Christchurch City Council

Resource Management Act 1991

Christchurch District Plan

Plan Change 14

Section 32 Evaluation

14

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

[PART 4]

Table of contents

1 Introduction

1.1 Purpose of this report

1.1.1 The overarching purpose of section 32 (**s32**) of the Resource Management Act 1991 (**RMA / Act**) is to ensure that plans are developed using sound evidence and rigorous policy analysis, leading to more robust and enduring provisions.

1.1.2 Plan Change 14 is an Intensification Planning Instrument (**IPI**), which the Council is required to progress to provide for urban intensification pursuant to the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. This report relates to the Commercial and Industrial provisions proposed by Plan Change 14.

1.1.3 Section 32 requires that the Council provide an evaluation of the changes proposed in Plan Change 14 (Commercial and Industrial Chapter) to the Christchurch District Plan (**the Plan**). The evaluation must examine whether the proposed objectives are the most appropriate way to achieve the purpose of the RMA, and whether the proposed provisions are the most appropriate way to achieve the objectives of the Plan. The report must consider reasonably practicable options, and assess the efficiency and effectiveness of the provisions in achieving the objectives. This will involve identifying and assessing the benefits and costs of the environmental, economic, social and cultural effects anticipated from implementing the provisions. The report must also assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.

1.1.4 The purpose of this report is to fulfil the s32 requirements for proposed Plan Change 14 – relating to the Commercial and Industrial Chapters, related definitions (chapter 2) and planning maps. In addition, the report examines any relevant directions from the statutory context including higher order documents.

1.1.5 This report should be read in conjunction with other parts of the section 32, particularly, Part 1 – Overview and High Level District Issues, Part 2 – Qualifying Matters, Part 8 – Planning Maps, Overlays and Zone Boundary Changes and Part 9 – Consequential Amendments and Appendices.

2 Resource management issues

2.1 Council's legal obligations and strategic planning documents

2.1.1 Sections 74 and 75 of the RMA set out Council's obligations when preparing a change to its District Plan. The Council has a responsibility under Section 31 of the RMA to establish, implement and review objectives and provisions for, among other things, achieving integrated management of the effects of the use, development, or protection of land and associated resources. One of the Council's functions is to control the actual and potential effects of land use or development on the environment, and to do so in accordance with the provisions of Part 2 of the Act.

2.1.2 Within Part 2, the purpose of the Act (Section 5) includes the sustainable management of physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural wellbeing and for their health and safety. This supports

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

2.1.3 Of relevance to this part of the plan change, section 6 matters of national importance to be recognised and provided for include the protection of outstanding natural features and landscapes from inappropriate subdivision, use and development. This requires consideration of any impact on the Port Hills / Te Poho-o-Tamtea, which is an identified Outstanding Natural Landscape recognised by s6, in part due to its importance as the natural backdrop to the City.

2.1.4 Other matters to be achieved when exercising functions and powers under the Act include (relevantly), the efficient use and development of physical resources (urban land) (s7b) and maintenance and enhancement of the quality of the environment (s7(f)) and amenity values (s7(c)).

2.1.5 The plan change must also take account of the Principles of Te Tiriti o Waitangi in accordance with section 8 of the RMA. Through seeking input from Papatipu Rūnanga in preparation of the plan change, their feedback has been addressed in the plan change.

2.1.6 As required by s74 and s75 of the RMA, a Plan Change must specifically give effect to, not be inconsistent with, take into account, or have regard to the following "higher order" documents / provisions which provide directions for the issues relevant to this plan change:

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

IPI-related Sections of the Act	Direction to Council
Section 77N	• Must use the IPI (defined under s80E) and intensification streamlined planning process • Must ensure provisions give effect to the changes required by policy 3 or policy 5 as the case requires. • May create new urban non-residential zones or amend existing urban non-residential zones. • May modify the requirements set out in policy 3 to be less enabling of development than provided for by policy 3, if authorised to do so under section 77O.
Section 77O	• May modify the requirements of policy 3 in urban non-residential zones to be less enabling of development to the extent necessary to accommodate specified "qualifying matters".
Sections 77P – 77R	• Requirements specified for the evaluation report required under s32

IPI-related Sections of the Act	Direction to Council
Section 77S	• Amends Policy 3 (d) to state: "(d) within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent), building heights and density of urban form commensurate with the level of commercial activity and community services."
Section 80E	• Defines the scope of an IPI. • Provides that an IPI must give effect to Policies 3 and 4 of the NPS-UD. • Provides that an IPI may include provisions relating to financial contributions, to enable papakāinga housing, and "related provisions" that support or are consequential on the MDRS or Policies 3, 4, and 5 of the NPS-UD. • Specifies, in a non-exhaustive list, several matters which may be provided for as "related provisions".
Section 80F	• Specifies that a Territorial Authority that must notify an IPI on or before 20 August 2022 includes every Tier 1 Authority
Section 80G	• Specifies that a Territorial Authority must not notify more than 1 IPI, use the IPI for any purpose other than specified in section 80E, or withdraw the IPI.
Section 80H	• The IPI must show how MDRS and objectives and policies are incorporated.
Schedule 3A	• Includes an Objective for inclusion in the District Plan that seeks: *"a well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future"*

2.1.8 **MDRS**

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

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

a. National Policy Statement on Urban Development

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

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

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

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

2.1.13 These matters set the minimum requirements as to what constitutes a well-functioning environment, which local authority planning decisions must achieve, and it is left to local authorities to further identify any other relevant matters. This may, for example, include matters relating to good urban design[1].

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

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

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

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

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

(c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.
(Objective 3)

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

"…District plans enable:

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

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

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

(i) existing and planned rapid transit stops

(ii) the edge of city centre zones

(iii) the edge of metropolitan centre zones; and

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

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

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

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

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

2.1.19 Policies 4, 6, and 9 establish what kinds of constraints are able to be considered through the required intensification response. The NPS-UD introduces the concept of 'qualifying matters' (as defined through Clause 3.32) that detail specific features that are able to be considered to modify any intensification directive Policy 3 requires (Policy 4). A number of the qualifying matters identified in subpart 6 (3.32) are relevant to Plan Chapters 15 (Commercial) and 16 (Industrial). Qualifying matters are considered in Part 2 of the s32 report and will be referenced in the evaluation that follows.

2.1.20 Objective 4 of the NPS-UD is relevant to the plan change in articulating that the urban environment develops and changes over time in response to changing needs of people, communities and future generations. In this context, the NPSUD anticipates change from what outcomes were previously defined as appropriate. Policy 6 supports Objective 4 by highlighting the change that should be anticipated through the wider intensification direction (which is not considered in itself an adverse effect), its benefits of urban development, and how development may impact the climate. In giving effect to the intensification direction, authorities must also develop in accordance with any future development strategies (FDSs), the values and aspirations of local hapū and iwi, involving them in policy development.

2.1.21 Decisions on urban development are to be integrated with infrastructure planning and funding decisions, strategic and responsive, having regard to proposals that add significantly to development capacity, in accordance with Objective 6. This is relevant in consideration of the appropriate locations for intensification of commercial activity that is directed by policy 3.

2.1.22 The NPSUD (Objective 8) also anticipates that urban environments support a reduction in greenhouse gas emissions and are resilient to the current and future effects of climate change. By directing greater levels of intensification in the City centre, there is an opportunity to achieve greater accessibility to employment, services and amenities and support greater use of public transport and active modes.

2.1.23 The plan change must give effect to these directions.

b. Canterbury Regional Policy Statement

2.1.24 The Canterbury Regional Policy Statement (**CRPS**) seeks to support and maintain the existing network of centres as a focus for commercial, community and service activities (Objective 6.2.5) and identifies Key Activity Centres (Objective 6.2.1(2)). Reflecting their role as a focal point for commercial activity, Objective 6.2.6 states that commercial activities are to be "*primarily directed to the Central City, Key Activity Centres, and Neighbourhood Centres*". The development and distribution of commercial activity is to avoid significant adverse effects on the function and viability of centres (Objective 6.2.5).

2.1.25 Policies to achieve the objectives support these outcomes by recognising the Central City's role as the city's primary commercial centre and reinforcing the role of Key Activity Centres (Policy 6.3.6(3)). New commercial activities are primarily to be directed to the Central City, Key Activity Centres and Neighbourhood Centres *where these activities reflect and support the function and role of those centres* (Policy 6.3.6(4)).

2.1.26 These directions support a hierarchical approach to the centres-based strategy with a deliberate policy bias in favour of the central city and key activity centres but with significant discretion and choice able to be exercised as to how a centres based approach is to be implemented.

2.1.27 Objective 6.2.5 states that centres will be high quality, support a diversity of business opportunities including appropriate mixed-use development, and incorporate good urban design principles. Objective 6.2.1 and Policy 6.3.2 again emphasise the importance of high quality mixed use development that incorporates the principles of good urban design.

2.1.28 Policy 6.3.7 (residential location, yield and intensification) seeks that residential intensification be focused around commercial centres commensurate with their role and function, along core public transport routes, in mixed use areas and on suitable brownfield land. It specifically points to enabling intensification and brownfield redevelopment to support housing affordability by providing a range of lot sizes, densities and appropriate development controls and more intensive development including mixed use, apartments, townhouses and terraced housing.

2.1.29 Regarding brownfield redevelopment, the CRPS (Policy 6.3.8 – Regeneration of Brownfield Land) encourages the regeneration of existing brownfield areas through new comprehensive residential, mixed use or business developments, provided such activities will not have adverse effects on the transport network nor significant adverse distributional or urban form effects on the central city and other centres. The reasoning in the CRPS points to the benefits of increasing high intensity and often more appropriate activities in these locations (Commercial centres) and enhancing the amenity of these areas. Recognition is also given to the benefits of reducing the adverse effects of travel to work, making efficient use of existing infrastructure and avoiding development in more sensitive locations. Significant emphasis is placed on the need for such regeneration projects to occur in a comprehensive matter to ensure that good design and amenity outcomes are achieved, and which can be supported by councils through for example, the provision of, and improvements to, open space and the streetscape.

2.1.30 The CRPS is strongly directive in Policy 6.2.6 (Business Land Development) that if land is zoned for industrial purposes, it should primarily be used for industrial purposes, unless it is identified for brownfield redevelopment.

2.1.31 Of relevance when considering the impact of significant changes to the city's urban form, will be any potential impact on the Port Hills / Te Poho-o-Tamatea given its national and regional significance as an Outstanding Natural Landscape (ONL). The whole of the Port Hills / Te Poho-o-Tamatea is identified in Appendix 4 of the CRPS as an ONL for a range of values including (relevantly) its legibility and significance as a backdrop to the City and as a landscape highly valued by tourists and locals. Te Poho-o-Tamatea is highly significant to Tangata Whenua who have a long spiritual and physical association with the Peninsula landscape. CRPS Objective 12.2.1 and Policy 12.3.1 seeks to identify and protect ONLs from inappropriate subdivision, use and development.

2.1.32 The plan change must give effect to these directions.

c. Land Use Recovery Plan

2.1.33 There are a number of relevant 'outcomes' in the Land Use Recovery Plan (**LURP**) to have regard to for this plan change including the following:

- Outcome 1: Key activity centres and neighbourhood centres provide for commercial activity needs including redevelopment of damaged centres.

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

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

2.1.35 The plan change must have regard to these directions.

d. Christchurch Central Recovery Plan (CCRP)

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

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

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

2.1.39 Key elements of the CCRP included:

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

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

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

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

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

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

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

e. Iwi Management Plans (IMP)

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

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

[2] Christchurch Central Recovery Plan (2012), page 35.
[3] Ibid, page 40.

g. Future Development Strategy

2.1.46 Regard must also be had to *Our Space* 2018 – 2048, which is a review of the land use planning framework for Greater Christchurch and is intended to address the requirement under the NPS-UDC (2016) to prepare a Future Development Strategy (**FDS**).

2.1.47 The FDS confirms the City to have more than sufficient long-term plan-enabled development capacity for housing and industrial activity and sufficient medium term capacity for commercial activity. It further concludes that the City has sufficient industrial land around the Central City to enable transition from industrial to commercial use if required, to meet any longer term shortfall of commercial space if it does eventuate.

2.1.48 Our Space' states that "*the Partnership will continue to focus commercial developments predominantly in the Central City, reinforcing it as the principal commercial hub of the Canterbury region, while also supporting developments in key activity centres, town centres and neighbourhood centres as part of supporting thriving local communities"* (5.1, page 19).

2.1.49 Reflecting the above, it is anticipated that employment is concentrated in a select number of areas, being "existing industrial and commercially zoned land and expansion of existing centres in the long-term if required" (5.2, page 27). Outside corridors identified for rapid transit, it is anticipated that "…commercial activity will continue to be located within the existing network of commercial centres particularly key activity centres" (Ibid).

h. Other

2.1.50 The proposed Plan Change is not inconsistent with any Water Conservation Orders or any regional matter under a regional plan.

2.1.51 No other management plans or strategies prepared under other Acts are relevant to the resource management issue identified.

2.2 Current Christchurch District Plan provisions

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

Table 1: Summary of Relevant Christchurch District Plan Strategic Objectives

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

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

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

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

Table 2: Summary of Relevant Christchurch District Plan Objectives

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

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

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

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

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

order centres[4] permit a greater range and scale of activities, are larger and serve a wider catchment compared to lower order centres. This is generally consistent with the way that centres are classified in the NPSUD and National Planning Standards, albeit that some of the zone names reflect a different type of centre (e.g., the operative district plan's local centres are described as neighbourhood centres in the NPDUD and vice versa).

2.2.5 A number of policies (including Policies 15.2.4.1 and 15.2.4.2) are concerned with ensuring that development is of a scale and form anticipated for a centre, according to their function. All new development is required to be well-designed and laid out and residential activity is also required to be designed to ensure a high quality healthy living environment. PC14 proposes amendments to these policies to reflect the revised outcomes for commercial zones, giving effect to the NPSUD directions, and to provide an appropriate policy framework to inform appropriate zone provisions and for considering consent applications for development in intensifying commercial areas.

2.2.6 Policy 15.2.4.3 requires regard be given to relevant Suburban Centre Master Plans when considering resource consent applications for development within those centres, in support of their recovery and long term growth. Of particular relevance to this plan change, this includes the Lyttelton and Sydenham suburban centre masterplans. The Lyttelton Master Plan, amongst other things, supports a 12 metre maximum height primarily to ensure new buildings are sympathetic to the surrounding development. The operative district plan also includes design guidelines for this centre seeking a similar outcome, acknowledging the special character of this particular centre. Policy 15.2.2.5 also seeks to recognise and protect the special character and role of Lyttelton centre.

2.2.7 Sydenham is another centre specifically listed in Policy 15.2.4.3 because it suffered considerable damage in the earthquakes and a master plan was developed to support its recovery. Of relevance to this plan change seeking to enable more intensification in and around Sydenham commercial centre, the master plan recognises that the centre's function and viability is impacted by not having an immediately surrounding residential catchment[5].

2.2.8 The operative district plan contains a range of policies related to the anticipated activities, design and amenity outcomes of central city commercial zones. These are intended to reflect the outcomes sought by the Christchurch Central Recovery Plan and consequently seek to prioritise commercial activity in the Central City Business Zone, in support of its recovery and to ensure that a high standard of amenity is achieved. The surrounding Central City Mixed Use zones are intended to provide a supporting commercial role, where the scale and range of activities is more limited. Residential intensification is supported in all central city commercial zones. PC14 proposes a number of amendments to these policies to support the proposed additional intensification and improved built form and amenity outcomes, that will contribute to the NPSUD's objectives of achieving well-functioning urban environments. The Plan Change also proposes additions to these policies to ensure that, where relevant, they also apply to commercial zones that are not centres, for example suburban mixed use zones and office parks.

2.2.9 Guidance for development and activity in the mixed use zones outside the central city is currently provided by Policy 15.2.3.2. As currently drafted, the policy provides no guidance to inform development in the suburban mixed use zones, other than describing a general presumption against new commercial activity. Whilst it is considered out of scope to revisit

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

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

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

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

2.3 Problem definition - the issues being addressed

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

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

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

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

2.3.3 As explained in Part 1 – 'Overview and High Level District Issues' and the technical report mentioned above[6], it is considered that Policy 3(b) – intensification within metropolitan centres and 3(c)(i) and (iii) – intensification within the walkable catchments of metropolitan centres and existing and planned rapid transit stops, are not relevant in the local Christchurch context on account of there being no centre zones equivalent to a metropolitan centre zone and no existing or planned rapid transit stops. The approach to giving effect to those directions is therefore not evaluated.

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

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

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

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

limit, Policy 3(a) leaves it to Tier 1 councils to determine for themselves, what that limit is. The Ministry for the Environment (MfE) provides some additional guidance to assist the understanding and implementation of this policy[7], expressing the opinion that:

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

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

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

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

2.3.8 The reference above to qualifying matters in the context of Policy 3(a) is somewhat puzzling because Policy 3(a) does not set a quantifiable intensification baseline or limit against which to assess the impact of a qualifying matter, as required under 3.33(2)(b). Unlike Policy 3(c) which sets a minimum 6 storey height limit, Policy 3(a) provides Council with the authority to set that limit, without the need to justify a lesser limit on the basis of a qualifying matter. We therefore read the directions to be that Council should seek to enable as much capacity as possible to maximise the benefits of intensification, having regard to the wider objectives of the NPSUD, which have at their core, the objective of achieving well-functioning urban environments and having particular regard to the matters identified above (e.g. accessibility, demand, transport choice, housing affordability, local circumstances etc).

2.3.9 Adopting that approach, we do not consider it necessary to assess proposed height limits in the city centre zone as qualifying matters but rather to assess their appropriateness under section 32, in the usual manner. That said, for the avoidance of all doubt, we have included lower height limit areas within the qualifying matters assessment (Part 2) to demonstrate that an even higher threshold of evaluation than necessary has been undertaken.

2.3.10 Crucial to the implementation of the intensification policies is Policy 1 of NPSUD, which requires that planning decisions contribute to well-functioning urban environments (WFUEs). Elsewhere[8], this s32 report describes a WFUE and how it not only means the specific matters listed in Policy 1 of the NPSUD, but extends to a range of other matters, relevantly including development that demonstrates the principles of good urban design[9]. This is an important consideration for giving effect to Policy 3(a) and which appears to rule out any option of having no development controls at all (i.e., no height limit, no built form or other controls that are necessary to achieve a well-functioning urban environment). We arrive at that conclusion because the RMA's set of medium density provisions[10] include urban design controls necessary to achieve a satisfactory standard of residential accommodation and amenity consistent with a well-functioning urban environment, and Policy 3 generally anticipates a greater scale and intensity of development in the listed centres than is anticipated in medium density zones. It follows that the areas with the most scale and range of activities, are more likely to have greater potential for adverse effects that need to be managed through the district plan. The technical report entitled "Urban Design – Commercial Zones" (Appendix 6) provides additional discussion on this matter including how the principles of good urban design contribute to WFUEs and the extent to which they are a necessary part of the package of provisions for more intensively enabled development in the City Centre Zone.

2.3.11 As also discussed in Part 1 of this section 32 report, "enable" is interpreted to mean that the district plan provides for intensification in accordance with the directions of Policy 3(a), as either a permitted, controlled or restricted discretionary activity. In the case of the latter, the extent of matters where discretion is restricted, should not be so extensive that they have the effect of being disenabling of the anticipated level of intensification set out in the Policy. MfE's intensification guidance[11] supports this view, clarifying that:

[8] Part 1 – Overview and High Level District Issues
[9] MfE Factsheet on Well-functioning Urban Environments (2020), page 2
[10] Schedule 3A of the RMA
[11] MfE Guidance - Understanding and Implementing Intensification Provisions for the NPSUD page 6.

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

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

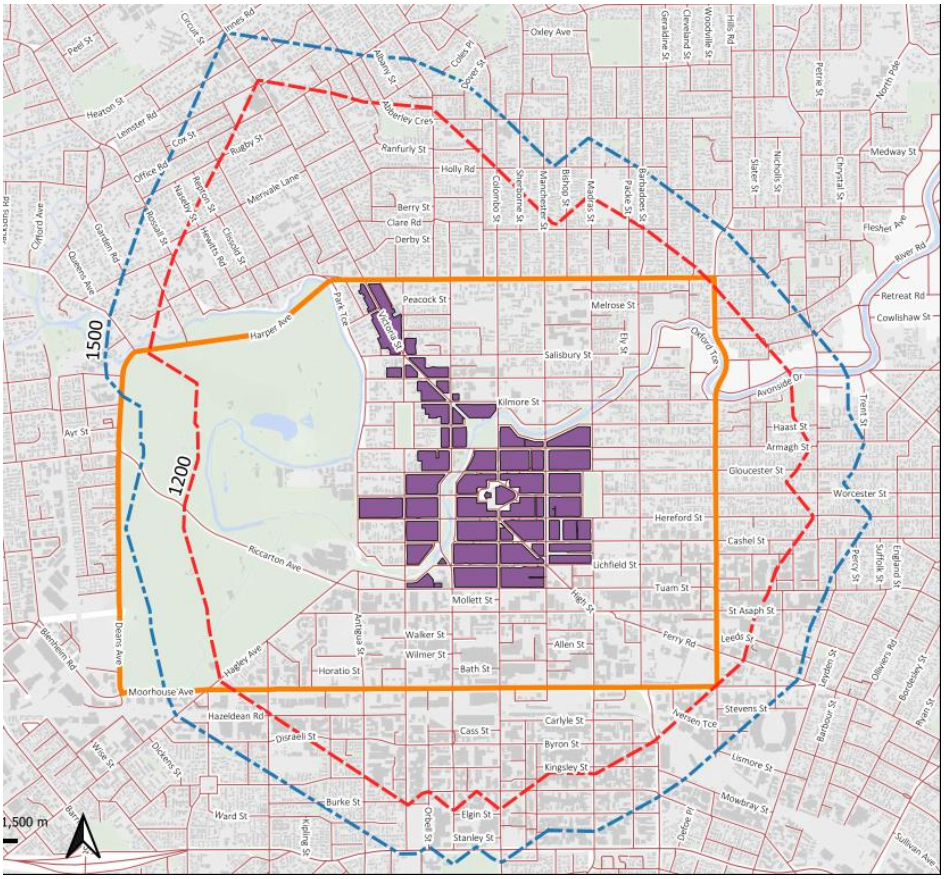
None of the intensification requirements are intended to override or undermine good quality urban design or quality urban environments.

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

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

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

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



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

2.3.15 The small Neighbourhood Centre zones[12] currently have an 8m height limit (2 storeys) with any height breach assessed as a restricted discretionary activity. Under Policy 3, these heights must be increased to achieve the mandatory 6 storeys, unless a qualifying matter applies. No qualifying matters are identified for central city neighbourhood centre zones. Of relevance also, the residential zones immediately surrounding these zones are proposed to have their height limits increased to at least 6 storeys (part 20m/part 32m) – Refer to the s32 evaluation for the Residential chapter (Chapter 14) for more detail (Part 3).

2.3.16 The Central City Mixed Use Zones currently have a permitted height limit of 17 metres, with restricted discretionary activity status for breaches of that height, and therefore at least 3 metres (one storey) of additional building height must be provided for to give effect to Policy 3. The CCMU and CCMU(SF) zones also have density controls (tenancy limits for retail and offices) in place to support the recovery of the city centre which need further review to determine whether they are still required, having regard to the enabling directions of Policy 3(c)(ii). The background to these is provided in 'Appendix 1 - Technical Report on Background to Central City Height and Density Controls'. Economists, Property Economics Limited, specifically address the need to retain the existing density controls (office and retail tenancy limits) and assess the potential costs and benefits of different height options, in their report – Economics Cost Benefit Analysis of Commercial Centres, included as Appendix 3.

2.3.17 It is also pertinent that monitoring of the effectiveness and efficiency of the existing CCMU and CCMU(SF) provisions has identified a range of quality-related issues that are detracting from achieving the intended outcomes of these zones and achievement of a well-functioning

[12] Classified as Local Centres in the Operative Christchurch District Plan

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

2.3.18 **ISSUE 3 – How to give effect to Policy 3(d) – intensification in suburban commercial zones**

2.3.19 Policy 3(d) requires council to enable building heights and densities of urban form within neighbourhood, local and town centre zones (or equivalent), commensurate with the level of commercial activity and community services in those centre zones. This requires an assessment of the relative role and function of each centre and the actual levels of commercial activity and community services in all centres. The technical report entitled, "Centres: Approach to Alignment with National Planning Standards" (Appendix 2), provides the context and centre composition analysis in relation to that direction. As these centres are lower in the centres hierarchy compared to metropolitan centres, the starting point for assessment is considered to be building heights that are less than the minimum anticipated for metropolitan centres (i.e. 6 storeys). This is consistent with the MfE's guidance referenced earlier and set out in page 29 of their guidance[13].

2.3.20 It is notable that significant heights and densities in suburban centres were enabled through the most recent District Plan review to implement a centres-based framework for managing commercial activity. All of the District Plan's district centres/key activity centres currently have a permitted height limit of 20 metres (6 storeys) which is the level of enablement that Policy 3 anticipates for metropolitan centres. Lower order centres (neighbourhood and local centres) currently have lesser heights (12m/8m respectively) to implement CRPS directions to give primacy to higher order centres (KACs and the Central City) and support their recovery.

2.3.21 **ISSUE 4 – How to give effect to Policy 3(c)(ii) and Policy 3(d) intensification of industrial zones within a walkable catchment of the City Centre, Town Centre and Local Centre zones.**

2.3.22 Policy 3 (c)(ii) and (d) does not just apply to commercial zones, it applies to all zones *around* the specifically listed zones in the Policy. This includes industrial zones unless a 'qualifying matter' set out in clause 3.32 of the NPSUD applies. The qualifying matters set out in clause 3.32 provide scope (3.33(1)(g)) to exclude low density business areas (such as industrial zones) from the intensification directions, however this is only to the extent that such areas are required to "*meet expected demand*" for those (low density) uses. It follows that where this land is not required to meet expected demand for those uses, council should consider enabling intensification in accordance with Policy 3 and the broader outcomes sought by the national direction.

2.3.23 Appendix 4 includes a technical report[14] which identifies a number of industrial areas located close to commercial centres that are potentially appropriate to transition to housing, for further evaluation in this report. No further consideration was given to enabling these areas for commercial activities as this would be inconsistent with the centres-based policy framework embedded in both the regional and district plan which directs that new commercial activity be primarily focused within the existing network of centres while providing for commercial activities outside centres where it will not give rise to significant adverse distributional or urban form effects[15].

[13] Understanding and implementing intensification provisions for the NPS on urban development (environment.govt.nz)
[14] Technical Report: Potential Industrial Land Transition Assessment, Christchurch City Council (2022) **Appendix 4**
[15] Objective 3.3.10 of Strategic Directions chapter (Chapter 3) of Christchurch District Plan

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

3 Development of the plan change

3.1 Background

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

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

3.1.3 The following technical advice informs this plan change.

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

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

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

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

3.2 Description and scope of the changes proposed

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

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

a. Restructuring and renaming zone sub-chapters to align with their equivalent centres in the NPSUD and National Planning Standards (and consequential renumbering); and

b. Amendments to objectives, policies and methods (including planning maps) to give effect to Policies 3 and 4 of the NPSUD, to increase heights and density of urban form in the specified locations. This includes amendments to provisions where necessary to ensure that implementation of those directions is undertaken in a manner consistent with the broader objectives of the NPSUD, including contribution to a well-functioning urban environment.

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

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

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

Table 4: Summary of Proposed Changes to Objectives

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

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

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

Table 5: Summary of Proposed Changes to Commercial Provisions

PROVISION	PROPOSED CHANGE
15.1 INTRODUCTION	
(c)	• Amend to add the words "*and the form and function of commercial centres and mixed use zones*" to better reflect the matters covered by Chapter 15, as particularly relevant to PC14 i.e. commercial centres and mixed use zones.
POLICIES – APPLICABLE TO ALL COMMERCIAL ZONES	
Policy 15.2.2.1 – Role of centres	• Amendments to reflect new centre zone structure, identification of local centres with different levels of commercial activities and commercial services (small, medium and large) to enable implication of NPSUD Policy 3d.

	• Amendments to (c) Local Centres to better express the density of residential activity proposed to be enabled within and around local centres depending on their level of commercial activity and community services. • Minor amendment to (c) regarding the naming of Sydenham commercial centre, for clarity, given the number of small centres located along Colombo Street. • Amendment to (d) Large format centres to add Northlink, Chappie Place and SupaCenta Large Format Centres, in order to implement the new centre zone structure. • Amendment to (e) to delete references to the different zoning of standalone supermarket centres which is no longer necessary as a result of the increased height enabled for all neighbourhood centres.
Policy 15.2.4.1 – Scale and form of development	• Amend to clearly articulate how the policy implements Policy 3 directions in the NPSUD relating to height and density, and implement Strategic Objective 3.3.7 and Objective 15.2.4 (Urban form, scale and design outcomes) with particular reference to the hierarchical approach to building heights, clustering of high rise buildings and specifying the parts of the central city where lesser heights are appropriate to manage potential impacts (Cathedral Square and Victoria Street). • Introduce policy direction for perimeter block form of development in the new mixed use zone where greater enablement of residential activity is proposed.
Policy 15.2.4.2 – Design of new development	• Amend to include the new matters of relevance for considering the design of new development, in response to the additional enablement of building heights and density of urban form proposed by PC14. • Policy support for new activity to be permitted in the city centre and south frame zones (small buildings) – acknowledging that buildings exhibiting certain built form characteristics are unlikely to generate adverse effects that require management through a consent process. • Policy direction introduced for the anticipated design of new development in the proposed new mixed use zone where comprehensive residential activity is proposed to be enabled.
CITY CENTRE ZONE	
Policy 15.2.6.3 – Amenity	• Amend to reflect that amenity values evolve over time and to reference new built form standards introduced to manage the impacts of tall buildings. • Also, to reflect that the urban design assessment requirement is proposed to apply to all buildings in the city centre zone, not just in the 'core' because a high standard of design is sought for all buildings in the central city and to reflect that there is no valid resource management reason for Victoria Street having a lesser standard of urban design assessment than other parts of the central city, outside the city centre zone. • Amendments to reflect that height limits are no longer proposed to be set to manage effects associated with the distribution of commercial activity (with reliance on tenancy/ floorspace limits) across the zone, but rather that design

	standards are set to manage the effects of tall buildings, where justified and consistent with the overall direction of the NPSUD.
Policy 15.2.6.4 – Residential intensification	• Amend to add reference to support existing and proposed provisions relating to sunlight access, communal amenity space and outlook spaces. • Amend to reference the intention for residential development to be high quality and supporting a range of residential typologies, tenures and prices.
Policy 15.2.6.5 – Pedestrian focus	• Amend to add reference to wind generation to reflect potential new effects of tall buildings on pedestrians.
Rule 15.11.1.1 P13 – Residential activity **and** **Rule 15.11.1.3 RD4**	• Amend to include a consistent set of activity specific standards for residential activity in all commercial zones by amending/ adding outdoor living space requirements (size and dimensions) and minimum requirements for outlook spaces. • Add reference to relevant assessment matters (glazing and outlook spaces) to Rule 15.11.1.3 RD4 to enable assessment of any breaches of those new standards.
Rule 15.11.1.1 P18 – Small buildings) and 15.11.1.3 RD2, RD5 and RD10	• Add new rule to permit 'small buildings' as defined in order to enable by a permitted pathway, an activity that is deemed to have no or minimum adverse effects on the environment and therefore provide an option for development not requiring an urban design assessment, including in the Retail Precinct. • Add reference to RD5 to enable consideration by a restricted discretionary consent, any breach of the built form standards for small buildings. • Add rule (RD10) to enable consideration of proposals for a small building that doesn't meet one or more of the activity specific standards and apply the exclusion in (c) so that RD10 does not apply to demolition, repairs and alterations etc. • Exempt small buildings from needing to comply with the following built form standards: Rules 15.11.2.1 (Building setback and continuity), 15.11.2.3 (Sunlight and access to the street), 15.11.2.6 (Location of onsite parking areas), 15.11.2.7 (Fences and screening structures), 15.11.2.11 (Maximum building height) 15.11.2.12 (Maximum road wall height), 15.11.2.14 (Building tower setbacks), 15.11.2.15 (Max. building tower dimension and building tower coverage), 15.11.2.16 (Building tower separation) and 15.11.2.18 (Wind). This is on the basis that these are not appropriate and / or necessary for the prescribed form of small buildings that are permitted under P18. • Add new restricted discretionary rule for small buildings which breach of any of the activity specific standards **(Rule 15.11.1.3 – RD10).**
Rule 15.11.1.2 C1 – Urban Design Certification	• Amend rule so that it applies to sites in all parts of the City Centre zone and is limited to developments of 28m of less (the status quo threshold for the availability of the certification route). Introduce two new built form standards that must also be met - (sunlight and outlook on the street and the maximum road wall height).

Rule 15.11.1.3 RD1 – Urban Design Assessment	• Amend so that it applies to sites in all parts of the City Centre Zone on the basis that there is no valid resource management reason why a lesser standard of quality and / or threshold for urban design assessment should apply in one part of the City Centre zone compared with another.
Rule 15.11.2.9 – Sunlight and Outlook	• Amend to reflect the MDRS recession plane standard, for consistency between residential and commercial zones.
Rule 15.11.2.11 – Maximum building height **Rule 15.11.2.12 – Maximum road wall height** **Rule 15.11.1.4 D1** **Rule 15.12.1.3 RD2**	• Amend rules to give effect to Policy 3(a) – including a new 90 metre maximum building height limit, new maximum building heights for the building base of 28m (lower part of the building that is typically built up to the street and side boundaries), introduction of lower height control areas around parts of Cathedral Square and Victoria Street (45m height limit applies) and the Arts Centre (16 metres) and New Regent Street (8 metres) where 90 metres is not appropriate for various reasons including protection of heritage values, logical and legible urban form and building bulk and dominance on surrounding residential activity. • Amend Rule 15.11.1.4 – D1, as the activity status for breaches of the new height rule. Additional allowance (bonus height) rule for corner buildings to encourage improved definition of the street corner and encourage mixed use.
15.11.2.14 – Building tower setback (new) **Rule 15.11.2.15 – Maximum building tower dimension and building tower coverage (new)** **Rule 15.11.2.16 – Minimum building tower separation (new)** **Rule 15.11.2.18 – Wind (new)** **Rule 15.11.1.3 RD5** **15.14.3.35 - Upper floor setbacks, tower dimension and site coverage in the central city** and **15.14.3.39 - Wind.**	• Amend to add new built form standards to manage the potential effects of tall buildings [refer to Technical Report – Urban Design – Commercial Zones **Appendix 6**]. • Add new matters of discretion (via Rule 15.11.1.3 RD5) for breaches of those rules.
Rule 15.11.1.2(d)(ii) and 15.11.2 - Advice notes	• Make consequential amendments to advice note to reflect that urban design assessment not limited to sites within the core only. • Add new advice note regarding potential infrastructure constraint.
CENTRAL CITY MIXED USE ZONE	
Policy 15.2.7.1 - Diversity of activities	• Amend to add a clause to support opportunities for taller buildings (for residential and visitor accommodation) outside the City Centre Zone, where they are co-located with the large-

	scale anchor projects of Te Kaha and Parakiore, that are themselves of significant scale to support a cluster of taller buildings around them.
Policy 15.2.8.1 - Usability and adaptability	• Amend to add additional considerations related to ground floor, street fronting development to support an active and attractive streetscene.
Policy 15.2.8.2 - Amenity and effects	• Amend to ensure that buildings and/or landscaping is located adjacent to the street frontage, to ensure adequate setbacks are provided with adjoining residential zones or activities to enable sufficient space for outdoor living space, sufficient sunlight access and outlook and that outdoor service space and car parking is located away from street frontages and entrances to buildings. • Specify that an urban design assessment is required for large scale (development exceeding 17m height) or residential developments of 4 units or more.
Policy 15.2.8.3 - Residential development	• Amend to require that sufficient private amenity space is provided for residents that is proportionate to the extent of residential activity to compensate for the predominantly commercial nature of the area and which can be provided as communal space. • The proposed policy amendments are aimed at ensuring greater consistency in respect to the standards and outcomes sought for development and activity in all central city commercial zones and to improve outcomes in the CCMU which monitoring demonstrates are inferior to those in other zones where urban design standards and assessment requirements apply.
Rule 15.12.1.1 P16 - Residential activity **Rule 15.12.1.3 RD1**	• Amend activity specific standard (a)(i) to refer to outdoor service space (a defined term) rather than outdoor service space consistent with other zones. • Amend to provide active and attractive street frontages in mixed use zones and a satisfactory set of amenity standards for permitted residential activity relating to the location of outdoor service space and outdoor living space, the size and dimensions of outdoor living space (including communal), minimum glazing for street facing elevations, outlook space requirements, maximum site coverage for predominantly residential buildings. These standards are broadly consistent with those in the adjoining High Density Residential Zone. • Add reference to relevant assessment matters (glazing and outlook spaces) to Rule 15.12.1.3 RD1 to enable assessment of any breaches of those new standards.
Built form standards **Rule 15.12.2.1 - Landscaping and trees** **Rule 15.12.2.2 - Height** **Rule 15.12.2.4 - Fencing and screening structures**	• Rule 15.12.2.1 (Landscaping and trees) to require more trees and landscaping on site, to specify the minimum dimensions to facilitate tree roots and canopies, to increase the landscaped front boundary setback from 2m to 3m to accommodate trees and to specify landscaping of required building setbacks. • Rule 15.12.2.2 (Height) – increasing the height limit from 17m to 32m but introducing a maximum height for the building base of 17m, providing a road wall height consistent with the status quo.

