacts on neighbours. Building placements should minimise any such effects on neighbours, as well as supporting the potential for development beyond a Masterplan roll.
  - Schools should maximise physical and visual connectivity throughout the school grounds and buildings.
- 3.1.8 Standards are provided in Table 3 for useable outdoor areas based on the number of school students. These are generally 30 – 40m<sup>2</sup> per learner, although constrained sites may provide less. The standards state that areas for outdoor learning and passive recreation are to take priority over active recreation space. Active recreation spaces should be set back from neighbours where practical and there should be good oversight for safe unsupervised use during and out of school hours. It is noted that disproportionately large central courtyards should be avoided.
- 3.1.9 The standards state that multi-level buildings are the preferred solution for constrained sites. Example strategies to preserve usable outdoor areas include compact, rational planning of buildings. The standards note that for connectivity, outlook and flexibility, there needs to be high quality visual and physical connection to the natural environment and covered outdoor learning.
- 3.1.10 The document does not have quantitative or locational standards for landscaping but does emphasise the natural environment, local ecology and soft landscaping, as well as preserving significant trees. This ties in with giving consideration in planning outdoor spaces to wind and shade.

## 3.2 Schools - Current Christchurch District Plan provisions

- 3.2.1 The current Plan’s Strategic Directions objectives, chapter objectives and provisions relevant to this plan change include the Objective 3.3.11 Community facilities and education facilities.

### *3.3.11 Objective - Community facilities and education activities*

- a. The expedited recovery and establishment of community facilities and education activities in existing and planned urban areas to meet the needs of the community; and
  - b. The co-location and shared use of facilities between different groups is encouraged.
- 3.2.2 The Schools subchapter Objective is more specific in terms of enabling providers to efficiently use and develop their land and buildings, which effectively is the purpose of the zone, and schools are also to act as hubs for a diverse range of community activities.

### 13.6.2.1 Objective - Use of education facilities

- a. Education providers are able to efficiently use and develop their land and buildings, within the wider network of education facilities across Christchurch, for:
  - i. education activity; and as
  - ii. hubs for a diverse range of community activities, while:
  - iii. mitigating significant adverse effects on the amenity values of adjoining zones, and
  - iv. recognising and enhancing the contribution of education buildings and sites to the character of neighbourhoods.

3.2.3 School built form standards in the operative District Plan are divided into three groups – those for schools within a lower density surrounding zone eg Residential Suburban or Residential Suburban Density Transition, those for schools in higher density zones eg Residential Medium Density, and those in the City Centre. This is for two reasons: (a) parts of school zoned sites may be redeveloped in accordance with the zoning of the surrounding area, and (b) it is considered that, in the design and location of school buildings, some attempt should be made to fit at least those buildings on the edge of the school zone, within the built form standards of that context, e.g. those “edge” buildings particularly should not overly dominate surrounding land uses with large building scale and mass.

3.2.4 The current school built form standards partly reflect those of the zones around them particularly near site boundaries, but with greater development opportunity further into sites to allow larger building scale and mass. Site coverage allowances are generally greater than for residential zones, as are heights provided for, with a step up of allowable heights with distance from residential boundaries. Both these rules are scaled “upwards” from the schools in RS/RSDT zones to RMD to Residential City Centre zones to allow for denser development. However, setbacks are generally greater than for residential zones to reflect schools’ larger building scale and mass and the potential for some adverse effects on the near neighbourhood. Internal boundary setbacks are kept the same for schools in all zones for this reason, but road boundary setbacks are less for schools in denser zones.

## 3.3 Schools - Description and scope of the changes proposed

3.3.1 The Plan Change only proposes very minor changes to the objectives and policies of the Plan in relation to schools. Strategic Objective 3.3.11 (see paragraph 3.2.1 above) will be renumbered to Objective 3.3.12, but its content will not change.

3.3.2 With respect to the schools subchapter Objective 13.6.2.1, (see paragraph 3.2.2 above), minor changes are proposed to the wording about amenity values in iii, since the NPS-UD as a higher level document states in Policy 6 that “amenity values are not of themselves an adverse effect”. Similar changes are proposed to Policy 13.6.1.2 Amenity of neighbourhoods, as discussed in the section 5.1 evaluation.

3.3.3 The purpose of this part of the plan change is to update the built form rule provisions of Chapter 13 Specific Purpose Zones for the School zone, to ensure that they are appropriate under the NPS-UD in enabling development which is consistent with the more enabling provisions introduced into the District Plan for the residential and commercial zones surrounding the schools. Plan Change 14 does not involve any changes to the activities provided for in the SP School Zone.

3.3.4 The proposed changes include:

- a. Adding a clause at the beginning of 13.6.6.2 exempting parts of school sites occupied by heritage items and settings from the schools built form standards, so that those parts of sites are controlled only by Chapter 9.3;
- b. In Rules 13.6.4.2.1, 13.6.4.2.2, 13.6.4.2.3 and 13.6.4.2.5 of the schools built form rules, updating the references to alternative zonings in Appendices 13.6.6.1, 13.6.6.2, and 13.6.6.3, so that those zone names match rezonings via PC14.
- c. Increasing the maximum building height for schools surrounded by the High Density Residential zone, both around larger commercial centres and around the Central City zone, to 5m height at 4m from internal boundaries, and up to 20m (or up to 32m around the Central City zone)<sup>3</sup> at 10m from internal boundaries. Heights between 5 and 14 metres are effectively limited by the recession plane, allowing some lower height building mass between 4 and 10 metres from boundaries. At greater recession plane angles there may need to be a horizontal step inwards above 14 metres in height, and above this height no recession plane applies. Heights above 14 metres will also require a restricted discretionary activity consent .i.e. they are enabled rather than permitted. In summary maximum height increases proposed here apply in combination with lesser setbacks than previously, other than very close to the boundaries, where the required setback would be increased slightly.
- d. Updating the applicable recession plane for schools surrounded by the HRZ zones, to match the recession plane now proposed as a qualifying matter across all residential zones, i.e. from points 3m above site boundaries plus one of three recession plane angles (either 60 degrees, 55 degrees or 50 degrees), depending on the orientation of the relevant site boundary to quadrants of the compass. This would give consistent outcomes along both sides of school internal boundaries.
- e. Introduction of a maximum continuous building length standard (30m) as part of the restricted discretionary assessment of buildings over 14 metres in height, to limit overly long buildings and promote connectivity through school grounds and buildings. This would apply anywhere on site, not just along boundaries. This is further discussed in the evaluation sections.
- f. Introduction of a landscaping rule, similar to the existing and proposed rule for landscaping of hospitals, but requiring fewer trees along internal boundaries, as the 10% landscaping requirement across the site may need to be more flexibly located for schools for functional reasons.
- g. Simplification of some of the current SP School zone rules in regard to current variations in rules for different elements of land uses on school sites, such as accessory buildings or buildings for spiritual activities.
- h. Updating some names and locations, as well as alternative zones for most schools (when the land is no longer required for education purposes) shown in Appendix 13.6.6.1, 13.6.6.2 and 13.6.6.3, to reflect those new zonings under PC14. Schools within industrial and rural zones are not within the scope of PC14.

3.3.5 In the residential sections of Plan Change 14, the majority of the current RS and RSDT zones have been rezoned to Medium Density Residential and the majority of the current RMD zones have been rezoned to High Density Residential. It is important to note that this is not always true and there are a number of schools in areas which have been “upzoned” by two steps from RS or RSDT to HRZ, because of their proximity to commercial centres and main public transport routes.

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<sup>3</sup> The heights of 20m and 32m are “plan-enabled” via a restricted discretionary consent, in accordance with the term “plan enabled” as defined in 3.4(2) of the NPS-UD.

- 3.3.6 “Upzonings” by two steps in terms of zonings surrounding the schools and therefore alternative zonings include St Andrew’s College, Heaton Intermediate, Ferndale School and Selwyn House in respect of the Merivale Large Local Centre, St Teresa’s School and Christchurch Girls High School in respect of the Riccarton Town Centre; the playing fields of Middleton Grange School in respect of the Church Corner Large Local Centre; South Hornby School, Hornby Primary and Hornby High School in respect of the Hornby Town Centre; St Joseph’s School and Papanui High School in respect of the Papanui Town Centre; Linwood Avenue School and Te Pa o Rakaihautu School in respect of the Linwood Town Centre; and Shirley Intermediate and the former Hammersley Park School site in respect of the Palms/Shirley Town Centre.
- 3.3.7 Outside of Plan Change 14, significant changes to schools in the Central City area are the forthcoming relocation of Marian College to Lydia Street in Papanui, the disposal of the old Girls High site in Montreal Street by Christs College, and the closure of the Academy private tertiary facility between Colombo St and Manchester Street.
- 3.3.8 Some current District Plan Specific Purpose School zone rules are not changing e.g. the built form rules for schools in the Medium Density Residential zones, as this is outside the scope of PC14.
- 3.3.9 Only minimal increases to coverage allowances for schools in the High Density Residential zones are proposed, because of the heightened importance of open space in the schools context, as explained in 3.1.8 and 3.1.9 above, and because of the need to safeguard usable open space in case of roll increases in future decades.
- 3.3.10 As well, the base 6m setback from internal boundaries for schools in Medium Density Residential zones (with the exception of any school building of less than 4.5m) is proposed to be modified for schools in High Density Residential settings to a 4 metre setback if the building does not exceed 5 metres in height. Buildings of between 5 and 14 metres in height within 10 metres of boundaries will effectively be limited in height by the recession plane. In the context of intensified development, it is still considered important to provide for some development near boundaries, but to plan for the wider interface between schools and adjoining residential uses, e.g. the potential effects of noise, traffic and parking, and security lighting on the school side of the interface; and potential domination by large building scale and mass on either side of the interface. For example if there is medium or high density residential development nearby, there could be issues of privacy for children from being overlooked, as well as possible shading of play space and other passive open space within the school grounds.
- 3.3.11 Road boundary setbacks area also kept largely the same (although some minimal ones are proposed to be increased to be more consistent across all schools), in order to provide in particular for school identity signs and features and for landscaping. In some cases these can also provide for off-road drop off zones, noting that MOE have a strong preference for pickup and drop off zones to be located off school sites.
- 3.3.12 In summary, in the context of potentially intensified development in the areas surrounding schools, Council still considers that it is justifiable to maintain some difference in the built form controls for schools from residential standards where there are strong reasons to do so, e.g. in the case of building coverage, setbacks, and step-ups of height from boundaries with residential zones. Most school development can still be of a scale and in particular of a height which is aligned with that provided for in surrounding residential zones, with larger buildings concentrated away from boundaries, some limits on length of buildings and a requirement for some landscaping.