Rule 15.12.2.5 - Screening of outdoor storage, service areas/spaces and car parking **Rule 15.12.2.6 - Sunlight and outlook** **Rule 15.12.2.7 - Minimum setback from the boundary with a residential zone or from an internal boundary** **Rule 15.12.2.8 - Minimum number of floors)** **Rule 15.12.2.10 - Building setbacks and Rule 15.12.2.11 - Building tower coverage** **Rule 15.12.2.12 – Glazing** **Rule 15.12.1.3 RD2**	• Rule 15.12.2.4 (Fencing and screening structures) – introducing additional controls where residential activity is proposed to be located at ground floor to ensure that the public street environment is not adversely impacted by fencing and screening structures put in place to secure privacy for ground floor dwellings. • Rule 15.12.2.5 (Screening of outdoor storage, service areas/spaces and car parking) – introducing car parking to the rule to ensure that it adequately located and screened so as not to adversely impact on the public street environment. • Rule 15.12.2.6 (Sunlight and outlook) – amend recession plane rule to align with the MDRS standard adopted in other zones for consistency. • Rule 15.12.2.7 (Minimum setback from the boundary with a residential zone or from an internal boundary) to specify the side boundary setbacks for residential buildings in support of a perimeter block urban form and require any required setback to be landscaped. • Rule 15.12.2.8 (Minimum number of floors) – include a new requirement for buildings to be a minimum of 2 floors, consistent with the approach in the neighbouring City Centre and CCMU (South Frame) Zones to make more efficient use of land and discourage low density building forms that are generally not appropriate in the inner city • Rule 15.12.2.10 (Building setbacks) and Rule 15.12.2.11 (Building tower coverage) – specifying minimum setbacks and site coverage for any building towers to support a comfortable and attractive environment for people on the street and reduce building tower bulk, dominance and other effects. • Rule 15.12.2.12 (Glazing) – consistent with other commercial zones and the MDRS standard applied widely in the residential zones, introduce a new rule specifying minimum glazing on building facades facing the street or a public space. • Additional matters of discretion are added to enable consideration of breaches of new built form standards.
Rule 15.12.1.4 D2	• Introduce new discretionary activity status (Rule 15.12.1.4 D2) for building heights exceeding 32 metres to reflect that, having regard to the anticipated urban form of the city and the strategic distribution of development capacity, buildings above 32m are not generally anticipated in the large CCMU Zone. Buildings between 17m-32m would be classified as restricted discretionary activities, as they are currently – Rule 15.12.1.3 RD2.
Rule 15.12.1.3 RD4 **Rule 15.12.1.3 RD5**	• Two new thresholds of development requiring an urban design assessment via a restricted discretionary consent are introduced – Rule 15.12.1.3 RD4 in respect of multi-unit developments of 4 or more residential units and Rule 15.12.1.3 RD5 for any building over 17 metres in height. • Appropriate matters of discretion are included to assess relevant urban design matters. This responds to monitoring of the quality of developments in the CCMUZ that suggest that

	additional controls are necessary to ensure a high quality residential environment is achieved for residents and that new buildings make a positive contribution to the central city recognising the significant role it plays as a community and commercial focal point for residents, workers and visitors.
Rule 15.12.1.3 RD3 – Retirement Villages	• Consequential amendment to this rule to reflect the deletion of 15.13.3.26 to consolidate assessment matters in 15.14. The relevant matters in the existing matter of discretion have been carried over into Matter of Discretion 15.14.1(b)(vi) and (a)(xiv) such that there is no material change in effect.
Rule 15.2.2 – Advice Note	• Add new advice note under Rule 15.12.2 regarding potential infrastructure constraint.
Rule 15.12.1.3	• Add in P22 to address current plan defect where commercial film studios are not currently subject to any built form standards.
CENTRAL CITY MIXED USE ZONE (SOUTH FRAME)	
Policy 15.2.10.2 – Residential development	• Amend to require that sufficient private amenity space is provided for residents that is proportionate to the extent of residential activity and to add additional matters that contribute to an appropriate level of amenity for residents, including: ▪ separation of balconies or habitable spaces from internal site boundaries, ▪ minimum outlook requirements and ▪ internal noise protection standards. This provides a consistent set of matters for all the central city commercial zones.
Rule 15.13.1.1 P13 – Residential activity **And** **Rule 15.13.1.3 RD4**	• Amend to require active and attractive street frontages in mixed use zones and a satisfactory set of amenity standards for permitted residential activity relating to the location of outdoor service space and outdoor living space, the size and dimensions of outdoor living space (including communal), minimum glazing for street facing elevations, outlook space requirements, boundary setbacks where residential activity is located at ground floor at the boundary of a street or public space, front and side boundary setback rules to encourage buildings to be built up to the front of a site to achieve a perimeter block form (unless ground floor residential in which case a 3 metre front setback is required), maximum site coverage for predominantly residential buildings. These standards are broadly consistent with those in the adjoining High Density Residential Zone and CCMUZ. • Add reference to relevant assessment matters (glazing and outlook spaces) to Rule 15.13.1.3 RD4 to enable assessment of any breaches of those new standards.

Built form standards **Rule 15.13.2.4 - Landscaping and trees** **Rule 15.13.2.1 – Height** **Rule 15.13.2.5 – Outdoor storage, fencing and screening structures** **Rule 15.13.2.10 - Building setbacks) and Rule 15.13.2.11 (Building tower coverage)** **Rule 15.13.2.12 – Glazing** **Rule 15.13.2.8 – Minimum number of floors**	• Rule 15.13.2.4 (Landscaping and trees) to specify the minimum dimensions to facilitate tree roots and canopies and to increase the landscaped front boundary setback from 2m to 3m to accommodate trees. • Rule 15.13.2.1 (Height) – increasing the height limit from 17m to 32m but introducing a maximum height for the building base of 17m, providing a road wall height consistent with the status quo. • Rule 15.13.2.5 (Outdoor storage, fencing and screening structures) – introducing additional controls where residential activity is proposed to be located at ground floor to ensure that the public street environment is not adversely impacted by fencing and screening structures put in place to secure privacy for ground floor dwellings. • Rule 15.13.2.10 (Building setbacks) and Rule 15.13.2.11 (Building tower coverage) – specifying minimum setbacks and site coverage for any building towers to support a comfortable and attractive environment for people on the street and reduce building tower bulk, dominance and other effects. • Rule 15.13.2.12 (Glazing) – consistent with other commercial zones and the MDRS standard applied widely in the residential zones, introduce a new rule specifying minimum glazing on building facades facing the street or a public space. • Rule 15.13.2.8 (Minimum number of floors) – amend so that it relates to all buildings in the zone, not just those fronting Colombo Street or High Street, to improve land efficiency.
Rule 15.13.1.3 RD5	• Additional matters of discretion are added to Rule 15.13.1.3 RD5 to enable consideration of breaches of those new built form standards.
Rule 15.13.1.4 D2 **[and related Rule 15.13.1.3 RD5].**	• Introduce new discretionary activity status for building heights exceeding 32 metres to reflect that, having regard to the anticipated urban form of the city and the strategic distribution of development capacity, buildings above 32m are not generally anticipated in the large CCMU Zone. Buildings between 17m-32m would be classified as restricted discretionary activities, as they are currently – Rule 15.13.1.13 RD5.
Rule 15.13.1.1 P16 – Small buildings; and **15.11.1.3 RD5 and RD7** **15.13.2.3 (Sunlight and access to the street), and 15.13.2.1 (Maximum building height)** **Rule 15.13.1.3 – RD7**	• Add a new rule to permit 'small buildings' (P16), as defined, in order to enable by a permitted pathway, an activity that is deemed to have no or minimum adverse effects on the environment and therefore provide an option for development not requiring an urban design assessment. • Add reference to RD5 to enable consideration by a restricted discretionary consent, any breach of the built form standards for small buildings. • Exempt small buildings from needing to comply with the following built form standards: 15.13.2.3 (Sunlight and outlook to the street), and 15.13.2.1 (Maximum building height). This is on the basis that these are not appropriate and / or necessary

	for the prescribed form of small buildings that are permitted under P16. • Add new restricted discretionary rule (RD7) for small buildings which breach of any of the activity specific standards.
Rule 15.13.1.2 C1 – Urban Design Certification	• Amend so that rule applies to buildings on sites up to 17m (the status quo threshold for the availability of the certification route).
Rule 15.13.2 – Advice Note	• Add new advice note regarding potential infrastructure constraint.
MIXED USE ZONE (OUTSIDE OF THE CENTRAL CITY)	
Planning Maps and Appendices	• Zone boundary – rezone part of IG to MUZ (consequential zone name change throughout the district plan). • Add Comprehensive Housing Precinct to show extent of area where comprehensive housing will be enabled. • Appendix 15.15.10 – update to include new mixed use zone.
Introduction / General	• Amend 15.1(c) to include reference to mixed use zones because Chapter 15 is not just concerned with centres but also non-centre commercial zones. • Amend zone name to align with a zone in the National Planning Standards Zone framework, i.e. from 'Commercial Mixed Use Zone' to 'Mixed Use Zone'.
Policy 15.2.3.2 - Mixed use areas outside the central city	• Amend to clarify through the title that the policy relates to the mixed use areas outside the central city and add new clause (b) to clearly articulate how Objective 15.2.3 (Office parks and suburban mixed use areas) will be implemented i.e. including through enabling comprehensively designed, high quality, high density development and by ensuring that the location, form and development of residential development supports the objective of reducing greenhouse gas emissions and provides for greater housing diversity.
Policy 15.2.4.2 (a)(i) - Design of new development	• Amend to recognise and support the intention for mixed use areas to transition to pedestrian friendly street environments and improved accessibility by walking and cycling to reflect the intended new mix of activities. • Additional reference added to (c) to reflect the fact that mixed use areas have a greater propensity to give rise to reverse sensitivity issues that requirement management.
Rule 15.10.1.1 P12 – Industrial activity	• Amend to reflect that the expanded mixed use zone will continue to enable industrial activities, other than those where evidence[16] shows that they are more likely to cause amenity conflicts with residential activities (e.g. scrap yards and metal product manufacturing and storage activities).

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

Rule 15.10.1.1 (P27) – Residential activity	• Amend to limit permitted residential activity to the status quo enablement of residential activity outside the new Comprehensive Housing Precinct. • Add new outlook space and minimum glazing rules, consistent with all other zones (in scope) where residential activity is enabled (MDRS standard). This is responding to the limited scope of the plan change and to ensure that any new residential activity achieves the intended objectives for housing in the mixed use zones via the comprehensive residential development mechanism.
Restricted discretionary activities **Rule 15.10.1.3 RD1, RD2 and RD3**	• Minor consequential changes to Rule 15.10.1.3 (RD1) to reflect revised names of some of the built form standards in Rule 15.10.2, to ensure new RD3 activities can be assessed under this rule and to correct a current plan defect where P29 is currently omitted from this rule in error. • Rule 15.10.1.3 (RD2) add assessment matters to address breaches of introduced residential activity standards (P27) for glazing and outlook spaces (MDRS standard consistent with other zones). • New Rule 15.10.1.3 (RD3) to provide via a restricted discretionary activity for developments comprising of four or more residential units (comprehensive residential development) with associated new and amended matters of discretion to ensure high standard of design and amenity.
Built form standards – 15.10.2	• Amend Rule 15.10.2(a) so that new rule 15.10.1.3(RD3) is also subject to the built form rules. • Amend Rule 15.10.2.1 (Maximum building height) to enable Comprehensive Residential Development to 20 metres, consistent with the 6 storey enablement in the walkable catchment of the City Centre Zone (not applicable more widely to low density uses). • Amend Rule 15.10.2.2 (Minimum building setback from residential zones) to ensure that all street boundaries have setbacks of sufficient size to enable tree planting, regardless of whether they are on a corner site or not. • Amend Rule 15.10.2.4 (Sunlight and outlook at boundary with a residential zone) Amend the recession plane rule so that it aligns with the MDRS standard being adopted for most other residential zones. Delete reference to Appendix 15.15.9 which is no longer required with the adoption of a single, standardised recession plane rule. • Amend Rule 15.10.2.5 (Outdoor storage areas) so that it also applies to outdoor service areas and car parking and to require that these parts of an activity are not located at the front of a site, consistent with the approach proposed for the Central City Mixed Use Zones. This is to reflect that the environment as the zone becomes more mixed, higher levels of amenity are anticipated.

	• Amend Rule 15.10.2.6 (Landscaping and trees) to require a landscaping width of 3 metres rather than 1.5 metres in order to accommodate trees along the frontage and provide consistency with a similar rule in the Central City Mixed Use Zone. Require a minimum root growth pit dimension and to require landscaping within residential zone boundary setbacks to be landscaped. • Add new **Rule 15.10.2.9 (Comprehensive Residential Development)** introducing a specific set of built form standards applicable to Comprehensive Residential Development only. To ensure that a high quality residential environment will be achieved for residents, that the potential for reverse sensitivity conflicts will be managed, and to promote a built form that is consistent with the objectives for the long term transition of this zone including to improve the general amenity (pedestrian accessibility, tree planting), such that high density perimeter block development will be achieved. • Exclusions added to some built form standards for Comprehensive Residential Development given the different built form outcomes expected for housing compared with other activities in the zone.
Other	• Correct defect in **Rule 15.10.1.1 (P1)** – currently doesn't include P28 and P29 • Correct defect in **Rule 15.10.1.3 (RD1)** by not referencing P29 introduced via the Regeneration Act. Without it the activity isn't subject to any built form controls, and this is not appropriate, particularly given the potential scale of commercial film or video production facilities. • Add new advice note under **Rule 15.10.2** regarding potential infrastructure constraint.
MATTERS OF CONTROL AND DISCRETION	
Rule 15.14.2.3 – Residential activity	• Amend to add matters to (b) to ensure that adequate consideration is given to providing sufficient space for bicycle storage, servicing, washing lines and heat-pumps and appropriately sized outdoor living space when assessing resource consent applications for residential activities. • Amend (e) to improve clarity and enable consideration of the adequacy of the size of outdoor living space including the ability to establish large-scale trees.
Rule 15.14.2.9 – Residential activity in the City Centre and Mixed Use Zones **Rule 15.14.2.11 Urban design in the Central City (South Frame) Mixed Use Zone**	• Minor amendments to 15.14.2.9 (a)(ii) and (c) to delete words for improve drafting clarity. • Minor amendments to 15.14.2.11(c) and (d) to improve drafting clarity. • Minor amendment to 15.14.3.4(iv) to improve drafting clarity.

Rule 15.14.3.4 – Sunlight and outlook at boundary with a residential zone.	
Rule 15.14.2.15 - Outdoor living space for residential activity of 4 units of more (new)	• New matters added to enable appropriate assessment of proposals with regards to outdoor living spaces in multi-unit complexes, particular to communal spaces.
Rule 15.14.3.1 – Maximum building height	• Add matters necessary to ensure comprehensive set of matters for assessing breaches of building height, including matters of urban form, financial viability, and impacts of tall buildings generally and specifically, in areas subject to lower height controls. • Additional matters in particular to respond to the potential impacts for tall buildings in the city centre and central city mixed use zones.
Rule 15.14.3.3 - Minimum separation from the internal boundary with a residential or open space zone.	• Minor amendment to (a)(ii) to specifically refer to 'bulk and dominance' effects that are more likely to result from tall buildings enabled by this plan change.
Rule 15.14.3.37 - Glazing	• Add new matter as a consequence of introducing new glazing rules and ensure consistency with rules adopted for other housing and mixed use zones.
Rule 15.14.3.5 – Screening of outdoor storage areas, service areas and car parking	• Amend to enable consideration of service areas/ spaces and car parking in intensifying areas which if not appropriately managed can have a detrimental impact on the street or for neighbours.
Rule 15.14.3.15 - City Centre Zone – Building setback and continuity	• Add matters to enable consideration of buildings fronting the street including the quality and activation of adjacent public space and the coherence of the street interface.
Rule 15.14.3.18 – City Centre Zone – Sunlight and outlook for the street	• Minor amendment to improve the phrasing of the matter relating to wind effects to reflect that such effects are not confined to wind funnelling.
Rule 15.14.3.24 – Minimum setback from the boundary with a residential zone or from an internal boundary	• Amend to broaden the consideration of effects relating to residential and internal boundary setbacks and improve drafting clarity.
Rule 15.14.3.26 – Commercial Central City Mixed Use Zone Maximum building height	• Delete assessment matter in its entirety and incorporate matters into the general building height matter of discretion (15.14.3.1) to reduce duplication. The relevant matters in 15.14.3.1 are clauses, (a)(xi), and(a) (xiv) and (b)(vi).
15.14.3.35 - Upper floor setbacks, tower dimension and site coverage in the central city	• Add new matters of discretion to enable consideration of proposals that breach the tower and podium development form anticipated by the built form standards for central city zones.
15.14.3.36 - Tall buildings in the Central City Mixed Use Zones	• Add new matters of discretion of specific relevance to tall buildings in response to the greater height enabled in these zones.

15.14.3.37 - Glazing	• Add new matter of discretion, consistent with the high density residential zone and MDRS standards, to consider the effects of proposals that do not meet the permitted activity specific standard for buildings fronting the street or public spaces.
15.14.3.38 - Outlook spaces	• Add new matter of discretion, consistent with the High Density Residential Zone and MDRS standards, to consider the effects of proposals that do not meet the residential activity specific standard for outlook spaces.
15.14.3.39 - Wind	• New matter of discretion to enable consideration of the impacts of wind from tall buildings on the safety and comfort of people at street levels and other public open spaces.
15.14.3.40 - Comprehensive residential development in the Mixed Use Zone	• New set of assessment matters relevant specifically to comprehensive residential development within the Comprehensive Housing Precinct, to ensure that proposals address all of the matters necessary to implement zone objectives for the long term transition to high quality, high density mixed use neighbourhoods with a perimeter block urban form.
15.14.4.5.1 Development Plan – St Albans Neighbourhood Centre	• Delete reference to obsolete RMD Zone and replace with reference to 'residential zone' to reflect the proposed zoning in the block of mixed high density and medium density.
TOWN CENTRE ZONE, LOCAL CENTRE ZONE, NEIGHBOURHOOD CENTRE ZONE AND COMMERCIAL BANKS PENINSULA ZONE	
General	• Split the current Commercial Core zone rules that relate to operative district centre and neighbourhood centre zones, into Town and Local Centre zones depending on the role/centre classification identified in Policy 15.2.2.1. • Changes to provisions shown in the tracked version of the zone chapters to reflect this structural reorganisation are not listed here or evaluated since they retain the status quo in terms of effects, just carried over into the new chapter zone structure.
Activity specific standards for permitted residential activities **Rules 15.4.1.1 P21** **15.5.1.1 P21** **15.6.1.1 P19**	• Add new standards to achieve standardisation / consistency of provisions between zones for outdoor service space, outdoor living space, glazing to street and public space facing elevations and minimum requirements for outlook spaces. The required outlook spaces from bedrooms are however larger in commercial zones to reflect that there is less certainty about the type of activities that may located on neighbouring properties and therefore greater propensity for land use conflicts that need to be managed more carefully in mixed use / commercial areas.
Restricted discretionary activities **Rules 15.4.1.3 RD1** **15.5.1.3 RD1** **15.6.1.3 RD2, RD4** **15.6.1.3 RD5** **15.6.1.3 RD6**	• Add relevant assessment matters to RD rules for breaches of the standards relating to glazing and outlook space - Rules 15.4.1.3 RD1, 15.5.1.3 RD1, 15.6.1.3 RD1 and for the TC Zone, amend Rule 15.4.1.3 RD1 so that breaches of the outlook space rule can be limited notified which is appropriate for a rule of this type that has the potential to affect directly adjoining neighbours. • For the Neighbourhood centre zone, add two new restricted discretionary activities to enable consideration of urban design matters for multi-unit developments of 4 or more units (Rule 15.6.1.3 RD5) and for sites within a Neighbourhood centre zone in the Central City, for all development exceeding 12 metres in height (Rule 15.6.1.3 RD6).

Building height rules - **Rules 15.4.2.2** **15.6.2.1** **15.4.5.2.1** **15.4.4.1.3 - RD2** **15.5.2.2** **15.5.3.2.1** **15.5.3.1.2 RD4** **15.5.3.1.3 RD4** **15.5.4.2.1** **15.6.1.3 RD6**	Amend to: • Increase permitted height limits at the larger Town Centre zones (Riccarton, Hornby and Papanui) to 22 metres to reflect the increased level of commercial activities and community services in these centres in comparison to other centres (to give effect to Policy 3d) – 15.4.2.2(a)(ii). • Delete bespoke height rules in the operative district plan for North Halswell Town Centre Zone (Rules 15.4.4.1.3 RD2 and 15.4.5.2.1), for 'other locations' (Rule 15.4.2.2 (a)(v)) and the Neighbourhood Centre Zone at 2 Carrs Road (Rule 15.6.2.1 (a)(ii)). • Increase the height limits for larger Local Centres from 12 metres to 14/20m to reflect their relative levels of community services and commercial activities (Policy 3d NPSUD). • Increase permitted building height in Neighbourhood Centre Zones from 8m to 12 metres (outside the central city) reflecting the heights of buildings in surrounding medium density residential zones. • Increase permitted building heights in Neighbourhood Centre Zones (within the Central City) to either 20m or 32m depending on their location and consistent with scale of anticipated surrounding residential development, with all development over 12 metres height requiring an urban design assessment under Rule 15.6.1.3 RD6. • Delete bespoke height rules for Ferrymead Local Centre in reliance on the standard height rule for Local Centres which is more enabling - Rule 15.5.3.2.1 and consequential amendment to 15.5.3.1.2 RD4.
Sunlight and outlook at the boundary with a residential zone **Rules 15.4.2.5, 15.5.2.5, 15.6.2.4**	• For Town, Local and Neighbourhood Centre Zones - to align with the new, more enabling standard in adjoining residential zones (MDRS standard). [CBP not updated, reflecting limitations of plan change scope to zones outside the urban environment].
Advice notes	• Add advice note under Built Form Standard Rules regarding potential infrastructure constraint – **Rules 15.4.2, 15.4.4.2, 15.5.2, 15.5.3.2, 15.5.4.2, 15.5.5.2, 15.5.6.2, 15.6.2, 15.6.3.2, 15.7.2.**
LARGE FORMAT RETAIL ZONE, COMMERCIAL OFFICE ZONE No material change	

Table 6: Summary of Proposed Changes to Industrial Provisions

PROVISION	PROPOSED CHANGE
POLICIES	
Policy 16.2.2.2 – Brownfield redevelopment **Rule 16.4.1.3 RD8 (new)** **Matter of Discretion 16.7.2.5 (new)**	• Add wording to Policy 16.2.2.2 to introduce new overlay areas at Hornby, Papanui, Cranford and Woolston, where comprehensive medium density residential development is supported in principle, subject to a restricted discretionary resource consent.

	• Minor amendments in Policy 16.2.2.2 to differentiate between the two existing overlay areas at the Tannery and Waterloo Business Park where a wider range of activities may be considered for redevelopment. • Add new restricted discretionary rule to enable 'comprehensive residential development on sites identified by a brownfield overlay at Hornby, Papanui, Cranford and Woolston' (15.4.1.3 RD8). • Add new matter of discretion 'Brownfield Area Redevelopment' setting out matters to be considered for comprehensive residential development of land identified by the new overlays at Hornby, Papanui, Cranford and Woolston. Those matters include the extent to which the criteria in Policy 16.2.2.2(c) are met, whether a high quality residential environment is achieved that is consistent with outcomes sought for medium density residential zones and the extent to which the proposal addresses the Residential Design Principles in Rule 14.15.1.
Built form standards – Sunlight and outlook at boundary with a residential zone. **Rules 16.4.2.4, 16.5.2.4, 16.6.2.5, 16.6.5.2.5, and 16.6.6.2.3**	• Consequential amendments to recession plane rules to reflect the new standards for residential zones introduced by the MDRS.

3.3 Community/Stakeholder engagement

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

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

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

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

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

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

- *Are we proposing the right areas for development above 12 metres? (Yes/No)*
  - *Comments (free text)*

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

3.3.5 A summary of the feedback was prepared and made publicly available (can be found here - https://www.ccc.govt.nz/assets/Documents/Consultation/2022/07-July/Plan-Change-14-Early-Feedback-Report.pdf.

3.3.6 The specific feedback received in relation to proposed changes to the Commercial and Industrial provisions of the District Plan related to

- Central City
- Commercial Centres
- Precincts (Centres Intensification)

3.3.7 General comments on commercial matters were concerned about the following matters:

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

3.3.8 In relation to development over 12m, all proposed commercially zoned land, and some industrial zoned land was proposed in the draft consultation documents to have building heights and density to support intensification and demand for business use in those locations.

3.3.9 Of the feedback received on the question 'Are we proposing the right areas for development above 12 metres? (Yes/No)', 8% (i.e. 265 people) said no – the right areas for development for over 12m had not been identified.

3.3.10 When reviewing comments, feedback sought to have a reduced height due to negative impacts on the community. This included impacts on shading of larger buildings on neighbouring residential properties, concerns about parking and traffic congestion, and general loss of amenity as a result of higher buildings.

3.3.11 In contrast, there was also support for increasing development within the city centre and other commercial centres, which would have the benefits of access to services and facilities, such as public transport, community facilities and retail/commercial activities.

3.3.12 Refer to the feedback separately on planning methods to control heights and density, namely the use of Qualifying Matters, which are discussed in the section 32 evaluation of qualifying matters (Part 2).

Providing enough business intensification: Mixed use and business intensification – 100 comments

3.3.13 Of the feedback received on the question, 'Does the proposed plan change allowed for enough business intensification (i.e. supply and extent)?' 76% of respondents agreed (i.e. yes), whereas 24% did not agree (i.e. no).

3.3.14 A substantial number of respondents supported mixed-use commercial and residential zones. Of the comments received, just over 40 respondents made a short supportive statement via a generic/proforma form. The benefits of mixed use (i.e. business on the ground floor and residential above) were seen to provide for a more activated streetscape, and the increased

numbers of people on streets that would frequent businesses that would add life and vitality to these areas.

3.3.15 Over three quarters of respondents agreed that the plan change allows for enough business intensification, with comments explaining that the post-earthquake and COVID-19 trend of businesses moving to the suburbs and more people now working from home is reducing demand in the centre of the city.

3.3.16 Comments were also received which questioned how the supply of business and commercial land may be staged and prioritised to support some areas over others, such as enabling more development in the Central City and other larger commercial centres. Concerns were raised about the economic impact of supporting further development of all business land in the city, on the Central City.

3.3.17 Feedback seeking specific changes to the planning provisions of the mixed use and business zone were received from larger organisations that sought to have more enablement supported through the proposed provisions.

Proposed changes to the central zone – 25 comments

3.3.18 Feedback received in relation to the Central City was also interweaved with general comments on business intensification, including feedback seeking staging and prioritisation of development in central areas ahead of other centres. Central City development was seen as being important to increase the vitality and success of the central city and to compete with suburban development.

3.3.19 It was noted by some comments that the opportunity for Christchurch's central area was different to that of Auckland and Wellington, due in part to the impacts of the Canterbury Earthquakes and the topography of the land.

3.3.20 The feedback also considered it to be beneficial that in addition to business land being redeveloped, the surrounding residential area in the central city was also being redeveloped, which would provide for increased population in the central city to support the businesses in the Central City.

3.3.21 When considering enabling heights, some concerns were raised about the post-earthquake recovery planning vision for a low-rise city, the visual and climatic amenity impacts of taller buildings (i.e. dominant buildings, wind tunnelling, and shading), and development which may be at odds with desires for a vibrant central city (i.e. design that contributes to unsafe environments)

3.3.22 The following table provides a summary of the changes made to the Commercial and Industrial chapters as a result of the feedback received:

Feedback received	Resulting change to the draft proposal
Areas identified for further intensification (i.e. over 12m in building height) through change to the land use zone provisions of existing commercial centres	• Increased heights for Riccarton, Papanui and Hornby • Name change of 'Emerging Metropolitan Centre Precinct' to now be 'Town Centre Intensification Precinct'

	• Commercial Retail Parks to be rezoned Large Format Retail Zone
Areas identified for further intensification (i.e. over 12m in building height) through Centre intensification Precinct.	• Large reduction in the extent of 10-storey enablement, concentrating only around the City Centre zone, in response to economic evidence. • Addition to matters for assessment of economic impact on the city centre when in breach of height. • Change in intensification response around some centres in response to further evidence. • Small scale precinct extent modifications: increasing in most instances; and reducing around the Shirley Centre along southern aspect. • Added notification exemptions to specific provisions.
Provisions to address design, layout and height of taller buildings.	• Stronger urban design controls or Central City Mixed Use zone • Stronger policy direction and urban design controls for taller buildings

3.3.23 **Additional provisions supported post pre-notification**

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

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

3.4 Consultation with iwi authorities

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

- Strategic Directions development (Chapter 3);

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

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

3.4.3 Draft evaluation reports and draft changes were provided to MKT on 22 July 2022 prior to notifying the plan change. No specific feedback was provided on the Commercial and Industrial chapters.

4 Scale and significance evaluation

4.1 The degree of shift in the provisions

4.1.1 The level of detail in the evaluation of the proposal has been determined by the degree of shift of the proposed provisions from the status quo and the scale of effects anticipated from the proposal and the level of direction (and discretion) provided by the NPSUD.

4.1.2 The degree of shift in the provisions from the status quo is significant because it substantially increases building heights in the central city commercial zones to such an extent that the community's aspirations expressed in the CCRP for a low rise city will no longer be promoted. However that shift will be anticipated by the community to a large extent, because it is directed by the NPSUD, and that direction has been reasonably well publicised.

4.2 Scale and significance of effects

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

Table 7: Scale and Significance Assessment

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

Criteria	*Scale/Significance*			*Comment*
	L	*M*	*H*	
Basis for change			**x**	• Give effect to the revised requirements of the National Policy Statement for Urban Development 2022. • In so doing, provides opportunity to resolve several residential development quality issues identified in intensification areas identified through s35 efficiency and effectiveness monitoring.
Addresses a resource management issue		**x**		• Enabling greater housing and business development capacity. • Supporting a variety of homes that meet the needs in terms of type, price and location of different households. • Improving accessibility between jobs, housing and other amenities to support community wellbeing. • Ensuring that additional intensification is well-designed and high quality. • Supporting development in a location and of a form that promotes reductions in greenhouse gas emissions. In so doing, ensuring that intensification enabled by implementation of Policy 3 contributes to a well-functioning urban environment.
Degree of shift from the status quo		**x**		• Spatial extent largely confined to existing commercial centre zones (except for some enablement proposed for industrial areas close to centres).
Who and how many will be affected / geographical scale of effects		**x**		• Citywide. Commercial centres are public spaces which people use frequently. • The central city is of regional significance. • A large number of businesses occupy areas subject to proposed change.
Degree of impact on or interest from iwi/ Māori			**x**	• The proposed provisions are of high interest to mana whenua who are concerned with housing affordability and accessibility. Whilst the proposed changes do not concern the development potential of Māori land, additional housing within urban areas is supported. This is subject to ensuring the protection of water quality and avoiding encroachment on waterbodies.

Criteria	*Scale/Significance*			*Comment*
	L	*M*	*H*	
				• Papakāinga/ Kāinga Nohoanga housing is specifically supported in proposed new mixed use areas covered by new Comprehensive Housing Precinct.
Timing and duration of effects		x		• Effects will be enduring.
Type of effects		x		• A range of positive and negative effects on different stakeholders (e.g. some individual landowner or business owners may have less or more restrictive provisions). • Potential positive effects from greater enablement of development capacity in and around centres – increasing viability, vibrancy and quality of centres. • Proposed additional standards to ensure build quality and amenity likely to have a positive impact on the wellbeing of residents, workers and visitors.
Degree of risk and uncertainty	x			• The provisions of the plan change result in effects that have been anticipated and directed to a large extent, by higher order documents e.g. CRPS (centres based approach), and NPSUD Policy 3; however: • Significant deviation from the Christchurch Central Recovery Plan, robustly considered in 2014 to influence timely and appropriate recovery of the central city.

5 Evaluation of the proposal

5.1 Statutory evaluation

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

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

5.2 Evaluation of options for objectives

5.2.1 Section 32 requires an evaluation of the extent to which the objectives[17] of the proposal are the most appropriate way to achieve the purpose of the Act.

5.2.2 The plan change proposes to make material (albeit in most cases, minor) amendments to five objectives of the Plan. This section of the report therefore examines whether the objectives, as proposed to be amended, are the most appropriate way to achieve the purpose of the Act. The evaluation relies on the earlier section 32 and s32AA evaluations prepared in support of the existing five objectives, and focuses on the specific areas of proposed change. This evaluation, as did the previous evaluation prepared to support the provisions of the proposed district plan, is largely focused on whether the objectives are the most appropriate means of achieving the provisions of the Canterbury Regional Policy Statement (CRPS), which was prepared in accordance with Part 2 of the Act, along with the more recent directions contained in the National Policy Statement on Urban Development.