### **3.4 Schools - Community/Stakeholder engagement**

| Date          | Consultation method                      | Stakeholders  | Feedback and resulting changes to the draft proposal   |
|---------------|--|---|--|
| August 2022   | Phone conversations and following emails | Ministry of Education   | Initial discussion of increasing heights for schools in and around Central City to either 20m or 32m.<br>Ministry agreed with CCC's proposal to amend permitted building heights of school zones within the central city to match those of surrounding proposed zone heights.  |
| August 2022   | Phone conversations and following emails | Christ's College, Cathedral Grammar, Catholic Diocese of Christchurch | Initial discussion of increasing heights for schools in and around Central City to either 20m or 32m.<br>All parties supportive of additional development opportunity.   |
| December 2022 | Virtual meeting                          | Ministry of Education representatives                                 | MOE representatives emphasised the need for as much flexibility as possible in rules, to provide for functional needs. There was mention of schools being on more constrained sites in future especially in the inner city and Auckland contexts, the possibility of more vertical development, and need to protect privacy of children and prevent shading of outdoor spaces in schools from medium density housing nearby. Acknowledged need for schools to fit into their neighbourhood, but opposed any prescriptive landscaping rule or any glazing or fencing rules. |
| February 2023 | Written advice                           | Ministry of Education representative                                  | Advised of the Ministry's approach to schools provisions in the context of the MDRS, and opposition to schools being a qualifying matter. Concern about two separate sets of rules being applied to SP School zones.   |

### 3.5 Schools - Consultation with iwi authorities

- 3.5.1 Previous consultation with Mahaanui Kurataiao on PC14 has been at a strategic level and on qualifying matters. All PC14 material as revised since September 2022, including the material on the Specific Purpose School zone, will be provided to Mahaanui Kurataiao representatives for their comment before public notification.

### 3.6 Hospitals – Background

- 3.6.1 The current complexity of SP Hospital zone provisions derives partly from the fact that they have been reviewed on more than one occasion, but never comprehensively. The Christchurch Central

Recovery Plan (2012) reviewed the height provisions for Christchurch Women’s Hospital only. A number of site specific rules were inserted as a result of submissions and mediation during the SP Hospital hearing of the District Plan Review process (2014-2017), in particular for private hospitals (Decision 19 – March 2016). This hearing covered only hospital sites outside the Central City, and those within the Central City (i.e. within the four avenues) were separately reviewed from the remainder of the SP Hospital sites, through the later Central City hearings (Decision 43 – September 2016), which has resulted in slightly different provisions.

- 3.6.2 Significant changes have occurred in the physical form of the health sector both as a result of the Canterbury Earthquakes and subsequent consolidation and rebuilding on main health sites, and also since the District Plan Review in terms of an increase in specialist services. There has been considerable investment in both public and private hospitals and health care facilities.
- 3.6.3 Objective 13.5.2.1 and Policies 13.5.2.2.1 and 13.5.2.2.2 point to the biggest issue planning wise in recent years being how to facilitate evolving hospital and health care facility needs, so that they can develop in an efficient manner; but at the same time encouraging more intensified and contained use of hospital sites, in preference to expansion outside of existing site boundaries, which can be disruptive to communities and neighbourhoods. Comprehensive and planned rather than incremental development is encouraged in the District Plan. Providing for greater heights and therefore more development opportunity will assist in achieving greater intensification of hospital sites, in preference to expansion beyond their current sites, in accordance with Policy 13.5.2.2.1. Consideration of the context within which hospitals are located is still required in order to mitigate any potentially significant adverse effects on neighbours, such as overlooking, or dominant buildings with long blank facades near residential boundaries.
- 3.6.4 Typically intensification of built development of the smaller and more constrained sites may become a challenge more quickly than for hospitals with larger sites, since they have more residential interfaces; however the two hospitals with larger sites (St Georges and Southern Cross) have also grown quickly in recent years, and in the case of St Georges expanded into a previously residential neighbourhood by removal or demolition of a strip of houses on Heaton Street.
- 3.6.5 Considerable work was undertaken in the lead up to the District Plan review on the issues around the built form of hospitals at that time. As a follow on from that work the Council has now commissioned further technical advice from its internal urban design team to assist with assessing the existing environment/issues and the potential effects of the proposed increased heights on the environment, as well as the potential options for mitigating any significant adverse effects. This advice is attached in **Appendix 1**:

3.6.6

**Table 1:** Technical Reports informing Plan Change 14 in regard to Hospitals

|   | <b>Title</b>   | <b>Author</b>          | <b>Description of Report</b>  |
|---|--|------------------------|---|
| a | Technical analysis of Specific Purpose Hospital zone provisions. | Urban Design team, CCC | Assessment and modelling of potential options for intensification of SPH built form provisions, including options for mitigating effects. |

### **3.7 Hospitals - Current Christchurch District Plan provisions**

- 3.7.1 As hospitals and health care facilities are community facilities, the current Plan's Strategic Directions objectives, chapter objectives and provisions relevant to this plan change include Objective 3.3.11 Community facilities and education facilities.

*3.3.11 Objective - Community facilities and education activities*

- a. *The expedited recovery and establishment of community facilities and education activities in existing and planned urban areas to meet the needs of the community; and*
- b. *The co-location and shared use of facilities between different groups is encouraged.*

- 3.7.2 The Hospitals subchapter 13.5 Objective is more specific in terms of enabling providers to efficiently use and develop their land and buildings, which effectively is the purpose of the zone, while recognising the character and amenity values of the surrounding environment.

*13.5.2.1 Objective - Enabling hospital development*

- a. *The evolving health care facility needs of Christchurch and the wider region are supported by efficient development of hospital sites while recognising the character and amenity values of the surrounding environment.*

- 3.7.3 *Policy 13.5.2.1.1.* has been mentioned above and is:

- a. *Encourage more intensified and contained use of hospital sites in preference to expansion outside of existing site boundaries.*

*Policy 13.5.2.1.2 – Comprehensive development* covers a number of matters. For Inner City sites this policy mentions ensuring that the form and scale of buildings recognises the anticipated residential scale and form at hospital site boundaries, providing visual interest and a human scale at the interface with the road, and encouraging higher quality amenity including planting along road frontages and in publicly accessible spaces.

- 3.7.4 As already noted built form standards for hospitals have become relatively site specific in recent years, but there is considerable similarity between standards for different sites, and they cover much the same matters. The standards for Inner Urban sites relate to a basic building envelope defined by building setbacks from roads and from internal boundaries, and heights provided for. Only some sites have recession planes at present, but there is some step-up in heights further into larger sites.

- 3.7.5 For Inner Urban sites, the larger sites have a road boundary setback of 10 metres, with sites on major arterial roads having a smaller setback of 4 metres. Smaller urban sites have a standard 4 metres setback to provide more flexibility for use of smaller sites. The setbacks for Montreal House (which will become part of this group as a result of this plan change), vary from this as it is the smallest and a quasi-residential site. Internal boundary setbacks are also generally 10 metres for the larger inner urban sites, and they are 4 metres for the smaller ones.

- 3.7.6 Heights for Inner Urban sites are currently standardised at 11 metres (3 storeys) except for the St Georges Heaton Overlay, which this plan changes proposes to remove. For some larger Inner Urban sites there is currently a step-up to 18 metres at 16 metres from the boundary. The former Christchurch Women's Hospital, which will become part of the smaller inner sites group as a result of this plan change, has a greater height limit than the 11 metres, of 14 metres (except for 2 small titles on Gracefield Avenue) as does Montreal House, which is also proposed to become part of the smaller inner sites group.

- 3.7.7 Only the former Christchurch Women's Hospital site and Montreal House have recession planes applying to their internal boundaries at present.



- 3.7.8 Each Inner Urban site has standards relating to landscaping, fencing height and outdoor storage. All sites have landscaping strips required adjacent to both road and internal boundaries of 4 metres width, except for site specific lesser provisions for Nurse Maude-Mansfield which is currently used for staff car parking, and Montreal House. All sites have a requirement for 10% of the site to be planted including landscaping strips, except the former Christchurch Women's Hospital site and Montreal House which were separately reviewed through the Central City hearings during the District Plan review. These two latter sites have a rule about planting being in accordance with Appendix 6.11.6 – Landscaping and Tree Planting Rules and Guidance, which the non-Central City sites do not have.
- 3.7.9 Rules for tree planting within landscaping strips are currently standard at 1 tree per 10 metres of any boundary for the smaller sites, (except Montreal House where trees are only required on the road boundary) but the larger sites have a lower ratio of trees required on internal boundaries of 1 tree per 15 metres. Trees within carparks are currently required for all Inner City sites at 1 tree per 5 at grade parking spaces.
- 3.7.10 Fencing within road boundary landscaping currently has a maximum height of 1.2 metres for most sites. The Central City sites of the former Christchurch Women's Hospital site and Montreal House have an additional provision allowing fences up to 1.75 metres in height if 75% of the additional height is visually transparent.
- 3.7.11 Outdoor storage area rules are the same across all Inner Urban sites and the two additional sites being considered here, precluding this within road boundary setbacks or other public space and requiring screening to 1.5 metres if they are visible from a public space or adjoining site.

### **3.8 Hospitals – Description and scope of the changes proposed**

- 3.8.1 The Plan Change only proposes very minor changes to the objectives and policies of the Plan in relation to hospitals.
- 3.8.2 With respect to the hospitals subchapter Objective 13.5.2.1, (see paragraph 3.7.1. above), a minor change is proposed to the wording about amenity values, since the NPS-UD as a higher level document states in Policy 6 that “amenity values are not of themselves an adverse effect”. The same change is proposed to Policy 13.5.2.1.2 in two places. The wording is proposed to be “amenity” rather than “amenity values”, so that the meaning of amenity does not default to that in section 2 of the Resource Management Act, but can be separately interpreted to include more measurable environmental effects as for schools – see 5.2.1 onwards for schools.
- 3.8.3 The purpose of this part of the plan change is to update the built form rule provisions of Chapter 13 Specific Purpose Zones for the Hospital zone, to ensure that they are appropriate under the NPS-UD in enabling development which is consistent with the more enabling provisions introduced into the District Plan for the residential and commercial zones surrounding the hospitals. Plan Change 14 does not involve any changes to the activities provided for in the SP Hospital Zone.
- 3.8.4 The proposed changes include:
- a. Reorganising the Inner Urban hospital sites, so that there is a first grouping of the larger sites occupying whole block ends, with larger setbacks, and a second grouping of the generally smaller sites with several residential boundaries, and with smaller setbacks because of more constrained sites. (See **Appendix 2**, Technical Analysis of Specific Purpose Hospital zone provisions). The former Christchurch Women's Hospital site and Montreal House are proposed to be included in this latter grouping. This reduces the three categories of sites

being reviewed here to two, and enables the separate rules for the two sites mentioned here to be deleted.

- b. Increasing the maximum building height for hospitals surrounded by the High Density Residential zone, both around larger commercial centres and around the Central City zone, up to 14 metres permitted and 20m enabled (or up to 32m around the Central City zone)<sup>4</sup> at 10m from internal boundaries for the larger Inner Urban sites or at 4 metres from internal boundaries for the smaller Inner Urban sites. Heights above 14 metres will require a restricted discretionary activity consent. In summary, maximum height increases proposed here apply in combination with the same setbacks as previously, but the previous 16 metre setback for heights of up to 18 metres on larger sites has been dropped, and greater height is possible closer to boundaries. For smaller Inner Urban sites the recession plane is proposed to be extended to apply to all the sites in this group and will provide for some lower height development between the 4 metre setback and 10 metres from the boundary.
- c. Updating the applicable recession plane for the smaller Inner Urban hospital sites, to match the recession plane now proposed as a qualifying matter across all residential zones, i.e. from points 3m above site boundaries plus one of three recession plane angles (either 60 degrees, 55 degrees or 50 degrees), depending on the orientation of the relevant site boundary to quadrants of the compass. This would give consistent outcomes along both sides of the internal boundaries of these hospitals with residential zones.
- d. Introduction of a maximum continuous building length standard (30m) as part of the restricted discretionary activity assessment for buildings over 14 metres in height, to limit length or introduce modulation to overly long buildings. This would apply anywhere on site, not just along boundaries. This is further discussed in the evaluation sections.
- e. Standardising rules where there is no clear basis for differentiation eg:
  - i. allowing for a greater fence height where a large proportion of the additional height is transparent;
  - ii. removing the additional height allowance for Nurse Maude Hospital and Wesley Care for lift shafts, mechanical plant etc, as this allowance is not provided for other hospitals. Additional height permitted and enabled should make this redundant;
  - iii. Making landscaping rules consistent across all Inner Urban hospital sites by extending the requirement to plant in accordance with Appendix 6.11.6 to all of these sites. This means using trees of a minimum size of 2 metres at time of planting, capable of reaching 8 metres at maturity, using tree protection measures such as wheel stop barriers etc. Also standardising wording relating to landscaping strips.
- f. Adding a coverage rule for the former Christchurch Women’s Hospital site, to acknowledge that significant building size and height is enabled (up to 32 metres, because the site is within a 15 minute walkable catchment of the Central City zone), which could have a very dominating effect on the small scale residential sites on Gracefield Avenue to the south, which will not practically be able to be developed to similar heights.
- g. Deleting the St Georges Heaton Overlay, as it is no longer relevant when there are no houses between the hospital site and Heaton Street.
- h. Making minor amendments to matters of discretion to include matters which better address the large scale, taller buildings which will be permitted and enabled under PC14.