5.2.3 Whilst the revised NPS on Urban Development has come into force after the CRPS became operative, and contains directive policies focused on commercial centres, the provisions of the CRPS relating to commercial activity and centres remain generally relevant. The exception to this is possibly the concept and pre-eminence of, 'key activity centres', which is an additional classification of centres that is not recognised by the NPSUD or the National Planning Standards. KACs are listed in the CRPS (although not spatially defined) and include all the proposed Town Centres and two Local Centres subject to this plan change (New Brighton and Barrington). CRPS policies direct councils to give primacy to them in district plans, along with the central city that has ultimate primacy. There is therefore a slight tension between the NPS and RPS in this regard, given that the NPS directs intensification in accordance with a hierarchy of centres based on their role and catchment, not any other matter; this contrasts with the CRPS which prioritises some lower order centres as a focus for growth and investment for other reasons, including regeneration need and appropriateness for further residential intensification around them.

5.2.4 Table 8 below provides the evaluation of appropriateness of the amended objectives with consideration given to the criteria of relevance, usefulness, reasonableness and achievability.

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

Table 8: Evaluation of Options for Objectives

Objective	Issue	Proposed Change	Evaluation
Objective 15.2.3 – Office parks and mixed use areas	1. The objective lacks clarity about whether it applies to the central city or suburban mixed use zones, or both; and 2. The objective does not describe the outcome sought for mixed use zones other than in respect to limiting commercial activity. Whilst this is an existing issue that is beyond the scope of this plan change to resolve, for the provisions that are proposed to be introduced to give effect to Policy 3 of the NPSUD, it is appropriate and necessary to express the outcomes for that via this objective.	**Amend** title to read: "Office parks and mixed use areas **<u>outside the Central City</u>**" **Amend** objective to read: … **"<u>b.</u>** **<u>Mixed use zones located close to the City Centre Zone are enabled to transition into high density residential neighbourhoods that contribute to an improved diversity of housing type, tenure and affordability and support a reduction in greenhouse gas emissions".</u>**	• The proposed objective would be more appropriate than the status quo for achieving the purpose of the RMA to sustainably manage valuable and scarce land resource close to existing jobs, services and amenities, and in particular would: • Promote more efficient use of land (s7b); • Maintain and enhance amenity values (s7c), and the quality of the environment (s7f); and • Respond to the effects of climate change (s7(i)). • It does this by setting an outcome for the longer term transition of well-located land for more intensive and efficient uses, that arguably benefit more from this central location than existing uses (although providing certainty for those uses to remain for the foreseeable future through a mixed use zone). The outcome promotes housing affordability and diversity, and a greater intensity of urban form within the walkable catchment of the City Centre Zone, all outcomes sought by the NPSUD as matters of national significance. • High density is more appropriate than medium density in this location, having regard to its proximity to the city centre and other commercial centres (Sydenham and Addington), good transport infrastructure and easy access to significant community facilities/assets (parks, tertiary institutions, hospital etc). Medium density housing is already well provided for throughout the city, particularly with the introduction of the MDRS provisions of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act in 2021 and to be implemented through this plan change. • The outcome expressed in the proposed objective directly responds to the results of Council's monitoring of urban development indicators (as required by the NPS on Urban Development) which shows that whilst Christchurch has more than sufficient plan-enabled housing capacity (even before considering the significant capacity enabled by the MDRS and Policy 3 of the NPSUD), the housing typologies currently delivered by the market are predominantly low to medium density, single, detached dwellings, and 2 to 3 storey townhouses. Only 1% of houses built in Christchurch in the year to 2021 were apartments[18] and most well outside the price range that the latest housing capacity assessment says is affordable[19]. The Future Development Strategy for Greater Christchurch[20] and the high level housing development feasibility work undertaken for PC14[21] both point to increasing housing unaffordability and smaller average household sizes over the next 30 years, which will support the need for greater diversity of housing stock, especially smaller typologies like apartments. • Without policy intervention / support, it is likely that this lack of housing diversity will perpetuate, at least for the short term, on account of the relative profitability of other typologies (including 1-3 storey townhouses) which yield higher returns[22]. Sense Partners points to the potential for promoting mixed typology development where townhouses might cross-subsidise a proportion of apartments, in circumstances where diversity of build type is important to Council. • A recent Council report examined the barriers to housing diversity in the central city[23], concluding that there were identified deficiencies across typologies and Council support should target those. This included high density housing (particularly one, two and 4+ bedroom units), co-housing, Papakāinga/kāinga nohoanga, and longer term rental and affordable housing (aligning with the first time buyer grant). The report recommends that the focus area for supporting alternative forms of housing in the central city, be expanded to the inner city area just outside the four avenues, due particularly, to the high cost of land in the central city. That revised study area coincides with the proposed new mixed use zone to which this objective relates.

[18] REINZ (2021), Residential Market Demand Report, page 3 **Appendix 9**.
[19] Greater Christchurch Partnership (2021), GC Housing Development Capacity Assessment.
[20] Greater Christchurch Partnership (2018), Our Space (2018-2048)
[21] The Property Group (2022), High Density Residential Feasibility Assessment (appended to PC14 Residential s32 report, Part 3).
[22] Sense Partners (2022), Cost-Benefit Analysis of Proposed Industrial Land Rezoning, page 3.
[23] CCC (2021), Central City Residential Programme: Supporting Alternative Housing Approaches and Projects.

Objective	Issue	Proposed Change	Evaluation

			• Land price differentials show that a more efficient land use in this location is housing, not industrial, and that industrial uses are effectively receiving an implicit subsidy by not facing true rents[24]. Economic analysis concludes that the benefits of mixed use zoning within the walkable catchment of the City Centre Zone would outweigh the costs[25]. The main benefits include:
			  • Additional dwellings, lowering houses prices, a little.
			  • Small but persistent returns to productivity improvements.
			  • Lower transport costs across the city.
			  • Infrastructure benefits from not having to provide new infrastructure at more expensive greenfield sites.
			• Property Economics discusses the benefits of increasing building height generally[26] and MfE[27] identifies social benefits associated with the high density development. These include encouraging greater physical activity, with consequent health benefits, and promotion of social connectiveness and vitality.
			• The proposed objective proactively responds to the challenges of climate change and housing affordability, providing for housing in a location where there is less need to rely on private vehicles, and there is a greater propensity for residents to travel by active modes. It promotes a more intensive form of development in a location that can absorb it, without detracting from any prevailing residential character. Rather, the objective of supporting this area for a mix of uses and over the long term (30+ years) transitioning to high density residential neighbourhoods, presents an opportunity to improve amenity, sustainability and other environmental outcomes for the city.
			• International and even local experience (e.g. CCMU zone) shows that light industry and residential activity can co-exist in a transitioning area. Allowing the area to be used more flexibly for housing, as well as light industrial uses, supports a more competitive land and development market, a further outcome sought by the NPS on Urban Development.
			• Moreover, the CRPS which gives effect to the RMA, generally supports the redevelopment of under-utilised industrial land through its brownfield policies. Whilst not prescribing the mechanism for achieving this, councils are encouraged to consider methods for brownfield redevelopment to help housing affordability and diversity and in recognition that redevelopment of urban land will reduce the need for further expansion of peripheral areas.
			• Overall, it is considered that the proposed objective is the most appropriate for achieving the purpose of the Act and key objectives of higher order planning documents and statutory instruments that give effect to it, including the NPSUD.

Objective 15.2.4 – Urban form, scale and design outcomes	1. This objective is intended to provide direction for the anticipated urban form, scale and design outcomes for all zones in the commercial chapter, including those proposed for further intensification in PC14. As currently drafted, its application and relevance is limited to commercial centres.
	2. There are a number of matters that the NPSUD emphasises as being important contributors to well-functioning urban environments that should be acknowledged in this objective to better implement that national direction (including supporting reductions in greenhouse gas emissions and urban environments being resilient to the effects of climate change).
		Amend objective to read:
		
		Objective - Urban form, scale and design outcomes
		a. A scale, form and design of development that is consistent with the role of a centre **and its contribution to city form, and the intended built form outcomes for mixed use zones**, and which:
		  i. recognises the Central City and ~~**District**~~ **Town** Centres as strategically important focal points for community and commercial investment;
		  ii. contributes to an urban environment that is visually attractive, safe, easy to orientate, conveniently
			• The status quo objective would be less appropriate for achieving the purpose of the Act and in particular with regard to maintaining and enhancing the quality of the environment for those commercial zones that are not classified as centres.
			• The proposed amendments would be more effective at implementing the RMA's direction to maintain and enhance the quality of the environment and amenity values, sustainably manage physical resources for the benefit of people, communities and the environment and to have particular regard to the effects of climate change.
			• Moreover, the proposed additions more directly implement the national direction of the NPSUD to achieve well-functioning urban environments, by making specific reference to matters of national significance contained in the RMA and NPSUD.

[24] Sense Partners (2022), Cost-Benefit Analysis of Proposed Industrial Land Rezoning, page 3.
[25] Ibid.
[26] Property Economics Limited (2022), Christchurch Central City and Suburban Centres (PC14) Economic Cost Benefit Analysis.
[27] Ministry for the Environment, "The Value of Urban Design" (2005), pages 10-12.

Objective	Issue	Proposed Change	Evaluation
	3. Amendments required to reflect NPSUD direction that amenity values change over time so the objective should acknowledge anticipated amenity. 4. A minor amendment is needed to acknowledge that mixed use areas have the potential to create conflicts and reverse sensitivity effects that can be managed through the scale, form and design of development.	accessible, and responds positively to **anticipated** local character and context; iii. recognises the functional and operational requirements of activities and the **anticipated** ~~**existing**~~ built form; iv. manages adverse effects **(including reverse sensitivity effects)** on the **site and** surrounding environment **including effects that contribute to climate change**; ~~**and**~~ v. recognises Ngāi Tahu/ mana whenua values through landscaping and the use of low impact urban design, where appropriate~~.~~ **; and** vi. **supports a reduction in greenhouse gas emissions.**	• The proposed objective is considered the most appropriate for achieving the purpose of the Act.
Objective 15.2.7 – Role of the Central City Mixed Use Zone	1. There is benefit in adding the words "high quality" into the objective to provide clarity about the expected quality outcomes for the CCMU Zone. This objective implements Strategic Objective 3.3.7 which refers to "high quality urban environments" and 3.3.8 which refers to (in regard to the central city) a "high amenity urban environment". Implementing policies also use the term "high quality" to describe directions for built form, for example: 15.2.8.2 – "…high standard of built form". 15.2.4.2 – "…high quality healthy living environment".	**Amend as follows:** **"Objective 15.2.7** a. The development of vibrant, **high quality** urban areas where a diverse and compatible mix of activities can coexist in support of the ~~**Commercial Central City Business**~~ **City Centre** Zone and other areas within the Central City ~~Central City"~~.	• Whilst a relatively minor matter in the context of the purpose of the RMA, the status quo would be less appropriate than the proposed change for implementing matters in Part 2 that recognise the importance of quality environments for the wellbeing of people and communities. It is reasonable to expect that those communities would benefit more from a high quality environment over a lesser quality one. • Whilst section 7 of the RMA refers to a quality environment and not a high quality one, it does refer to maintaining and *enhancing* the quality of the environment and amenity values (emphasis added) and which implies promotion of an improved or enhanced state. A high quality urban area can be considered an element of a well-functioning urban environment. • In any event, whether urban areas should be quality or high quality may be immaterial if the desired outcomes and responses to the objective are the same in practice. That is, it is the interpretation and application of the words quality/high quality that matters. • That said, the words "high quality" are more consistent with the language used in strategic objectives 3.3.7 and 3.3.8, and District Plan rule 3.3a (interpretation) directs that the objectives and policies in all other chapters of the Plan are to be expressed and achieved in a manner consistent with the objectives in Chapter 3. • The amendment to seek a high quality urban area is to achieve Objective 1 in Schedule 3 of the RMA, which seeks a 'Well-functioning Urban Environment'. As discussed, this can include development that demonstrates the principles of good urban design[28]. • It is therefore concluded that the proposed change is the most appropriate for achieving the purpose of the Act and related strategic objectives in Chapter 3.
Objective 15.2.8 – Built form and amenity in the Central City Mixed Use Zone	1. Objective 4 of the NPSUD states that "New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities and future generations". A minor amendment to this objective is recommended to reflect this stated outcome by referencing the 'evolving amenity values' of the Central City Mixed Use Zone.	**Amend as follows:** **Objective 15.2.8 -** Built form and amenity in the Central City Mixed Use Zone a. Ensure a form of built development that contributes positively to the **evolving** amenity values of the area, including people's health and safety, and to the quality and enjoyment of the environment for those living, working within or visiting the area".	• The proposed addition is the most appropriate for implementing the national direction of the NPSUD, a statutory instrument prepared under the RMA, having regard to the clearly stated outcome expressed in Objective 4 of the NPSUD.

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

Objective	Issue	Proposed Change	Evaluation
Objective 16.2.2 - Brownfield Redevelopment	1. Policy 3(d) directs intensification in areas *adjacent* to neighbourhood centre zones, local centre zones and town centre zones and this includes all zones in an urban environment unless a qualifying matter applies. PC14 proposes to enable several suburban industrial zones that are located close to / adjacent to centres, to transition to residential use, should that opportunity be taken up (refer to Residential Section for discussion around interpretation of 'adjacent'). To achieve this, additional brownfield overlays are proposed to be introduced for these areas, which will mean that sites within the overlay can be considered for comprehensive housing redevelopment via a restricted discretionary consent pathway, and without needing to consider the broader objectives and policies of Chapter 16 which would otherwise be a constraint. An amendment to Objective 16.2.2 is required to facilitate this. The proposed objective also requires amendment to set out the intended outcome for these areas to achieve quality residential environments, consistent with the outcomes sought for the surrounding residential medium density zones. Further amendment is necessary to make a distinction between brownfield *sites*, and the new brownfield *areas*; because the latter have only been assessed for their appropriateness to transition to housing, not any other activity including commercial. The proposal to introduce these new overlays follows an assessment of industrial land supply and analysis of the potential for industrial land close to commercial centres to redevelop for housing. Those assessments conclude that there is no land supply need for several areas at Hornby, Papanui, Cranford and Woolston to remain in industrial use, and redevelopment would be appropriate (subject to further evaluation through s32)[29]. Relevantly, that assessment considered whether these areas met the definition of 'brownfield land' such that it could be considered for redevelopment under the current district plan brownfield policy.	**Amend to add reference to proposed new overlays as follows:** a. The recovery and economic growth of the Christchurch District is provided for by enabling residential, mixed-use or commercial redevelopment~~, including mixed-use development,~~ of appropriate brownfield sites **and areas** while ~~not compromising the function of the wider industrial area for primarily industrial activities.~~ ensuring that: i. Commercial activities are primarily directed to the Central City and commercial centres; and ii. Where commercial activities are located out of centres as a result of brownfield redevelopment, there are no significant adverse distributional or urban form effects on the Central City and commercial centres; ~~and~~ iii. **For brownfield sites (not within brownfield areas),** the function of the wider industrial area for primarily industrial activities is not compromised~~.~~**"; and** **iv. For brownfield areas identified by an overlay at Woolston, Hornby, Cranford and Papanui, a high-quality residential environment is achieved that is consistent with the outcomes sought for residential medium density zones.**	• Objective 16.2.2 as proposed to be amended is supported by CRPS policies that encourage appropriate brownfield redevelopment, especially for comprehensive housing. CRPS Policy 6.2.6 (Business Land Development) strongly directs that if land is zoned for industrial purposes, unless it is identified for brownfield redevelopment, it should primarily be used for industrial purposes. However, if land is not required for / zoned for industrial activities, redevelopment for alternative uses, including comprehensive housing, is encouraged. • Business Land Capacity Assessments prepared for Council in 2018 and 2022 both identify a significant surplus of industrial land. • The benefits of brownfield redevelopment are specifically acknowledged in CRPS Policy 6.3.8, which supports the regeneration of existing brownfield areas through new comprehensive residential, mixed use or business redevelopment, provided such activities will not have adverse effects on the transport network nor significant adverse distributional or urban form effects on the central city and other centres. The areas considered for new overlays at Woolston, Hornby, Cranford and Papanui, benefit from good accessibility to shops, services, and amenities including public transport, and adjoin existing residentially zoned land, such that they are unlikely to cause any significant urban form or transport effects. Further assessment of effects would, however, be required at the resource consent stage by Policy 16.2.2.2. As the areas are only proposed to enable comprehensive housing development and not commercial activities, an assessment of potential distributional impacts is not necessary. • It is relevant that the Christchurch District Plan currently gives effect to the higher order policies of the CRPS by the identification of two brownfield overlay areas, and a policy that is applicable to sites, rather than areas. These objectives and policies have previously been assessed as being the most appropriate for achieving the purpose of the RMA. • The NPSUD has recently been revised to direct further intensification of urban zones around key commercial centres and which has led to the identification of a number of additional sites where brownfield redevelopment may be appropriate, subject to further, more detailed, assessment (in resource consent applications). • In light of the above, the objective as proposed to be amended is considered to be more appropriate than the status quo for achieving the purpose of the Act including key objectives and policies of higher order planning documents and statutory instruments that give effect to it, including the NPSUD.
Objective 15.2.6 – Role of the City Centre Zone **Objective 15.2.9** – Role of the Central City Mixed Use Zone **Objective 15.2.10** – Built form and amenity in the South Frame **Objective 15.2.11** – Role of the Neighbourhood Centre Zone in the Central City	Zone name change only – change not evaluated.		

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

5.3 Evaluation of options for provisions

5.3.1 As an 'amending proposal'[30], the examination of proposed provisions must consider whether they are the most appropriate means of achieving both the provisions and objectives of the amending proposal (this plan change) and the relevant objectives of the operative district plan.

5.3.2 This evaluation is provided in the following section and contains a level of detail corresponding to the scale and significance assessed in section 4.2. It focuses primarily on evaluating the preferred option against the status quo option.

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

Table 9: Evaluation of Options for Provisions

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

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

Relevant technical reports:
Background to City Centre Building Heights and Densities (2022) **Appendix 1**
Centres: Approach to Aligning with National Planning Standards (2022) **Appendix 2**
Lower Height Limits: Victoria Street and Cathedral Square – Qualifying Matters (2022) **Appendix to s32 on qualifying matters, Part 2**
Property Economics – Cost Benefit Analysis (2022) – **Appendix 3**
Lincoln University – Central City Business Capacity Assessment (2022) – **Appendix 5**
CCC – Technical Report – Urban Design – Commercial Zones (2022) **Appendix 6**

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

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

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

Options	Efficiency	Effectiveness
Option1 – Status Quo Current district plan provisions would continue to apply. In summary these include: • Maximum permitted building height 28m (other than New Regent Street and Art Centre where lower height limits apply). • Breaches of height classified as fully discretionary. • Maximum road wall height of 21 metres. • Recession planes applying above road wall height. • Building setbacks from residential zones. • Urban design assessment required if located in the 'core' as a controlled activity via certification or RDA via standard pathway. • Other built form and activity standards • Policies and assessment matters seeking high quality design.	**Costs:** • Potentially less development capacity enabled than other options (which enable skyscrapers), although noting that similar 'floor area ratios' (FARs) can be achieved on low to mid-rise buildings, as taller buildings, because taller buildings typically need more space around them to provide adequate daylight and sunlight and avoid visual dominance as shown below:  • Reduced flexibility to accommodate different activities that benefit from being in taller buildings (e.g. hotels); • Potentially greater costs borne by the individual landowner / developer from less development enabled (with the benefits accrued to the general public from greater amenity and to other landowners from distributed commercial activity). • Potential for poor urban design outcomes in non-core parts of the city centre on account of the urban design assessment requirement not applying there. • PEL's economic advice is that this option is the least economically efficient. In their view, any height option of 50 metres and below would result in a significantly reduced level of development enablement (relative to a 90m limit and no height limit) and would reduce the economic efficiency and productivity of the city centre long term. This would generate long term economic costs to the community	This option is most effective for implementing the CCRP which established a set of provisions aimed at achieving an expedited recovery (see Technical Report: Background to Central City Heights and Density controls **Appendix 1**). However, it is not most effective for implementing the NPSUD because the operative limits on building height do not accord with the direction in Policy 3, which anticipates that in city centre zones, Councils enable building heights and densities to realise as much development capacity as possible, to maximise the benefits of intensification. Furthermore, Objectives 6 and 4 anticipate that Council decisions are responsive, particularly in relation to proposals that would add significant development capacity and that recognition is had that urban environments change over time in response to changing needs of people, communities and future generations. Whilst the lower rise city concept appears to be less enabling than an approach that allows tall buildings, the development controls enable a greater intensity of use of the site (greater site coverage) which is achievable when buildings are lower rise. For the 'Core', the CCRP changed a FAR of 5 (1995 City Plan) to a FAR of 0, but reduced the height limits (see Technical Report: Urban Design – Commercial Zones - **Appendix 6**). However, the current 'discretionary activity status' for breaching the permitted height standard would not implement the NPSUD directions to be enabling. The status quo option would not be the most appropriate for implementing the purpose of the plan change and amended objectives, including strategic objective 3.3.7, that anticipates "*The pre-eminence of the city centre built form, supported by enabling the highest buildings*". Furthermore, there are known deficiencies with existing district plan provisions that have been identified through RMA s35 monitoring of plan effectiveness; the status quo option would perpetuate those issues.

	relative to the 90m and no height limit options. A zone wide cap on height enablement of 50m and below introduces significant economic costs that would compromise the long-term development of the city centre. • Standards for residential activity are more restrictive than MDRS e.g. Minimum unit size, adding costs to development and consenting. **Benefits:** • The status quo is the District Plan provisions decided in the District Plan Review process, which carried through the CCRP provisions which were justified by the government as the most appropriate in the post-earthquake environment having regard to: o the cost of building on liquefiable soils; o most likely to be built - development feasibility; o forecast demand over the recovery period; o the need to distribute commercial activity to avoid activity gaps on vacant sites; o built environment amenity in public spaces. [refer to Technical Report: Background to current Height and Density Controls **Appendix 1**] • Recognition of the heritage value of the Arts Centre and New Regent Street through lower height controls • Provides sufficient capacity to meet forecast needs to 2051 and beyond.	The current standards for residential activity are not consistent with MDRS as prescribed in part 3 of Schedule 3A of the RMA. However, MDRS is not applicable to commercial zones and the standards contribute to the well-being of residents and are an important element of good design, therefore contributing to a well-functioning urban environment as sought by Objective 1 in clause 6 of Schedule 3A.
	Risks of Acting/Not Acting: There has not been any quantification of the development capacity enabled under the status quo option compared with other options to enable a clear understanding of actual differences in plan enabled development capacity. It is therefore unclear to what extent the management approach for development in the central city developed by the CCRP, maximises the benefits of intensification in the way or to the extent anticipated by the NPSUD or in comparison with other options.	
Option 2 – Restricted discretion, no height limit • No prescribed upper height limit. • All development classified as RDA. • No other built form rules apply where the RDA assessment does apply.	**Costs:** • Lack of certainty of outcome for developers and neighbours as there are no built form standards and all development is RDA. • More likely to have inconsistent decision-making with only a qualitative assessment.	**Effectiveness:** PEL raises concern with the unlimited height option because the extent of the CCBZ/City Centre Zone is large and may encourage dispersed rather than consolidated development. Consequentially, they recommend a more refined area where the unlimited heights would be focused. They state that "*to maximise enablement and efficiency from an economic perspective, identification of a precinct within the City Centre*

• Assessment matters defined to enable consideration of whether the development achieves a well-functioning urban environment. • Amendments to policies to support approach and inform decision making. • No height control areas around Cathedral Square, New Regent Street, Arts Centre and Victoria Street.  PwC, Commercial Bay, Auckland https://www.precinct.co.nz/properties/pwc-at-commercial-bay	• May require extensive matters of discretion that have the effect of a discretionary activity. • Does not recognise the built environment, including the transition in scale to the mixed-use zones and the adjacent residential zones, especially along Victoria Street. • Greatest chance of activity gaps remaining on vacant sites and consequential amenity and recovery impacts as many years of commercial demand could be taken up by one building that only covers part of a site (see discussion about PwC building under 'Effectiveness'). • Potential to undermine existing city identity and urban form by enabling the introduction of over-dominant and potentially obtrusive structures and foregoing the 'low rise city' concept previously promoted by government and the community. • Taller buildings will result in adverse impacts including shading on important public spaces including Cathedral Square, New Regent Street and Arts Centre, and their heritage values due to the dominant built form. Refer to separate evaluation of effects of taller buildings on Cathedral Square and Victoria Street in Appendix 27 of part 2 (Qualifying matters) to the s32 evaluation. • Provides capacity well in excess of demonstrated demand for building heights. Less than 1% of homes built in City in year to 2021 were apartments, highlighting the limited demand for apartment style living[31]. Only 170,000sqm of office floorspace forecast to be needed by 2051[32]. • Unless the extent of an area with no height limit is further limited by a precinct, there is potential for dispersed rather than consolidated development, given the large size of the City Centre Zone and limited demand, and which will detract from agglomeration benefits etc[33]. • Lack of built form standards likely to result in increased transaction costs associated with resource consent applications and Council negotiating minimum standards. **Benefits:** • Greatest flexibility for a variety of uses.	*with no height limit to encourage the highest possible land use and intensified activity would represent the most efficient economic outcome. Identification of a precinct could maximise business and employment value generators and provide the most benefit from agglomeration and centralisation of business activity*"[34]. Staff have considered the potential for a more localised precinct to consolidate a 'no height limit' area but have been unable to identify an appropriate area. This has regard to the extent of redevelopment that has recently occurred in key areas, the need to protect important public spaces and promote a coherent and logical urban form. Without a smaller precinct, there is a risk associated with this option of sporadic development occurring within the zone, given the size of the City Centre Zone and lack of demand for many tall buildings. This is also supported by empirical evidence, with Lincoln University economist David Dyason concluding that there is sufficient existing plan enabled capacity in the central city to meet forecast demand for business activities to 2051[27]. Given the lack of demand in Christchurch for residential apartment towers, tall buildings in the foreseeable future are most likely to be for offices or hotels. Forecasting demand for hotels rooms / development is fraught because it is so dependent on a range of factors (e.g. migration settings, aviation fuel costs, global issues). However, office demand can be forecast more reliably and Lincoln University's modelling projects demand for an additional 170,000sqm of office floorspace in the central city by 2051. To put this in context, the recently constructed PwC Tower at Commercial Bay in Auckland (left image), comprises 130,000sqm over 38 floors (180m). A potential scenario arising is that one or two large buildings could be developed at significant height, absorbing years or decades of capacity in one development. Whilst the probability of this occurring is low, the impacts on character and

[31] REINZ (2021), Residential Market Demand Report, page 3. **Appendix 9**
[32] Lincoln University (2022), Business Land Capacity Assessment for Central City.
[33] Property Economics (2022), Economics Cost Benefit Analysis – Commercial Centres.
[34] Property Economics Limited (2022), Christchurch Central City and Suburban Centres (PC14) Economic Cost Benefit Analysis.

	• Supports city centre's economic competitiveness. • May increase development viability on a site-by-site basis for some types of activities relative to other options (e.g., hotels); • Greatest efficiency in use of infrastructure. • Potential to support greater transport choice and accessibility. • Lack of built form standards could lead to more varied and interesting buildings.	appearance of the still regenerating city, could be significant. As a consequence, this option is likely to be less appropriate for achieving a high quality environment and legible urban form appropriate in its context, attractive to residents, businesses and visitors, and for recognising areas of special character and amenity value, as required by Strategic Objective 3.3.7. Nor would it support a city form that contributes to an urban environment that is visually attractive and responds positively to anticipated local character and context, as sought by Objective 15.2.4. It cannot be seen therefore to achieve the NPS objective for well-functioning urban environments. There is potential for adverse effects on heritage values of important public spaces including Cathedral Square and New Regent Street as well as on the setting of the Arts Centre. This is inconsistent with Objective 9.3.2.1.1 of maintaining the contribution of historic heritage to the City's character and identity. Whilst this option has significant benefits for enabling capacity and providing certainty to the market, overall, it is considered that the disbenefits of intensifying in this way mean that this option is not the most appropriate for achieving the objectives of this plan change or the district plan.
	Risks of Acting/Not Acting: as above.	
Option 3 – Most Enabling • No prescribed upper height limit, and • Development permitted up to 28m subject to built form standards. • RDA above 28m (no built form standards). • Assessment matters to address matters to achieve a well-functioning urban environment. • Amendments to policies to reflect approach and inform decision making.	**Costs:** • As for Option 2 above. **Benefits:** • As for Option 2 but with more certainty for proponents of developments below 28m in height.	**Effectiveness:** As above.
	Risks of Acting/Not Acting: as above.	

• No height control areas around Cathedral Square, New Regent Street, Arts Centre and Victoria Street		
Option 4 – Hybrid • Mostly as per option (3) above but height above 90m classified as a discretionary activity; and • New policy to promote the clustering of tall buildings within the City Centre Zone. • Additional built form rules comprising: - Retain status quo road wall heights (21 m) and certification pathway for urban design assessment (to 28m only); - A recession plane applying from the road up to 28 / 32m; - Additional upper floor setbacks of 10% of the building height above 28m; - Maximum site coverage of 50% above height limits; - Separation of building towers by 12m; - Wind management requirements; - Introduction of a new permitted pathway for small buildings (prescribed standards); - Other built form and activity standards • No height control areas around Cathedral Square, New Regent Street, Arts Centre and Victoria Street	**Costs:** • Less development capacity potentially enabled than Options 2 and 3 (although noting that 90m is higher than any building ever built in Christchurch to date and there is limited demand for residential and office towers); • Does not recognise the existing built environment, including the transition in scale to the mixed-use zones and the adjacent residential zones, especially in Victoria Street; • Continues to have the potential to erode existing city identity and built urban form by introducing over dominant and potentially visually obtrusive structures distributed sporadically, given lack of demand but less so than the unlimited height options; • Significant chance of activity gaps remaining on vacant sites and consequential amenity and recovery impacts as years of commercial demand could be taken up by one or two buildings that only covers part of a site (noting this is low risk for schemes requiring bank finance – a bank requirement being presales which would be difficult in a low demand environment); • Taller buildings will result in adverse impacts including shading on important public spaces including Cathedral Square, New Regent Street and Arts Centre, and their heritage values due to the dominant built form. Refer to separate evaluation of effects of taller buildings on Cathedral Square and Victoria Street in Appendix 27 of part 2 (Qualifying matters) to the s32 evaluation.. • Additional transaction costs and uncertainty associated with discretionary activity status for buildings exceeding 90m. However, the probability of a large number of 90m+ high buildings being developed in Christchurch's city centre given the size of the city's commercial and residential market is considered low[35]. Also, the transactional costs associated with seeking consent for a taller building with a discretionary activity status is not considered material in the overall	**Effectiveness:** This option is more appropriate than the options above, for achieving the objective of the plan change to enable development capacity to realise as much development capacity as possible to maximise the benefits of intensification. It does this by introducing a management framework that seeks to be as enabling of height and density as possible, whilst managing the potential for adverse effects on the people and communities who work, live and visit the City Centre. The set of proposed provisions has been thoroughly assessed to be the most appropriate for achieving a high quality urban environment as sought by Strategic Objective 3.3.7 and to achieve the urban form, scale and design outcomes sought by Objective 15.2.4. [Refer to Technical Report – Urban Design – Commercial – **Appendix 6**]. The one significant exception to this is for the sensitive areas around Cathedral Square, Victoria Street, New Regent Street and the Arts Centre where a 90m height limit is not considered to be the most appropriate option for achieving those objectives of a high quality urban environment. There is potential for adverse effects on heritage values of these important public spaces and heritage setting. This is inconsistent with Objective 9.3.2.1.1 of maintaining the contribution of historic heritage to the City's character and identity. The current standards for residential activity are not consistent with MDRS as prescribed in part 3 of Schedule 3A of the RMA. However, MDRS is not applicable to commercial zones and the standards contribute to the well-being of residents and are an important element of good design, therefore contributing to a well-functioning urban environment as sought by Objective 1 in clause 6 of Schedule 3A.

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

	context of the likely building cost and associated risk (ibid) and would be limited to few developers who seek to develop. • Standards for residential activity are more restrictive than MDRS e.g. Minimum unit size, adding costs to development and consenting. **Benefits:** • Very significant development capacity enabled; however it is noted that the latest assessment of business land capacity in the central city[36] concludes that even the status quo scenario provides more than sufficient plan enabled development capacity to meet forecast demand to 2048. • Effects between 28m and 90m in height can generally be anticipated (so can be subject to RDA); • Additional built form standards provide additional certainty to developers and neighbours. • Additional built form standards support achieving appropriate outcomes in relation to visual impact, visual interest, sunlight and outlook access, and wind management. • May further increase development viability on a site-by-site basis for some types of activities (e.g. hotels). • Is greater than the maximum height of a building ever built in Christchurch so provides significant scope for tall buildings to occur. • More efficient use of infrastructure than lower height options. • Can support transport choice and accessibility.	
	Risks of Acting/Not Acting: As above.	
Options with lower height control areas • 2A; • 3A; • 4A (preferred option) As for Options 2, 3 and 4 above but with a height limit of 45 metres around Cathedral Square and	**Costs:** • As for Options 2, 3 and 4 as relevant. • Reduced development potential around Cathedral Square, New Regent Street, Arts Centre and Victoria Street due to lower maximum height limit. [refer to Qualifying Matters Assessment of Lower Height Limits for Commercial Zones, Part 2 of section 32 report[37]]. In the context of the significant plan enabled capacity (existing and proposed), limiting development in these specific areas is not likely to	**Effectiveness:** More appropriate sub option because it provides for a very enabling level of intensification over most of the central city business zone yet manages shading effects on Cathedral Square, effects on the urban form in Victoria Street and heritage values and context of New Regent Street and Arts Centre. In doing so, this option contributes to a Well-functioning urban environment as sought by Objective 3.3.7 and maintaining the contribution of historic heritage to the

along Victoria Street and height limit of 28 metres around New Regent Street and Arts Centre.	materially impact on plan-enabled development capacity, noting also that a designation (with no height controls) exists anyway[38] and there is a lack of forecast demand for largescale office and residential apartment towers. • Additional transaction costs and uncertainty for developers of proposals over 45m around Cathedral Square and along Victoria Street; noting however that this is significantly above the current 28m height limit for these areas. • Additional costs and uncertainty arise for any development in the area surrounding New Regent Street and on the east side of Montreal Street, opposite the Arts Centre, where building heights would be limited to 28m **Benefits** • As for Options 2, 3 and 4 as relevant; • Greater recognition of the special characteristics of Cathedral Square as an important public open space and heritage item in its own right, as well as the heritage values and context of New Regent Street and Arts Centre.	City's character and identity, consistent with Objective 9.3.2.1.1. Strikes an appropriate balance to maximise the benefits of intensification and therefore more appropriately gives effect to the NPSUD. This option is the most appropriate for achieving the purpose of the plan change (to give effect to Policy 3a of the NPSUD) than options 2, 2A, 3, 3A and 4 and is therefore the **preferred option.**

[36] Lincoln University (2022), Business Land Capacity Assessment for Central City.
[37] Note that whilst an assessment of the impact of lower height controls on development capacity has been undertaken consistent as if these heights required an assessment under 3.32 of the NPSUD (as qualifying matters), we do not consider that lower heights in the City Centre Zone require justification as qualifying matters; rather they can, and should, be assessed under s32 in the usual way. That is, unlike Policy 3c, Policy 3a does not set a minimum height that must be achieved, setting a baseline for assessing impact below that baseline.
[38] Convention Centre Precinct Designation, reference V6 in Chapter 10 of the Christchurch District Plan.

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

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

Also see under Issue 2, section 5.3 of Part 3 (Residential) of this evaluation report in regard to the strategic assessment of heights and densities appropriate within the walkable catchments of the City Centre Zone. That assessment concludes that this policy should be applied to zones within *at least* 1200m of the City Centre Zone, and that a 32 metre height limit is the most appropriate, having regard to a range of metrics including accessibility and demand.

Relevant technical reports:
CCC - Background to City Centre Building Heights and Densities (2022) **Appendix 1**
Property Economics – Cost Benefit Analysis (2022) **Appendix 3**
Lincoln University – Central City Business Capacity Assessment (2022) **Appendix 5**
CCC – Technical Report – Urban Design – Commercial Zones (2022) **Appendix 6**

Options	Efficiency	Effectiveness
Option 1 – Status Quo Current District Plan provisions would continue to apply for the CCMU and CCMU (South Frame) Zones. • 17m height limit in most parts of the CCMU and CCMU(SF) Zones. • Controls on type and tenancy size of commercial activity. • No urban design assessment requirement. • Limited built form controls, especially for residential activity. • Other built form and activity standards	**Costs:** • Less development capacity enabled in the mixed use zones compared to other options, limiting land values and potential feasibility for some developments. • Poor urban design outcomes continue to arise due to the absence of an urban design assessment. • Standards for residential activity are more restrictive than MDRS e.g. Minimum unit size, adding costs to development and consenting. **Benefits:** • Strongly directs greater levels of intensified development into the City Centre, where the district plan seeks the bulk of 'tall buildings' to occur. This would help entrench the City Centre Zone as the primary location for commercial activity and intensification, given its primacy in the hierarchy of the city's network of centres (PEL). • Breaches of the 17m/32m height limits are classified as RDA i.e. still enabling.	This option would be most effective for implementing the CCRP which established a set of provisions aimed at achieving an expedited recovery (see "Technical Report: Background to Central City Height and Density Controls" for background – **Appendix 1**). Whilst this option could be seen to already give effect to the NPSUD Policy 3(c)(ii), (by enabling heights of at least 6 storeys via RDA pathway), it is not the most appropriate method. Section 35 monitoring of plan effectiveness has identified issues with the quality of some development in the CCMU (refer to "Technical Report, Urban Design – Commercial Zones" – **Appendix 6**), that is detracting from achievement of the quality outcomes sought by district plan objectives. This option would therefore not be the most appropriate for achieving intensification that contributes to a well-functioning urban environment as anticipated by the NPSUD. Nor would it achieve district plan Objectives 15.2.7 and 15.2.10 that promote vibrant, high quality urban areas in the zones.

		The current standards for residential activity are not consistent with MDRS as prescribed in part 3 of Schedule 3A of the RMA. However, MDRS is not applicable to commercial zones and the standards contribute to the well-being of residents and are an important element of good design, therefore contributing to a well-functioning urban environment as sought by Objective 1 in clause 6 of Schedule 3A.
Option 2 – Proposed option • 32m height limit for both zones (Permitted up to 17m, Restricted Discretionary up to 32, and discretionary above this). • Amended policies to support taller buildings and improve outcomes (particularly for urban design / amenity). • Urban design assessment introduced for proposals of 4 residential units or more in the CCMU and for development over the current permitted height (17m). • Additional / amended standards comprising: - Permitted standards for residential activity relating to outdoor service spaces, outdoor living space, glazing requirements, outlook spaces, road boundary setbacks, site coverage; - front and side boundary setbacks; - Landscaping and trees; - Building height; - Fencing and screening structures; - Screening of outdoor storage areas; - Height in relation to boundary; - Residential zone boundary setbacks; - Minimum number of floors; - Building setbacks from road boundary	**Costs:** • Economic costs associated with more height (as described generally above in the Introduction below the heading for Issue 1) and relative to the status quo). • Potential for more development costs including opportunity costs from the introduction of additional built form requirements. • Option is less directive of intensification of commercial activity in the City Centre as the primary commercial centre for the City and some displacement of activity from the City Centre Zone as a result. However, Property Economics Limited considers that this cost would be minimised by retaining the current tenancy controls that apply in these zones. (office and retail tenancy limits)[39] • Some economic inefficiencies due to the significant increase in capacity that the extent of CCMU/CCMUSF represents (PEL p35). • The level of development that would be enabled may draw some higher density development out of the city centre to more fringe locations where access to infrastructure and amenity is inferior and the negative externalities associated with intensification are more difficult to manage over a wider area.	This option is the most appropriate option for giving effect to the NPSUD direction to increase building heights to at least 6 storeys within the walkable catchment of the city centre and ensures that quality urban environments are achieved consistent with a well-functioning urban environment. This option more appropriately achieves the outcome of a high quality environment sought by the CRPS (Objective 6.2.1 and Policy 6.3.2 in particular) and district plan objectives 3.3.7, 15.2.4, 15.2.7 and 15.2.10. Moreover, the introduction of urban design controls represents an approach to managing activities and development that is more consistent with other central city commercial zones which results in a more level playing field. That is, a more liberal management approach adopted immediately outside the CCBZ/City Centre Zone, is likely to incentivise development in the mixed use zones to the detriment of the City Centre Zone. A more consistent approach to district plan rules is therefore more likely to better achieve the recovery and primacy outcomes sought by Objective 15.2.2 – Centre's-based Framework, for the City Centre Zone. The proposed standards for residential activity are not consistent with MDRS as prescribed in part 3 of Schedule 3A of the RMA. However, MDRS is not applicable to commercial zones and the standards contribute to the well-being of residents and are an important element of good design, therefore contributing to a well-functioning urban

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

- Building tower setback from internal boundaries; - Additional upper floor setbacks of 10% of the building height above 28m; - Building tower site coverage; - Glazing to street front; and - For the CCMU(SF) – introduction of new small buildings permitted activity. • Retain other existing provisions including activity and tenancy limits.	• Standards for residential activity are more restrictive than MDRS e.g. Minimum unit size, adding costs to development and consenting. **Benefits:** • Economic benefits associated with more height (as described generally above in the Introduction below the heading for Issue 1 and relative to the status quo). • Improved environmental and social outcomes resulting from introduction of urban design controls. • Introduction of new small buildings permitted activity provides a more enabling pathway for development, providing benefits in terms of development certainty, pace and less transaction costs for developers.	environment as sought by Objective 1 in clause 6 of Schedule 3A.
Option 3 (various alternatives considered) Other key options considered include: • Removing current density controls (tenancy limits) • Different height limits (22m, 50m, 90m, unlimited) • Various derivations of urban design controls and policies.	**Removing density controls** **Costs:** refer to Property Economics CBA **Benefits:** refer to Property Economics CBA **Different height limits** **Costs:** refer to Property Economics CBA **Benefits:** refer to Property Economics CBA **Various urban design controls and policies** **Costs:** refer to Technical Report - Urban Design: Commercial – **Appendix 6** **Benefits:** refer to Technical Report - Urban Design: Commercial – **Appendix 6**	**Efficiency** Property Economics specifically considers the need to retain existing density controls in place for commercial zones outside the City Centre / CCB zone. They conclude that these tenancy limits are still needed to support primacy and recovery of the CCBZ/City Centre and therefore remain the most appropriate option for giving effect to the CRPS and district plan objectives that promote primacy and recovery of the City Centre. Various other height limit options have also been considered for the CCMU and CCMU(SF) Zones. Property Economics state that whilst a lower height limit may be more appropriate for giving primacy to the City Centre Zone, a 32m limit with tenancy controls would not detract significantly from the outcomes sought for the city's principal centre. However they strongly advise against any additional height enablement in the CCMU/CCMUSF on the basis that it could diminish the role and function of the CCB/City Centre Zone[40].

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

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

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

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

Relevant technical reports:
CCC – Centres Alignment with National Planning Standards (2022) **Appendix 2**
Property Economics – Cost Benefit Analysis (2022) **Appendix 3**
CCC – Technical Report – Urban Design – Commercial Zones (2022) **Appendix 6**

Options	Efficiency	Effectiveness
Status Quo (– for equivalent centres) Town Centres – 20m height limit Local Centres – 12m height limit Neighbourhood centres – 8m height limit With site or area-specific bespoke height limits Existing package of development controls.	**Costs:** • Less development capacity enabled than other options • Incoherent zoning pattern (where centre heights in some cases would be lower than surrounding residential neighbourhoods) e.g. reduced height limit of 12 m in a District Centre within 30 m of an adjoining residential zone. • Poorer environmental outcomes, particularly for future residents as a result of amenity controls that are less prescriptive than other zones. • Recession plane rules more stringent than surrounding residential zones – perverse outcome of shading and built form effects from residential development in adjoining zones than from commercial development adjacent. • Standards for residential activity are more restrictive than MDRS e.g. Minimum unit size, adding costs to development and consenting. **Benefits:** • Some area-specific height limits may provide a more place-based response to built form, more sympathetic to surrounding built and natural form and aligned with anticipated growth demands. • A reduced height limit within 30 m of a residential zone in the Town Centre zone(equiv. District Centre) provides for a	The status quo option would be less appropriate for achieving the directions of Policy 3(d) because it fails to provide for intensification (building heights and density of urban form) commensurate with the level of commercial and community services. Some of the centre heights in the district plan are also no longer appropriate as a result of the greater enablement of heights in residential zones surrounding centres (MDRS provisions) having regard to objectives 3.3.7(b) and 15.2.4 and policy 15.2.4.1 which specifically refers to achieving a legible urban form and the concept of a sensible zoning pattern[41]. The current standards for residential activity are not consistent with MDRS as prescribed in part 3 of Schedule 3A of the RMA. However, MDRS is not applicable to commercial zones and the standards contribute to the well-being of residents and are an important element of good design, therefore contributing to a well-functioning urban environment as sought by Objective 1 in clause 6 of Schedule 3A.

	consistent height at the interface with the adjoining area where zoned Medium Density Residential.	
Proposed option Town Centres – 22m height limit (for 3 largest, being Riccarton, Hornby and Papanui), all others 20m Local Centres – large (20m), medium (14m) and small (12m) Neighbourhood centres – 12m height limit outside the central city and 20/32m within the central city. No site or area specific controls other than at Northwood/Belfast where a Qualifying matter applies. Minor amendments to development controls, particularly for residential activities for consistency with MDRS and / or other commercial zones. Other standards continue to apply.	**Costs:** • Potential for some redistribution of development capacity from higher order centres, including the central city. • Greater levels of capacity are provided for higher order centres (the strongest centres already), which may be of detriment to already declining or vulnerable centres. • Standards for residential activity are more restrictive in some instances than MDRS e.g. Minimum unit size, adding costs to development and consenting. • The height of development enabled in a Town Centre zone (equiv. to District Centre) within 30 m of a residential zone could give rise to greater effects on residential properties associated with the bulk/ mass of buildings. This is mitigated by a recession plane and the increased height limit in the adjoining residential zone (Both Medium Density Residential zone and Height Density Residential zone). **Benefits:** • Provides additional development capacity, particularly for housing, in appropriate locations. • Potential increased population can improve the viability and vibrancy of existing centres. • May improve feasibility for some developments. • Additional development controls likely to improve amenity for future residents and ensure a consistent approach to boundary controls with adjoining residential zones and other commercial zones.	A detailed investigation of the current composition of each centre has identified differences between centres within the same centre classification, necessitating a more nuanced approach to setting height limits, as sought by the Policy 3 direction. The proposed option is therefore more appropriate than the status quo option for implementing Policy 3. The proposed option continues to give effect to a centre's based framework including a hierarchy of centres, as directed by the CRPS and district plan objective 15.2.2. The proposed standards for residential activity are not consistent with MDRS as prescribed in part 3 of Schedule 3A of the RMA. However, MDRS is not applicable to commercial zones and the standards contribute to the well-being of residents and are an important element of good design, therefore contributing to a well-functioning urban environment as sought by Objective 1 in clause 6 of Schedule 3A.

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

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

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

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

Relevant technical reports:
CCC – Assessment of Potential Transition of Industrial Areas' (2022) **Appendix 4**
Sense Partners – Cost Benefit Analysis (2022) **Appendix 7**

Options	Efficiency	Effectiveness
Status Quo Retain existing Industrial (IG) zoning and rely on existing brownfield policies and (discretionary activity) rules to consider appropriateness for redevelopment, on a site-by-site basis.	**Costs** • Financial costs and uncertainty for potential developers seeking to redevelop industrial land for comprehensive residential development in locations prioritised by the NPSUD. • Societal costs for not enabling land that is well-located to employment, services and amenities to be used for its highest and best use. • Opportunity costs associated with not realising development potential of suitably located sites. **Benefits** • Existing planning method that can be utilised without any further planning intervention. • Redevelopment proposals more rigorously assessed to ensure all effects are appropriately considered and managed.	• Redevelopment potential limited to *sites* that meet the existing brownfield overlay criteria. More limited capacity to consider 'areas' unless identified by an overlay. • No policy direction on development form outcomes to inform and assess development proposals. • May not achieve well-functioning urban environments (not currently part of existing policy criteria). • Lacks land use flexibility that the NPSUD seeks for urban environments. • May give rise to ad-hoc brownfield redevelopment in the absence of a strategic response
Residential Zoning	**Costs** • Would introduce a planning framework that does not recognise the existing non-residential uses of the land, providing uncertainty for existing businesses and potentially	• This option would be less effective at achieving the intentions of the NPSUD to enable greater flexibility of land use and encourage competitive land and development markets.

Introduce a RMD or RHD Zoning for all IG Zones that meet the Policy 3 locational and appropriateness criteria.	greater costs should they wish to undertake new activities or development that is inconsistent with the outcomes sought for residential environments. **Benefits** • Would clearly signal the intended outcomes of the areas for landowners and future developers and ensure that redevelopment occurred wholly consistent with the provisions for the relevant medium or high-density zones.	• Whilst the rezoning would be consistent with residential medium and high-density zone policy directions that encourage residential intensification in close proximity to centres, it would cause a conflict between current activities and the residential zone provisions that is undesirable and less appropriate.
Brownfield Overlay Apply brownfield *overlay* to *all* IG zoned land that meets the Policy 3 locational and appropriateness criteria; and • Amend Obj. 16.2.2. to clearly state the outcome for brownfield areas to transition to residential; • Amend Policy 16.2.2.2 to add additional criteria for built form outcomes. • Restricted discretionary activity status for comprehensive housing on land within the overlay. • New assessment matters based on Policy 16.2.2.2 and to better express intended built form and environmental outcomes.	**Costs** • Development opportunities may not be as obvious to the development sector, resulting in lesser take up. • Longer-term outcomes for the areas not as clearly articulated and understood which may result in inconsistent outcomes and missed opportunities. • Some potential displacement of industrial activities to other zones/ locations as a result of higher land values, commercial benefits of selling more valuable land. **Benefits** • Enables an area-wide approach to be taken rather than a site-by-site assessment of brownfield redevelopment potential, with consequential environmental benefits. • More enabling framework than the status quo (more certainty, less transaction costs). • Improved environmental and built form outcomes. • Continues to fully support and provide certainty to industrial activities that their activities can operate without undue constraint.	• This option would directly respond to NPSUD outcomes and district plan objectives and policies seeking to improve accessibility to jobs, shops and amenities by enabling greater intensification of residential activity close to centres. • However, for the larger industrial general zone within a walkable catchment of the city centre, applying an overlay over the whole area to enable housing development, may be inconsistent with Objective 16.2.2 which enables redevelopment 'of appropriate brownfield sites' provided it 'does not compromise the function of the wider industrial area'. In the case of this area, enablement of housing would mean the zone would function as a mixed use rather than light industrial area; the long-term intention being to transition the area away from being a primarily industrial area. • Further, not all sites within the overlay area would presently meet the definition of 'brownfield' i.e., they are in active and sometimes intensive industrial use not 'abandoned or under-utilised industrial land'. This may result in a Plan inconsistency where a brownfield overlay applies to sites that are not brownfield (by strict definition). It could however be argued that the areas *are* brownfield by way of being under-utilised / less productive than they could be, having regard to their accessible location and the highest and best use for the land. Sense Partners (2022) concludes that "land price differentials show that a more efficient use

		of land is housing, not industrial uses that are effectively receiving an implicit subsidy by not faceting true rents" in this location (page 3). • The option wouldn't distinguish the different outcomes sought for central (of high density residential development) vs. suburban brownfield areas (of medium density residential development) such that development may be inappropriate for its context and therefore not contribute to a well-functioning urban environment.
New Mixed-Use Zone Combine the operative Commercial Central City Mixed Use Zone and the Commercial Mixed-Use Zone into a single Mixed-Use Zone, and apply to all areas (with amendments)	**Costs** • Time and complexity associated with merging two zones whilst ensuring that sufficient regard is had to the Christchurch Central Recovery Plan that inserted the CCCMU provisions. • Potential incompatibility of zone outcomes, whereby the CCCMU is much more enabling of commercial activities compared to its more suburban counterpart, reflecting its location adjoining the central business district. • Should commercial activity be enabled more widely in the Mixed Use Zone, it would lead to a dispersed pattern of commercial activity and potentially undermine the economic viability of commercial centres. • Some potential for reverse sensitivity effects on existing industrial activities through introduction of higher value activities. • Some potential (voluntary) displacement of industrial activities to other zones/ locations as a result of higher land values, commercial benefits of selling more valuable land. • Standards for residential activity are more restrictive than MDRS e.g. Minimum unit size, adding costs to development and consenting. **Benefits** • Amendments could promote consistent outcomes and methods for the mixed-use areas, regardless of their location	• This option would directly respond to NPSUD and district plan policy outcomes seeking to improve accessibility to jobs, shops and amenities by enabling greater intensification of residential activity close to centres. • The amendments would address an existing policy gap and would ensure that development occurs in a manner compatible with the intended objectives for the zone. • However, Mixed Use zoning in suburban locations may also facilitate non-housing uses permitted by the zone, thereby not realising the objectives of increasing housing supply and diversity in locations most suited for residential intensification. • Crucially, merging the zone provisions for the central city mixed use zones and the suburban mixed-use zones is likely to result in a dispersed pattern of commercial activity that would conflict with the centre's based policy framework of the regional policy statement and district plan. • The standards for residential activity are not consistent with MDRS as prescribed in part 3 of Schedule 3A of the RMA. However, MDRS is not applicable to commercial zones and the standards contribute to the well-being of residents and are an important element of good design, therefore contributing to a well-functioning urban environment as sought by Objective 1 in clause 6 of Schedule 3A.

	within the 4 avenues or not, of benefit to Plan users and the development community. • Implements a standard zone identified by the National Planning Standard Zone Framework, designed to streamline and simplify plans for the benefit of plan users and the development community. • Provides an opportunity to remedy known Plan defects with both zones and thereby achieve improved social, economic and environmental outcomes. • Provisions would still enable most industrial activities to establish and operate unhindered.	
Mixed-Use Zoning (without amended provisions) Introduce MUZ zoning (as per current provisions) for all IG zoned land that meets the Policy 3 locational and appropriateness criteria.	**Costs** • Mixed-use development may be inappropriate for suburban contexts resulting in poor urban design, amenity and urban form outcomes. • Some potential for reverse sensitivity effects on existing industrial activities through introduction of housing. • Some potential (voluntary) displacement of industrial activities to other zones/ locations as a result of higher land values, commercial benefits of selling more valuable land. • Lack of appropriate management framework would likely result in poor outcomes for the area and for future communities given that these areas currently lack the amenity appropriate for residential and mixed use areas, necessitating greater, not lesser planning intervention. • Standards for residential activity are more restrictive than MDRS e.g. Minimum unit size, adding costs to development and consenting. **Benefits** • Existing planning method that can be utilised without any further planning intervention and is understood by developers. • Provisions would still enable most industrial activities to establish and operate unhindered.	• This option would directly respond to NPSUD outcomes and district plan objectives and policies seeking to improve accessibility to jobs, shops and amenities by enabling greater intensification of residential activity close to centres. • However, the current CMU zone provisions lack policy direction and sufficient design quality standards to ensure that the areas are well-functioning and achieve the desired outcomes. Housing is only currently permitted in CMU Zones above ground floor and to the rear of other permitted uses. • CMU zoning may also facilitate non-housing uses permitted by the zone thereby not realising the objectives of increasing housing supply and diversity, particularly for the more suburban areas where housing may be the most suitable use of the brownfield land. • The standards for residential activity in the Mixed Use zone (as per current provisions) are not consistent with MDRS as prescribed in part 3 of Schedule 3A of the RMA. However, MDRS is not applicable to commercial zones and the standards contribute to the well-being of residents and are an important element of good design, therefore contributing to a well-functioning urban environment as sought by Objective 1 in clause 6 of Schedule 3A.

Mixed-Use Zoning (with amended provisions) Introduce MUZ zoning (with amended provisions to promote high density residential development[42]) for all IG zoned land that meet the Policy 3 locational and appropriateness criteria.	**Costs** • Some potential for reverse sensitivity effects on existing industrial activities through introduction of housing (but which can be ameliorated by district plan controls). • Some potential (voluntary) displacement of industrial activities to other zones/ locations as a result of higher land values, commercial benefits of selling more valuable land. • Mixed-use development may be inappropriate for suburban contexts resulting in poor urban design, amenity and urban form outcomes. • Standards for residential activity are more restrictive than MDRS e.g. Minimum unit size, adding costs to development and consenting. **Benefits** • Existing planning method that can be utilised and is understood by developers. • Amended provisions would enable housing intensification to occur more widely, subject to appropriate standards. • Amended provisions would provide more consistency between zones that provide for high density housing, of benefit to plan users and the development community. • Provisions would still enable most industrial activities to establish and operate unhindered.	• This option would directly respond to NPSUD and district plan policy outcomes seeking to improve accessibility to jobs, shops and amenities by enabling greater intensification of residential activity close to centres. • The amendments would address an existing policy gap and would ensure that development occurs in a manner compatible with the intended objectives for the zone. • However, MUZ zoning in suburban locations may also facilitate non-housing uses permitted by the zone, thereby not realising the objectives of increasing housing supply and diversity in locations most suited for residential intensification. • The standards for residential activity are not consistent with MDRS as prescribed in part 3 of Schedule 3A of the RMA. However, MDRS is not applicable to commercial zones and the standards contribute to the well-being of residents and are an important element of good design, therefore contributing to a well-functioning urban environment as sought by Objective 1 in clause 6 of Schedule 3A.
Hybrid – Brownfield Overlay and MU Zones with amended provisions (PREFERRED OPTION) Apply brownfield overlay to all suburban IG zoned land that meets the criteria, and MU Zoning (with Comprehensive Housing Precinct) to appropriate Central City Industrial land only. Amend provisions (policies and rules) to clearly express the intended outcomes for residential intensification in these areas.	**Costs** • Some potential for reverse sensitivity effects on existing industrial activities in the mixed use zone through introduction of housing (but which can and are proposed to be ameliorated by district plan controls). • Some potential (voluntary) displacement of industrial activities to other zones/ locations as a result of higher land values, commercial benefits of selling more valuable land. • Objectives sought for the MU zone (Comprehensive Housing Precinct) area are likely to be slow to be taken up by the market, due to the higher and more prescriptive standards and lower level of feasibility of the proposed development	• This option would be most effective at responding to NPSUD and district plan objectives seeking to improve accessibility to jobs, shops and amenities by enabling greater intensification of residential activity close to centres whilst ensuring that development is well-functioning, appropriately designed and appropriately managed consistent with its particular context. • This option promotes an urban outcome that is most appropriate given its future focus by supporting a type and form of development that responds to evidence about

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

For suburban locations: ○ Amend policies 16.2.2.1 and 16.2.2.2 to support comprehensive medium density housing consistent with the outcomes sought for r medium density zones. For central locations: ○ Amend policy 15.2.3.2 to provide direction for implementing objective 15.2.3(b) and promote transition into high quality residential neighbourhoods that supports housing diversity and affordability and the objective of reducing greenhouse gas emissions. ○ Introduce a precinct to refine the area where comprehensive residential development is appropriate and enabled (by resource consent); ○ Limit the establishment of new industrial activities most likely to generate adverse effects on residential amenity (e.g. metal product manufacturing and storage and demolition and salvage yards). ○ Introduce additional built form standards to guide the type and form of development sought, consistent with objectives that seek: ▪ high density, perimeter block form of development; ▪ significant provision of landscaping and trees; ▪ diversity of housing typology including proportion of (4-6 storey apartments); ▪ a high quality living environment for future residents; and	form, compared with other locations and typologies that the market is currently preferring to deliver. However, economic analysis suggests that this will shift in the medium term and even in the short term, some parties may take on more associated risk for longer-term rewards (Sense Partners page 3). • Some opportunity costs for developers and landowners associated with the MUZ built form standards that direct a particular form of development and that preclude the establishment of metal product manufacturing and storage and demolition and salvage yards. • Standards for residential activity are more restrictive than MDRS e.g. Minimum unit size, adding costs to development and consenting. **Benefits** • Utilises existing planning methods (with amendment) that are used and understood by the development community (i.e. brownfield overlays and mixed use zones). • The amended provisions will promote the housing, diversity and quality objectives intended for these areas, in a way that is appropriate to their context. • Provisions would still enable most industrial activities to establish and operate unhindered. • Greater clarity for plan users and developers as to the outcomes anticipated for housing in this zone. • Improved residential amenity outcomes for future residents and improved urban amenity generally by enabling residential activity to be located along street frontages. • Provides a more consistent approach to quality and amenity outcomes anticipated between zones that provide for high density housing. • Focusing high density housing in the MUZ zone close to the central city would promote transformational change to meet the needs of future residents in a location where there is no	future housing needs and affordability and the challenges of climate change. • It better recognises that the large central city mixed use area will be truly mixed use for the foreseeable future and most strongly recognises and supports the existing industrial and commercial activities that operate in this area. • Similarly, it encourages the suburban locations to be redeveloped into residential communities, consistent with their surrounding land uses. • The proposed standards for residential activity are not consistent with MDRS as prescribed in part 3 of Schedule 3A of the RMA. However, MDRS is not applicable to commercial zones and the standards contribute to the well-being of residents and are an important element of good design, therefore contributing to a well-functioning urban environment as sought by Objective 1 in clause 6 of Schedule 3A. Overall, this hybrid approach is considered to provide the most appropriate framework for facilitating the desired land use change, and for achieving the objectives and policies appropriate for the receiving environment. The proposed package of provisions is the most appropriate for implementing the NPSUD directions to intensify in the locations specified in policy 3 and contribute to a well-functioning urban environment that supports housing supply and diversity, competitive land and development markets, and a reduction in greenhouse gas emissions (policy 1).

▪ non-car dependent development that promotes active transport and supports carbon reduction goals. ▪ Add two new restricted discretionary activity rules for comprehensive housing development that meets, and does not meet, the built form standards, with relevant matters of discretion.	established residential amenity that could be adversely impacted. These areas offer significant capacity to accommodate change and improve the overall quality of the urban environment for both businesses and new residents. • Provisions provide clarity and certainty for development community, existing land uses and future residents about the intended built form and housing diversity outcomes sought – being an area identified for transition into a high quality, high density, more sustainable form of development over the long-term, based on an internationally proven perimeter block urban form. Refer to the following technical reports: • CCC, Potential Industrial Land Transition Assessment that assesses the appropriateness of industrial zones for potential redevelopment **(Appendix 4)** • CCC, Urban Design – Commercial which provides an overview of urban design matters both generally and specifically in terms of this zone **(Appendix 6)** • Sense Partners comprehensive Cost Benefit Analysis that concludes the benefits outweigh the costs in respect to the rezoning of inner city industrial land to enable housing intensification **(Appendix 7)**. • CCC, Urban Design Analysis of Comprehensive Housing precinct provisions that provides analysis that informed the proposed package of provisions **(Appendix 8)**	

Plan Change 14

Section 32: Appendix 1

Background to Central City Height and Density Controls

Christchurch City Council

Technical Report

Date: *18 July 2022*
Version:
Author:
Peer reviewed:

DISCLAIMER:

Christchurch City Council has taken every care to ensure the correctness of all the information contained in this report. All information has been obtained by what are considered to be reliable sources, and Christchurch City Council has no reason to doubt its accuracy. It is however the responsibility of all parties acting on information contained in this report to make their own enquiries to verify correctness.

This document has been prepared for the use of Christchurch City Council only. Copyright © 2022 by Christchurch City Council

Christchurch City Council

Introduction

The purpose of this report is to provide a summary of the context to the existing district plan height and density controls relating to commercial zones.

1. Pre-earthquake plan provisions

1.1.1 Prior to the CCRP[1], building heights in the Central City provided for heights of 60-80m in the 'frame' (the area around the inner edge of the Central City), 45m in the 'core' (to provide openness and sunlight for Cathedral Square), whilst the east and west fringes enabled 30-40m. A lower height limit of 20m applied to City South.

1.1.2 The pre-earthquake landscape included a number of tall buildings[2]. Approximately 50 buildings exceeded 30m in height and approximately 29 buildings had heights between 21m and 29m in the Central City. The tallest building was the 'Pacific Tower' on Gloucester Street at 86.5 metres (23 storeys), which still stands today. Approximately, 10-15 of the pre-quake buildings exceeded the current district plan permitted height limit of 28 metres.

1.1.3 The February 2011 earthquake damaged many of the City's tall buildings, leaving approximately 20 buildings above 35m in height.

[1] https://ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Historic-Plans/City/04-Pre-CCRP-Volume-3.pdf
[2] http://cccbeforeafter.digitalnewzealand.info/

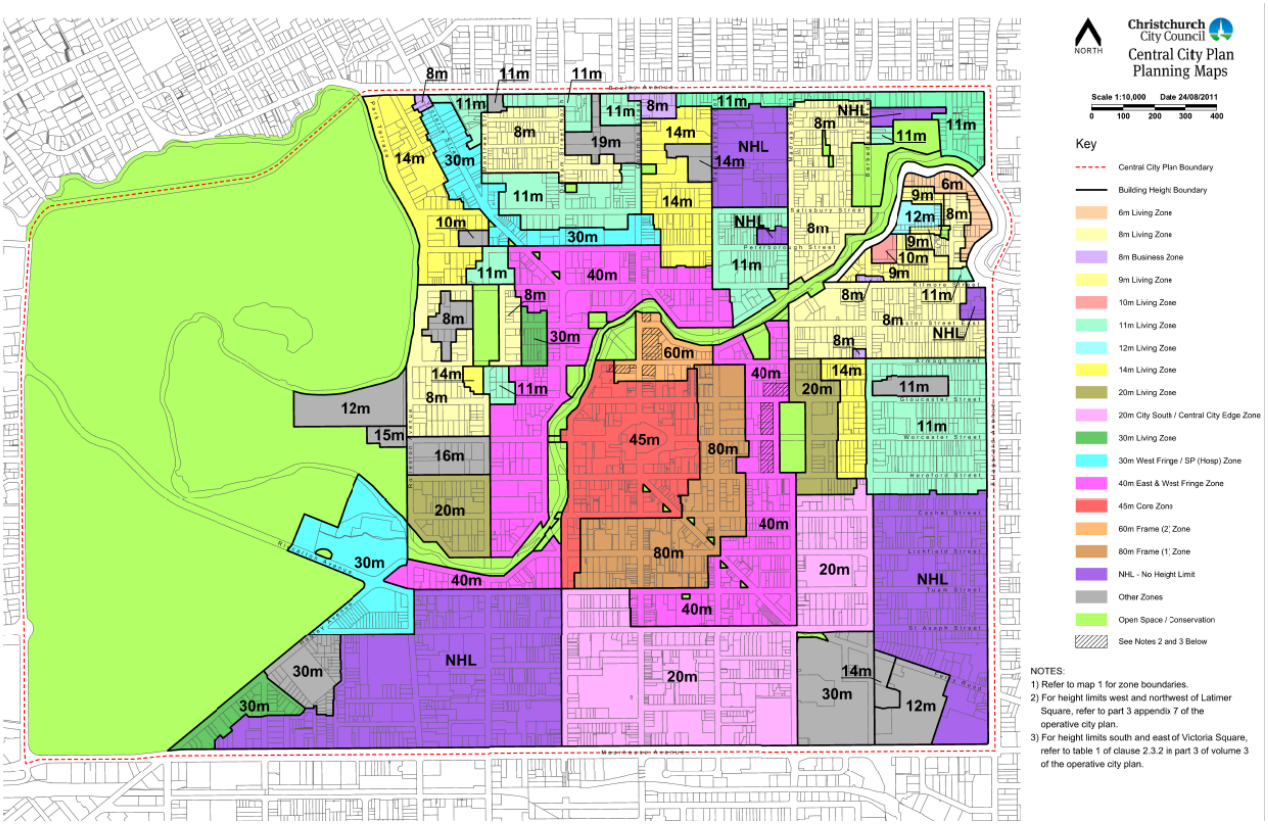


Figure 1: Christchurch City Plan Height Limits (pre-earthquakes)

2. Christchurch Central Recovery Plan

2.1.1 The CCRP recognised the changing landscape following the earthquakes and reconsidered the future urban form, scale and design of the city centre, including building heights. The key reasons cited in the CCRP for the current height limits are:

- Compact CBD – A key focus of the CCRP is to "consolidate a central area so it functions more effectively"[3]. This focuses retail, hospitality and office space in the inner core, to create vibrancy and greater amenity in the most walkable area of the Central City.

- Urban Design considerations – lower buildings are intended to encourage greater interaction with the surrounding street and public spaces. Acknowledging that public spaces are well-used when not shadowed by tall buildings and lower buildings reduce the adverse effects of tall buildings (shadowing and wind tunnels). Key streets and public places were considered to benefit from lower height limits (e.g. New Regent Street, Cashel Mall) as the streets have greater vibrancy and street level interaction.

- Safety - lower building heights were deemed to assist perceptions of safety in the Central City following the earthquakes. Lower buildings were also deemed less dominating and to have a better interaction with the surrounding street, to create a safe, accessible and welcoming place day and night.

[3] https://ceraarchive.dpmc.govt.nz/sites/default/files/Documents/christchurch-central-recovery-plan-march-2014.pdf

- Identity – it was thought that lower rise buildings would contribute to the creation of a unique identity for Christchurch, different from that of other large centres in New Zealand. A low-rise compact Central City which prioritises green spaces and walkways has its own distinct identity. A low-rise city is also at a scale that complements heritage buildings and mature trees.

Background – Christchurch Central Recovery Plan

2.1.2 The key focus of the CCRP was the inclusion of blueprint that sought to consolidate a central area of the Central City so that it would function more effectively. The spatial 'blueprint' was produced based on design principles aimed to address challenges identified in the wake of the Christchurch earthquakes.

2.1.3 Key points from the CCRP are set out below.

- The overall design concept was the development of a greener, more accessible city with a compact core and stronger built identity.

- It involved the definition of a new central city "core", and the provision of new green spaces along with the provision of a range of commercial and residential development opportunities.

- The purpose of the "Frame" was to reshape central Christchurch with its three components – East, South and North – each having its own distinct character.

- A key challenge facing the central city was deemed to be 'too much space' whereby the demand for commercial and retail space was assessed as being insufficient to fill the extent of vacant commercial land in the central city.