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<sup>4</sup> The heights of 20m and 32m are “plan-enabled” via a restricted discretionary consent, in accordance with the term “plan enabled” as defined in 3.4(2) of the NPS-UD.

- i. Updating alternative zones for most hospitals (when the land is no longer required for education purposes) shown in Appendix 13.5.6.1, to reflect those new zonings under PC14.

### 3.9 Hospitals – Community/Stakeholder Engagement

#### 3.9.1

| Date         | Consultation method                      | Stakeholders                       | Feedback and resulting changes to the draft proposal   |
|--------------|--|------------------------------------|--|
| August 2022  | Phone conversations and following emails | Te Whatu Ora – Waitaha Canterbury  | Initial discussion of increasing heights for former Christchurch Women’s hospital site to either 20m or 32m, and Montreal House.<br>TWO stated they were happy to support 20m for the Christchurch Women’s site. No specific comment on 32m or Montreal House. |
| October 2022 | Discussion                               | St Georges Hospital representative | Conversation about the various planning provisions affecting the site under Plan Change 14.  |

- 3.9.2 To date there have been no discussions with other private hospitals eg Nurse Maude and Southern Cross.

### 3.10 Hospitals – Consultation with iwi authorities

- 3.10.1 Previous consultation with Mahaanui Kurataiao on PC14 has been at a strategic level and on qualifying matters. All PC14 material as revised since September 2022, including the material on the Specific Purpose Hospital zone, will be provided to Mahaanui Kurataiao representatives for their comment before public notification.

## 4 Scale and significance evaluation

### 4.1 Schools - The degree of shift in the provisions

- 4.1.1 The level of detail in the evaluation of the proposal has been determined by the degree of shift of the proposed objectives and provisions from the status quo and the scale of effects anticipated from the proposal.
- 4.1.2 The section 32 report for the residential provisions of PC14 assesses the MDRS as part of the status quo for residential zones, because of the legislative requirement to implement these standards and because once notified they would have had immediate legal effect, until the Council proposed additional qualifying matters. This means that the increased heights enabled (via a restricted discretionary activity consent) of 20m in high density areas around larger commercial centres and 32m around the Central City zone under the NPS-UD are the most significant change. Many of these areas already enable an increased level of density in response to direction in the Canterbury Regional Policy Statement and in recognition of the benefits of concentrating development around centres. Further development of centres is therefore somewhat anticipated or expected, and can be considered to be a shift of medium scale and significance from the status quo.

- 4.1.3 When this is applied to schools within these surrounding residential areas, the same conclusion can be reached of a shift of medium scale and significance from the status quo for schools surrounded by a High Density zone which allows six storey or 20m in height, to a much greater degree of alignment with this.
- 4.1.4 For the schools surrounded by a High Density zone around the Central City zone which enables 10 storey or 32m in height, a greater alignment of SP School zone rules with these provisions can be considered a shift of high significance, because of the change from the traditional maximum of two storey height of school buildings, to a school form that is of a completely different character.

## 4.2 Schools - Scale and significance of effects

- 4.2.1 The scale and significance of the likely effects anticipated from the implementation of the proposal has also been evaluated. The initial assessment of the environmental, economic, social and cultural effects anticipated has been expanded on by consideration of the technical reports and stakeholder engagement. In making this evaluation regard has been had to whether these proposed provisions:
- a. will result in effects that have been considered, implicitly or explicitly, by higher order documents:
    - i. The proposed provisions will give effect to the National Policy Statement for Urban Development 2020 requirements in Policy 3(a), 3(c) and 3(d).
    - ii. Will enable consistent application of this intensification direction across schools which are located in areas of High Density Residential zoning. Intensification within residential zonings near larger commercial centres is a primary focus of this direction, and is likely over time to increase the number of households and people living within the catchments of these schools.
  - b. are of city wide significance and will have particular localised impact, because of greater levels of intensification being focused around larger centres and a greater impact relative to the status quo.
  - c. will affect individual property owners around all of these sites, especially if greater intensification of these facilities proceeds ahead of intensification in surrounding residential areas. Increased intensification of schools would have the potential to diminish the amenity and privacy of some residential settings, hence the proposal includes some mitigation measures on residential boundaries.
  - d. could result in some change to the character of local communities;
  - e. should not have effects on heritage buildings on school sites (heritage is considered to be a matter of national importance in terms of Section 6 of the Act) as these heritage items and their settings will not be subject to SP school zone rules, and instead be controlled by rules in Subchapter 9.3 heritage. Settings already defined in that subchapter are considered adequate to act as a buffer for these items from adjoining development.
  - f. could result in some school sites being more intensively used to accommodate additional school age population in the area because of additional infill development. This would be an efficient use of the school property resource. For state and state-integrated schools this will be subject to the principles and guiding statements in the Designing Schools in Aotearoa New Zealand Property Design Standards, including the need to protect usable outdoor areas both for current numbers of learners and potential future rolls.

- g. represent a medium level of uncertainty, chiefly because of uncertainty as to how much residential intensification will occur in the catchments around the schools in question, and when that may happen.

### **4.3 Hospitals - The degree of shift in the provisions**

- 4.3.1 The level of detail in the 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.
- 4.3.2 The section 32 report for the residential provisions of PC14 assesses the MDRS as part of the status quo for residential zones, because of the legislative requirement to implement these standards and because once notified they would have had immediate legal effect, until the Council proposed additional qualifying matters. This means that the increased heights enabled (via a restricted discretionary activity consent) of 20m in high density areas around larger commercial centres and 32m around the Central City zone under the NPS-UD are the most significant change. Many of these areas already enable an increased level of density in response to direction in the Canterbury Regional Policy Statement and in recognition of the benefits of concentrating development around centres. Further development of centres is therefore somewhat anticipated or expected, and can be considered to be a shift of medium scale and significance from the status quo.
- 4.3.3 When this is applied to hospitals within these surrounding residential areas, the same conclusion can be reached of a shift of medium scale and significance from the status quo for hospitals surrounded by a High Density zone which allows 6 storey or 20m in height, to a much greater degree of alignment with this.
- 4.3.4 For the hospital site surrounded by a High Density zone around the Central City zone which enables 10 storey or 32m in height (the former Women's Hospital site only), a greater alignment of SP Hospital zone rules with these provisions can be considered a shift of medium to high significance, because of the change from the traditional height of hospital buildings (other than those of the Christchurch Hospital itself, which has a much greater height limit already) to a hospital form which is of a different character. At this time the future of the former Women's Hospital site is still under review, and there is a possibility of residential rather than hospital development. Residential development can proceed without a plan change under the alternative HRZ zoning for this site.

### **4.4 Hospitals - Scale and significance of effects**

- 4.4.1 The scale and significance of the likely effects anticipated from the implementation of the proposal has also been evaluated. The initial assessment of the environmental, economic, social and cultural effects anticipated has been expanded on by consideration of the technical report and stakeholder engagement to date. In making this evaluation regard has been had to whether these proposed provisions:
  - a. will result in effects that have been considered, implicitly or explicitly, by higher order documents:
    - i. The proposed provisions will give effect to the National Policy Statement for Urban Development 2020 requirements in Policy 3(a), 3(c) and 3(d).
    - ii. Will enable consistent application of this intensification direction across hospitals which are located in areas of High Density Residential zoning. Intensification within residential zonings near larger commercial centres is a primary focus of this direction, and is likely over time to increase the number of people requiring hospital services.

- b. are of city wide significance and will have particular localised impact, because of greater levels of intensification being focused around larger centres and a greater impact relative to the status quo.
- c. will affect individual property owners around all of these sites, especially if greater intensification of these facilities proceeds ahead of intensification in surrounding residential areas. Increased intensification of hospitals would have the potential to diminish the amenity and privacy of some residential settings, hence the proposal includes mitigation measures on residential boundaries.
- d. could result in some change to the character of local communities;
- e. should not have effects on heritage buildings on hospital zoned sites (heritage is considered to be a matter of national importance in terms of Section 6 of the Act) as these heritage items and their settings will not be subject to SP hospital zone rules, and instead be controlled by rules in Subchapter 9.3 heritage. Settings already defined in that subchapter are considered adequate to act as a buffer for these items from adjoining development. The only heritage item on the hospital sites being reviewed here is Fitzroy (McDougall House) on the Nurse Maude site.
- f. could result in some hospital sites being more intensively used to accommodate additional and expanded services, because of increased population within city boundaries as a result of infill development. This would be an efficient use of the hospital property resource.
- g. represent a medium level of uncertainty, chiefly because of uncertainty as to how much residential intensification will occur in the catchments around the hospitals in question and in the wider city, and when that may happen.

## 5 Evaluation of the proposal

### 5.1 Schools and Hospitals - Statutory evaluation

- 5.1.1 A change to a district plan should be designed to accord with sections 74 and 75 of the Act to assist the territorial authority to carry out its functions, as described in 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 the proposed plan change meets the applicable statutory requirements, including the District Plan objectives. The relevant higher order documents and their directions are outlined in section 2.1 of this report. Plan Change 14 Specific Purpose School and Hospital zones has been prepared to give effect to the requirements of implementation of the National Policy Statement for Urban Development.

### 5.2 Schools - Evaluation of the objectives of the plan change

- 5.2.1 Section 32 requires an evaluation of the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the Act (s 32(1)(a)).
- 5.2.2 The plan change proposes to make a minor amendment to the main SP schools zone Objective 13.6.2.1 Use of education facilities. This objective includes several components, with an amendment only being proposed to the third limb of the objective, "mitigating significant adverse effects on the amenity values of adjoining zones", by deleting the words "amenity values of":

*Objective 13.6.2.1 – Use of education facilities*

*Education providers are able to efficiently use and develop their land and buildings, within the wider network of education facilities across Christchurch, for:*

- i. education activity; and as*
- ii. hubs for a diverse range of community activities, while:*
- iii. mitigating significant adverse effects on the amenity values of adjoining zones, and*
- iv. recognising and enhancing the contribution of education buildings and sites to the character of neighbourhoods.*

5.2.3 This deletion is proposed because Policy 6 of the NPS-UD states:

“(b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:

- (ii) may detract from amenity values appreciated by other people, communities and future generations, including by providing increased and varied housing densities and types” and
- (iii) are not of themselves an adverse effect....”

5.2.4 “Amenity values” as defined in the RMA “means those natural or physical qualities and characteristics of an area that contribute to people’s appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes.”

5.2.5 In the context of District Plans, amenity values are commonly considered to include the more measurable environmental characteristics of a site, locality or zone, such as levels of noise, glare, odour, privacy, shading and visual dominance from adjoining buildings, the level of traffic in a neighbourhood, the presence and size of advertising signs etc.

5.2.6 In the context of Policy 6 of the NPS-UD, which is a higher order document, using the term “amenity values” in the SP School zone in relation to the effects of schools on their residential neighbourhoods is not considered useful or aligned with the NPS. Therefore the term is proposed to be deleted, in favour of reliance on a more specific explanation of environmental effects of relevance to ensuring schools fit well within their neighbourhoods, through Policy 13.6.2.1.2. Significant adverse effects could still be of concern as a result of intensification, especially if intensification occurs unevenly across areas and school/residential boundaries.

5.2.7 The proposed amended Objective 13.6.2.1 still emphasises efficient use and development of education land and buildings, and is still the most appropriate way of giving effect to the Strategic Objective 3.3.11 – *Community facilities and education activities*:

- a. The expedited recovery and establishment of community facilities and education activities in existing and planned urban areas to meet the needs of the community; and*
- b. The co-location and shared use of facilities between different groups is encouraged.*

5.2.8 This strategic objective does not preclude and could be considered to encourage intensification of education facilities, especially as the needs of the community change over time. The amended Objective 13.6.2.1 also gives better effect to the higher order document (being the NPS), than the objective as currently worded, and hence to the purpose of the RMA.

5.2.9 A table evaluating options for the proposed objective is not presented here as neither the status quo (no change to the Objective) nor changes other than deleting the words “amenity values” would be consistent with the higher order direction of Policy 6 of the NPS-UD.

### 5.3 Schools - Reasonably practicable options for provisions

- 5.3.1 In considering reasonably practicable options for achieving the objectives of the Plan, and of the NPS-UD, reasonably practicable approaches/options for policies and rules have been identified. There are three possible options for rules for SP school zones; leaving them as they stand, adopting the built form rules proposed for the adjoining High Density Residential zone(s), or modifying this package to reflect the specific characteristics of schools and their potential effects. 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.
- 5.3.2 **Option 1** – Status quo – No change - Retain current SP School zone provisions where these schools are located not only within the new Medium Density Residential zone, but also within the new High Density Residential zone.
- 5.3.3 **Option 2** – Adopting the proposed built form rules for the High Density Residential zone, where schools are located within this zone.
- 5.3.4 **Option 3** – Proposed Plan Change – Adopting the height limits for the High Density Residential zone (where schools are located within these zones) with some reductions near the boundary with residential zones; and adopting the recession planes now proposed for all residential zones. Maintaining largely the same internal boundary and road boundary setbacks as for the current SP School zone; and largely maintaining the same coverage standards. Adding two new rules in relation to continuous building length and landscaping which are similar to, but more tailored to schools than those rules as proposed for the High Density Residential zones.

### 5.4 Schools - Evaluation of options for provisions

- 5.4.1 The policies of the proposal must implement the objectives of the District Plan (s75(1)(b)), and the rules are to implement the policies of the District Plan (s75(1)(c)). 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 objectives of the plan change [s32(6)(a)].
- 5.4.2 Before providing a detailed evaluation of the policies and rules proposed in the plan change, 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. These assessments are summarised in the tables below.
- 5.4.3 The overall effectiveness and efficiency of each option has been evaluated, as well as the risks of acting or not acting.
- 5.4.4 **Option 1 - Status quo – Retain current SP School zone provisions everywhere in the City**

| Benefits   | Appropriateness in achieving the objectives/ higher order document directions   |
|--|---|
| Environmental: <ul style="list-style-type: none"> <li>SP School zone objective and policies are tailored to schools, giving considerable flexibility for development, while identifying the elements of school development which neighbours and the</li> </ul> | Efficiency<br>This option does not maximise the potential for development of existing school property. It anticipates a relatively slowly evolving urban environment, |



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| <p>Council could be interested in, and the level of residential amenity that Council is seeking to protect.</p> <ul style="list-style-type: none"> <li>• There is a likely to be a continuation of the current built form of schools, with some evolution to larger scale buildings but within defined and relatively well-understood building envelopes.</li> <li>• MOE and private school requirements for usable outdoor space and for opportunities to develop to meet future roll growth, can readily be accommodated within current SP zone coverage allowances.</li> <li>• The SP school provisions are well accepted and rule breaches requiring consent are usually only required for constrained sites.</li> </ul> | <p>whereas the NPS-UD signals a step change in potential building form and densities.</p> <p>Effectiveness:<br/>Not especially effective in specifying and achieving the environmental outcomes sought (increased housing supply and supporting community services, leading to intensification/infill in particular near the city centre and larger commercial centres, to support a well-functioning urban environment).</p> <p>The current provisions for the SP zone do however already give considerable flexibility for development, albeit not to the height that the NPS-UD envisages.</p> |
| <p><b>Economic:</b></p> <ul style="list-style-type: none"> <li>• Low density, low rise schools are likely cheaper to build than schools with multi-level buildings, so long as land prices make it feasible for new sites of adequate size to be acquired.</li> </ul>  |   |
| <p><b>Social:</b></p> <ul style="list-style-type: none"> <li>• Relatively consistent provisions across all schools in the City builds on longstanding expectations for the SP Schools zone.</li> </ul>   |   |
| <p><b>Cultural:</b></p> <ul style="list-style-type: none"> <li>• The current school provisions have not inhibited the increasing use of school sites for community and cultural uses.</li> </ul>   |   |
| <p><b>Costs</b></p> <p><b>Environmental:</b></p> <ul style="list-style-type: none"> <li>• Over time there are likely to be increasing disparities between the scale of development in school neighbourhoods/catchments and that on school sites. Putting aside higher levels of open space required for schools, this could create a “basin” like physical form effect for school sites within their neighbourhoods.</li> <li>• Intensified development adjoining school sites has the potential to create adverse effects on schools unless this interface is</li> </ul>  |   |

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| <p>carefully considered, e.g. issues of privacy for children from being overlooked, as well as possible shading of play space and other passive open space.</p>   |  |
| <p>Economic:</p> <ul style="list-style-type: none"> <li>As intensification proceeds in the areas surrounding schools, there is likely to be an increase in school rolls, requiring more buildings and more efficient use of school property. Constrained sites combined with restrictive rules eg in relation to height, could lead to the need to find additional school sites elsewhere e.g. in greenfield areas, leading to increased commuting, which is contrary to the objectives of the NPS-UD.</li> </ul> |  |
| <p>Social:</p> <ul style="list-style-type: none"> <li>There is an interrelationship between planning provisions and school enrolment zones specified by the MOE, with further schools being likely to need to close off their rolls if further school buildings (and teaching staff) are not readily able to be provided. (This will depend on how much intensification does occur and over what time periods).</li> </ul>  |  |
| <p>Cultural:</p> <ul style="list-style-type: none"> <li>N/A</li> </ul>  |  |
| <p><b>Risk of acting/not acting</b><br/>The NPS-UD is a higher order document and requires the District Plan to be amended to reflect it. There are relatively short implementation timeframes.</p>   |  |
| <p><b>Recommendation:</b> This option is not recommended as Council is legally bound to amend the status quo planning provisions for areas within and adjacent to the city centre and larger commercial zones. It is not reasonable to limit this to residential zones only, as the NPS-UD does not adopt this limitation, therefore the SP School zone provisions also need amendment to align at least with the heights being proposed for the High Density Residential zones.</p>                              |  |

5.4.5 **Option 2 - Adopt the proposed built form provisions for the High Density Residential zone, where schools are located within areas with this zoning.**

| Benefits       | Appropriateness in achieving the objectives/ higher order document directions |
|----------------|---|
| Environmental: | Efficiency:   |

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| <ul style="list-style-type: none"> <li>Over time there are likely to be considerable similarity and fewer disparities between the scale of development in school neighbourhoods/catchments and that on school sites.</li> <li>Avoidance of an uneven urban form.</li> </ul>   | <ul style="list-style-type: none"> <li>The objectives and policies of the High Density Residential zone are about providing for high density residential development and in themselves are unrelated to schools. There is a misalignment with the outcomes schools seek in terms of a network of education facilities and efficient use of sites for educational activity, and the contribution of schools to their communities.</li> <li>Adopting HRZ rules for schools in Christchurch would be confusing when there will continue to be a specific SP School zone in Christchurch at least until the NBEA plan for Canterbury is implemented.</li> <li>It is not efficient to adopt built form provisions eg internal boundary setbacks, which do not recognise the needs and unique characteristics of schools and their effects on their neighbourhoods.</li> </ul> <p>Effectiveness:</p> <ul style="list-style-type: none"> <li>The environmental benefits of adopting the HRZ rules as they are proposed do not outweigh the environmental costs, therefore this option is not considered effective.</li> </ul> |
| <p>Economic:</p> <ul style="list-style-type: none"> <li>Schools will be able to develop to their maximum built potential, accommodating large increases in rolls on the same site.</li> <li>It is unlikely that resource consents would be required for private school development, or that Council could dispute the built forms proposed for new or altered state school buildings, in processing outline plans. This could make school development slightly cheaper and simpler for school providers.</li> </ul> |  |
| <p>Social:</p> <ul style="list-style-type: none"> <li>Clear matching of the potential capacity of schools with likely increases in population within their catchments.</li> <li>This could be of particular benefit to constrained sites, meaning that further or larger school buildings are still able to be provided on these sites.</li> </ul>  |  |
| <p>Cultural:</p> <ul style="list-style-type: none"> <li>School built forms may approach those found outside of New Zealand eg multi-storey development as a standard form, which is likely to be familiar to an increasingly diverse population.</li> <li>More scope for community and cultural uses on school sites without concerns about effects on neighbours.</li> </ul>   |  |
| <p><b>Costs</b></p>   |  |
| <p>Environmental:</p> <ul style="list-style-type: none"> <li>HRZ rules are not designed for schools and some may not be appropriate or necessary for schools. School buildings</li> </ul>   |  |

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| <p>are on average of greater scale than residential ones, and may be of greater height, building length and floor space, so standard residential built form rules are probably not appropriate.</p> <ul style="list-style-type: none"> <li>• Lack of concern for the elements of school development which neighbours could be interested in, and the level of residential amenity that Council is seeking to protect. This includes considerations of shading and visual dominance from adjoining school buildings, noise, glare, privacy, and the level of traffic in a neighbourhood.</li> <li>• MOE and private school requirements for usable outdoor space and for opportunities to develop to meet future roll growth, may be difficult to achieve under maximum development scenarios, depending on how sites are laid out. There could be less than desirable levels of usable outdoor space.</li> <li>• Intensified development on adjoining non-school sites has the potential to create adverse effects on schools themselves, especially where school development is close to boundaries, unless this interface is carefully considered.</li> </ul> |  |
| <p>Economic:</p> <ul style="list-style-type: none"> <li>• Multi-level school buildings are likely to be more expensive to develop than lower height buildings eg require more lifts.</li> </ul>   |  |
| <p>Social:</p> <ul style="list-style-type: none"> <li>• This model of school development is a relatively disruptive one in terms of longstanding expectations about the built form of schools in New Zealand, where school buildings are generally of one to two storeys.</li> </ul>  |  |
| <p>Cultural:</p> <ul style="list-style-type: none"> <li>• As noted above, potentially greater community and cultural use of large buildings close to boundaries, eg outside</li> </ul>  |  |

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| of school hours, could result in increased adverse effects on neighbours.  |  |
| <p><b>Risk of acting/not acting</b></p> <p>The risk of applying HRZ zone rules is that they are not designed for schools, which are a different land use to residential use with different effects. Applying HRZ rules without modification could have significant costs for areas surrounding schools in particular and also for school sites themselves.</p> |  |
| <p><b>Recommendation:</b></p> <p>This option is not recommended as it is considered that the preferred option will produce better outcomes while still implementing Policy 3 of the NPS-UD.</p>  |  |

- 5.4.6 Summing up, Options 1 – 2 for schools are not considered as efficient and effective in achieving the objectives of the Plan and the relevant directions of the higher order document, the NPS-UD, as the preferred option. The detailed evaluation of **Option 3**, the preferred option, follows.