- It was considered that compressing the available land area through the 'frames' mechanism, would address the issue of too much space and potentially unconstrained development, whilst also adding high quality urban open space to the centre.

2.1.4 Five separate design principles were developed to address the identified challenges[4] including:

- 'Compress' – compress the size and scale of expected development to generate a critical mass in the core.
- 'Contain' – contain the core to the south, east and north with a frame.

2.1.5 The CCRP states at page 35 that,

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

2.1.6 A key statement with specific regard to building heights in the CCRP is that "*lower buildings will become a defining central city feature in the medium term … and that a lower rise city fits in with the community's wishes and takes into account of the economic realities and market demand for property in the core. It recognises the character and sensitivity of certain areas, such as New Regent Street, and reduces wind tunnels and building shade*.' (page 40)

2.1.7 The CCRP set out statutory directions aimed at enabling the opportunity to create a distinctive, vibrant and prosperous central city that encourages economic and emotional reinvestment to be realised. This comprised a number of amendments (contained in Appendix 1 of the CCRP) to the Christchurch District Plan. Of particular relevance, is the following statement on page 103 of the CCRP:

'In developing these amendments consideration has been given to enabling recovery in the immediate to medium term (up to 10 years)'.

2.1.8 Under the 'Statutory Direction to Amend District Plan' heading of the CCRP there is also a sub-section titled 'A consolidated central city business area' (page 103) which states that:

'Christchurch has traditionally had a geographically expansive CBD which, at times, has struggled to attract and retain workers, residents, shoppers and tourists. The operative District Plan effectively enables traditional CBD activities such as offices, retail activities, travellers' accommodation and the like to establish throughout a significant portion of the CBD. This has enabled activities to spread across an extended area resulting in pockets of low or no activity, significant ratios of lower grade, semi-occupied buildings and diminished amenity values which have in turn dis-incentivised residential occupation and development…'

The Recovery Plan seeks to address this by creating a consolidated Central City Business Zone that effectively encompasses an area of approximately 40 hectares – compared to 90 hectares of Central City zoned land in the operative District Plan.'

[4] CCRP, page 31.

2.1.9 Under the same heading above there is a section on page 105 relating to a 'lower rise quality built environment'. Under the subheading 'height of buildings', the following text is provided:

An important component in developing the framework for an active and vibrant city centre is determining how best to utilise the available land. Consolidating development opportunities in a central business area and reducing the height of buildings assists with an appropriate distribution of development activities across the available area. Lower buildings are less dominant, making streets more inviting and people friendly. Lower building heights also reduce the adverse effects of tall buildings (shadowing, wind tunnels and the like).

Despite these benefits, it is recognised that height limits have potential to affect the viability of development. This is particularly the case where development is required to optimise a small or unusually shaped lot due to the underlying (largely fragmented) ownership structure. It is self-evident that providing for uneconomic development defeats the goal of recovery.

Capacity and viability analyses together with urban design considerations have combined to inform new height limits for the Central City Business and Central City Mixed Use Zones as follows:

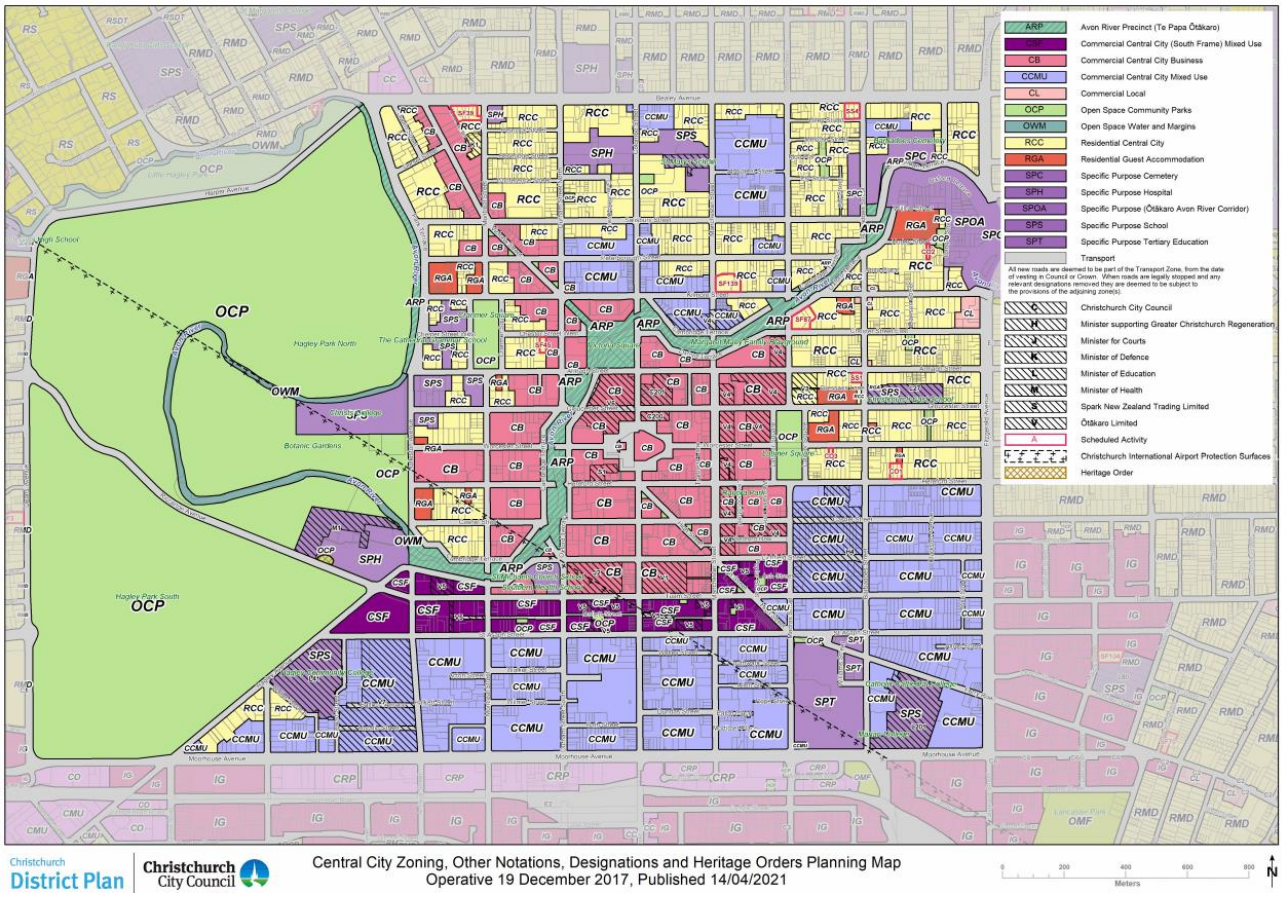
- *Central City Business Zone (Core) 28m*
- *Central City Business Zone (Gateway) 17m*
- *Central City Mixed Use Zone 17m*

These heights provide for 7 storey buildings in the Core and 4 storey buildings in the balance areas. Some exceptions to these height limits exist for particularly sensitive sites including the Mixed Use zones in the north adjacent to Living Zones and in New Regent Street where lower heights are required to ensure sunlight protection and/or reflect existing character. Developments which do not comply with the height limits are discretionary activities in the Central City Business Zone and restricted discretionary in the Central City Mixed Use Zone.

2.1.10 During the Christchurch District Plan review process, the CCRP provisions were largely rolled over into the new District Plan due to the CERA Act (and its successive legislation – the Greater Christchurch Regeneration Act) requirement that those with powers under the Resource Management Act 2991 must not make decisions inconsistent with the Recovery Plan. These functions and powers included decisions on resource consents, and preparing or changing planning documents. Most of the GCR Act has since been repealed (including, relevantly, s60) such that the directive to not be inconsistent with the recovery plan has fallen away.

Christchurch District Plan

2.1.11 Currently the Commercial Central City Business Zone permits buildings up to 28m high (with a 21 road wall height) with no site size (density) limitation. The Christchurch District Plan planning map (below) shows the range of land use zones across the Central City.



Christchurch District Plan | Christchurch City Council

Central City Zoning, Other Notations, Designations and Heritage Orders Planning Map
Operative 19 December 2017, Published 14/04/2021

2.1.12 The maximum building heights for the Central City are depicted in the map below and the relevant built form standards for residential and commercial zones with the Central City typically refer to this map albeit there are some exceptions and additional detail/restrictions provided – see below:

- Residential Central City Zone - the Central City Maximum Building Height planning map does not apply to the 3 specific sites where a maximum building height of 20 metres shall apply to buildings for a retirement village (refer 14.6.2.1).

- Commercial Central City Business Zone - 15.10.2.11 and 15.10.2.12 specify the maximum and minimum height of any building; and the maximum road wall height respectively as detailed by the below District Plan excerpt:

15.10.2.11 Building height

a. The maximum and minimum height of any building shall be as follows:

	Applicable to	Standard
i.	All buildings, except as provided for in ii. and iii. below.	The maximum height shall be in accordance with the Central City Maximum Building Height planning map
ii.	All buildings in New Regent Street	The minimum and maximum height shall be 8 metres.
iii.	All buildings at the Arts Centre, being land bordered by Montreal Street, Worcester Street, Rolleston Avenue and Hereford Street.	The maximum height shall be 16 metres.

15.10.2.12 Maximum road wall height

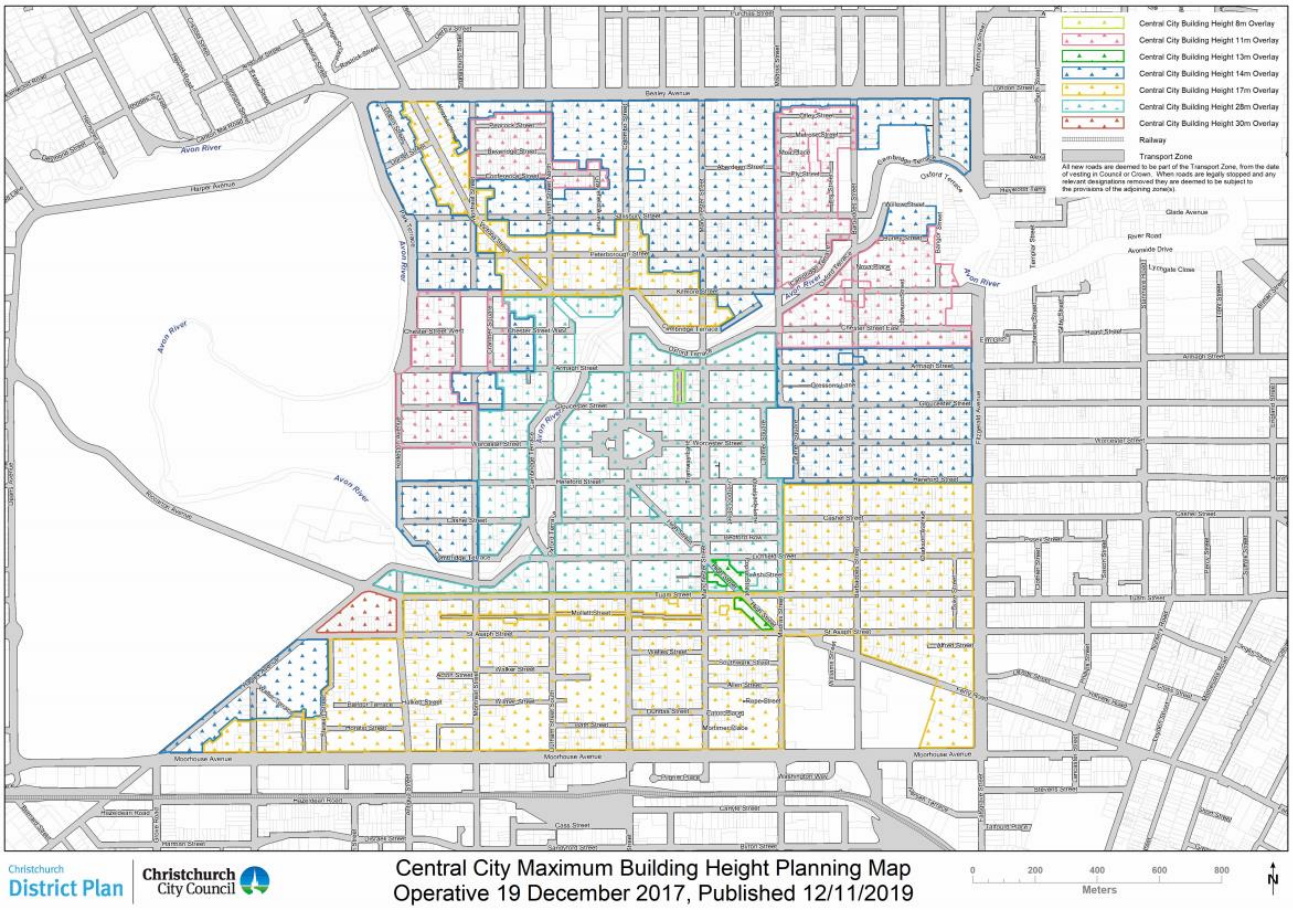
a. The maximum height of the road wall of any building shall be:
   i. 21 metres in the area subject to a 28 metre height limit on the 'Central City Maximum Building Height planning map' unless specified below.
   ii. 17 metres where the wall fronts the northern side of Cashel Street, between Oxford Terrace and High Street.

- Commercial Central City (South Frame) Mixed Use Zone: 15.12.2.1 specifies the maximum height of any building

15.12.2.1 Building height

a. The maximum height of any building shall be as follows:

	Applicable to	Standard
i.	All buildings	The maximum height of all buildings shall be in accordance with Central City Maximum Building Height planning map;
ii.	All sites where the maximum permitted height is more than 21 metres	The maximum road wall height shall be 21 metres, except that for Part Lot 1 Deposited Plan 11323, the 21 metres road wall height shall only apply to the Tuam Street road boundary;
iii.	All buildings	No building shall project beyond a recession plane of 45 degrees applying from the maximum road wall height and angling into the site.



Christchurch Replacement District Plan – evidence of key relevance

2.1.13 The following evidence was adduced for the Christchurch District Plan Review and provides additional useful context to the issue of building height in the Central City.

Evidence of Ken Gimblett (planning expert)

2.1.14 Ken Gimblett (Director, Boffa Miskell) was involved in developing the planning provisions to give effect to the CCRP and then provided continued assistance to CERA including developing subsequent planning provisions for the Central City.

2.1.15 In his evidence (on behalf of the Crown) dated 14 January 2016[5] before the Christchurch Replacement District Plan Hearings Panel[6], Ken Gimblett addressed a number of matters including the development of the Christchurch Central Recovery Plan (CCRP), and the background and intent of the CCRP provisions in the Replacement Plan to support earthquake recovery of central Christchurch. Dialogue of particular relevance is set out below:

- Acknowledgment that Christchurch has traditionally had a geographically expansive CBD, which at times has struggled to successfully attract visitors, workers and residents;

- With specific reference to building height, Mr Gimblett stated the following:

[5] Refer: http://chchplan.ihp.govt.nz/wp-content/uploads/2015/08/3721-Crown-Evidence-of-Ken-Gimblett-14-1-2016.pdf

[6] In the Matter of the Resource Management Act 1991 and the Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014, and Stage 3 of the Christchurch Replacement District Plan

6.12 An important consideration in the development of this framework for an active and vibrant CBD was how to promote effective utilisation of available land. Along with essentially reducing the spatial extent of the developable opportunity, this had a direct bearing on standards put in place to limit building height.

6.13 Pre-earthquake, the Operative Plan provided for a variety of maximum building heights, with up to 80 metres permissible in some parts of the CBD. Through the CCRP process it was determined that consolidating the area of development opportunity and generally reducing the heights of buildings would assist with achieving an appropriate distribution of development opportunities.

6.14 In seeking to achieve a lower rise quality built environment, the maximum height was set at 28 metres, or around 7 storeys[7]. Other influences in determining this height were factors such as reducing building dominance for pedestrians, minimising wind tunnelling and overshadowing impacts, and perhaps less so, a response to community perceptions of the apparent safety and desirability of taller buildings in the aftermath of the earthquake events.

6.15 An associated (lower) maximum road wall height standard was also imposed to limit development to 21 metres at the interface with the road and stepping back to the higher overall limit by way of recession plane control[8]. This was directed to controlling the effects of building dominance and shadowing of the street.

6.16 Given the significance of building heights to achieving the outcomes sought, the height standards (maximum building and maximum road wall height) were set as community standards whereby non-compliance triggered full discretionary activity status. Informed by viability and capacity analysis, the CCRP states that this approach was intended to achieve a distribution of activity without compromising economic viability.[9]

Evidence of Ian Mitchell (residential market expert)

2.1.16 In his evidence (on behalf of the Crown) dated 14 January 2016[10] before the Christchurch Replacement District Plan Hearings Panel, Ian Mitchell[11]addresses the trends in the central city residential market post-earthquakes together with discussion of the key market drivers and market outlook. Ian had been providing the Crown with his expertise in relation to the housing market in Christchurch since 2013. As part of his evidence, he interviewed most developers undertaking larger central city residential developments and asked about their perspectives on the central city market.

2.1.17 With respect to the existing planning environment established through the CCRP (and in the context of the central city residential market), most developers considered that it was permissive in light of current demand at the time and did not have a significant impact on the level of units that could be developed within a site. There were exceptions however, whereby two developers felt the height limits imposed altered the design and feasibility of their developments.

2.1.18 The conclusions that Mr Mitchell came to in his evidence are provided below (page 21 and 22):

Christchurch's central city will offer a significantly different living environment once the rebuild has been completed. The anchor projects and the proposed public amenities within the central city will provide a modern urban space in which people can live and work. However, there is a degree of uncertainty associated with the speed

[7] A lower 17 metres applying generally outside the Core in the balance areas of the CCBZ (Map 3 – Central City Heights)
[8] CCRP Appendix 1, Rule 2.3.2
[9] CCRP – Statutory Direction to Amend District Plan page 103.
[10] Refer: http://chchplan.ihp.govt.nz/wp-content/uploads/2015/08/3721-Crown-Evidence-of-Ian-Mitchell-14-1-2016.pdf
[11] Director at Livingston Associates Ltd., a niche consultancy company which provides property related advice.

at which the key public projects will be completed, the rate at which businesses will relocate with the central city business area and the strength of the underlying demand for residential units.

Christchurch's central city residential market will grow in size and diversity over the next decade. The rate at which it expands and replaces the stock lost in the 2010/2011 earthquakes will be influenced by a number of factors including the rate at which amenity is provided and anchor projects are developed…

Evidence of Marius Ogg (local valuation/property expert)

2.1.19 In his evidence (on behalf of the Crown) dated 14 January 2012[13] before the Christchurch Replacement District Plan Hearings Panel. Marius' evidence was provided to identify the market dynamics in the central city at that time and into the immediate future. In conclusion, Marius stated he felt positive about the progress and redevelopment of the city, in particular the CBD core, noting the significant amount of investment that had been made by the Crown, the Council and the private sector. Notwithstanding that, he opined that there remained some risks and challenges, particularly from a supply and demand perspective and the potential for isolated undeveloped pockets of land.

Anecdotal Feedback

2.1.20 Anecdotal discussions with planning and urban design practitioners involved in the development of the CCRP, provides some additional context, including reference to relevant commercial feasibility assessments undertaken to inform and assess the approach to central city building heights. This includes:

- A key consideration for the Blueprint consortia developing the masterplan for the central city for CERA was the anticipated demand-side for development and use of central city land. Ernst & Young's Commercial Market Property Study (May 2012) provided key analysis at the time – discussed further below. There was also associated work available on pre-earthquake commercial occupancy within the central city. See the section further below re. Colliers' advisory report titled 'Financial Feasibility of Building Development in the Christchurch CBD' (2011).

- Notably the idea of reduced (relative to the then operative city plan) central city building heights for central city commercial areas was introduced in the CCC draft recovery plan, which discussed creating more of a human scale to development, proposing max building heights of 31m in the Core, 21m in the Fringe and 17m in the Mixed Use areas of the CBD, along with more contextual limits in places such as the City Mall (sunlight) and New Regent Street (historic heritage).

- An important finding of the demand and supply side analysis undertaken for CERA was the apparent oversupply in comparing pre-earthquake developable opportunity vs. anticipated post-earthquake take-up of retail and commercial floorspace. The Blueprint and the CCRP both identified and responded to this. Guided by the Blueprint principles, the CCRP:
    - Sought to both compress and contain the commercial area of the CBD – i.e. better to reduce the available opportunity than face an 'incomplete' outcome.

    - Reduced the spatial extent of this area from some 90ha to 40ha – mainly through designating both the South and East Frames, essentially taking this land out of the supply side, and equally designating several large site for the anchor projects, having a similar effect.

[12] Refer: http://chchplan.ihp.govt.nz/wp-content/uploads/2015/08/3721-Crown-Evidence-of-Marius-Ogg-14-1-2016.pdf
[13] http://chchplan.ihp.govt.nz/wp-content/uploads/2015/08/3721-Crown-Evidence-of-Marius-Ogg-14-1-2016.pdf

- Enabled future outward expansion to be possible through the original park-like approach to the Frames – these areas essentially offered a future insurance or 'land bank' should there prove to be insufficient commercial or residential space – the underlying zonings and designated purposes allowed for both activities, and the designation tool meant there was no prescribed height limit (as was/is the case for the designated anchor project sites).

- Compressed the available opportunity by reducing the max permissible building heights (similar to the CCC draft recovery plan) landing on the even more simplified 28m and 17m areas. Remembering that in some areas the operative plan enabled up to 80m heights.

- As well as responding to the demand/supply analysis, at the time there were also other factors in the decisions taken on setting commercial building heights:

  - There was sensitivity to the community feedback received through the 'Share an Idea' process about people's anxiety about tall buildings, particularly those buildings that would not be new (post-earthquake) constructions.

  - Given what was emerging about buildings either lost or expected to have to be demolished, most of the remaining/surviving buildings were expected to be around 5-7 storeys or lower.

  - International experience suggested successful cities (economically and socially) were of this scale (e.g. the likes of Paris, Copenhagen, Amsterdam)

  - The designers in the Blueprint masterplan process (like the CCC) wanted a human scale and greater uniformity from an urban form perspective, while still maintaining overall central city primacy in the context of the city as a whole.

  - Contextual variations were still maintained in key areas, e.g. sunlight angle into the mall, etc.

CERA Christchurch Central City Commercial Property Market Study

2.1.21 In May 2012, the 'CERA Christchurch Central City Commercial Property Market Study'[14] prepared by Ernst & Young was released. The purpose of this study was to identify the projected supply and demand for commercial property (office, retail, hotel and hospitality), the attractiveness of commercial property to investors and developers and to analyse the financial viability of development.

2.1.22 The key elements of the study were - demand side analysis (involved collecting data from tenants and consumers through online surveys and interviews), supply side analysis (involved quantifying likely construction costs for various new commercial buildings in the Central City; and quantifying the likely yields and margins required by property owners and developers intending to develop in the Central City Area). Viability testing (using a Monte Carlo simulation technique to predict the level of rent that would be required for each of the identified building profiles) was also undertaken.

[14] The Canterbury Earthquake Recovery Agency (CERA) commissioned Ernst & Young (EY) to undertake this study. EY engaged Ocean Partners Limited, Colliers International Valuation Limited and Apollo Projects to assist with the study.

Financial Feasibility of Building Development in the Christchurch CBD

2.1.23 On 14 November 2011, Colliers International issued an advisory report titled 'Financial Feasibility of Building Development in the Christchurch CBD'. In the introduction it is stated that Beca and Colliers were engaged separately by CCC to provide building and property professional consultancy respectively for input into the Christchurch City Central Plan. The principal aim of the exercise was to determine the trends and viability of Council selected building heights and to provide informed input into the Central City Plan.

2.1.24 This report includes development feasibility of different building options that were undertaken as part of the development of the building height rules. It was considered then that the 'sweet spot' for maximising development profit was in the 4-6 storey range. The tallest building assessed was 12 levels. The Development Feasibility results section contains a summary of the valuation outputs measured in terms of development profit or margin and residual land value under each building option:

1) Option 1 – conventional podium / tower structure with basement parking and land size of 1,500sqm

2) Option 2 – conventional podium / tower structure without basement parking and land size of 1,500sqm

3) Option 3 - conventional podium / tower structure without basement parking and land size of 2,400sqm.

Development Feasibility Results – Option 1

Building	Profit Margin $	Profit Margin %	Land Value $	Land Value $ psm
4 Levels	$3,260,000	14.54%	$2,090,000	$1,393
5 Levels	$3,370,000	13.04%	$1,660,000	$1,107
6 Levels	$4,190,000	13.67%	$1,580,000	$1,053
7 Levels	$3,940,000	11.11%	$ 700,000	$ 467
8 Levels	$4,380,000	10.32%	$ 50,000	$ 33
12 Levels	$6,690,000	10.91%	($1,160,000)	($ 483)

Development Feasibility Results – Option 2

Building	Profit Margin $	Profit Margin %	Land Value $	Land Value $ psm
4 Levels	$3,250,000	16.85%	$2,550,000	$1,700
5 Levels	$3,650,000	16.36%	$2,400,000	$1,600
6 Levels	$4,990,000	18.75%	$2,760,000	$1,840
7 Levels	$4,630,000	13.84%	$1,500,000	$1,000
8 Levels	$5,130,000	13.30%	$1,150,000	$ 767
12 Levels	$6,720,000	11.55%	($ 610,000)	($ 254)

Development Feasibility Results – Option 3

Building	Profit Margin $	Profit Margin %	Land Value $	Land Value $ psm
4 Levels	$3,300,000	12.03%	$3,180,000	$2,120
5 Levels	$1,260,000	4.38%	$1,460,000	$ 973
6 Levels	$2,200,000	6.58%	$1,520,000	$1,013
7 Levels	$1,830,000	4.64%	$ 370,000	$ 247
8 Levels	$1,920,000	4.27%	($ 330,000)	($ 220)
12 Levels	$3,930,000	5.90%	($2,260,000)	($ 942)

2.1.25 The report concluded as follows:

It should be noted this analysis did not investigate the financial feasibility of building heights below 4 levels and above 12 levels. Historically buildings higher than 12 levels have been developed in Christchurch in isolated cases

although it is debateable whether any of these buildings have even been an economic success from a development perspective.

The financial analysis indicated a positive development profit margin (after holding costs) of between 4.26% and 18.75% of total cost under the 18 different "model" buildings. A development profit margin at or greater than 20.00% is generally an aspirational target for developers although in reality many will only achieve between 10.0% and 20.00%.

The Option 2 analysis produced the most attractive feasibility results where the development margin ranged from 11.55% for the 12 level building and 18.75% for the 6 level building. There was a tight development margin for the Option 2 Level 4 to Level 6 buildings and then the development profit margin reduced gradually for the Level 7 building and above.

The Option 2 building configuration (without basement and a land area of 1,500 square metres) is the most efficient in terms of the build cost and land utilisation. The Option 3 building configuration (without basement and a land area of 2,400 square metres) is the least efficient.

The financial analysis indicated a similar pattern in terms of indicated residual land value which declined sharply as building height increased above 6 levels.

In summary the Option 2 building financial analysis indicated that buildings of 4 to 12 levels are feasible, although only marginally and only after achieving new post-earthquake rent levels. In the current market environment, the analysis indicated the optimum building height.

3. Background to current tenancy limits – office and retail

3.1.1 The District Plan contains limits on tenancy sizes for commercial activities in a number of locations in order to support the centres-based commercial framework and in particular to give primacy to the Central City, recognising its role as the principal employment and business centre for the City and surrounding area.

3.1.2 In summary, office tenancy sizes are limited in both centres outside the City Centre and the Central City Mixed Use zone to encourage larger offices to locate in the Commercial Central City Business Zone. Retail tenancy sizes are also limited in neighbourhood and local centres and the Central City Mixed Use zone to encourage large floorplate retail activities to locate in higher order centres i.e the District Centres and CBD.

3.1.3 Further detail about the office tenancy limits is set out below.

Office Limits - Background

3.1.4 The District Plan contains a maximum tenancy size of 500sqm GLFA (Gross Leasable Floor Area) for office activity in the following locations:

- All District Centres plus New Brighton and Barrington (all KAC's).
- The Commercial Retail Park zone at Langdon's Road.
- The Industrial Park (Tait Campus) and (Awatea) zones

3.1.5 The limit on office tenancy size supports Objective 15.2.2 (Centres-based framework), Policy 15.2.2.1 (Role of Centres) and Objective 15.2.5 (Diversity and Distribution of activities in the Central City). The limit on office space in the suburban centres, retail park zone and industrial zones ensures that primacy is provided to the Central City and further supports the recovery of the city centre post-earthquake, both important directions in the Canterbury Regional Policy Statement (CRPS).

3.1.6 The threshold of 500sqm was determined as office requirements greater than this typically accommodate businesses that serve a much wider city, national or international function, and these activity types would both encourage and stimulate the recovery of the central business zone, aside from the economic advantages that these businesses contribute to the economy from location in the Central Business District[15].

3.1.7 Evidence[16] provided during hearings for the District Plan summarised the issue of dispersed business activity in a post-earthquake environment and the potential effect of this on the City Centre and wider economy.

A change perpetuated in the Christchurch economy post-earthquake is the decentralisation of business activity (specifically commercial) from identified centres. This dilution of activity will have long-term impacts upon the competitiveness and economic prosperity of the Christchurch community. This change is not simply an effect of the loss of substantial capacity from the CBD as a result of the earthquakes. This trend had been of concern for at least 10 years prior. In 2000, the CBD accounted for 53% of commercial activity within the City. By 2010, this figure had fallen by over 20% to under 41%. The competitive deterioration of the CBD has diverted commercial activity throughout the City with commercial activity now becoming increasingly dispersed throughout Christchurch.

The key issue that is of concern within the Christchurch economy is the undermining of the wider competitive influence of the CBD and the fact that loss of activity from this, and other centres, is likely to reduce Christchurch's economic competitiveness as a City resulting in a fall in community well-being. Economic benefits to the Christchurch economy with regard to the Central City are dependent on critical mass (and effective density) that produce improve overall productivity.

3.1.8 The decision[17] in respect of the maximum office tenancy, concurred that,

The weight of the evidence satisfies us that imposing a maximum tenancy cap on offices in KACs and those two Industrial Park zones would support the recovery of the CBD. The evidence directly pertains to our task in giving effect to the CRPS. In particular, we refer to CRPS Objective 6.2.5. The evidence suggests that, without a cap on maximum tenancy size of offices, there is some greater risk of development and distribution of offices in KACs and Industrial Parks that could otherwise go to the CBD. That would pose an associated risk of adverse impacts on the CBD of the kind noted in CRPS Policy 6.3.1.

In addition, the evidence demonstrates that imposing a cap would not impose a significant cost on the KACs. Mr Ogg explained that very few of the centres around Christchurch actually have reasonable office offering and, particularly pre-earthquake, there were considerable vacancies. When asked about the capacity of Northlands and Merivale Malls to develop, Mr Osborne explained that any capacity they had would more likely be taken up by retail than by office

[15] http://resources.ccc.govt.nz/files/TheCouncil/policiesreportsstrategies/districtplanning/districtplanreview/Appendix8.3-PropertyEconomicsReport.pdf contained within http://resources.ccc.govt.nz/files/policiesreportsstrategies/dpr_section32_for_tenancy_maximum_for_offices2016v2%20.pdf
[16] http://www.chchplan.ihp.govt.nz/wp-content/uploads/2015/08/3723-CCC-Central-City-Phil-Osborne-Evidence-Economics-17-12-20151.pdf
[17] Decision 55, Chapter 15 Commercial (Part) and Chapter 16 Industrial (Part): Proposal for a 500sqm Gross Leasable Floor Area Maximum Tenancy for Offices

uses. These factors indicate to us that imposing an office cap in centres would not likely restrict developers much beyond the existing market conditions.

In addition, Mr Bartlett indicated that AMP [AMP Capital Property, owners of the Belfast/Northwood SupaCentre] was not interested in extending significant offices at Styx. In regard to Commercial Retail Park zone north of Langdon's Road, we received only minimal evidence. The Joint Statement expresses the joint views of Messrs Stevenson and Chrystal that "the office allocation reflects development which is currently permitted, consented or occurring on the site". As for the two Industrial Park zones, we accept that we do not have any evidence as to the implications or otherwise of the imposition of a maximum tenancy cap for any current or prospective development in those areas. We also accept the evidence that a 500m² cap would continue to allow for suburban suppliers, such as small accountancy or legal firms (the typical "mum and dad" firm), to be able to establish within suburban centres. In terms of the s 32 requirement that we assess benefits and costs, and the risks of acting or not acting, we find on the evidence that the balance favours the imposition of a cap.

Plan Change 14

Section 32: Commercial Appendix 2

Approach to Alignment with National Planning Standards

Christchurch City Council

Technical Report

Date: *3 August 2022*
Version:
Author: Jac Chester
Peer reviewed:

DISCLAIMER:

Christchurch City Council has taken every care to ensure the correctness of all the information contained in this report. All information has been obtained by what are considered to be reliable sources, and Christchurch City Council has no reason to doubt its accuracy. It is however the responsibility of all parties acting on information contained in this report to make their own enquiries to verify correctness.

This document has been prepared for the use of Christchurch City Council only. Copyright © 2022 by Christchurch City Council

1. Commercial Chapter: National Planning Standards Alignment

1.1. Summary of Findings

1.1.1. The implementation of Policy 3 of the National Policy Statement on Urban Development requires an intensification response for a range of commercial centres. The types of centres where intensification should be enabled are specified in Policy 3, by reference to the named zones in the National Planning Standards zones.

1.1.2. The current commercial chapter of the District Plan does not reflect the zone terminology used in the National Planning Standards and therefore, in order to meet the direction of Policy 3, it is necessary to align the current commercial framework with National Planning Standards. Section 1.4 of the NPS UD notes that local authorities, in aligning zones, should refer to the 'nearest equivalent zone'[1]. This requires analysis of the current centre descriptions, roles and zoning framework in order to determine an appropriate alignment response.

1.1.3. In summary this report notes that the current District Plan centres hierarchy enables alignment to the National Planning Standards zoning framework. The following table summarises in broad terms, the proposed alignment approach (noting that there are some additional nuances in terms of alignment/'equivalence' which are outlined in this report's conclusions.)

Table 1: Proposed Alignment Approach

Current Centre (as per District Plan)	Zoning	National Planning Standard Equivalent	Zoning
Central City	Central City Commercial Business	City Centre	City Centre zone
N/A	N/A	Metropolitan Centre	Metropolitan Centre
District Centre	Commercial Core and in some cases Retail Park	Town Centre	Town Centre
Neighbourhood Centre	Commercial Core or Commercial Local	Local Centre	Local Centre
Local Centre	Commercial Local or Commercial Banks Peninsula (Lyttelton only)	Neighbourhood Centre	Neighbourhood Centre or Commercial Banks Peninsula (Lyttelton only)
Retail Park	Commercial Retail Park	Large Format Retail Centre	Large Format Retail Centre

1.1.4. Policy 3d also requires an assessment in terms of 'the level of commercial activities and community services' within town, local and neighbourhood centres. This is in order to determine a 'commensurate' response in terms of the building heights and density of urban form enabled in and around these zones.