## 5.5 Hospitals – Evaluation of the objectives of the plan change

- 5.5.1 Section 32 requires an evaluation of the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the Act (s 32(1)(a)).
- 5.5.2 The plan change proposes to make a minor amendment to the main SP hospitals zone Objective 13.5.2.1 Enabling Hospital Development. This objective includes two components, with an amendment only being proposed to the second part of the objective:

### 3.5.2.1 Objective – Enabling hospital development

*The evolving health care facility needs of Christchurch and the wider region are supported by efficient development of hospital sites while recognising the character and **amenity amenity values** of the surrounding environment.*

- 5.5.3 This deletion is proposed because Policy 6 of the NPS-UD states:
- “(b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:*
- (iv) may detract from amenity values appreciated by other people, communities and future generations, including by providing increased and varied housing densities and types” and*
  - (v) are not of themselves an adverse effect....”*
- 5.5.4 The purpose of this amendment is to remove the term “amenity values” as defined in the RMA and leave the word “amenity” undefined, so that it can be separately interpreted to include more measurable environmental effects as for schools, and as amenity may change over time with intensification, can also refer to future amenity rather than just current amenity.
- 5.5.5 In the context of hospitals, environmental effects of concern to the neighbourhood are slightly different to those for schools, for example effects resulting from traffic, parking and noise are less significant than for schools. The hospital sites generally have good levels of parking provision on-site, and traffic generated other than that for staff vehicular movements, is more spread over the day and evening rather than being concentrated at peak periods before and after school. Noise is generally not an issue for hospitals, which are internally focused rather than requiring a

usable outdoor space as schools do. Some hospital sites have a greater building scale including height than most schools.

- 5.5.6 Therefore the environmental effects of concern in regard to hospitals do focus around form and scale of buildings particularly at site boundaries in terms of potential effects on neighbouring properties such as visual dominance, and effects on privacy if a building is significantly higher than those on adjoining properties, and also landscaping and views of the site and buildings from public spaces. It is difficult to move entirely away from the word “amenity” in this sense, as it is used throughout this subchapter.
- 5.5.7 The amended Objective 13.5.2.1 also gives better effect to the higher order document (being the NPS), than the objective as currently worded, and hence to the purpose of the RMA.
- 5.5.8 A table evaluating options for the proposed objective is not presented here as neither the status quo (no change to the Objective) nor changes other than amending the term “amenity values” would be consistent with the higher order direction of Policy 6 of the NPS-UD.

## **5.6 Hospitals – Reasonably practicable options for provisions**

- 5.6.1 In considering reasonably practicable options for achieving the objectives of the Plan, and of the NPS-UD, reasonably practicable approaches/options for policies and rules have been identified. As for schools, there are three possible options for rules for SP hospital zones; leaving them as they stand, adopting the built form rules proposed for the adjoining High Density Residential zone(s), or modifying this package to reflect the specific characteristics of hospitals and their potential effects. 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.
- 5.6.2 **Option 1** – Status quo – No change- Retain current SP Hospital zone provisions where these hospitals are located not only within the new Medium Density Residential zone, but also within the new High Density Residential zone.
- 5.6.3 **Option 2** – Adopting the proposed built form rules for the High Density Residential zone, where hospitals are located in areas with this zoning.
- 5.6.4 **Option 3** – Proposed Plan Change – Adopting the height limits for the High Density Residential zone (where hospitals are located in areas with this zoning) with some reductions near the boundary with residential zones; and for the smaller sites adopting the recession planes now proposed for all residential zones. Maintaining largely the same internal boundary and road boundary setbacks as for the current SP Hospital zone; and introducing a coverage standard for hospitals in the 32 metre zone (HRZ outside of the Residential Precincts) to mitigate potential significant adverse effects on residential neighbours to the south from such a large increase in building scale, which they will themselves will not be able to achieve. Adding a new rule in relation to continuous building length for buildings over 14 metres in height, as part of a restricted discretionary assessment, and which is similar to that rule as proposed for the High Density Residential zones.

## **5.7 Hospitals – Evaluation of options for provisions**

- 5.7.1 The policies of the proposal must implement the objectives of the District Plan (s75(1)(b)), and the rules are to implement the policies of the District Plan (s75(1)(c)). 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 objectives of the plan change [s32(6)(a)].

- 5.7.2 Before providing a detailed evaluation of the policies and rules proposed in the plan change, 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. These assessments are summarised in the tables below.
- 5.7.3 The overall effectiveness and efficiency of each option has been evaluated, as well as the risks of acting or not acting.
- 5.7.4 **Option 1 - Status quo – Retain current SP Hospital zone provisions everywhere in the City**

| <b>Benefits</b>  | <b>Appropriateness in achieving the objectives/ higher order document directions</b>  |
|--|---|
| <p>Environmental:</p> <ul style="list-style-type: none"> <li>• SP Hospital zone objective and policies are tailored to hospitals, giving considerable flexibility for development, while identifying the elements of hospital development which neighbours and the Council could be interested in, and the level of residential amenity that Council is seeking to protect, as represented by the relevant rules.</li> <li>• Under this option there could be a continuation of the current built form of hospitals, with some evolution to larger scale buildings but within defined and relatively well-understood building envelopes.</li> <li>• The SP hospital provisions have been in place for some time, are reasonably well accepted, and rule breaches requiring consent are usually only required for constrained sites.</li> </ul> | <p>Efficiency<br/>This option does not maximise the potential for development or redevelopment of existing hospital property. It anticipates a relatively slowly evolving urban environment, whereas the NPS-UD signals a step change in potential building form and densities.</p> <p>Effectiveness:<br/>Not especially effective in specifying and achieving the environmental outcomes sought by the NPS-UD (increased housing supply and community services which support this, leading to intensification/infill in particular near the city centre and larger commercial centres, to support a well-functioning urban environment).</p> <p>The current provisions for the SP zone do however already give considerable flexibility for development, albeit not to the height that the NPS-UD envisages.</p> |
| <p>Economic:</p> <ul style="list-style-type: none"> <li>• Low rise hospitals are likely cheaper to build than hospitals with multi-level buildings, so long as land prices make it feasible for new sites of adequate size to be acquired.</li> </ul>  |   |
| <p>Social:</p> <ul style="list-style-type: none"> <li>• Provisions for hospitals are relatively similar, although not totally consistent, across all hospitals in the City. This builds on longstanding expectations for the SP Hospital zone.</li> </ul>  |   |

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| <p>Cultural:</p> <ul style="list-style-type: none"> <li>N/A</li> </ul>   |  |
| <b>Costs</b>   |  |
| <p>Environmental:</p> <ul style="list-style-type: none"> <li>Over time there are likely to be increasing disparities between the scale of development in hospital neighbourhoods/catchments and that on hospital sites. This could create a “basin” like physical form effect for hospital sites within their neighbourhoods.</li> </ul>   |  |
| <p>Economic:</p> <ul style="list-style-type: none"> <li>As intensification proceeds in the areas surrounding hospitals, there is likely to be an increase in demand for services, requiring more buildings and more efficient use of hospital property. Constrained sites combined with restrictive rules e.g. in relation to height, could lead to the need to find additional hospital sites elsewhere e.g. in greenfield areas, which is undesirable when hospitals need to be more centralised in location and easily accessible by public transport. It could also lead to increased commuting, which is contrary to the objectives of the NPS-UD.</li> </ul> |  |
| <p>Social:</p> <ul style="list-style-type: none"> <li>There is some interrelationship between planning provisions and hospital planning, with hospitals needing to expand in size, services and potentially height over time without undue planning barriers. The extent of this issue will depend on how much intensification does occur and over what time periods.</li> </ul>   |  |
| <p>Cultural:</p> <ul style="list-style-type: none"> <li>N/A</li> </ul>   |  |
| <p><b>Risk of acting/not acting</b><br/>The NPS-UD is a higher order document and requires the District Plan to be amended to reflect it. There are relatively short implementation timeframes.</p>  |  |
| <p><b>Recommendation:</b> This option is not recommended, as Council is legally bound to amend the status quo planning provisions for areas within and adjacent to the city centre and larger commercial zones. It is not reasonable to limit this to residential zones only, as the NPS-UD</p>  |  |



does not adopt this limitation, therefore the SP Hospital zone provisions also need amendment, at least to align with the heights being proposed for the High Density Residential zones.

**5.7.5 Option 2 - Adopt the proposed built form provisions for the High Density Residential zone, where hospitals are located within this zone.**

| <b>Benefits</b>  | <b>Appropriateness in achieving the objectives/ higher order document directions</b>  |
|--|---|
| <p>Environmental:</p> <ul style="list-style-type: none"> <li>Over time there are likely to be considerable similarity and fewer disparities between the scale of development in hospital neighbourhoods/catchments and that on hospital sites.</li> <li>Avoidance of an uneven urban form.</li> </ul>  | <p>Efficiency:</p> <ul style="list-style-type: none"> <li>The objectives and policies of the High Density Residential zone are about providing for high density residential development and in themselves are unrelated to hospitals. There is a misalignment with the outcomes sought for hospitals in terms of efficient development of hospital sites to support the evolving health care facility needs of Christchurch and the wider region.</li> <li>It is not efficient to adopt built form provisions eg internal boundary setbacks, which do not recognise the needs and unique characteristics of hospitals and their effects on their neighbourhoods.</li> </ul> <p>Effectiveness:</p> <ul style="list-style-type: none"> <li>The environmental benefits of adopting the HRZ rules as they are proposed do not outweigh the environmental costs, therefore this option is not considered effective.</li> </ul> |
| <p>Economic:</p> <ul style="list-style-type: none"> <li>Hospitals will be able to develop to their maximum built potential, serving the health needs of more people on the same site.</li> <li>Fewer resource consents are likely to be required for hospital development or new or altered buildings, as some standards are more generous. This could make the development of hospital and health facilities slightly cheaper and simpler.</li> </ul> |   |
| <p>Social:</p> <ul style="list-style-type: none"> <li>Clearer matching of the potential capacity of hospitals with likely increases in population within their wider catchments.</li> <li>This could be of particular benefit to constrained sites, meaning that further or larger hospital buildings are still able to be provided on these sites.</li> </ul>   |   |
| <p>Cultural:</p> <ul style="list-style-type: none"> <li>More hospital built forms may approach those found outside of New Zealand eg multi-storey development as a standard</li> </ul>   |   |

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| <p>form, which is likely to be familiar to an increasingly diverse population.</p>   |  |
| <p><b>Costs</b></p>  |  |
| <p>Environmental:</p> <ul style="list-style-type: none"> <li>• HRZ rules are not designed for hospitals and some may not be appropriate or necessary for hospitals. Even existing hospital buildings are on average of greater scale than residential ones, and may be of greater height, building length and floor space, so standard residential built form rules are probably not appropriate.</li> <li>• Lack of concern for the elements of hospital development which neighbours could be interested in, and the level of residential amenity that Council is seeking to protect as indicated in the relevant rules. This includes considerations of shading, visual dominance and privacy in respect of adjoining hospital buildings, and possible glare from security lighting.</li> </ul> |  |
| <p>Economic:</p> <ul style="list-style-type: none"> <li>• Multi-level hospital buildings are likely to be more expensive to develop than lower height buildings e.g. require more lifts and connections between separate multi-level buildings.</li> </ul>   |  |
| <p>Social:</p> <ul style="list-style-type: none"> <li>• This model of hospital development differs from longstanding expectations about the scale of hospital development outside the City Centre.</li> </ul>  |  |
| <p>Cultural:</p> <ul style="list-style-type: none"> <li>• N/A</li> </ul>   |  |
| <p><b>Risk of acting/not acting</b><br/> The risk of applying HRZ zone rules is that they are not designed for hospitals, which are a different land use to residential use with different effects. Applying HRZ rules without modification could have significant costs for areas surrounding hospitals in particular, especially if residential development does not intensify for some years.</p>   |  |
| <p><b>Recommendation:</b></p>  |  |

This option is not recommended as it is considered that the preferred option will produce better outcomes while still implementing Policy 3 of the NPS-UD.