1.1.5. This work has drawn upon the existing hierarchy of centres in the District Plan and an understanding of the scale and range of activities within this hierarchy, in order to provide a commensurate response to enabling additional intensification within and around the centres.

[1] Section 1.4, (4)(b) of the NPS UD 4(b)

1.1.6. The table below recognises the Council's broad approach. Again, this report's conclusions recognise some further nuance in terms of category tiers (pertaining to scale and range of activities) which are reflected in the Council's proposed intensification response (see residential Section 32).

Table 2: Proposed 'Level of Commercial Activities and Community Services' across centres hierarchy

Centre	Role of centre	Range of commercial activities & community services	Catchment	Commensurate response to building heights and density	
Central City	Main centre for district or region	Broad range plus recreational & residential activities	District/Regional		Apply widest catchment and highest heights.
Metropolitan	Focal point for sub-regional urban catchment	Broad range plus recreational & residential activities	Sub-regional		Apply wide catchment and minimum 6 storeys.
Town	Meet the needs of the immediate & neighbouring suburbs	Range plus recreational & residential activities	Immediate & surrounding suburbs		Apply catchment and height depending on scale of centre
Local	Meet the needs of the residential catchment	Range plus recreational & residential activities	Residential		Apply catchment and height depending on scale of centre
Neighbourhood	Meet the needs of the immediate residential neighbourhood	Small scale commercial and community	Immediate residential		MDRS commensurate with scale of centres

2. Purpose

2.1.1. This report outlines the process and analysis undertaken in regards to aligning the current District Plan centres framework with that identified in National Planning Standards. This is a piece of work that has been required as a result of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021, which amended elements of the National Policy Statement on Urban Development (NPS UD) 2020 relevantly, Policy 3.

2.1.2. The NPS UD and new legislation refer to the National Planning Standards. The Christchurch District Plan does not currently refer to the National Planning Standards zone framework. Christchurch City Council was given seven years from the date that the planning standards came into effect (in November 2019) to comply with the mandatory zone framework standard.[2]

2.1.3. Whilst this deadline is therefore not immediate from a National Planning Standards perspective, the fact that the NPS UD (which needs to be implemented in 2022) refers to the National Planning Standards means that there is a need for Council to adopt those relevant to the NPS UD alignment work stream.

2.1.4. This report will identify the method by which Council has determined Christchurch's equivalent zone[3] in relation to those National Planning Standard zones identified in Policy 3 of the NPS UD (see 3.1.7 – 3.1.9 for text re: 'equivalence'). Those zones highlighted in bold are of relevance to this work.

Policy 3: *In relation to tier 1 urban environments, regional policy statements and district plans enable:*

a) in **city centre zones**, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; and

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

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

(i) existing and planned rapid transit stops

(i) the edge of city centre zones

(ii) the edge of metropolitan centre zones; and

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

2.1.5. In relation to Policy 3d, Tier 1 Councils must assess the level of commercial activities and community services within centres in order to determine a 'commensurate' intensification response. This assessment has drawn on the extensive data that Council collates in relation to the centre zones in order to provide a reasoned basis for the Council's intensification response within and adjacent to centres.

2.1.6. In summary therefore, this report will outline the Council's response to these key matters:

- What is meant by City Centre, Metropolitan, Town, Local and Neighbourhood zones?
- What is considered to be a response that is 'commensurate with the level of commercial activity and community facilities'?

[2] https://environment.govt.nz/assets/Publications/Files/national-planning-standards-november-2019.pdf

[3] [3] NPS UD 1.4 (4) Implementation

3. Background

3.1.1. The operative District Plan approach to managing commercial activity is recognised as the 'centres based framework'. Essentially this approach directs new commercial activity into a network of commercial centres and manages it elsewhere. The key outcomes sought by this approach are to:

- Support a compact and sustainable urban form that provides for the integration of commercial activity with community activity, residential activity and recreation activity in locations accessible by a range of modes of transport.
- Enable the efficient use and continued viability of the physical resources of commercial centres, promoting their success and vitality, reflecting their critical importance to the local economy.

3.1.2. Each centre is identified within a centres hierarchy based on the intended role of each centre and the catchment area the centre serves.

CENTRE	PRINCIPAL CATCHMENT	APPROX. SIZE	ACTIVITIES	ZONING
Central	City, region and visitor	+100,000m2	Full Range	Central City Business Central City Mixed Use Central City Mixed Use (South Frame)
District	Sub-City and Region in some cases (e.g. Riccarton)	+30,000m²	Full range Office sizes limited <500m²	Commercial Core, Commercial Retail Park (Hornby, Belfast and Papanui)
Neighbourhood	Several suburbs	3,000m²-30,000m²	Full range Office / Retail sizes limited <500m²	Commercial Core Commercial Banks Peninsula
Local	Surrounding streets / suburb	Up to 3,000m²	Convenience based Office / Retail sizes limited <250m²/350m²	Commercial Local Commercial Core (supermarkets)
Large Format	City, region	various	Limited range 450m² GLFA	Commercial Retail Park Zone

3.1.3. Primacy is given to the central city and key activity centres (namely all district centres and the neighbourhood centres of New Brighton and Barrington). This primacy is given effect to by controls around:

- Overall size of the commercial zone (e.g. higher order centres have larger commercial zones),
- The range and type of activities permitted in the centre (e.g. higher order centres permit a wider range of activities); and
- The scale of activity permitted (e.g. higher order centres permit taller buildings and office and retail tenancy limits are in place outside the Commercial Central City Business Zone) (see Appendix 1).

3.1.4. The benefits of this approach are that it:

- Enables an economically efficient distribution of centres with less overlapping catchments;
- Facilitates agglomeration or spill over benefits;
- Provides certainty for private investment;
- Enables efficient public investment (e.g. public transport, streetscape works etc.)
- Is good for consumers (accessible / enables comparison shopping and linked trips)
- Supports medium density housing; and
- Protects industrial land.

3.1.5. Significantly, the centres based approach promotes intensification of centres (i.e. development within existing commercial zone boundaries) rather than consolidation (which would support growth both within and increasingly outwards of the zone boundaries) or dispersal.

3.1.6. The current centres based framework comprises a commercial hierarchy of centres with policy objectives that generally align with those of the NPS UD. As noted previously, the issue is therefore largely one of 'equivalence'[4] in terms of the alignment between Christchurch District Plan commercial centres and National Planning Standard commercial centres.

Equivalence

3.1.7. Where a Council has not yet implemented the zone framework into their plan as per Standard 8 of the Planning Standards, it is necessary (for those Councils) to apply an approach that seeks to identify the 'nearest equivalent zone' in order to provide the direction required by the NPS UD.

3.1.8. In determining the 'nearest equivalent zone' Council has sought to assess both the range of activities at each category of centre (both actual and plan enabled) and the catchment, in line with the 'limbs' as outlined within each definition of centre as per the National Planning Standards framework (Limb 1 identified the range of activities and Limb 2, a description of the catchment).

3.1.9. It is considered that the NPS UD directs the identification of one zone as it refers to the nearest equivalent zone, singular, rather than plural and as such, means that, for example, multiple zones could not collectively be identified as the City Centre zone.

[4] NPS UD 1.4 (4) Implementation

4. Issues and Approach to Assessment

4.1. National Planning Standards Alignment

How do we determine whether we have zones equivalent to City Centre, Metropolitan, Town, Local and Neighbourhood zones?

4.1.1. The commercial zone framework within the Christchurch District Plan identifies a hierarchy of centres - District Centres, Neighbourhood Centres and Local Centres. Some of the larger centres are also identified as Key Activity Centres (as identified in the Canterbury Regional Policy Statement). The District Plan zoning of these centres is Central City Business Zone, Commercial Core, Commercial Local or Commercial Banks Peninsula and there are also some areas of Commercial Retail Park zoning that are included within several of our centres.

4.1.2. The District Plan identifies that Christchurch's network of centres gives primacy to the Central City followed by District Centres and Neighbourhood Centres identified as Key Activity Centres. Local centres are the smallest commercial centre and are not afforded protection within the Plan. These are often spot zones of a single service station or a dairy.

4.1.3. National Planning Standards offer a range of Commercial zones and it is for the individual Council to determine which are most appropriate for their locality. The Planning Standards zone descriptions make it clear that a number of the zones align to a centres hierarchy (marked with an *). As such, the following range of zones is available for Council to select:

- City Centre zone*
- Metropolitan Centre zone*
- Town Centre zone*
- Local Centre zone*
- Neighbourhood Centre zone*
- Large format retail zone
- Commercial zone
- Mixed Use zone

4.1.4. An early approach to alignment identified the following preferred option for Christchurch's centres and this has been used as the basis for further assessment:

Current Centre (as per District Plan)	National Planning Standards Equivalent
Central City	City Centre
District Centre	Metropolitan Centre or Town Centre
Neighbourhood Centre	Town centre or Local Centre
Local Centre	Neighbourhood Centre

4.1.5. The alignment considerations for each of these centre categories is discussed in more detail in the following sections.

4.2. City Centre

4.2.1. The NPSUD requires that building heights and density be enabled in city centre zones "to realise as much development capacity as possible, to maximise the benefits of intensification" (unless a qualifying matter applies, Policy 3).

4.2.2. In Christchurch, because we have not yet implemented the National Planning Standard's zone framework standard, we do not have a 'City Centre zone'. The City Centre zone is described in National Planning Standards as:

"Areas used predominately for a broad range of commercial, community, recreational and residential activities. The zone is the main centre for the district or region."

4.2.3. There are three main options for defining the City Centre zone:

1) All of the land within the four avenues (as per the broad definition of central city in the Christchurch District Plan).
2) All of the commercial/business zones within the four avenues, that is, the Commercial Central City Business zone (CCCBZ) and the Commercial Central City Mixed Use Zones (CCCMU), including the South Frame.
3) The Commercial Central City Business Zone (CCCBZ).

4.2.4. The Planning Standard zones are clearly commercial centre zones and in the case of the City Centre zone, it is a zone that is used predominantly for a broad range of commercial, community, recreational and residential activities. On that basis, we do not consider it appropriate to define the City Centre as all zoned land within the four avenues as this in particular includes the Residential Central City zones that do not permit anything other than very small-scale non-residential activities.

4.2.5. The second option has some merit in that it recognises the mixed-use zones adjoining the CCCBZ. However, whilst the CCCMU zone provides for a variety of uses, the scale and range of retail and office activities is limited to support the primacy, recovery and regeneration of the principal commercial area of the CCCB Zone.

4.2.6. In addition, and contrary to Options 1 and 2 above, is that the NPSUD appears to direct the identification of only one zone, because it states the 'nearest equivalent zone'- singular, rather than plural. This is reinforced by the language of Limb 2 that also refers to a singular zone. Any interpretation that involves more than one zone would therefore, in our view, be more difficult to support.

4.2.7. That leaves Option 3 – the CCCBZ. Council has recently decided to adopt Plan Change 5B to the Christchurch District Plan, which, amongst other changes, clarifies that the city's principal commercial centre is the CCCBZ. The need for this plan change was identified prior to the NPSUD coming into force, to assist with implementation with the plan's centre's based framework (i.e. by clarifying what the central city commercial centre is). The approach in Plan Change 5B is supported by Objective 15.2.6 that states that the CCCBZ is to "redevelop as the principal commercial centre for Christchurch District …".

4.2.8. It is therefore reasonable to use this as the equivalent City Centre zone for the purposes of implementing the NPSUD. The CCCB is a large zone where the broadest range and scale of activities is enabled and where many of the existing activities that serve the sub-region and region, are located. This includes the Canterbury Museum, the Convention Centre, the Art Gallery, the Town Hall and Performing Arts Precinct.

It is also the primary commercial employment node for the City, where many of the country's most high profile legal, financial and other firms are located. Thus, both of the limbs[5] to the definition are met.

[5] Limb 1 relates to the range of activities and Limb 2 relates to the catchment of the centre. In the case of the Central City, there is a broad range of activities and the catchment is the district or region.

4.3. Metropolitan Centres

4.3.1. National Planning Standards describe a Metropolitan Zone as *"an area used predominately for a broad range of commercial, community, recreational and residential activities. The zone is the focal point for the sub-regional urban catchment".* This explanation is also repeated in the Spatial Layers Guidance for the National Planning Standards Zone Framework[6] with additional comment noting that:

"The main centre in a district or region is likely to have the 'city centre zone' applied to it. Depending on the local circumstances of the district or region, metropolitan or town centre zones should be applied to secondary commercial and mixed-use areas. This could be in a neighbouring city. District plans should recognise and manage the real-world functions and hierarchy of metropolitan areas, and not just the administrative boundaries of a district or city".

4.3.2. The NPS requires that within a Metropolitan Zone, building heights and density of urban form should reflect demand for housing and business use in those locations and in all cases, of at least 6 storeys.

4.3.3. There has been considerable assessment undertaken in Christchurch to determine whether any District Centres meet the threshold for being a Metropolitan Centre. This was based on exploring the two limbs of the definition of a Metropolitan Centre in the National Planning Standards. Both are relevant when determining whether any zones in the District Plan meet the Planning Standards Zone description. Specifically, the two limbs are:

- Limb 1 - Areas used predominantly for a broad range of commercial, community, recreational and residential activities; and
- Limb 2 - The zone is a focal point for a sub-regional urban catchment.

4.3.4. Both limbs have interpretation issues as discussed in the assessment below. Appendices 1-3 provide analysis relating to interpretation of Limb 1 and 2.

4.3.5. In terms of Limb 1, an issue arising is whether the zone needs to enable the stated range of activities or whether these activities must actually be present 'on the ground'. Another issue is the meaning of "a broad range of (…) activities", particularly in contrast to Town centre zones which only refer to a range of activities (not a broad range). Finally, 'sub-regional urban catchment' is not a defined term, so there is an issue as to its meaning.

4.3.6. Guidance issued by MfE[7], although not legally binding, says that local authorities should rely on the zone descriptions and intent in the standards and compare and align this with their current zoning to work out what the nearest equivalent zone is.

4.3.7. The Council has considered these issues in two ways. Firstly, we have reviewed our existing zone descriptions to determine whether there are any nearest equivalent zone. Secondly, we have assessed the centres afresh, to consider whether they provide for the specified range of activities and role / catchment.

[6] https://www.mfe.govt.nz/sites/default/files/media/RMA/guidance-for-zone-framework-and-district-spatial-layers-standards.pdf, page 9

[7] Guidance for District Spatial Layers Standard and Zone Framework Standard.

Christchurch District Plan - Commercial Centre Zones

4.3.8. Outside the Central City, the District Plan only has two commercial zones – the Commercial Core and Commercial Local zone. The District Plan's description of the Commercial Local zone[8] clearly does not meet the definition of a Metropolitan centre zone; given that the purpose of that zone is to provide primarily for small-scale convenience activities to serve a catchment accessible by walking and cycling. In some cases, the extent of this zone is limited to a single service station.

4.3.9. This leaves the Commercial Core zone that applies to over 30 suburban centres classified as either neighbourhood or district centres in the District Plan. These centres vary widely in size and function, from small-scale ribbon retail development (e.g. Colombo/Beaumont) to larger centres featuring significant shopping malls and main street retail precincts (e.g. Riccarton). The range, depth and quality of the offer in these centres (and therefore their catchment reach) also varies markedly.

4.3.10. Having regard to the Metropolitan centre zone definition, and in particular to the second limb of that definition which expresses its role and catchment, it is clear that only the larger centres could perform that higher order role. The seven district centres are larger and therefore have a greater depth to the range of activities enabled and established in the centre when compared with (most) neighbourhood centres.

4.3.11. Further enquiry is however required to determine whether these centres perform, or are likely to perform, the role of a 'Town centre' or 'Metropolitan centre' as defined in the National Planning Standard. This enquiry has necessitated an assessment of the centres against the two limbs of the definition.

Assessment of Limb 1 – Broad range of activities

4.3.12. Metropolitan centre zones, like City centre zones, are intended to be those areas used predominantly for a broad range of activities. This contrasts with just a range of activities that are anticipated in Town centres, the next centre down in the centres hierarchy. It is unclear how to make a distinction between a broad range compared with just a range of commercial, community, recreational and residential activities in order to enable an assessment of whether our existing centres meet Limb 1 of the definition. The NPSUD guidance material[9] states that a range of services should be thought of as "…a variety of commercial and community services that serve the needs of the catchment…". No guidance is given on how the term "a broad range" should be interpreted.

4.3.13. One important guide to interpretation is that Metropolitan and City centres are deemed to enable (and therefore intended to provide), a similar (broad) range of activities i.e. what one might expect to see in a City centre zone, we would be expected to occur in Metropolitan centres. This view is supported by the commentary provided by Auckland Council and MfE in the context of the drafting of the National Planning Standards, where it is clearly anticipated that Metropolitan centres go beyond just providing for retail and small-scale offices and services to include other activities of more-than-local significance. Cited examples include tertiary education, head offices, high quality public spaces and high quality public transport. The higher order function of Metropolitan centres makes sense in a sub-regional context where it is reasonable to expect that the centres in remote or distinctly separate catchment areas would

[8] Policy 15.2.2.1 – Role of centre

[9] https://www.mfe.govt.nz/sites/default/files/media/Towns%20and%20cities/Understanding-and-implementing-intensification-provisions-for-NPS-UD.pdf, page 35

look to provide for a wide spectrum of activities, to support their community's social, economic and cultural needs.

4.3.14. Even though Auckland Council and MfE have provided useful additional information about the differences between a Town centre and a Metropolitan centre zone, assessment of the type, quality and scale of activities to which they refer, is not possible under Limb 1 of the definition. This is because we can only assess the zone provisions in terms of the broad categories that are included/enabled in the district plan e.g. education, offices, community facilities and open space. That is, the plan does not specify tertiary education or the type of offices (head offices) or the scale and type of community facilities and open space. More detailed consideration of the sub-type of activities (and their quality and scale) is a matter that falls to Limb 2 to consider. That is, Limb 2 can consider whether these broader facilities and activities exist or are planned for these centres, such that they do, or will, act as a focal point for a much wider or distinct sub-regional urban catchment.

4.3.15. To conclude on this Limb, the analysis in Appendix 2 shows that the plan-enabled range of activities is broadly the same for all the district and neighbourhood suburban centres zones i.e. the plan-enabled range of activities is not a distinguishing feature between centres and therefore Limb 1 is not conclusive in analysing whether we have any equivalent zones.

Limb 2 – Role and Catchment

4.3.16. The second limb (i.e. the intended catchment) arguably provides more of a point of difference but is also unclear. It is evident that there is a hierarchy between the centres, with the City centre zone serving the largest catchment (which could include visitors from the region and beyond), the Metropolitan centres serving a 'sub-regional urban catchment', town centres primarily serving immediate and neighbouring suburbs, and local and neighbourhood centres serving more localised needs. It is, however, uncertain what a 'sub-regional urban catchment' means, which is a defining feature of a Metropolitan centre zone.

4.3.17. What is clear is that it appears to mean different things to different people and organisations. Some local authorities have traditionally used the term to refer to commercial centres that serve a more-than-local resident retail spending population. Recent advice from a retail consultant[10] indicated that it could be viewed as a proxy for the size of a centre i.e. "the larger the centre, the higher the retail sales, the broader the employment base and the wider the centre would draw shoppers and employees"[11]. Auckland City though, has Metropolitan centres[12] identified in its Unitary Plan that range in size from 30,000sqm to over 100,000sqm, i.e. size is not the defining feature. The Property Council classifies sub-regional shopping centres as medium-sized shopping centres ranging between 10,000 and 30,000 sqm[13] For comparison, Christchurch's district centres range in size from 30,000sqm to over 100,000sqm as shown on the table below with Papanui, Riccarton and Hornby being significantly larger than other district centres.

[10] Property Economics, October 2020

[11] That same consultant advised that size on its own would not be a defining characteristics for a metropolitan centre, but that its broader employment base was similarly important, particularly office based employment

[12] Defined prior to the NPSUD coming into effec

[13] Property Council (2013) Directory of Shopping

District Centre	Centre Size (sqm)	Retail Floor space (sqm)
Riccarton	97,300	73,900
Papanui/Northlands	116,500 (excl Northlink)	70,400
Hornby	87,800	70,800
Linwood/Eastgate	35,900	33,705
Belfast/Northwood	31,900	28,100
Shirley/The Palms	39,100	37,000
North Halswell	NIL	NIL

Christchurch District Centre Size

4.3.18. While the relevant term is not defined, the Council has taken the view that "is the focal point for sub-regional urban catchments" means that the centre in question is a main "drawcard" for people living in urban areas located in more than Christchurch (being local). This could include Akaroa, but is something less than "regional" (being all of Canterbury). The draw needs to be in relation to all the activities listed in Limb 1, not just commercial/retail activities. This limb requires a wider assessment than the zone provisions and can include consideration of how the centre operates in the market.

4.3.19. These parameters have been useful reference points for the Council in assessing each of our current commercial centre zones against the Metropolitan Centre zone definition.

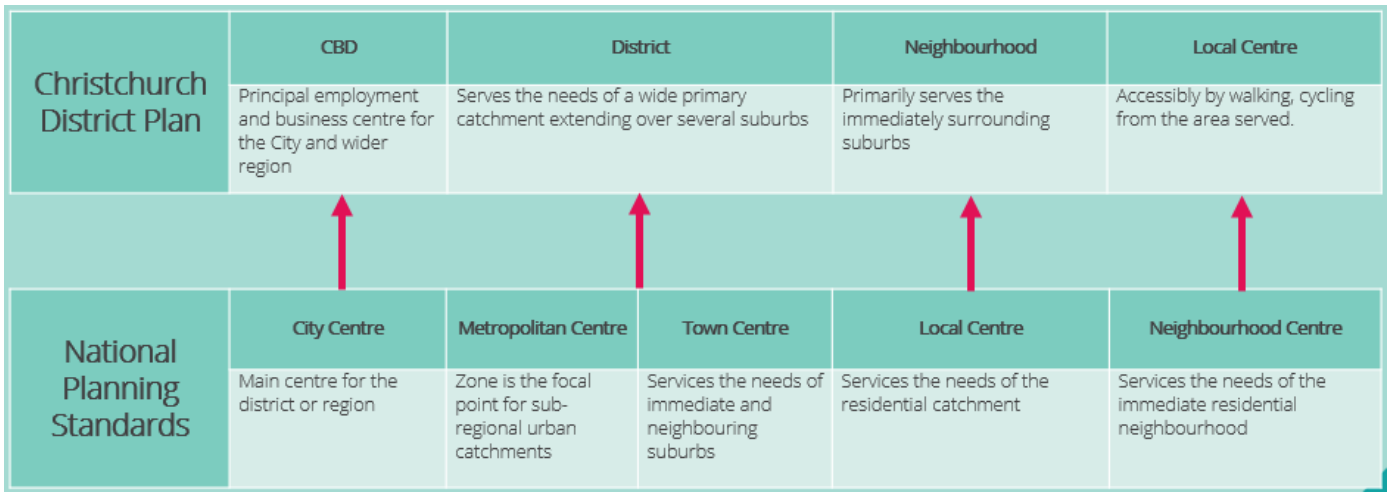
4.3.20. The approach taken considers that Metropolitan centres are more than just focal points for shopping and local employment. This also aligns with the views expressed by Auckland Council and MfE that distinguish between Metropolitan and Town centres based on other, less typical, activities such as tertiary education, civic and community facilities, head (compared to local) offices and high quality PT and open spaces. The importance of this wider range of activities contributes to the role of the centre as a focal point for a wider catchment than anticipated for town centres. In our opinion, it is this broad range of higher order activities that catalyses the centre as a regular focal point, a centre of activity, interest or attention. People look to these centres to meet their wide ranging needs for commercial, employment and social needs.

4.3.21. The Auckland metropolitan centres can be seen to have evolved from being sub-regional nodes of some significance for their respective administrative areas. They are also distributed spatially to account for the spatial landforms that make quite logical and less overlapping spending catchments.

4.3.22. In contrast, within Christchurch, none of our centres are more than 8km driving distance from the central city and four of the main centres (Riccarton, Papanui, Shirley and Merivale) are within 3km of the central city. The close proximity of centres in a flat, accessible city like Christchurch, results in catchments that overlap considerably. Arguably, the entire population has good accessibility to the central city and its broad range of activities and facilities such that these need not be replicated in suburban locations.

4.3.23. A direct comparison of the zone descriptions in the National Planning Standard and our district plan centres relating to role/catchment is provided in the diagram below. This comparison shows that none of our centre classifications includes reference to a sub-regional urban catchment. Arguably, the way that the catchment extent is expressed for our district centres[14] more closely (but not wholly) aligns with the 'Town Centre Zone' in the national planning standard. This is because the District centres all at least serve the needs of immediate and neighbouring suburbs (notwithstanding in some cases the catchment area is wider).

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


Christchurch District Plan
CBD
Principal employment and business centre for the City and wider region
District
Serves the needs of a wide primary catchment extending over several suburbs
Neighbourhood
Primarily serves the immediately surrounding suburbs
Local Centre
Accessibly by walking, cycling from the area served.
National Planning Standards
City Centre
Main centre for the district or region
Metropolitan Centre
Zone is the focal point for sub-regional urban catchments
Town Centre
Services the needs of immediate and neighbouring suburbs
Local Centre
Services the needs of the residential catchment
Neighbourhood Centre
Services the needs of the immediate residential neighbourhood

Summary – Metropolitan Centres

4.3.24. Based on the above discussion, the table below summarises the extent to which each of the District Centres meets the two limbs of the definition of Metropolitan Centre, depending on which interpretation is taken.

Definition	**Limb 1**				**Limb 2**				**Meets Both Limbs?**
Centre	**Broad Range of Activities**				**Focal Point for Sub-Regional Catchment**				
	Score*	**Broad range of activities enabled**	**Illustrates similar range of activities to that of the City Centre (as required for a Met Centre – see score in Column 1)**	**Serviced by MRT**	**Size (Ability to attract)**	**Draws significant trade from adjoining districts (around 20%)**	**More than 50% of retail spend from outside a 5km drive time catchment.**	**Presence of sub-regional community, civic or educational facilities**	
Central City	*91*	✓	✓	*x*	✓	✓	✓	✓	*N/A*
Riccarton	49	✓	X	x	✓	✓	✓	X	No
Papanui	53	✓	X	x	✓	X	✓/x	X	No
Hornby	39	✓	X	x	✓	✓	✓/x	X	No
Linwood	27	✓	X	x	X	X	X	X	No
Shirley	25	✓	X	x	X	X	✓/x	X	No
Belfast	20	X	X	x	X	✓	X	X	No
Halswell	0	✓	X	X	X	X	X	X	No

*As per Council's Annual land-use activity survey (see Appendix 1 for further detail)

Conclusions on Metropolitan Centres

- It is clear from a review of the background to the National Planning Standards, that the introduction of Metropolitan centre zones was in response to an Auckland submission seeking the addition of a centre zone that accommodated their Unitary Plan classified metropolitan zones. Prior to amalgamation in 2010, most of these centres were the city and regional nodes of the former city and regional authorities and consequently they had the role and function of city centres (e.g. including a broad range of civic, cultural, commercial, community, education activities etc.).

- The National Planning Standards clearly anticipates that larger urban centres can have Town centre zones that, whilst still providing a range of commercial and community activities, are not commercial, community and employment nodes of such significance that they draw significant patronage from beyond the surrounding suburbs.

- It appears from the definition of City Centre and Metropolitan Centre zones that both zones are intended to reflect areas used for the same or a similarly broad range of activities. The distinction between the City centre and Metropolitan centre zones appears therefore to be about their relative catchments, which in turn is a reflection of centre size, employment base and attractiveness for other reasons (e.g. metropolitan sports facilities).

- The actual range of activities undertaken in the Central City is much broader than in suburban centres (and obviously a greater number of activities within each range). Suburban centres do not typically have civic, recreational, or education facilities of any more than local significance, are not tourism hubs, and have a much weaker commercial office component. The larger ones are large due to their significant retail floor space rather than as a result of providing for a wider range of activities compared with other suburban and neighbourhood centres.

- The plan-enabled range of activities is similar for all commercial centres, although arguably more enabling in suburban centres in terms of range but less enabling in terms of tenancy sizes/scale.

- The anticipated role of district centres (Policy 15.2.2.1) is to provide a range of commercial, community, recreational and residential activities and there is no mention of the centre being a focus for activities such as civic and cultural venues/ facilities (including museums, art galleries).

- The lack of clarity in the National Planning Standard makes it difficult to assess with certainty whether or not we have commercial centres that meet the definition of Metropolitan centre, difficult.

4.3.25. As such, the Council has determined that the most appropriate approach is that no District Centres are categorised as Metropolitan Centres. This is based on the actual current range of activities (commercial, community, residential and recreational) within the centre zones. Longer term and as matters such as Mass Rapid Transit and the regional Spatial Plan are worked through, it may be appropriate to reassess the context for some centres (likely Papanui, Hornby and Riccarton) and potentially make the case for these centres being defined as Metropolitan centres.

4.3.26. Other options considered were whether the three larger centres (Riccarton, Papanui/Northlands and Hornby) should be identified as metropolitan centres. This would largely be on the basis of their already large retail floor space and wider employment base than other district and neighbourhood centres. None of these centres satisfactorily meet the sub-regional catchment in relation to community or recreational facilities however so fall short on several elements of Limb 2 assessment.

4.3.27. The other option would be that Riccarton only was identified as a Metropolitan Centre on the basis that it performs the strongest of all district centres against all commercial metrics, notably that its offer is sufficiently attractive to draw trade from more than a local catchment (immediate and neighbouring suburbs). Notwithstanding Riccarton's strength commercially, the lack of a sub-regional role in relation to community and recreational facilities remains. As such, the preferred option is that, at this point in time, no District Centres are considered to be Metropolitan.

4.3.28. As such and in conclusion, the preferred option is that, at this point in time, no District Centres should be categorised as Metropolitan Centres.

4.4. District Centre / Town Centre Alignment

4.4.1. In common with the 'tier position' of District Centres, Town Centres are noted as the 'second tier' under the Central City by the National Planning Standards commercial centres framework, in locations where Metropolitan Centres are not applicable.

4.4.2. In addition, the descriptions of District Centres (as outlined in the Christchurch District Plan) and Town Centres (as per National Planning Standards) are very similar. The Christchurch District Plan identifies (via Policy 15.2.2.1, Table 15.1) that District Centres are the major retail destination for comparison and convenience shopping and a focal point for employment (including offices), community activities and community facilities (including libraries, meeting places), entertainment activities, food and beverage and guest accommodation. Medium density housing is contemplated above ground floor level and around the centre and the centre is anchored by large retailers including department store(s) and supermarket(s). The centres serve the needs of a wide primary catchment extending over several suburb and are accessible by a range of modes of transport including multiple bus routes. Public transport facilities including an interchange, may be incorporated. The size of these centres is greater than 30,000sqm.

4.4.3. The current extent of the centre is the commercial core zone and, in the case of Belfast, Papanui and Hornby, an additional Retail Park zone[15]. The Commercial core zone provides for a range of commercial, community, residential and recreational activities.

4.4.4. The National Planning Standards identify that a town centre (and zone) comprises the following in larger urban areas - a range of commercial, community, recreational and residential activities that service the needs of the immediate and neighbouring suburbs.

4.4.5. In general there is therefore a high level of alignment between the description of a town centre (and zone as per NPS) and the commercial core zone of a District Centre (as per the District Plan). The range of activities permitted is identical and the targeted catchment is similar. District Centres (District Plan) are noted as a major retail destination whereas Town Centres (National Planning Standards) are identified as centres that should serve both immediate and neighbouring suburbs. In summary, there is therefore a general alignment between the relative 'positioning' of Town Centres and District Centres Commercial Core Zone such that they can be considered the "nearest equivalent zone"..

[15] See Section 4.7 for approach to Commercial Retail Park zones which are currently contained within District Centres.

4.5. Neighbourhood Centre/Local Centre Alignment

4.5.1. District Plan objectives and policies note that commercial activity is focussed within a network of centres to meet the wider community's and businesses' needs in a way that (amongst other matters) gives primacy to the Central City followed by District Centres and Neighbourhood Centres identified as Key Activity Centres (Objective 15.2.2(4)). As such, Neighbourhood Centres are the 'third tier' centre under a Central City in the District Plan.

4.5.2. In common with the 'tier position' of Neighbourhood Centres in the District Plan, Local Centres are noted as the 'third tier' under the Central City by the National Planning Standards commercial centres framework in locations where Metropolitan Centres are not applicable.

4.5.3. The descriptions of Neighbourhood Centres (as outlined in the Christchurch District Plan) and Local Centres (as per National Planning Standards) are also very similar:

The Christchurch District Plan identifies (via Policy 15.2.2.1 Role of Centres, Table 15.1 – Centre's Role) that Neighbourhood Centres are,

'A destination for weekly and daily retailing needs as well as for community facilities. In some cases, Neighbourhood Centres offer a broader range of activities comprising guest accommodation, residential activities (above ground floor level) along with small-scale comparison shopping, food and beverage outlets and offices. They are anchored principally by a supermarket(s) and in some cases, have a second or different anchor store. They primarily serve the immediately surrounding suburbs and are accessible by a range of modes of transport including one or more bus services. It is recognised that a wider range of activities is anticipated in Neighbourhood Centres that are Key Activity Centres or those located in Banks Peninsula, reflecting their distinctive roles and/or remote catchments." The size of neighbourhood centres varies between 3,000 to 30,000sqm GFA. Neighbourhood centres are primarily zoned as commercial core zone which provides for a range of commercial, community, residential and recreational activities.

National Planning Standards identify that a local centre (and thereon zone) are,

'Areas used predominately for a range of commercial and community activities that service the needs of the residential catchment.'

4.5.4. Overall, there is therefore a high level of alignment between the description of a local centre (and zone as per NPS) and a neighbourhood centre (as per the DP). The range of activities permitted is identical (albeit the District Plan goes into more detail) and the targeted catchment is similar - 'immediately surrounding suburbs and in some cases, residents and visitors from a wider area' for neighbourhood centres whereas local centres are said to 'service the needs of the residential catchment'. The relative 'positioning' of Neighbourhood Centres (as per the District Plan) and Local Centres (as per National Planning Standards) in terms of a hierarchy of centres is also closely aligned, such that they can be considered the 'nearest equivalent'.

4.6. Local Centres/Neighbourhood Centres Alignment

4.6.1. Policy 15.2.2.1 of the District Plan (Role of Centres, Table 15.1) notes that Local Centres are a small group of primarily convenience shops and, in some instances, community facilities. They are the smallest tier of centre identified in the District Plan. They are accessible by walking and cycling from the area they service and are on a bus route in some instances. They also incorporate a standalone supermarket serving the surrounding residential community. Overall size of the centres varies up to 3,000sqm.

4.6.2. The majority of Local centres are zoned Commercial Local rather than Commercial Core as for District and Neighbourhood Centres (current District Plan centres). The Commercial Local zone enables commercial, community and residential activities but differs from the Commercial Core zone in that tenancy size limits are in place.

4.6.3. The National Planning Standards smallest tier of centres is Neighbourhood Centres. These are described as areas that are used 'predominately for small-scale commercial and community activities that serve the needs of the immediate residential neighbourhood'.

4.6.4. Aligning a Local Centre zone to a Neighbourhood Centre Zone would continue the enablement of a similar range and scale of activities and would also allow for the continued inclusion of standalone supermarkets (as per Local Centres zoning) given that standalone stores do not function as higher order centres. The use of the phrase 'small scale' in the National Planning Standards Neighbourhood Centre mirrors the intention of the District Plan's Local Centre in terms of the application of tenancy size limits.