- 5.7.6 Summing up, Options 1 – 2 for schools are not considered as efficient and effective in achieving the objectives of the Plan and the relevant directions of the higher order document, the NPS-UD, as the preferred option. The detailed evaluation of **Option 3**, the preferred option for hospitals, follows from section 6.5 onwards.

## 6 Evaluation of the preferred option for provisions

### 6.1 Schools

- 6.1.1 **Option 3 is the proposed plan change**, which adopts the height limits for the High Density Residential zone (where schools are located within these zones) with some reductions near the boundary with residential zones; and adopts the revised recession planes now proposed for all residential zones. Option 3 maintains largely the same internal boundary and road boundary setbacks as for the current SP School zone; and keeps largely the same coverage standards. It adds two new rules for continuous building length and landscaping which are similar to, but more tailored to schools than those rules as proposed for the High Density Residential zones.

### 6.2 Schools - Assessment of costs and benefits of policies

- 6.2.1 **Proposed Policy 13.6.2.1.2 – ~~Amenity of Effects on~~ neighbourhoods.** It is proposed to amend Policy 13.6.2.1.2 in a similar way and for the same reasons as the proposed amendment to Objective 13.6.1.1. discussed in paragraph 5.2.2. above, i.e. the word amenity is proposed to be deleted and replaced with the word “effects”. This is more specific than amenity, and more measurable in terms of what effects are of concern. Note that the wording of the policy is about ensuring that adverse effects are not significant, so it does not preclude the possibility of accepting adverse effects which are minor, nor of amenity as experienced in the future as a result of increases in density on school sites being different to how “amenity” is perceived by residents at present. Ignoring effects of schools on neighbourhoods and vice versa, would be a one-sided approach to change, and would require significant amendment to Council’s planning approach to schools as expressed through the schools objective and other policies. Indeed Policy 13.6.2.1.3 recognises that schools can also have positive benefits for the character of neighbourhoods, as well as being of primary importance for education and almost always contributing as hubs for a diverse range of community activities.
- 6.2.2 A table evaluating options for the proposed Policy 13.6.2.1.2 is not presented here as neither the status quo (no change to the policy) nor changes other than deleting the words “amenity values” are considered to be consistent with the higher order direction of Policy 6 of the NPS-UD.

### 6.3 Schools - Assessment of costs and benefits of the proposed rules

- 6.3.1 **Rule changes for the SP School zone which are the same or largely the same as the High Density Residential zone rules, where schools are within these areas. These are increases to height limits and a revision of recession planes.**

## 6.3.2

| <b>Benefits</b>   |
|---|
| <p><b>Environmental:</b></p> <p><b>Height limits</b> are proposed to increase to 20m at a setback of 10m from internal boundaries, which will allow for 6 storey development, and 32m at the same setback from boundaries for schools within the Central City zone, which will allow for 10 storey development. These are the same as the plan-enabled heights in the relevant high density residential zone. Within the 10m distance however, some development is possible within a smaller setback of 4m, with heights being limited by the recession plane. The height limit for all sites is 14m at 10m from the boundary.</p> <p>These step-ups in height are being proposed to create a more acceptable interface (greater distance between building bulk) between different land uses in a high density setting, both in terms of effects of schools and their characteristics on residential use and vice versa if there is adjoining high density residential use. See the Technical Analysis of SP School built form provisions at Appendix 1.</p> <p>Additional minor changes are to increase the setback for 1 storey buildings to 4m from the boundary rather than 3m, to make this space more usable for landscaping or access, and the standardisation of setbacks for all buildings including for accessory buildings or buildings for spiritual activity on school sites.</p> <p><b>Recession planes</b> for schools are proposed to be amended within the HRZ zone areas to match the new approach for recession planes in residential zones across the City. At the time of writing it was considered that recession planes were likely to become a qualifying matter, with a simpler and more standardised approach to orientation based on 4 quadrants and with lower starting points and slightly lesser angles than those in the MDRS, to reflect the shorter sunlight hours in winter in a more southerly location. There is an environmental benefit in this approach also being applied to schools.</p> |
| <p><b>Economic:</b></p> <p>A slight decrease in floorspace possible at upper floors due to reduced height height near boundaries, will not have a noticeable effect on the economics of school buildings, since there will still be considerable space on school sites to locate taller buildings away from boundaries.</p>   |
| <p><b>Social:</b></p> <p>Locating most school building bulk slightly further into sites, with a slightly tighter recession plane than the standard MDRS one, will have benefits in terms of reduced shading and dominance of buildings outside school sites, and potentially result in better relationships with neighbours of schools.</p>   |
| <p><b>Cultural:</b></p> <p>N/A</p>  |
| <b>Costs</b>  |
| <p><b>Environmental:</b></p> <p>N/A</p>   |
| <p><b>Economic:</b></p> <p>See comments above under benefits</p>  |

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| <p><b>Social:</b><br/>         These variations in rules to mitigate the effect of building bulk near boundaries, do not change the fact that this model of school development is a relatively disruptive one in terms of longstanding expectations about the built form of schools in New Zealand. The large increases in enabled height, if realised, are likely to have a greater effect than reduced height near boundaries, and depending on how quickly and comprehensively intensification occurs in the area, could result in large discrepancies with potentially lesser density adjoining residential development.</p> |
| <p><b>Cultural:</b><br/>         N/A</p>   |

| <b>Consistency with the policies and appropriateness in achieving the objectives</b>  |
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| <p><b>Efficiency:</b><br/>           The benefits of these rules will likely be greater than the costs in that they implement Policy 3 of the NPS-UD as Council is required to do, give greater flexibility of building form than the current height and recession plane rules, and avoid a situation of an intensified school built form being out of keeping with an intensified surrounding neighbourhood. At the same time providing for step-ups in height near boundaries and slightly tighter recession planes than the MDRS, will go some way toward mitigating the effect of schools on immediately adjacent neighbours.<br/>           The proposed rules are still consistent with the objective and policies of the SP School zone.</p> |
| <p><b>Effectiveness:</b><br/>           The proposed height limits and recession plane rules are effective in achieving the environmental outcomes that are sought by the NPS-UD, while mitigating some potential environmental disadvantages of the HRZ rules eg shading and building dominance, and effects on privacy which are likely if these rules were applied in an unmodified form.</p>  |
| <p><b>Risk of acting/not acting</b><br/>           The NPS-UD is not as prescriptive as the MDRS and therefore there is greater scope to modify the HRZ zone provisions to account for the fact that school use is of a different nature to residential use. There would be a risk of inconsistency with the NPS-UD if heights and densities provided for enable less overall density and height across school sites. It is not considered that this will be the case.</p>  |

6.3.3 **SP School zone rules which will remain the same or largely the same, for schools located within areas of High Density Residential zones. These are internal boundary setbacks and road boundary setbacks, and coverage allowances.**

6.3.4

| <b>Benefits</b>  |
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| <p><b>Environmental:</b><br/> <b>Internal boundary setbacks</b> are interrelated with building height in terms of effects on neighbours. Modelling indicates that the heights proposed by the NPS-UD (six storeys or more) can be supported if setbacks are kept similar to current setbacks (6m or more for up to 14m, which would be the permitted height without consent). More than 14m or 3-4 storeys as plan-enabled development requires a greater setback of at least 10m, for these two elements of built form rules to be consistent, and for recession planes also to be complied with.</p> |

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| <p><b>Road boundary setbacks</b> are proposed to be kept at 4m, which is the same as current road boundary setbacks for the schools within the RMD zone. Current 2m road setbacks in the Central City are proposed to be increased to 4m in the interests of standardisation and because 2m is not useful for planting or for identity signs or entrance features. There is no compelling reason for schools to be built up to the footpath/front boundary in Central City areas, as they are a different type of use than for example, retail, and frequently occupy larger sites.</p> <p>Finally, there are considerable environmental benefits in maintaining a similar <b>coverage</b> allowance for schools in HDR zoned areas. At present the allowance is 45% for the RMD zone, which will become the High Density Residential zone outside of the Central City, and the few schools in Central City areas do not have a coverage restriction at all. This is considered inappropriate, in that schools generally require and benefit from a high degree of open space. This is to enable sufficient usable outdoor areas, including for learning, and passive and active outdoor recreation as well as room for future expansion as rolls increase. It is proposed that Schools in the HRZ zone around the City Centre and within the City Centre have a coverage allowance of 50% (as for the HRZ zone itself). However it is not considered necessary to promote lack of provision of on-site parking other than mobility parking, as an incentive to achieve more coverage on site.</p> <p>In situations where schools have ready access to off-site, nearby recreational areas eg Hagley Park, additional coverage could be achieved on-site via restricted discretionary consent.</p> |
| <p><b>Economic:</b><br/>While the rules discussed here concern maximum footprint of buildings on a site and the location of those footprints in relation to site boundaries, a factor which is likely to have a greater effect on maximum development capacity on a site is height or the number of floors that can be built.<br/>Since these SP rules do not limit height, it is not considered that they will impose an additional cost on building schools, in comparison with adoption of High Density Residential zone setbacks.</p>  |
| <p><b>Social:</b><br/>SP zone setbacks and coverage allowances will be familiar to those involved in the development or rebuilding of schools.</p> <p>Maintaining SP zone road boundary setbacks will enable a better quality entrance to schools than might otherwise occur. Maintaining SP zone Internal boundary setbacks will assist in preserving relationships with neighbours. Built form modelling undertaken provides a justifiable basis for setbacks in relation to height of buildings.</p>  |
| <p><b>Cultural:</b><br/>N/A</p>  |

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| <b>Costs</b>                         |
| <p><b>Environmental:</b><br/>N/A</p> |
| <p><b>Economic:</b></p>              |