4.6.5. There is therefore a good level of alignment between Local Centres in the District Plan and Neighbourhood Centres in the National Planning Standards. They both provide for the smallest commercial centres within the commercial centres framework and seek to meet the needs of the immediate surrounding residential population.

4.7. Commercial Retail Park Zones – Alignment Approach

4.7.1. The direction provided by Policy 3(d) indicates a zone-based response to intensification around centres. The types of zones (where intensification should be enabled) are identified using the National Planning Standards commercial framework. Earlier sections discussed our approach to aligning our current centres framework with categories from the National Planning Standards framework.

4.7.2. Where centres currently have Commercial Core or Commercial Local zoning only, the alignment is relatively straightforward. The extent of three District Centres is however more complex. Papanui, Hornby and Belfast are currently outlined in the District Plan as including both Commercial Core **and** Commercial Retail Park zoned land. These centres are all Key Activity Centres. Going forward a decision needs to be taken in relation to the future extent of the town centre zoning for these centres. The options available are broadly:

- Amend both Commercial Core and Commercial Retail Park zoning to Town Centre zone.
- Amend only Commercial Core to Town Centre and rezone the Commercial Retail Park zone as Large Format Retail Zone.
- Amend both the Commercial Core and Commercial Retail Park to Town Centre zone but apply a precinct over the current Commercial Retail Park area. The precinct would be subject to different provisions than the rest of the town centre zone.

4.7.3. The key determinant of the most suitable option is the 'nearest equivalent zone'[16] and in this respect the option to amend the Commercial Core to Town Centre zone and the Retail Park to Large Format zone is clear. The alignment between the Commercial Core and Town Centre zone is outlined earlier in the report and the alignment between the District Plan's Retail Park Zone and the National Planning Standard's Large Format Zone is outlined below:

Current Centre (as per District Plan)	**Zoning**	**National Planning Standard Equivalent**	**Zoning**
Large Format Centre	Commercial Retail Park	Large Format Retail Centre	Large Format Retail Zone
A standalone retail centre comprising stores with large footprints, yard based suppliers, trade suppliers including building improvement centres and other vehicle orientated activities. Provision of commercial activities and residential and community uses is limited. This includes limiting offices to an ancillary function, and, at Tower Junction, providing for a limited amount of commercial services. The centre serves large geographical areas of the city and is not necessarily connected to a residential catchment. The area is primarily accessed by car with limited public transport services.		An area used predominately for commercial activities which require large floor or yard areas	

4.7.4. In summary therefore, the most suitable option for those centres which currently comprise a Commercial Core Zone and Retail Park zone within the extent of the centres (Belfast, Papanui and Hornby), is for the Commercial Core zone to become Town Centre zone and the Commercial Retail Park zone to become Large Format Retail zone.

[16] NPS UD Section 1.4 4(b)

4.7.5. This approach supports the policy intent of the Commercial Retail Park zone[17] (and Large Format Retail zone in terms of National Planning Standards) which is different to that of a Town Centre zone, offering no housing, community activities, finer grain retail or office activity. Large Format Retail zones are also not typically supported by public or active transport infrastructure, are not necessarily connected to a residential catchment and generally have limited design controls and a different urban form structure to that anticipated in a Town Centre zone.

4.7.6. Transport advice[18] in relation to the matter of zone decoupling in Papanui, Hornby and Belfast also concluded that areas zoned as Commercial Retail Parks should be retained as Large Format Retail Centres. The transport advice highlighted that Commercial Retail Park zones in these locations all operate as Large Format Retail Centres with activities that are vehicle orientated and with limited public transport services. The sites are also constrained by poor intersection performance or have multi-lane arterial road frontage with limited/poor pedestrian accessibility. Significant physical constraints exist between the Commercial Retail Park and Commercial Core zones so there is limited ability to develop these as single, cohesive, walkable town centres.

[17] Policy 15.2.2.1 Role of Centres, Table 15.1, Christchurch District Plan

[18] CCC Transport advice re: Potential Rezoning Options for Papanui, Hornby and Belfast centres – see Appendix 6. Commercial Centres – Alignment National Planning Standards Alignment

4.8. Banks Peninsula Commercial Centres response

4.8.1. All Banks Peninsula centres except for Lyttelton (including Akaroa and smaller centres like Governors Bay and Diamond Harbour), lie outside the 'urban environment' as defined by the NPS UD[19] and therefore are outside the scope of this plan change.

4.8.2. As such, a bespoke response needs to be adopted for the commercial centres in Banks Peninsula that are currently zoned Commercial Banks Peninsula Zone (CBPZ). Only Lyttelton commercial centre (currently defined as a Neighbourhood Centre in the operative district plan) could be zoned or treated as the equivalent 'Local Centre' (as per the National Planning Standards alignment approach outlined earlier). All other Banks Peninsula Commercial Centres would be retained as Commercial Banks Peninsula zone given the issue of scope (they are outside the urban area as defined by the NPS UD). Lyttelton will also retain bespoke planning provisions.

4.8.3. Taking this approach for Lyttelton, the following options are available:

a) Apply the Policy 3 direction to Lyttelton only on the basis of it being equivalent to a Local Centre (i.e. apply the Policy 3 directions but do not rezone it).
b) Rezone only Lyttelton to Local Centre Zone, carrying over all its bespoke CBP rules.

4.8.4. The preferred option is to apply the NPS UD policy direction to Lyttelton on the basis of it being a Local Centre but the zoning will be retained as Commercial Banks Peninsula zone (Option a). A future plan change will have the capacity to address the complexities in terms of aligning the Commercial Banks Pensinsula zone with a relevant equivalent zone and will enable greater flexibility in terms of amending the provisions.

[19] As defined by Section 77F of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021,

4.9. Conclusions re: Centre Alignment

4.9.1. The table below summarises the points identified within the report and identifies the preferred alignment option:

District Plan Centre	Centre Activities	Catchment	National Planning Standard Centre	Centre Activities	Catchment
Central City	Widest range and greatest scale of activities available in centres	Principal employment and busine centre for the City and wider region	**City Centre**	Broad range of commercial, community, recreational and residential	Main centre for district or region
N/A	N/A	N/A	**Metropolitan**	Broad range of commercial, community, recreational and residential	Sub-regional
District Centre	Commercial, community, residential & recreational	Major retail destination	**Town Centre**	Range of commercial, community, recreational and residential	Immediate & neighbouring suburbs
Neighbourhood Centre	Commercial, community, residential & recreational	Destination for weekly & daily shopping	**Local Centre**	Range of commercial and community	Residential
Local Centre	Commercial, community & recreational (tenancy size limits) and residential	Primarily convenience shopping & standalone supermarkets	**Neighbourhood Centre**	Small scale commercial and community	Immediate residential

4.9.2. The proposed commercial hierarchy recognises the role of the centres and also sets a framework for the urban form of the city. It is useful to acknowledge the range of attributes (built form, movement and activities) anticipated across the centres and ensure that these are commensurate with the level of commercial activity and community facilities. The diagram in Appendix 4 provides a graphic summary of the scale and form of the aligned centre zones for Christchurch.

4.9.3. It is however important to acknowledge that within each of the individual National Planning Standards centre categories, it is possible to accommodate a range of centres in terms of both the size and range of commercial and community activities. This is no different to the current categorisation under the District Plan framework for instance, District Centres vary in scale and range of activities provided from somewhere like Riccarton (wider range and larger scale) to Shirley (smaller range and scale).

4.9.4. As part of the NPS UD implementation and particularly in recognition of the Policy 3(d)'s requirement for an intensification response that is commensurate to the level of commercial activity and community services at a particular centre, an additional level of detail has been added to the categorisation approach. This nuancing approach enables the categories to be split into tiers of centre (in terms of the scale and range of offer) and is based on general information we have on our existing centres (see Appendix 5 for more detail). This nuancing is summarised below:

Current District Centres		Current Neighbourhood Centres	
Larger centres	Hornby Riccarton Papanui	Larger centres	Bush Inn Ferrymead Merivale Sydenham North
Remaining centres	Belfast Shirley Linwood N Halswell	Medium centres	New Brighton Bishopdale Prestons Barrington
		Smaller centres	Addington, Avonhead, Colombo/Beaumont, Edgeware, Halswell, Ilam/Clyde, North West Belfast, Parklands, Redcliffs, Richmond, Stanmore/Worcester, St Martins, Sumner, Sydenham South, Wairakei/Greers Road, Woolston and Yaldhurst

4.9.5. Taking this nuancing approach forward and taking into account the preferred alignment approaches already outlined in this report, the recommended categorisation of commercial centres in order to align with the National Planning Standards is outlined below:

National Planning Standard Category & Zone	Proposed Alignment Category	Centre	Comment
Central City	City Centre	City Centre (CCCB Zone)	Single zone selected to represent the extent of City Centre.
Metropolitan Centre	N/A	N/A	N/A
Town Centre	Large Town Centre	Papanui Hornby Riccarton	Town centres.
	Town Centre	Shirley/Palms Linwood/Eastgate Belfast/Northwood North Halswell	Existing District Centres and Key Activity Centres.
Local Centre	Large Local Centre	Bush Inn Ferrymead Merivale Sydenham N	The largest tier of Local Centre and ones that should provide a greater role in terms of intensification enablement because of their greater commercial and community services offer.
	Medium Local Centre	New Brighton Bishopdale Prestons Barrington	A lesser scale of commercial and community services offer in comparison to the Large Local Centres but still greater than the 'small local centres'.
	Small Local Centre	All other current Neighbourhood Centres	Limited commercial and community services offer.
Neighbourhood Centre	Neighbourhood Centre	All current Local Centres	Very limited commercial and community services offer. In some locations, standalone supermarkets can provide this small-scale commercial activity.

APPENDIX 1: ANALYSIS OF CHRISTCHURCH CENTRES

Assessment of Actual Range of Activities

Council undertakes yearly surveys of all activities (ground floor and above) undertaken in commercial centres. This provides us with a full picture of the current composition of centres and enables a direct comparison between them. As an example, with the high level category of 'commercial services' includes a number of sub-activities including banks, hairdressers, travel agents. Within the office category are a number of sub-categories including architect, financial services, legal services, web designers, insurance brokers etc.

Table below: Diversity of activities within each broad activity set[20]

	Central City	Riccarton	Hornby	Papanui	Shirley	Linwood	Belfast	Halswell
Commercial Services	9	11	7	7	5	4	3	0
Community Facility	5	2	0	2	1	1	0	0
Education Facility	4	0	0	3	0	1	0	0
Entertainment Facility	6	2	2	3	1	0	0	0
Industrial / trade supplier	8	4 and close by	3 and close by	3	1	3	0	0
Guest Accommodation	3	0 but close by	1	0 but close by	0	0	2	0
Healthcare facility	6	2	0	4	3	0	1	0
Hospitality	1	1	1	1	1	1	1	0
Office	26	12	3	8	1	6	1	0
Recreation activity	2	1	1	1	1	0	1	0
Residential	1	1	1	1	1	1	1	1
Retail	20	13	20	20	10	10	10	0
Total	91	49	39	53	25	27	20	0

This analysis shows that using the Central City as a benchmark, the suburban centres typically do not provide the same range of activities. There is a range but clearly not as broad as the central city. 91 different types of activities were in the central city (in December 2019). This compares with 50 in Riccarton, 53 in Papanui and 39 in Hornby.

CONFIDENTIAL

[20] Green means the range of sub-activities is equal to or greater than the range in the central city. Red denotes a lesser range.

APPENDIX 2: Assessment of Plan-enabled range of Activities (rather than actual)

	NATIONAL PLANNING STANDARD ZONES			DISTRICT PLAN COMMERCIAL CENTRE ZONES	
	City Centre Zone	**Metropolitan Centre Zone**	**Town Centre Zone**	**Central City Business Zone**	**Commercial Core Zone – District Centre**
ACTIVITIES	A broad range of commercial, community, recreational and residential activities.	A broad range of commercial, community, recreational and residential activities.	A range of commercial, community, recreational and residential activities.	**District Plan Policy 15.2.2.1 Role of Centre** Principal employment and business centre for the City and wider region providing for the widest range and greatest scale of activities available in centres, including comparison shopping, dining and night life, entertainment activities, guest accommodation, events, cultural activities and tourism activities. Provides for high density residential activity, recreation activities and community activities and community facilities (including health and social services) as well as civic and cultural venues/ facilities (including museums, art galleries). The focus for the district, sub-regional and wider transport services with a central public transport interchange.	**District Plan Policy 15.2.2.1 Role of Centre** Major retail destination for comparison and convenience shopping and a focal point for employment (including offices), community activities and community facilities (including libraries, meeting places), entertainment activities, food and beverage and guest accommodation. Medium density housing is contemplated above ground floor level and around the centre. Anchored by large retailers including department store(s) and supermarket(s). [Unlike the description of the central city, the role of the centre description does not mention civic, cultural, events, tourism, high density residential and recreation] **CONTINUED OVERPAGE...**

CONFIDENTIAL DISCUSSION DRAFT

				Activities enabled[21] in zone: • Retail • Office • Entertainment activity • Recreation activity • Gymnasium • Community facility • Health care facility • Education (incl. preschools) activity • Care facility • Spiritual activity • Art • PT facility (by way of designation) • Residential activity (upper floors) • Emergency service facilities (by way of designation) • Parking lots/parking building • Retirement Village	**Activities enabled[22] in zone:** • Retail • Offices (limited to up to 500sqm) • Entertainment activity • Recreation activity • Gymnasium • Community facility • Health care facility • Education (incl. preschools) activity • Care facility • Spiritual activity • Art • PT facility • Residential activity (upper floors) • Emergency service facilities • Parking lots • High tech industrial activity • Trade supplier • Yard-based supplier • Service Station • Drive-through services [Wider range of activities actually enabled despite the description of central city being to provide the widest range and scale of activities]
CATCHMENT	"Main centre for the district or region"	"Sub-regional urban catchment"	"Immediate and neighbouring suburbs"	"City and region-wide catchment and visitors"	"Wide primary catchment extending over several suburbs"

Overall assessment of First Limb: Broad range of activities

Looking at the actual range of activities in our district centres (preferred option), it could be interpreted that none of them have a *broad range* (Met Centre), rather they just have a range (Town Centre). If we interpreted the definition to mean that we should be considering the range of activities *enabled*, all centres except for Belfast (currently only realistically a Large Format Retail centre), would meet the definition.

[21] Permitted, controlled or restricted discretionary (and designated)
[22] Permitted, controlled or restricted discretionary (and designated)

CONFIDENTIAL DISCUSSION DRAFT

Appendix 3: Analysis of Limb 2: Serves a sub-regional urban catchment

Adopting different interpretations of what sub-regional urban catchment means yields different results.

(a) Sub-regional urban catchment = large size (total Gross Floor Area)

Result – Riccarton, Papanui/Northlands and Hornby

District Centre	Centre Size (sqm)	Retail Floorspace (sqm)
Riccarton	97,300	73,900
Papanui/Northlands	116,500 (excl Northlink)	70,400
Hornby	87,800	70,800
Linwood/Eastgate	35,900	33,705
Belfast/Northwood	31,900	28,100
Shirely/The Palms	39,100	37,000
North Halswell	NIL	NIL

(b) Sub-regional urban catchment = draws significant trade (around 20%) from adjoining districts in the Greater Christchurch sub-region

Result – Hornby and Belfast

TA	Riccarton	Hornby	Papanui	Shirley	Linwood	Belfast	North Halswell	Four Aves
Christchurch	66.9	59.8	77.1	81.5	88.8	69.2	NIL	66.6
SDC	7.8	22.6	2.0	1.4	1.3	1.0	NIL	3.9
WDC	2.9	2.1	6.6	6.5	1.5	18.2	NIL	3.0
SDC+WDC	10.7	24.7	8.6	7.9	2.8	19.2	NIL	6.9
Rest of Canty	5.6	2.5	3.0	2.2	1.0	4.6	NIL	3.1
Rest of NZ	13.7	9.8	9.3	7.1	6.5	6.2	NIL	15.3
International	3.1	1.2	1.3	0.8	0.5	0.7	NIL	1.1

It is unclear however, how much of the spending that originates in SDC and WDC is from urban rather rural areas. This percentage is also likely to change as the district has become more self-sufficient and North Halswell Key Activity Centre becomes established. It is not recommended that this option be used.

(c) Sub-regional urban catchment = primary catchment is less than region / city but more than immediate and neighbouring suburbs (i.e. more than 50% of spend from outside a 5km drive-time catchment)

Result – Riccarton, Hornby and Shirley (this is based on 2018 data prior to significant gains at Papanui and losses at the Palms). It is likely that **Papanui** would have increased its spending catchment and Shirley / Palms has decreased its catchment based on retail distribution activity that has occurred since 2019.

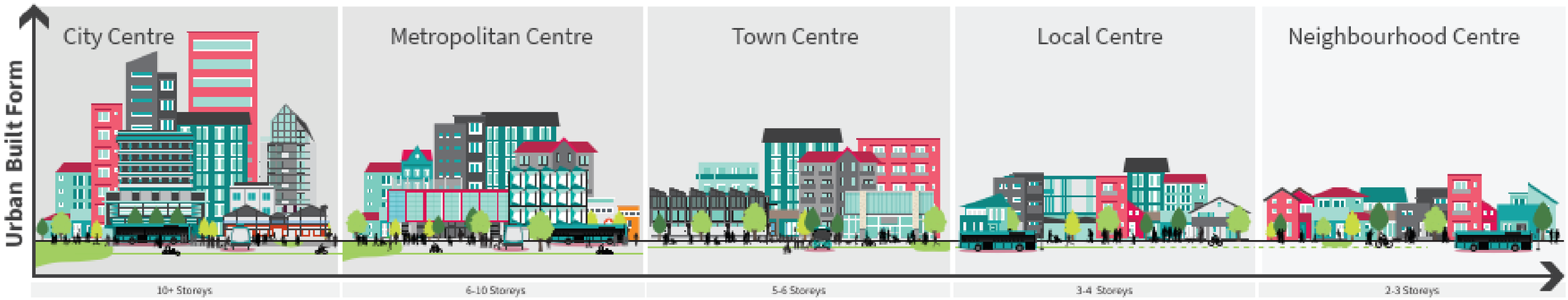
CONFIDENTIAL DISCUSSION DRAFT

	Riccarton	Hornby	Papanui / Northlands	Belfast / Northwood	Shirley/ The Palms	Linwood
Within 5km Drive	35%	30%	52%	37%	48%	57%
Within 10km Drive	59%	53%	72%	65%	76%	80%
Outside 30km Radius	25%	24%	16%	15%	12%	9%
International	3%	1%	1%	1%	1%	1%

Overall assessment of second limb: based on use of the favoured metric (spending within a 5km drive-time distance) only Riccarton would definitely meet this limb. There remains uncertainty around Papanui, Hornby and Shirley.

CONFIDENTIAL DISCUSSION DRAFT

Appendix 4: Hierarchy of Centres



Scale of Centres

Activity

Residential, Retail And Commercial Mix	• Inter-regional catchment • Highest density and mixed-use • Has the broadest range activities • Primary business and tourism destination • High quality public realm • Large scale, high quality government and head offices • Entertainment and night-time economy • Focus of arts and culture • General hospital	• Sub-regional catchment • High density and mixed-use • Broad range activities • Secondary business and tourism destination • High quality public realm • Large scale retail offer • Entertainment and night-time economy • Specialist hospital services	• Sub-city catchment • High to medium densities and mixed-use • Range of activities • Local business and visitor node • High quality public realm • Anchor stores and business hub • Specialist medical hub	• Suburban catchment • Medium densities and mixed-use • Activities that serve the suburban catchment • Small scale business and office activity • Supermarkets generally form anchor for retail activities • Quality public realm • Corner hospitality and entertainment • Small business hub • Health centre	• Local catchment • Medium to low densities and mixed-use • Activities that serve the local, walkable catchment • Local businesses • Quality public realm • Health services • Small scale health services and offices
Civic/Community	City Library, Town Hall, Metro Sports and Arena, Civic Park and Square, Convention Centre	Library, Community Centre and Civic Plaza, Tertiary Education, Large Recreation Facilities	Library and Community Facilities	Local Library and Community Facilities*	

Movement

	Rapid Transit, Station, MCR*, W1*	Rapid Transit,Station, MCR*, W1*	Rapid or frequent transit, Bus Priority, Transport Interchange, MCR*, W1*	Frequent, Local Stop, Secondary Cycleway, W2*	Secondary Cycleway, W2*

CONFIDENTIAL

Appendix 5 : Recognising Category Nuance

Key Metrics: District Centres (To be aligned as Town Centres)

Centre	Size (ha)	Total Commercial Floor space (sqm)	% retail	% commercial office	% hospitality	% Vacancy	Rental Values Retail Average $ per sqm	Office Average per $sqm	Land Value (median/sqm)	Spend at centre (2019-2020) $	Proportion of spend by customer origin %			Employee Count	No travelling to workplace**	From no. of different areas**	Community Facilities (within commercial core)	Community Facilities (outside commercial core)
											Local Chch*	Rest of Chch	Outside Chch					
Papanui	32.6	125,504	50	11.5	8	12	600 Langdons Rd 250	250 Langdons Rd 275	950	338,252,251	45	34	21	Not available	2517	139	Library	Gordon Condon opposite mall
Papanui*	21.60	125,279	43.6	9	6.3	9.7	600	250	910					2949			Library	
Riccarton	15.5	203,341	47.4	9.1	15.75	8.6	1000	250	1476	407,568,644	23	45	32	2820	4254	170	Service centre, community rooms	Wharenui pool about 400m away
Hornby	20.5	79,434	60.4	0.7	7.1	0.5	575 Hornby East 225	200 Hornby East 185	624	362,056,815	39	31	29	2229	5919	190		New pool, library & community centre in Kyle Park
Hornby*	13.02	72,414	50.2	1.6	7.4	0.6	575	200	414					1759			None	
Belfast	18	47,840	66	0.7	2.2	6.9	300 Supa Centre 275	200 Supa Centre200	255	135,305,390	51	25	24	564	897	78		
Belfast*	10.37	3,104	100				300	200	186					176			None	
Linwood	9.2	60,308	67.2	3.3	9	10	500	175	602	82,341,788	60	31	9	972	303	29	Library, service centre	Linwood Pool across Linwood Ave in park
Shirley	9.6	47,448	62	0.4	8.6	15.6	700	225	472	125,694,119	51	32	17	672	615	53	Library, service centre	

*Commercial core only.

Sources for both tables:
Rental Values – CBRE, 2022 update
**No. travelling to workplace – Waka Kotahi commuter data
Spend at centre – Origin of spend data 2019-2020, Marketview
Remainder – The Property Group, Dec 2021

CONFIDENTIAL

Key Metrics: Neighbourhood Centres (To be aligned as Local Centres)

Centre	Size (ha)	Total Commercial Floorspace (sqm)	% retail	% commercial office	% hospitality	% Vacancy	Rental Values Retail Average $ per sqm	Office Average per $sqm	Land Value (median/sqm)	Spend at centre (2018-2021) $ bn	Proportion of			Employee Count	No travelling to workplace*	From no. of different areas*	Community Facilities (within commercial core)	Community Facilities (outside commercial core)
											Local Chch	Rest of Chch	Outside Chch					
Bush Inn	8.5	41,340	37.7	4.4	25	17.3	525	225	1103	115,305,108	39	38	23	951	1833	105		Upper Riccarton library
Ferrymead	9.2	29,689	18.2	0.5	15	10.5	300	250	1479	101,976,996	66	25	9	1229	1227	87		
Merivale	6.1	27,421	31	14.2	20.8	8.3	675	350	2238	98,407,837	45	29	26	1389	3426	154		
Sydenham North	6.5	31,467	23.7	26.9	9.8	24	450	235	1674	54,277,977	25	51	25	901	Chch Central S 16941	215		
Bishopdale	6.3	11,943	50.2	10.2	18	20	250	250	1443	49,633,679	69	19	12	519	753	38	Library & Community centre	
New Brighton	5	23,900	39.5	5.2	17.5	27.3	170	150	393	26,939,147	73	17	10	332	429	24		Opposite -Library, service centre & community rooms
Prestons	10.7	6,986	60	0	7	12			312	58,166,015	59	24	16	181	396	18		
Barrington	4.3	13,894	57	5	19	6.9	525	200	624	79,706,278	59	23	18	564	933	54	Library,	

Availability of metrics for Small Neighbourhood Centres is limited but, where available, they illustrate that these centres are of a smaller scale/range of activities than the large and medium local centres.

CONFIDENTIAL DISCUSSION

Appendix 6: Transport Preferred Options: Town Centre/Retail Park Zoning – Papanui, Hornby & Belfast

Papanui – Transport Preferred Option:

Preferred Option (Town Centre and Large Format Centre)	
Preferred Option	**Zoning**
Northlands & Main Street	Town Centre Zone
Northlink	Large Format Zone

Transport Characteristics

- The site is 70% completed as a LFR centre (albeit with some smaller tenancies provided for under 2020 consent) newly built site with internal parking – little opportunity to re-develop to an alternative town centre
- Nearest PT stop 500m from site, No direct PT services to the site hence is not well connected to transport corridors
- Site is constrained by poor intersection performance at Langdons /Greers – not programmed in LTP for improvements hence not infrastructure ready
- Located over 600m from Northlands Mall with limited route via Langdons Road only
- Nearest bus service interchange on Main North Road approx. 1Km from the site beyond acceptable walk distance
- Separated from Northland Mall by Papanui High School and is grounds and a Railway Line
- The site operates as a LFR centre with activities that are vehicle oriented with limited PT services
- Given the physical constrains between the site and the Northlands Mall it cannot be made to operate as a single cohesive, walkable town centre

Hornby - Transport Preferred Option A:

Status Quo: District Centre & KAC		Preferred Option: Separate Centres (Town Centre and Large Format Centre)	
Existing / Status Quo	**Zoning**	**Preferred Option**	**Zoning**
The Hub, Dress Smart & Main South Road shops	Commercial Core Zone	The Hub, Dress Smart & Main South Road shops	Town Centre Zone
Chappie Place	Commercial Retail Park Zone	Chappie Place	Large Format Centre Zone

Transport Characteristics

- The site appears to be fully developed as an LFR centre newly built site with internal parking – little opportunity to re-develop to an alternative town centre without major site demolition and reconfiguration
- Multi Lane Arterial road frontage with limited pedestrian crossing opportunities
- With the need to cross highly trafficked Major arterials to the south and west of the site there are high delays imposed in crossing these roads
- Built as a former State Highway there is discontinuous footway provision along the site frontage

- Detour of some 600m walk to existing Hornby town centre
- Route requires crossing Major Arterial, two local roads and two arms of State Highway
- Located over 670m from Hornby PT exchange
- Separated from surrounding land uses by Railway line to the north, State highway and railway line to the west and Major Arterial (Main South Road) to the south and Industrial land uses to the east
- The site operates as a LFR centre with activities that are vehicle oriented with limited PT services
- Given the physical constrains between the site and the Hornby town centre it cannot be made to operate as a single cohesive, walkable town centre

Belfast Approach Transport Preferred Option

Status Quo: District Centre & emerging KAC		**Preferred Option : Local Centre**	
Existing / Status Quo	**Zoning**	**Preferred Option**	**Zoning**
New World & land with consent[1] for retirement village	Commercial Core Zone	New World	Local Centre Zone
Supa Centre	Commercial Retail Park Zone	Retirement Village	Medium Density Residential Zone
		Supa Centre	Large Format Retail Zone

Transport Characteristics

- The site appears to be fully developed as an LFR centre. While established for many years there is little opportunity to re-develop to an alternative town centre without major site demolition and reconfiguration
- Multi Lane State highway to the west separates the site from the existing commercial zone (New World supermarket)
- With the need to cross highly trafficked SH there are high delays imposed in crossing
- Limited access from the east given the existing railway line that borders the site
- Discontinuous footway provision along the site frontage – no LTP program for funding this
- Located over 2km from nearest PT exchange at Northlands
- The site operates as a LFR centre with activities that are vehicle oriented with limited PT services
- Given the physical constrains between the site and the existing commercial core it cannot be made to operate as a single cohesive, walkable town centre

[1] Currently under construction

PROPERTY ECONOMICS

CHRISTCHURCH CENTRAL CITY AND SUBURBAN CENTRES (PC14) ECONOMIC COST BENEFIT ANALYSIS

Client: Christchurch City Council

Project No: 52156

Date: July 2022

W: www.propertyeconomics.co.nz E: tim@propertyeconomics.co.nz P: 09 479 9311 PO: Box 315596, Silverdale 0944

SCHEDULE

Code	Date	Information / Comments	Project Leader
52156.15	July 2022	Report	Tim Heath / Phil Osborne

DISCLAIMER

This document has been completed, and services rendered at the request of, and for the purposes of Christchurch City Council only.

Property Economics has taken every care to ensure the correctness and reliability of all the information, forecasts and opinions contained in this report. All data utilised in this report has been obtained by what Property Economics consider to be credible sources, and Property Economics has no reason to doubt its accuracy.

Property Economics shall not be liable for any adverse consequences of the client's decisions made in reliance of any report by Property Economics. It is the responsibility of all parties acting on information contained in this report to make their own enquiries to verify correctness.

Front cover image: Denizen

COPYRIGHT

© 2022 Property Economics Limited. All rights reserved.

CONTACT DETAILS

Tim Heath

Mob: 021 557713

Email: tim@propertyeconomics.co.nz

TABLE OF CONTENTS

LIST OF FIGURES

1. INTRODUCTION

Property Economics has been engaged by Christchurch City Council (**Council**) to identify the high-level economic costs and benefits of allowing greater height limits for development envelopes in suburban centres and the Central City of Christchurch in the context of the RMA. This is part of the Housing and Business Choice Plan Change (proposed Plan Change 14 (**PC14**)) which enables additional development capacity for residential and commercial activity in the Central City and suburban centres through increased heights.

Specifically, Hornby, Papanui and Riccarton centres and the main suburban centre zoning focus, along with City Centre, Central City Mixed Use Zones (**CCMUZ**) which includes both the Central City and South Frame Mixed Use Zones, and High-Density Residential Zone (**HRZ**) which in effect is the higher density residential zone in Christchurch's central area.

This assessment also considers other potential locations appropriate for intensified residential development from an economic perspective. This is predominantly focused on the main arterial road frontage heights along Main North Road between the two main centres of Merivale and Papanui / Northlands.

This assessment has been prompted by Councils having to give effect to the National Policy Statement of Urban Development (**NPS UD**) and the Resource Management Act (Enabling Housing Supply and Other Matters) Amendment Act 2021 (**Enabling Housing Supply Act**).

This includes the introduction of the Medium Density Residential Standards (**MDRS**) under the Enabling Housing Supply Act where the government introduced a significant increase in residential capacity to residential zones in Tier 1 authorities across New Zealand.

This assessment is part of a broader body of work undertaken by Council in response to the MDRS and Qualifying Matter (**QFM**) considerations to ensure there is sufficient feasible capacity

provided in the District Plan over the long term (30-year timeframe based on current metrics) and the Council's policy setting appropriately align with the government directives, NPS UD sought outcomes and the RMA.

This assessment follows a centres-based approach that recognises the primacy of the City Centre in the hierarchy of centres in Christchurch City when managing commercial activity in the City's centre network.

Additional centre height enablement not only contributes to additional residential capacity but may also provide retail, employment and community opportunities and increased residential environments. This is not only for the Central City but the suburban centres spread throughout Christchurch.

The key policy considerations under the NPS UD are policies 3 and 4 (below) – increasing height enablement within the City Centre as much as possible to encourage intensification and development capacity, subject to QFMs. This provides unique challenges to Council as to the spatial distribution capacity and timing of infrastructure delivery and funding.

> *"Policy 3: In relation to Tier 1 urban environments, regional policy statements and district plans enable:*
>
> *(a) in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; and*
>
> *(b) in metropolitan centre zones, building heights and density of urban form to reflect demand for housing and business use in those locations, and*
>
> *(c) in all cases building heights of at least 6 storeys; and building heights of at least 6 storeys within at least a walkable catchment of the following:*
>
> *(i) existing and planned rapid transit stops*
>
> *(ii) the edge of city centre zones*
>
> *(iii) the edge of metropolitan centre zones; and*
>
> *(d) within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent), building heights and densities of urban form commensurate with the level of commercial activity and community services.*
>
> *Policy 4: Regional policy statements and district plans applying to tier 1 urban environments modify the relevant building height or density requirements under Policy 3 only to the extent necessary (as specified in subpart 6) to accommodate a qualifying matter in that area."*

A key focus of the proposed policy settings in PC14 is to implement the NPD UD and Enabling Housing Supply Act ~~is~~ to produce a significant increase in the enablement of intensified development within economically efficient locations around the city. This is delivered primarily

through implementing a suite of increased permitted heights in and around centre locations staggered highest to lowest to reflect the centre hierarchy in the District Plan.

When considered in the round, the height options considered in this report across the suite of residential and commercial zones would substantially increase the development opportunity and capacity of both residential and commercial activity relative to the status quo provisions of the District Plan. These material increases would enable, and accommodate, a level of residential and commercial growth that is substantially more than the demand requirement for those land uses in Christchurch and go well beyond the 30-year timeframe.

Additionally, in many instances any breach of the height enablement threshold in a zone to develop a taller structure (than Permitted) will have a Restricted Discretionary (RD) activity status. While this may provide slightly less market certainty on outcome of an application and some relatively minor additional transactional costs justifying a height breach, the RD status is also considered an enabling status albeit with a few more checks and balances by Council on identified matters to ensure any such development is appropriately considered.

An RD status is considered more enabling, provides more market certainty and lower transactional / consenting costs than applications with a Discretionary (D) or Non-Complying (NC) activity status and therefore sends a positive signal to the market on a relative basis.

PC14, while seeking to enable significantly more residential and commercial development capacity to contribute to long term sufficiency, is unlikely to result in a surge of such development in the short – medium term.

PC14 takes a longer term 30-year+ perspective that would facilitate the transition of urban development from what has traditionally been a '*sprawl and infill*' approach to a more nuanced method to deliver more efficient urban development that results in a more productive use of the scarce land resource.

PC14 aims to better align more intensified urban growth with infrastructure capacity (current and future), funding capacity, LTP investments, timing of the aforementioned and land use efficiency.

A purpose of PC14 is to implement the NPS-UD while considering economic efficiency and other factors (social, cultural and environment, etc.) relevant to intensified development.

The following table encapsulates the options assessed in this report as part of Council's implementation of NPS-UD.

Policy	Zone	Options
Central Christchurch Building Height Options	City Centre	P on height up to 28m and D on height beyond 28m (Status Quo).
		P on height up to 28m, RD on height up to 90m and D on height beyond 90m.
		P on height up to 32m, RD on height up to 90m and D on height on height beyond 90m.
		P on height up to 50m, RD on height up to 90m and D on height beyond 90m.
		P on height up to 90m and D on height beyond 90m.
		No height limit.
	Mixed Use Zone and Mixed Use Zone (South Frame)	P on height up to 17m (current baseline) and D on height beyond 17m
		P on height up to 17m, RD on height up to 32m and D on height beyond 32m.
		P on height up to 22m, RD on height up to 32m and D on height beyond 32m.
		P up to 32m and D beyond 32m.
		P on height up to 50m and D on height beyond 50m.
		P on height up to 90m and D on height beyond 90m.
		No height limit.
	HRZ	P on height up to 14m (current baseline) and D on height beyond 14m.
		P on height up to 20m and D on height beyond 20m with select areas closest to Christchurch's City Centre enabling heights up to 32m as P on height.
		P on height up to 32m and D on height beyond 32m.