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| See comments above under benefits.  |
| <p>Social:<br/>These variations in rules from the HRZ model, to mitigate the effect of building bulk near boundaries, may not satisfy concerns about the potential increase in built scale of schools. However limits on coverage for large sites will mean that some degree of openness can be maintained.</p> |
| <p>Cultural:<br/>N/A</p>  |

| <b>Consistency with the policies and appropriateness in achieving the objectives</b>  |
|---|
| <p><b>Efficiency:</b><br/>The benefits of these rules will likely be greater than the costs in that they still give a considerable degree of flexibility of building form. At the same time, providing for setbacks that are more generous than the HRZ zone and similar coverage controls to maintain useable open space and opportunities for future roll growth, acknowledges the slightly different characteristics of schools versus residential use, and will go some way toward mitigating the effect of schools on immediately adjacent neighbours.</p> <p>The proposed rules are still appropriate in achieving the objective and policies of the SP School zone.</p>  |
| <p><b>Effectiveness:</b><br/>The proposed setbacks and coverage allowances, while very similar to those in the SP School zone, are still effective in achieving the environmental outcomes that are sought by the NPS-UD, while mitigating some potential environmental disadvantages of HRZ rules eg shading and building dominance, and adverse effects on privacy, which are likely if HRZ rules were applied in an unmodified form.</p>   |
| <p><b>Risk of acting/not acting</b><br/>The NPS-UD is not as prescriptive as the MDRS and therefore there is greater scope to modify the HRZ zone provisions to account for the fact that school use is of a different nature to residential use. However there is a risk of inconsistency with the NPS-UD if heights and densities provided for, enable less overall density and height across school sites than HRZ provisions. It is not considered that these SP zone rules do this, because schools are typically on much larger sites than residential properties, and because increasing site building coverage above a certain level would not be educationally acceptable.</p> <p>In situations where schools have access to off-site but nearby recreational areas, additional coverage could be achieved on-site via restricted discretionary consent.</p> |

6.3.5 **Additional rules proposed for the SP School zone, for schools located within areas of High Density Residential zones. These are new rules for continuous building length and landscaping.**

6.3.6

| <b>Benefits</b>  |
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| <p>Environmental:<br/>The proposed <b>continuous building length rule</b> for within areas of High Density Residential is part of a restricted discretionary assessment where buildings are above 14m in height, and</p> |

rising to 20m or 32 m at 10m from boundaries. This rule recognises the visually dominating effect of potentially lengthy, large buildings with continuous and at times blank building facades, particularly on adjoining neighbours. Buildings of this length and height could also be visually dominating in any location on school sites, because there may be more open space and more irregularly placed buildings than in a residential setting. The rule proposes that if buildings are above 14m in height, for every 30m in building length, a minimum recess of 4m in length and 2m deep should be required for the full height of the building (including the roofline). This is very similar to the continuous building length rule proposed for the SP Hospital zone and also intended to be introduced into the HRZ zone.

This rule will assist in breaking up building length and will also promote physical and visual connections across school sites, which are emphasised in the Ministry of Education School Property Design Standards.

A new **landscaping rule** is proposed for schools, requiring 10% of the site to be landscaped, with specified provision for trees along boundaries. While many (especially new or rebuilt) schools are well landscaped at present, it will be worthwhile to establish a minimum or baseline standard for schools within High Density Residential environments to provide a landscape buffer to large scale buildings on either side of boundaries. This minimum standard is half of the 20% landscaping required in residential zones, to recognise the functional use of schools, but requires some trees along school boundaries to soften the bulk of large buildings. While the MOE School Property Design Standards do not have quantitative or locational standards for landscaping they do emphasise the natural environment, local ecology and soft landscaping, as well as preserving significant trees. It is not expected that this rule will prove onerous to comply with, and will also provide an indication of what the community expects to see as a minimum in terms of landscaping and tree planting.

**Economic:**

The continuous building length rule will not apply to school buildings of 1-3 storeys, which is the most common building form at present, which could be seen as a benefit by school providers. Recent school redevelopments have included some very lengthy new buildings of this height.

Landscaping and tree planting: N/A

**Social:**

There are benefits in aligning continuous building length rules across schools, hospitals and residential uses in a high density context, as it will assist in mitigating effects of potential dominance and improve visual relationships between different types of buildings, particularly where buildings run parallel to zone boundaries.

Landscaping and tree planting: Benefits to neighbours are similar in terms of mitigating potential dominance and improving visual amenity of schools. There is current community concern about loss of trees with intensification, which will likely mean that any preservation of existing trees and any new tree planting on school sites will be welcomed.

**Cultural:**

N/A

**Costs**



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| Environmental:<br>N/A  |
| Economic:<br>Breaking up very large buildings into separate components is likely to be more expensive than allowing a very large building form.<br><br>Any additional landscaping required will also have an economic cost. However indications from recent outline plans and consents are that this level of landscaping at least percentage wise is likely to have been provided anyway. |
| Social:<br>N/A   |
| Cultural:<br>N/A   |

| <b>Consistency with the policies and appropriateness in achieving the objectives</b>  |
|---|
| <p><b>Efficiency:</b><br/>The environmental benefits of these rules on continuous building length and landscaping and tree planting, in terms of school amenity on-site and also improving the visual character of schools in the context of their neighbourhood will almost certainly be greater than the economic costs. The package of proposed SP School zone rules still gives a considerable degree of flexibility of building form and layout across sites. There is some consistency with new rules requiring landscaping in the HRZ zones as a result of intensification directives.</p> <p>These proposed new rules are consistent with the SP School zone objectives and policies, which already mention recognising and enhancing the contribution of education buildings and sites to the character of neighbourhoods, and encouraging education providers to develop sites to a high standard of visual amenity and design.</p> |
| <p><b>Effectiveness:</b><br/>These proposed new rules are expected to be effective in mitigating some of the potential adverse effects of intensification. They will contribute to improved school amenity on site and assist in enhancing the character of intensified neighbourhoods.</p>   |
| <p><b>Risk of acting/not acting</b><br/>The NPS-UD is not as prescriptive as the MDRS and therefore there is greater scope to modify the HRZ zone provisions to account for the fact that school use is of a different nature to residential use. However there is a risk of inconsistency with the NPS-UD if the package of rules put forward provides for enable less overall density and height across school sites. It is not anticipated that this will be the case.</p>   |

## 6.4 Schools - The most appropriate option

- 6.4.1 The option for SP School zone amendments discussed in 6.2 and 6.3 above, Option 3, which adopts some HRZ rules e.g. height, with modifications near site boundaries, continues some school zone rules with some simplification, and adds two additional rules to mitigate the potential effects of intensification, e.g. on visual amenity, is the preferred option. The preferred

option is tailored to schools, and is consistent with the SP School zone objective and policies. It is considered that this option will produce better environmental outcomes than a replication of purely High Density Residential zone rules, while still implementing Policy 3 of the NPS-UD.

- 6.4.2 Provisions for schools located in areas zoned Medium Density Residential are not able to be revised at this time because the wording of the MDRS limits its application to relevant residential zones only. Nor are schools able to be rezoned to residential zoning under Plan Change 14, as this is limited to intensification of existing zonings.

## 6.5 Hospitals

- 6.5.1 **Option 3 is the proposed plan change**, which adopts the height limits for the High Density Residential zone (where hospitals are located within these zones) with some reductions near the boundary with residential zones; and for the smaller sites adopts the recession planes now proposed for all residential zones. Recession planes are proposed for all smaller sites rather than only some. The proposed plan change maintains very similar internal boundary and road boundary setbacks to the current SP Hospital zone, although one is reduced and one is increased. These are the Nurse Maude internal boundary setback (reduced to 4 metres from 5 metres), and the Heaton Street road boundary setback, (increased from 8 metres to 10 metres) as a result of the removal of the St Georges Heaton Street overlay.

- 6.5.2 New elements of the Plan change are the introduction of a new coverage standard for the only hospital in the 32 metre zone (HRZ outside of the Residential Precincts) to mitigate potentially significant adverse effects on residential neighbours to the south. A new rule is added in relation to continuous building length for buildings over 14 metres in height, as part of a restricted discretionary assessment. This is similar to the rule on the same matter proposed for the High Density Residential zones. Tree planting is proposed to be required along internal boundaries for the smaller Inner Urban sites whereas previously this was only required for the larger sites.

## 6.6 Hospitals – Assessment of costs and benefits of policies

- 6.6.1 **Proposed Policy 13.5.2.1.2 –Comprehensive development.** It is not proposed to amend Policy 13.5.2.1.2 in respect of the two uses of the term “amenity values” as these are in the parts of the policy relating to Suburban and Suburban Services hospital sites, and Christchurch Hospital, which are not covered in this current review prompted by the NPS-UD. See however the comments in 5.5.2-5.5.6 above in relation to rewording of the SP Hospital objective.

- 6.6.2 Changes proposed to this policy are minor and most of these are the result of reorganisation of the Inner Urban sites into two groups, and adding the former Christchurch Women’s Hospital and Montreal House into the second group. Defining human scale in the District Plan is a result of changes elsewhere in Plan Change 14, and adding “along internal boundaries” to the clause of this policy on planting reflects the extension of the landscaping rule requirement to smaller Inner Urban sites.

- 6.6.3 A table evaluating options for the proposed Policy 13.5.2.1.2 is not presented here as changes to policies are not considered to be more than consequential to rule changes.

## 6.7 Hospitals – Assessment of costs and benefits of proposed rules

- 6.7.1 **Rule changes for the SP Hospital zone which are the same or largely the same as the High Density Residential zone rules, where hospitals are within these areas. These are increases to height limits and a revision of recession planes.**

## 6.7.2

| <b>Benefits</b>   |
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| <p>Environmental:</p> <p><b>Height limits</b> are proposed to increase to 20m at a setback of 10m from internal boundaries, which will allow for 6 storey development, and 32m at the same setback from boundaries for hospitals within the Central City zone, which will allow for 10 storey development. These are the same as the plan-enabled heights in the relevant high density residential zone. Within the 10m setback distance however, some development is possible for the smaller sites and they have a smaller setback of 4m, with heights being limited in this area by the recession plane. The height limit for all sites is 14m at 10m from the boundary.</p> <p>These step-ups in height are being proposed to create a more acceptable interface (greater distance between locations of building bulk) between different land uses in a high density setting, in terms of effects of hospitals and their characteristics on residential use. See the Technical Analysis of SP Hospital built form provisions at <b>Appendix 2</b>.</p> <p><b>Recession planes</b> for hospitals are proposed to be amended within the HRZ zone areas to match the new approach for recession planes in residential zones across the City. At the time of writing it was considered that recession planes were likely to become a qualifying matter, with a simpler and more standardised approach to orientation based on 4 quadrants and with lower starting points and slightly lesser angles than those in the MDRS, to reflect the shorter sunlight hours in winter in a more southerly location. There is an environmental benefit in this approach also being applied to the smaller hospitals, in terms of their interface with adjoining sites.</p> |
| <p>Economic:</p> <p>A slight decrease in floorspace possible at upper floors due to reduced height near boundaries, will not have a noticeable effect on the economics of hospital buildings, since there will still be considerable space on hospital sites to locate taller buildings away from boundaries.</p>   |
| <p>Social:</p> <p>Locating most hospital building bulk slightly further into sites, with a slightly tighter recession plane than the standard MDRS one, will have benefits in terms of reduced shading and dominance of buildings outside hospital sites, and potentially result in better relationships with neighbours of hospitals.</p>  |
| <p>Cultural:</p> <p>N/A</p>   |
| <b>Costs</b>  |
| <p>Environmental:</p> <p>N/A</p>  |
| <p>Economic:</p> <p>See comments above under benefits</p>   |
| <p>Social:</p> <p>These variations in rules to mitigate the effect of building bulk near boundaries, do not change the fact that this model of hospital development varies from longstanding expectations about the “suburban” built form of hospital sites in New Zealand. The large increases in enabled height, if realised, are likely to have a greater effect than reduced height near boundaries, and</p>  |

depending on how quickly and comprehensively intensification occurs in the area, could result in large discrepancies with potentially lesser density in adjoining residential development.

Cultural:  
N/A

#### Consistency with the policies and appropriateness in achieving the objectives

##### Efficiency:

The benefits of these rules will likely be greater than the costs in that they implement Policy 3 of the NPS-UD as Council is required to do, give greater flexibility of building form than the current height and recession plane rules, and avoid a situation of an intensified hospital built form being out of keeping with an intensified surrounding neighbourhood. At the same time providing for step-downs in height near boundaries and slightly tighter recession planes than the MDRS, will go some way toward mitigating the effect of hospitals on immediately adjacent neighbours.

The proposed rules are still consistent with the objective and policies of the SP Hospital zone.

##### Effectiveness:

The proposed height limits and recession plane rules are effective in achieving the environmental outcomes that are sought by the NPS-UD, while mitigating some potential environmental disadvantages of the HRZ rules eg shading and building dominance, and effects on privacy which are likely if these rules were applied in an unmodified form.

##### Risk of acting/not acting

The NPS-UD is not as prescriptive as the MDRS and therefore there is greater scope to modify the HRZ zone provisions to account for the fact that hospital use is of a different nature to residential use. There would be a risk of inconsistency with the NPS-UD if heights and densities provided for enable less overall density and height across hospital sites. It is not considered that this will be the case.

6.7.3 **SP Hospital zone rules which will remain the same or largely the same, for hospitals located within areas of High Density Residential zones. These are internal boundary setbacks and road boundary setbacks.**

6.7.4

#### Benefits

Environmental:

**Internal boundary setbacks** are interrelated with building height in terms of effects on neighbours. Modelling indicates that the heights proposed by the NPS-UD (6 storeys or more) can be supported if setbacks are kept similar to current setbacks (10 metres for larger sites or 4 metres for smaller sites) for up to 14m in height, which would be the permitted height without consent. More than 14m or 3-4 storeys as plan-enabled development requires a greater setback of at least 10 metres, for these two elements of built form rules to be consistent, and may also require other methods of modulating building form such as horizontal steps.

**Road boundary setbacks** are proposed to be kept at 10 metres for larger sites (with some exceptions) and 4m for smaller sites, which is the same as current road boundary setbacks. The St Georges Heaton overlay is being removed, and the road boundary setback increased here from 8 metres to the standard 10 metres, partly to provide some mitigation for the increase in

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| <p>height from 8 metres (previous residential scale height limit) to 20 metres (enabled) which will now be possible on this part of the site. The Montreal Street boundary of Montreal House continues to be an outlier at 2 metres minimum.</p>  |
| <p><b>Economic:</b><br/>While the rules discussed here concern maximum footprint of buildings on a site and the location of those footprints in relation to site boundaries, a factor which is likely to have a greater effect on maximum development capacity on a site is height or the number of floors that can be built.<br/>Since these SP rules do not limit height, it is not considered that they will impose an additional cost on building hospital.</p>   |
| <p><b>Social:</b><br/>SP zone setbacks will be familiar to those involved in the development or redevelopment of hospitals.<br/><br/>Maintaining SP hospital zone road boundary setbacks will enable a better quality entrance to hospitals than might otherwise occur, which is desirable in terms of identifying signs and entrance features for hospitals. Maintaining SP zone internal boundary setbacks will assist in preserving relationships with neighbours. Built form modelling undertaken provides a justifiable basis for setbacks in relation to height of buildings.</p> |
| <p><b>Cultural:</b><br/>N/A</p>   |

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| <p><b>Costs</b></p>   |
| <p><b>Environmental:</b><br/>N/A</p>  |
| <p><b>Economic:</b><br/>See comments above under benefits.</p>  |
| <p><b>Social:</b><br/>These variations in rules from the HRZ model, to mitigate the effect of building bulk near boundaries, may not satisfy concerns about the potential increase in built scale of hospitals.</p> |
| <p><b>Cultural:</b><br/>N/A</p>   |

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| <p><b>Consistency with the policies and appropriateness in achieving the objectives</b></p>  |
| <p><b>Efficiency:</b><br/>The benefits of these rules will likely be greater than the costs in that they still give a considerable degree of flexibility of building form. At the same time, providing for setbacks that are more generous than the HRZ zone acknowledges the slightly different characteristics of hospitals versus residential use (generally greater bulk), and will go some way toward mitigating the effect of hospitals on immediately adjacent neighbours.<br/><br/>The proposed rules are still appropriate in achieving the objective and policies of the SP Hospital zone.</p> |

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| <p><b>Effectiveness:</b></p> <p>The proposed setbacks, while very similar to those in the SP Hospital zone, are still effective in achieving the environmental outcomes that are sought by the NPS-UD, while mitigating some potential environmental disadvantages of HRZ rules e.g. shading and building dominance, and adverse effects on privacy, which are likely if HRZ rules were applied in an unmodified form.</p>   |
| <p><b>Risk of acting/not acting</b></p> <p>The NPS-UD is not as prescriptive as the MDRS and therefore there is greater scope to modify the HRZ zone provisions to account for the fact that hospital use is of a different nature to residential use. However there is a risk of inconsistency with the NPS-UD if heights and densities provided for, enable less overall density and height across hospital sites than HRZ provisions. It is not considered that these SP zone rules do this, because hospitals are typically on much larger sites than residential properties, thus allowing for considerable density and height.</p> |

- 6.7.5 **Additional rules proposed for the SP Hospital zone, for hospitals located within areas of High Density Residential zones. These are new rules for continuous building length and a new maximum coverage rule for one site. Tree planting requirements on internal boundaries are proposed to be extended to smaller sites.**

6.7.6

| <b>Benefits</b>   |
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| <p><b>Environmental:</b></p> <p>The proposed <b>continuous building length rule</b> for hospitals within areas of High Density Residential is part of a restricted discretionary assessment where buildings are above 14m in height, and rising to 20m or 32 m at 10m from boundaries. This rule recognises the visually dominating effect of potentially lengthy, large buildings with continuous and at times blank building facades, particularly on adjoining neighbours. Buildings of this length and height could also be visually dominating in any location on hospital sites, because there may be more open space and more irregularly placed buildings than in a residential setting. The rule proposes that if buildings are above 14m in height, for every 30m in building length, a minimum recess of 4m in length and 2m deep should be required for the full height of the building (including the roofline). This is similar to the continuous building length rule proposed for the SP School zone and also that in the HRZ zone.</p> <p>This rule will assist in breaking up building length and will also promote physical and visual connections across hospital sites, improving site legibility and wayfinding.</p> <p>The SP Hospital zone has existing <b>landscaping</b> rules for hospitals, although they are not entirely consistent across the different sites. More recently reviewed sites have a rule requiring landscaping to be in accordance with Appendix 6.11.6 of Chapter 6, which requires minimum sizes of trees at time of planning and at maturity. (The latter may need to be amended for trees planted in setbacks where these are only 4 metres, to a smaller size at maturity). This is being extended to the other Inner Urban sites as a matter of consistency. Currently the rule requiring 1 tree per 15 metres of internal boundary applies only to the larger Inner urban sites but it is proposed to also apply to smaller sites of this category which generally have several boundaries with residential zones. It is not expected that this rule will prove onerous to comply with, as it applies a consistent minimum in terms of landscaping and tree planting. Wording in these rules has also been made consistent in terms of planting being in landscaping strips.</p> |

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| <p>Finally, a rule is proposed limiting <b>coverage</b> on the former Women’s Hospital site to 60%. This is because the site has long residential interfaces and will be enabled to 32 metres in height. If development was to occur across the whole site with no coverage limitation, there could be a considerable bulk of large buildings located to the north of the small residential sites on Gracefield Avenue, visually dominating them and diminishing privacy. While the continuous building length rule will assist in breaking up building mass, the coverage rule proposed will provide a realistic upper limit on the extent of that building mass.</p>   |
| <p><b>Economic:</b><br/>The continuous building length rule will not apply to hospital buildings of 1-3 storeys, which is a common building form at present, which could be seen as a benefit by hospital providers.</p> <p><b>Landscaping and tree planting:</b> N/A</p>  |
| <p><b>Social:</b><br/>There are benefits in aligning continuous building length rules across hospitals and residential uses in a high density context, as it will assist in mitigating effects of potential dominance and improve visual relationships between different types of buildings, particularly where buildings run parallel to zone boundaries.</p> <p><b>Landscaping and tree planting:</b> Benefits to neighbours are similar in terms of mitigating potential dominance and improving visual amenity of hospitals. There is current community concern about loss of trees with intensification, which will likely mean that any preservation of existing trees and any new tree planting on hospital sites will be welcomed.</p> |
| <p><b>Cultural:</b><br/>N/A</p>  |

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| <p><b>Costs</b></p>  |
| <p><b>Environmental:</b><br/>N/A</p>   |
| <p><b>Economic:</b><br/>Breaking up very large buildings into separate components is likely to be more expensive than allowing a very large building form.</p> <p>Any additional landscaping required will also have an economic cost.</p> |
| <p><b>Social:</b><br/>N/A</p>  |
| <p><b>Cultural:</b><br/>N/A</p>  |

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| <p><b>Consistency with the policies and appropriateness in achieving the objectives</b></p>  |
| <p><b>Efficiency:</b><br/>The environmental benefits of these rules on continuous building length and landscaping and tree planting, in terms of hospital amenity on-site and also improving the visual character of</p> |

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| <p>hospitals in the context of their neighbourhood will almost certainly be greater than the economic costs. The package of proposed SP Hospital zone rules still gives a considerable degree of flexibility of building form and layout across sites. There is some consistency with new rules requiring landscaping in the HRZ zones as a result of intensification directives.</p> <p>These proposed new rules are consistent with the SP Hospital zone objectives and policies, which already mention both efficient development of hospital sites and recognising the character and amenity of the surrounding environment, and ensuring that the form and scale of buildings recognises the anticipated residential scale and form at hospital boundaries.</p> |
| <p><b>Effectiveness:</b></p> <p>These proposed new rules are expected to be effective in mitigating some of the potential adverse effects of intensification. They will contribute to improved hospital amenity on site and assist in enhancing the character of intensified neighbourhoods.</p>   |
| <p><b>Risk of acting/not acting</b></p> <p>The NPS-UD is not as prescriptive as the MDRS and therefore there is greater scope to modify the HRZ zone provisions to account for the fact that hospital use is of a different nature to residential use. However there is a risk of inconsistency with the NPS-UD if the package of rules put forward enables less overall density and height across hospital sites. It is not anticipated that this will be the case.</p>   |

## 6.8 Hospitals – The most appropriate option

- 6.8.1 The option for SP Hospital zone amendments discussed in 6.6 and 6.7 above, Option 3, is the preferred option. This adopts some HRZ rules e.g. height, with modifications near site boundaries, continues some SP hospital zone rules with some increased standardisation across sites, and adds two additional rules to mitigate the potential effects of intensification,. The preferred option is tailored to hospitals, and is consistent with the SP Hospital zone objective and policies. It is considered that this option will produce better environmental outcomes than a replication of purely High Density Residential zone rules, while still implementing Policy 3 of the NPS-UD.
- 6.8.2 Provisions for hospitals located in areas zoned Medium Density Residential are not able to be revised at this time because the wording of the MDRS limits its application to relevant residential zones only.

## 7 Conclusions

- 7.1.1 Having evaluated alternatives to the proposed amendments, the proposed plan change provisions are considered the most appropriate method to achieve the District Plan Strategic Objective, subchapter objectives and higher order document directions (in particular the NPS-UD) relating to school and hospital provisions in the District Plan, and that the plan change is in accordance with the sustainable management purpose of the RMA.