		No height limit.
Minimum number of storeys	City Centre	Two or more storey building development as P on minimum number of storeys and below two storeys as D.
	City Centre	Three or more storey building development as P. Below three storeys as D.
	City Centre Mixed Use Zone and Mixed Use Zone (South Frame)	Two or more storey building development as P. Below two storeys as D.
		No minimum number of storeys.
Office Tenancy Cap	City Centre Mixed Use Zone and Mixed Use Zone (South Frame)	Tenancy cap of 500sqm of office GFA
	Centre Zones other than City Centre	Tenancy cap of 500sqm of office GFA
Retail Restrictions	City Centre Mixed Use Zone and Mixed Use Zone (South Frame)	Retail in the CCMUZ (including South Frame) is restricted to: (a) the display and sale of goods produced, processed or stored on the site and ancillary products up to 20% of the net floor area on the site used to produce, process or store these goods, or 350m² retail floor space, whichever is the lesser; (b) second hand goods outlet; (c) food and beverage outlet; (d) small scale general convenience store where grocery items are offered for sale with a maximum GLFA of 250m²; and one supermarket with a maximum GLFA of 2500m² located within the Commercial Central City Mixed Use Zone block bounded by Manchester, Salisbury and Madras Streets.
Suburban Centre Building Heights	Town Centre Heights (Hornby, Papanui, Riccarton)	P on height up to 20m and D on height beyond 20m.
		P on height up to 22m and D on height beyond 22m.
		P on height up to 32m and D on height beyond 32m.
		P on height up to 50m and D on height beyond 50m.

	Other Town Centre Heights	P on height up to 20m and D on height beyond 20m.
	Local Centre – Large	P on height up to 20m and D on height beyond 20m.
	Local Centre – Medium	P on height up to 14m and D on height beyond 14m.
	Local Centre – Small	P on height up to 12m and D on height beyond 12m.
	Neighbourhood Centre	P on height up to 12m and D on height beyond 12m.

1.1. OBJECTIVES

Key objectives in this assessment are:

- Identify the extent of the suburban centres and Central City areas by their proposed height enablement alternatives.
- Assess the strategic objectives, and policies to meet those objectives, of increases in centre height enablement in identified suburban centres and Central City.
- Assess the current plan enabled, or status quo, height limit for each centre location as a baseline.
- Assess the proposed height enablement change options for each identified suburban centre and Central City area.
- Assess the trended employment changes in the City Centre and CCMUZ (including the South Frame MUZ) to assess the extent of the Central City's post-earthquake recovery.
- Determine the appropriateness of the office and retail tenancy thresholds and whether they should remain in place, and if so which zone(s).
- Assess the likely activity of each centre by proposed height enablement change.
- Identify distinctive features of each centre location that may impact the desirability of increased centre height enablement.
- Identify the high-level economic costs and benefits of proposed height enablement changes for each centre.
- Provide an economic direction based on the high-level costs and benefits of height enablement changes in each suburban centre location and Central City.

1.2. DATA SOURCES

Information has been obtained from a variety of reputable data sources and publications available to Property Economics, including :

- Business Demography Data – Stats NZ
- Geographic Boundaries – Stats NZ
- Primary Land Parcels – LINZ
- Maps – Bing
- Christchurch District Plan – CCC
- National Road Centre Lines – Waka Kotahi
- Proposed Centre Heights Options– CCC
- Draft Housing and Business Choice Plan Change - CCC
- National Policy Statement on Urban Development – MfE
- National Planning Standards – MfE
- Sydney Floorspace Data – NSW Government
- Central City Commercial Area Resource Consent Data - CCC

1.3. GLOSSARY OF ACRONYMS AND TERMS

The following list is a glossary of acronyms and terms utilised within this report.

- **CCBZ -** City Centre Business Zone.
- **CCMUZ** – Central City Mixed Use Zone
- **CCMUZ (South Frame)** – Central City Mixed Use Zone (South Frame)
- **HRZ** - High-Density Residential Zone
- **NPS UD** – National Policy Statement on Urban Development 2020
- **NPS** – National Planning Standards
- **RMA Land Use Activity Status**
    - **P –** Permitted
    - **RD -**Restricted Discretionary
    - **D –** Discretionary
- **ODP** – Operative District Plan

- **Enabling Housing Supply Act -** Resource Management Act (Enabling Housing Supply and Other Matters) Amendment Act 2021
- **MDRS** - Medium Density Residential Standards
- **QFM –** Qualifying Matters
- **Transaction Costs -** Costs that arise as part of engaging in an economic trade. This can include compliance costs, planning costs, variation costs, etc.
- **RMA –** Resource Management Act
- **GFA** – Gross Floor Area (sqm)
- **Stats NZ** – Statistics New Zealand
- **KAC** – Key Activity Centre
- **PC14** – Plan Change 14
- **ANZSIC** – Australia New Zealand Standard Industrial Classification 2006
- **CBD** – Central Business District
- **CCC** – Christchurch City Council (or 'Council')
- **MfE** – Ministry for the Environment

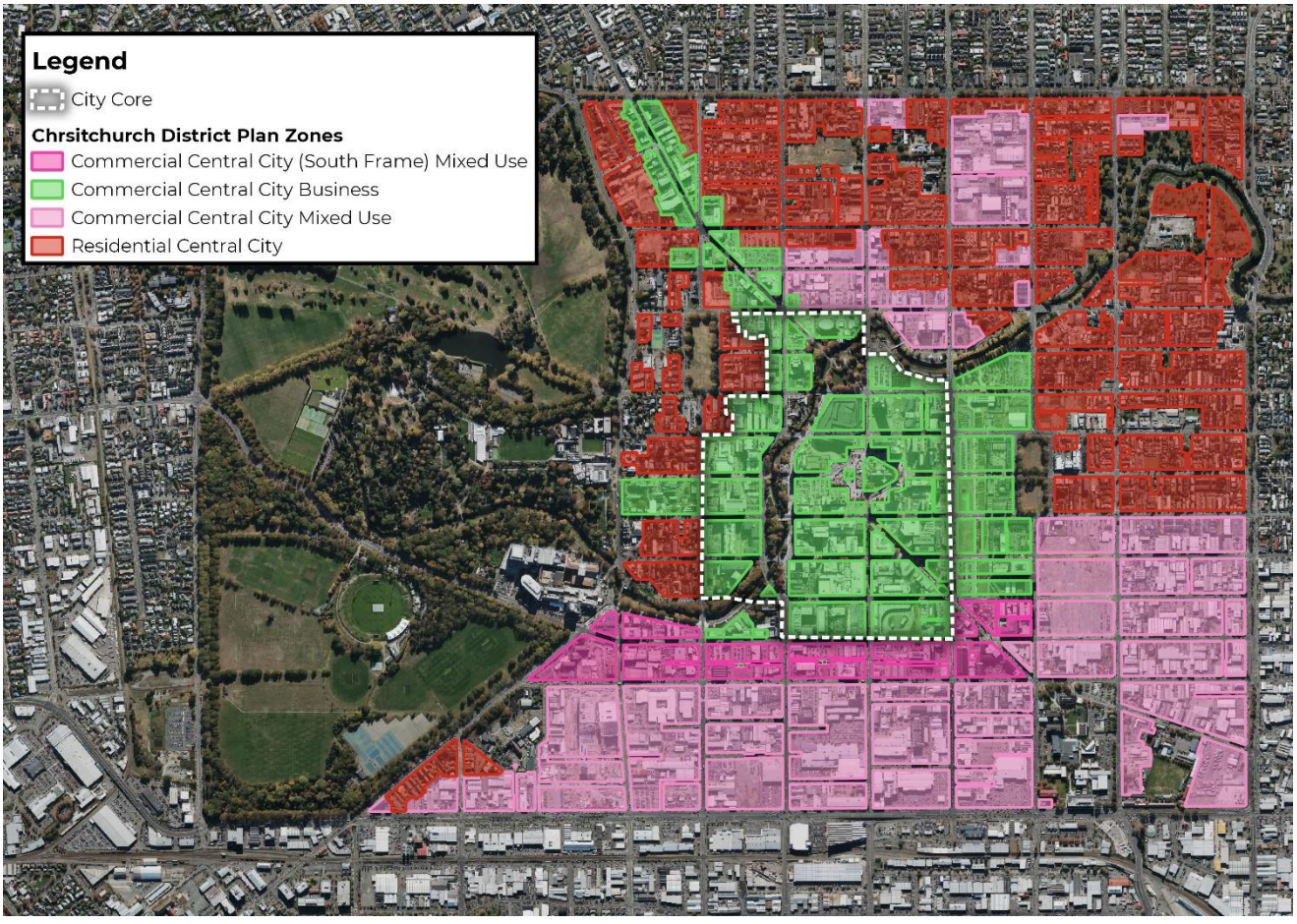
2. CENTRAL CITY HEIGHTS

The Christchurch City Centre is the preeminent commercial hub in the city accommodating the largest and most diverse employment base. In essence the City Centre is a key economic engine for the Christchurch economy and the more productive and efficiently utilised the land resource, the better for the city from an economic perspective.

Diversification of land uses are also important for the economic and social 'health' of a City Centre including residential, community, cultural, tourist and recreational activities. Ultimately, maximising the development potential of the City Centre represents a positive and proactive economic position for the community, and provides increased market certainty for both public and private sector investment.

Figure 1 illustrates the extent of the different zones across the Central City – including the City Centre (named Central City Business in the ODP), the CCMUZ, CCMUZ (South Frame) and High-Density Residential Zone (HRZ) (named Residential Central City in the ODP).

FIGURE 1: CHRISTCHURCH CENTRAL CITY ASSESSED CENTRE HEIGHTS EXTENT



Source: Christchurch City Council, LINZ, Bing.

The zones that are included as part of this assessment on height enablement, and identified in Policy 3 of the NPS UD, are:

- City Centre: the identified hub of activity for the city is anticipated to occur in the City Centre area which enables a diverse range of commercial, community, recreational and residential activities.
- Central City Mixed Use Zone and South Frame Mixed Use Zone (CCMUZ): the primary support zones of the City Centre that enable a similar mix / type of diverse activity but limit the scale to a support function.
- High Density Residential Zone (HRZ): a higher density residential zone with a greater focus on enabling intensified residential development relative to other residential zones. Note, this zone is referred to as the Residential Central City Zone in the ODP.

There is a net 56ha of City Centre, 112ha of CCMUZ (15ha of South Frame and 98 of Mixed Use), and 89ha of HRZ. The total area of Christchurch's Central City being assessed for centre heights is approximately 256ha net, or around 420ha gross (excluding Hagley Park). See Appendix 1.

For context, the 420ha gross land area of Christchurch's Central City is only 20ha smaller than the Sydney CBD's approximately 440ha gross land area[1] (refer Appendix 2). For additional context in terms of capacity, the Sydney CBD contained 12.1m sqm GFA in 2017[2].

The City Core area identified in Figure 1 provides a more consolidated City Centre extent

The equivalent zones of the City Centre identified in the NPS-UD is the City Centre Zone targeted in Policy 3(a. The identified suburban centres assessed in this report are equivalent to Town Centre Zones identified in Policy 3(d).

City Centre

The status quo has a building height limit in the City Centre of 28m. Heights above 28m are a Discretionary activity in the ODP. The following height enablement options proposed for the identified City Centre are:

- 28m (baseline)
- 32m
- 50m
- 90m
- No Height Limit

[1] *Measured by Property Economics from Bing Maps*

[2] *https://www.cityofsydney.nsw.gov.au/surveys-case-studies-reports/floor-space-employment-survey-2017*

CCMUZ

The status quo height limit for the CCMUZ is 17m and a Restricted Discretionary activity beyond 17m. Both CCMUZ's were assessed (Mixed Use Zone and South Frame) as part of this assessment. We note that the CCMUZ also has office tenancy floor area controls and retail tenancy controls in place that further limit the activity enabled on a site. Whether these should remain in place is discussed in more detail later in the report.

The following height enablement options proposed for the identified CCMUZ areas are:

- 17m (baseline)
- 22m
- 32m
- 50m
- 90m
- No Height Limit

HRZ (in the central city)

The status quo height limit for the higher density residential zone, HRZ, is 11+1m, with some areas enabled up to 14m. This is the minimum height under the NPS-UD directive.

A 20m height enablement baseline is proposed to distinguish the HRZ from the NPS UD and promote a greater level of residential density in the HRZ and detract from sporadic, intensified residential density from occurring within the medium density zone in anticipation of, and post-, MDRS implementation.

The following height limit options proposed for the identified HRZ are:

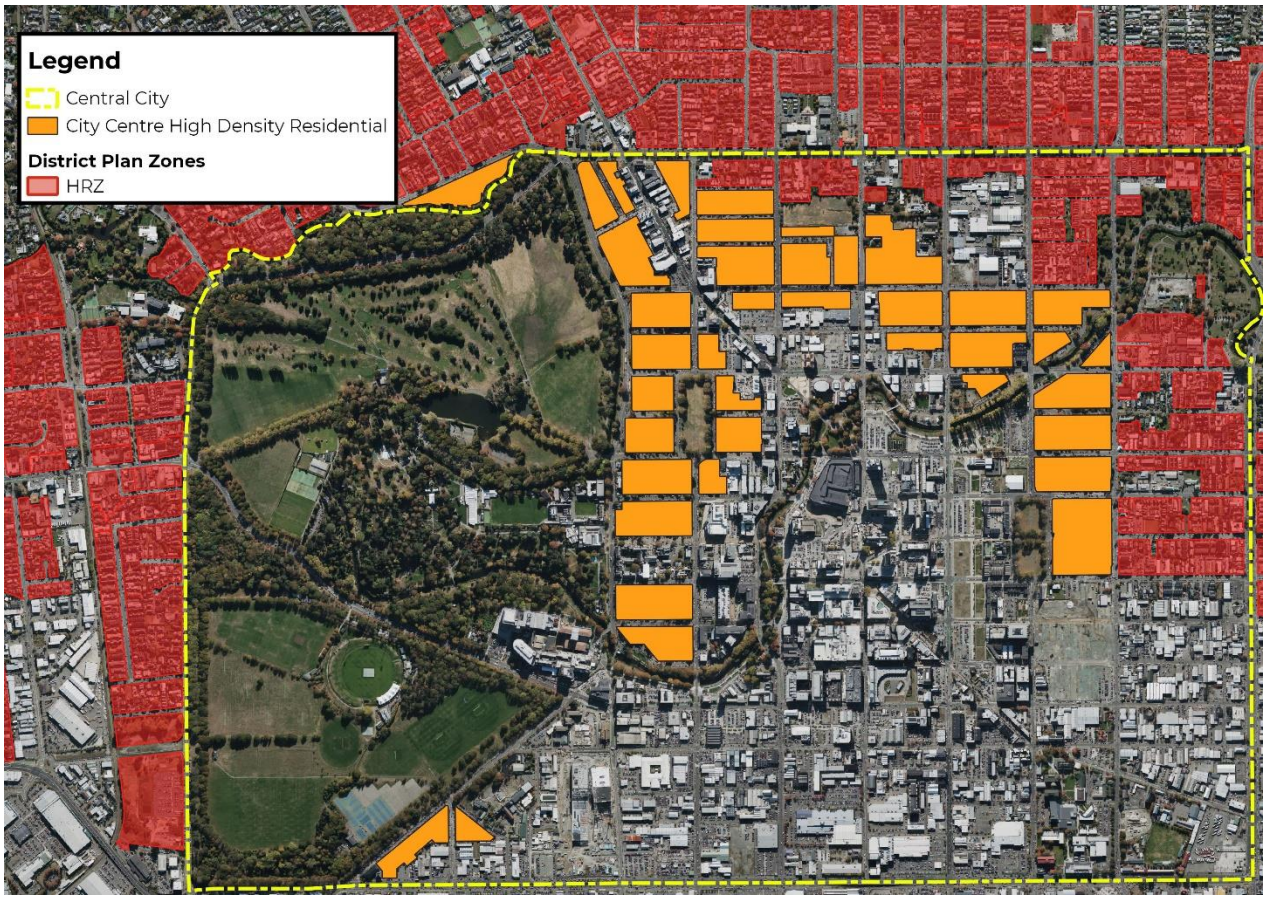
- 14m (current baseline)
- 20m with an identified higher density area enabling 10-storeys (32m)
- 32m
- No Height Limit.

The following figure shows an indicative planning map (provided by Council and adapted using parcel boundaries by Property Economics) of where the HRZ and the geospatial extent of the proposed HRZ higher density area with an enablement (up to 32m). The areas of greater height enablement within the HRZ are generally closer to the City Centre and other commercial areas (CCMUZ and South Frame) as these are the most efficient locations for greater height enablement.

The map also indicates that the extent of the higher density residential enablement area, formerly RCCZ, has increased in size with the introduction of the HRZ. The extent to which this increase has been implemented covers areas surrounding larger centres in Christchurch (Town and Local centres) as well as key corridors and is demonstrated later in this report. These other areas of proposed HRZ also have additional proposed height enablement precincts adjusting their height limits beyond that of the proposed HRZ.

This map is merely indicative and is only intended to show the broad areas of where the potential HRZ high density residential area could be. This indicative area does not consider any QFM review that may limit some development capacity in the identified areas.

FIGURE 2: CHRISTCHURCH CENTRAL HRZ AND INDICATIVE HIGH-DENSITY RESIDENTIAL AREA



Source: Christchurch City Council, Property Economics, Bing, LINZ.

3. CHRISTCHURCH CENTRAL CITY RECOVERY

This section sets out some high-level background (economic) context on the post-earthquake recovery of the City Centre to assist determining the appropriate suite of policy settings for the commercial and residential zones across Christchurch. This is not intended to represent an exhaustive economic position on the recovery of Christchurch's City Centre but some salient metrics for the purposes of assisting the implementation of the NPS UD and Enabling Housing Supply Act directives.

The City Centre is the primary commercial centre of Christchurch City and is identified as the principal employment and business centre for the city. It was for these reasons that, in the post-earthquake period, further provisions granting the City Centre a competitive advantage in the Christchurch Central Recovery Plan (followed by the District Plan) were enacted to help revitalise the City Centre and concentrate employment and business activity there.

Without the advantages granted to the City Centre to attract additional development and employment the City Centre would be competing on a more even playing field with other Key Activity Centres (KACs) around the city. This would detract office employment from concentrating which would lead to a less efficient distribution of office employment activity and a slower recovery period post-earthquake.

A key policy implemented to promote the City Centre as a hub of employment and business activity was the restriction of office tenancies greater than 500sqm GFA outside of the City Centre. These medium-large employers tend to be the largest value generators and also benefit the most from agglomeration and centralisation of their businesses. As a result of restricting these businesses to the City Centre there are positive impacts on productive and allocative efficiencies of Christchurch City, and the broader region as a whole. This policy was reviewed during the IHP process for the proposed replacement district plan

This policy directed larger businesses to the City Centre but also lowered the value (rents) of office space and increased the available capacity in KACs making them relatively more affordable for smaller SME office enterprises where they could service a more localised market.

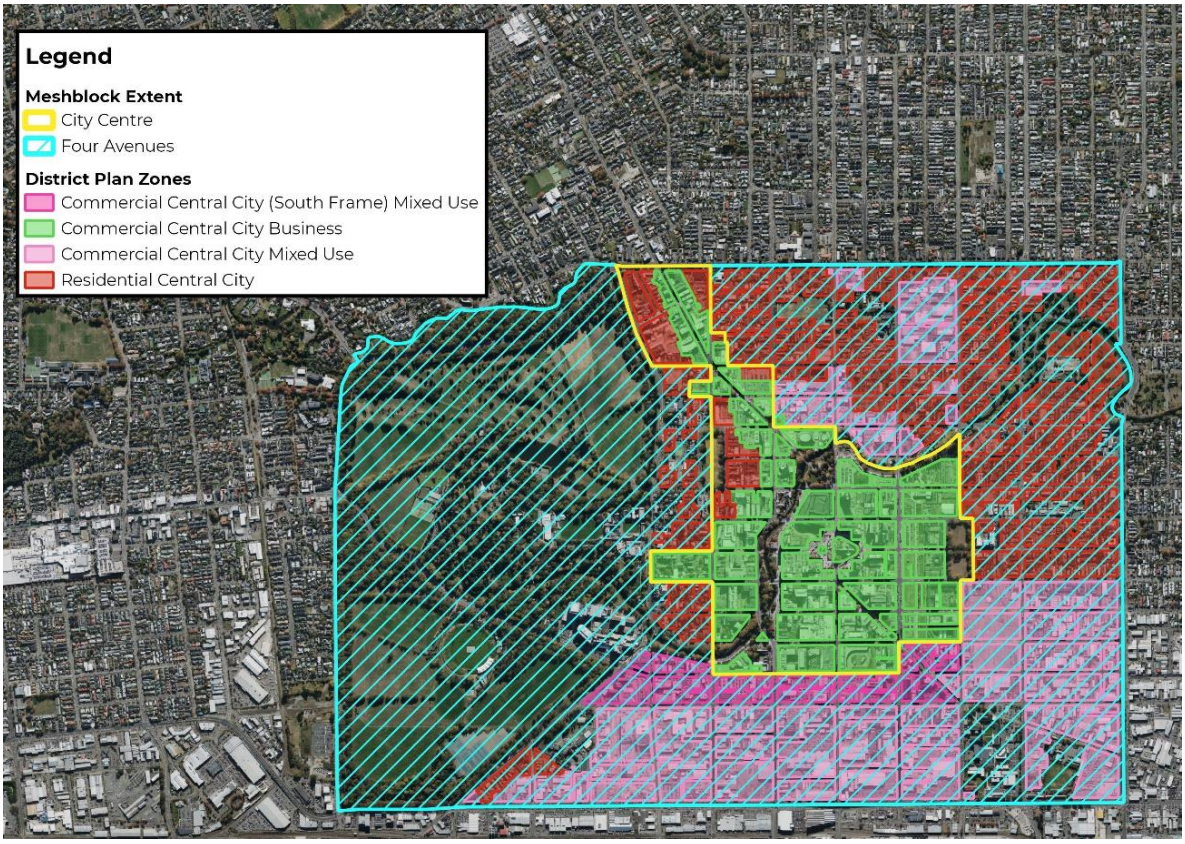
The success of a City Centre is generally determined by its ability to attract businesses, especially high value commercial businesses. There are two reasons for this, the first is that these businesses are both more productive than others and are the drivers of productivity growth. The second is that a high profile and successful City Centre provides a national and international profile for business and therefore contributes to a city's competitive advantage.

The general level of employment is also critical to a successful city centre as it creates additional footfall for shops, bars and restaurants and together these developments contribute to the overall social amenity provided. This amenity, in turn, influences people's decision to live in the City Centre.

The following figure shows the extent of the City Centre (named Central City Business), and Central City, defined by Stats NZ meshblock[3] boundaries. These geographic areas are used to show employment trends within Christchurch's City Centre. The meshblock boundaries do not perfectly align with the City Centre but do provide a close approximation of the City Centre area for the purposes of determining the level of employment activity within Christchurch's foremost employment hub. As discussed above, the employment metric is an important economic indicator of the current position of the City Centre's recovery.

The extent defined as the 'City Centre' shows the location of the City Centre land while the extent of the 'Four Avenues' area includes the remainder of the area circumscribed by Moorhouse Avenue, Deans Avenue, Bealey Avenue and Fitzgerald Avenue. Together these areas form Christchurch Central and represent the main area of interest for consolidated activity in the post-recovery period of the 2011 earthquakes in this assessment.

FIGURE 3: CHRISTCHURCH CENTRAL CITY (MESHBLOCK BOUNDARIES)



Source: Bing, Stats NZ, Christchurch City Council, Property Economics.

[3] *Meshblocks are the smallest geographic unit that Stats NZ uses to publish data.*

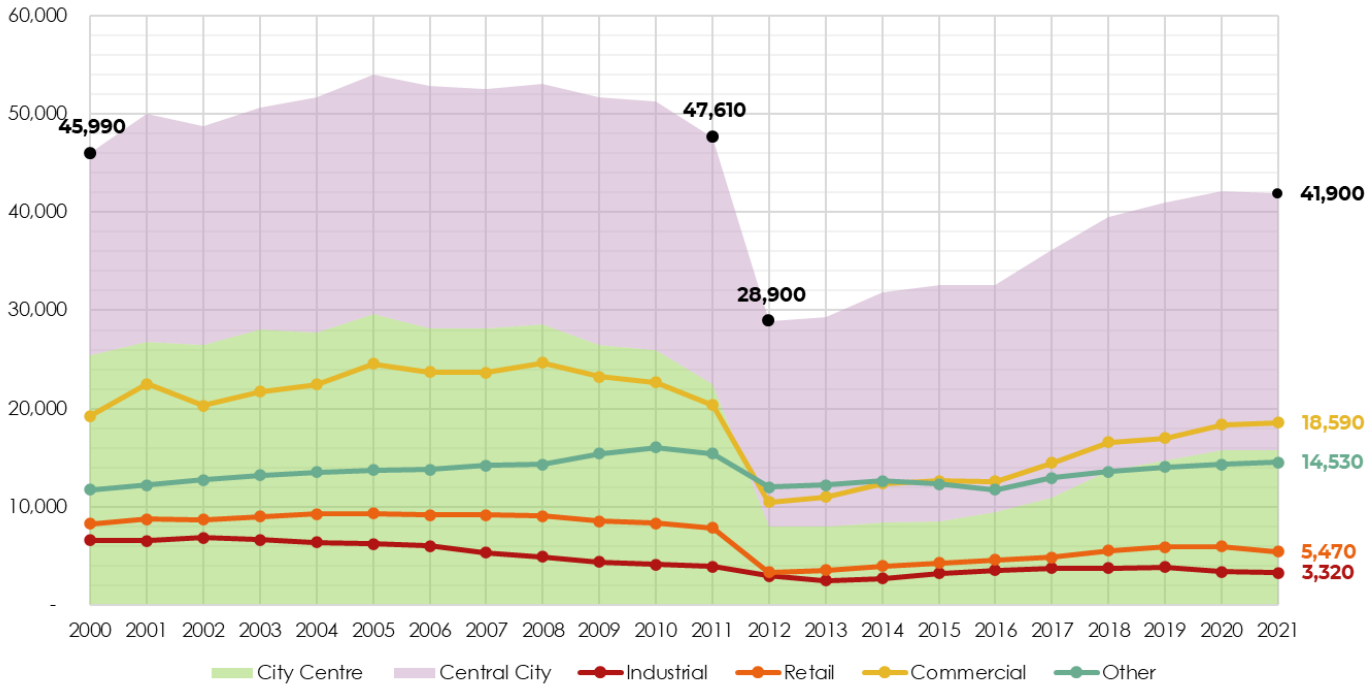
The following figure shows the employment by zone and by sector for central Christchurch. The coloured area shows the total employment by City Centre and the remainder of the four avenues stacked. The lines show the total employment across both zoned areas that comprise the Christchurch Central City area (City Centre and remainder of four avenues), by broad ANZSIC[4] sector.

3.1. CENTRAL CITY TOTAL EMPLOYMENT TRENDS

The graph shows that commercial and retail activity in the central city were both, understandably, significantly impacted negatively by the February 2011 earthquake. Both sectors have made robust gains towards pre-earthquake levels despite subsequent challenges posed by COVID-19 and the post-COVID recovery period.

The employment base of the Central City pre-earthquake totalled around 47,600 employees, with about 47% in the City Centre and the balance 53% in the remainder of the four avenues (broadly the CCMUZ and HRZ). This '*bottomed out*' at around 28,900 employees in 2012, with a progressive shift towards the rest of the four avenues area with 72% of employees in the Central City outside of the City Centre and just 28% in the City Centre as the city begun its recovery.

FIGURE 4: CHRISTCHURCH CENTRAL CITY EMPLOYMENT BY SECTOR AND ZONE



Source: Stats NZ, Christchurch City Council, Property Economics.

[4] *Australia New Zealand Standard Industrial Classification*

In 2021 total employment in the Central City area grew to just under 42,000 as employment builds back into the Central City – 38% of Central City employees located in the City Centre and 62% outside the City Centre. This shows that current total employment within the Central City is still below the pre-earthquake total by just over 5,700 employees.

Of interest is that this difference is made up entirely out of businesses leaving the City Centre post-earthquake. The City Centre area has almost 6,800 fewer employees in 2021 than in 2011 (pre-February earthquake), whereas the remainder of the Central City has experienced a net increase in the total number of employees of just over 1,000 employees since the earthquake. This contrast suggests the areas outside the City Centre in the Central City have recovered their commercial and employment base, which has potentially been at the expense of City Centre.

The City Centre has, however, experienced significant redevelopment and investment that has resulted in solid growth in employment since the earthquake occurred. The total employment in the immediate aftermath of the earthquake was just over 8,000 employees and has grown by just over 7,700 employees to a 2021 total of 15,750 employees. This shows there has been significant progress in its recovery, however there is still significant development and business consolidation to occur before it could be considered in a '*recovered state*' from an economic perspective.

3.2. TOTAL CENTRAL CITY EMPLOYMENT TRENDS BY SECTOR

Commercial employment represented 43% of employment in the Central City pre-earthquake and 36% post-earthquake. Commercial employment now represents 44% of total employment in the Central City, a return to its pre-earthquake proportion. Note this is off a lower employment base, but indicates commercial employment is recovering ahead of the other sectors on a proportional basis.

Retail employment represented 17% of the Central City total employment base pre-earthquake dropping to 12% immediately post-earthquake. However, the recovery of retail sector employment has stalled at around 13% of total employment in the Central City. COVID-19 has had a bearing on this proportion with many retailers culling staff during COVID and now trying to rebuild as the retail sector starts its post-COVID recovery.

Based on the key employment metric, the Central City appears still to be in post-earthquake "recovery" mode. This is not unexpected given the extent of buildings that had to be demolished and it is only just over a decade since one of the country's biggest natural disasters. The recovery and redevelopment of the Central City requires a significant amount of resources and investment over a sustained period. Over the last two years the recovery has been further hampered by the COVID-19 pandemic and the enduring adverse effects this has had (and continuing to have) on the economy.

3.3. CENTRAL CITY RECOVERY DIRECTION

The proposed policy settings in PC14 seeks to further facilitate development enablement in the Central City to increase its competitiveness within a planning framework designed to support more intensified and efficient development. Increased enablement and development capacity through heights represent a positive economic effect to achieve a higher level of development, flexibility and market certainty, all vital to the City Centre's recovery.

Property Economics consider it important that Council continue to advance policy direction that encourages and facilitates growth of commercial and retail activity in the Central City and improves the City Centre's competitiveness in order to facilitate the ongoing recovery of the City Centre.

To maximise enablement and efficiency from an economic perspective, identification of a precinct within the City Centre with no height limit to encourage the highest possible land use and intensified activity would represent the most efficient economic outcome. The extent of the City Centre is large and may encourage dispersed rather than consolidated development.

An identified area could take the form of a precinct over the most efficiently located areas within the City Centre such as those on main arterials or within a specified 'heart' of the City Centre that enables greater heights than the surrounding zone.

As mentioned earlier, this would maximise these business and employment value generators and provide the most benefit from agglomeration and centralisation of business activity. CBDs are designed to be the areas of tallest buildings in a city and focal point for a city's commercial activity.

However, context is important. This is Christchurch City, not Sydney or New York who individually have population bases and commercial markets more than 10 times the size of Christchurch City. As such the question from an economic perspective is what is the economic cost of a 90m height enablement (D for greater heights) vs no height limit?

The probability of a large number of 90m+ high buildings being developed in Christchurch's City Centre given the size of the city's commercial and residential apartment market is considered low. Additionally, the economic transactional costs associated with seeking a taller building with a D activity status with the few, if any, who may seek to develop taller buildings is not considered material in the overall context of the likely building cost and associated risk. As mentioned earlier a D activity status is considered to compromise the level of enablement that would facilitate the development of tall buildings and generate economically efficient outcomes.

The option of 50m height enablement would reduce the development potential and City Centre capacity significantly. This would result in a significantly reduced level of development enablement (relative to 90m and no height limit) and would reduce the economic efficiency and productivity of the City Centre long term. This would generate long term economic costs

to the community relative to the 90m and no height limit options. As such this is considered an economically inferior height enablement to the alternatives.

A zone wide cap on height enablement 50m and below introduces significant economic costs that could compromise the long-term development of the City Centre. By enabling areas of higher built form and more efficient land use Council would signal to the market that these areas are intended for this purpose and are the most efficient locations for highest density developments.

3.4. OFFICE TENANCY THRESHOLDS

Large tenancies (>500sqm GFA) as key contributors to the recovery, growth and primacy of the City Centre. While these potential businesses made up less than 20% of Christchurch's commercial office companies, they contributed around 70% of employment to these sectors. The ongoing recovery of the City Centre is dependent on it accommodating medium to large commercial office businesses.

The current situation facing Christchurch is one of dislocation with businesses operating in locations that are driven by individual decisions. This reflects a city that does not currently possess the economic benefits within centres to drive the market appropriately. The key centre in providing this centralised activity is the City Centre.

Some of the costs of business dislocation in the case of Christchurch's economy include:

i. A decline in centre amenity and a social value potentially not achieved elsewhere, i.e., a net loss of value. There is a social value placed by the community on a vibrant Central City, if this activity is simply dispersed throughout the city this value is likely to be lost altogether.

ii. Loss of agglomeration benefits. The proportional decline of commercial activity within the City Centre and the dispersal of this commercial activity throughout Christchurch impacts upon productivity, which decreases both the value and competitiveness of businesses in Christchurch; and

iii. With the $billions spent on projects upgrading public City Centre assets, the loss of activity within the City Centre increases the marginal cost of this infrastructure while reducing the social value attributable to these public goods and services.

For Christchurch to meet economic wellbeing and efficiency, it is fundamental that business locations, particularly the City Centre, are competitive. As a highly influential competitive asset it is critical to the ongoing recovery of the City Centre (and wider Christchurch economy) as a whole that emphasis should be placed on generating appropriate activity within this principal centre.

High value-added employment requires high amenity, accessible locations exhibiting convenience to other services, agglomeration benefits and often high profiles. In terms of

competitiveness, it is important to recognise that these larger businesses servicing larger national markets often have locational options in most major centres.

The Christchurch community must therefore consider carefully the business environment its planning direction is producing and, where appropriate, intervene to facilitate greater community wellbeing through this development.

The need for exogenous intervention into a market is necessitated by the fundamental intent of seeking to maximise community wellbeing either through improvements in equity or an improvement in economic efficiency.

There are clear priorities that endure through the Commercial and Industrial Chapters of the ODP that relate to the Christchurch City Centre. Not only is this prioritised by the community through the ODP but is fundamental in terms of Christchurch's economic wellbeing. A vibrant and vital City Centre offers a unique environment for economic activity that is unlikely to be replicated elsewhere in Greater Christchurch. The timely recovery of the City Centre is fundamental in driving recovery for the rest of the Christchurch, and Canterbury economies. Given the City Centre has not yet recovered in respect of employment or business activity this should remain a priority.

The commitment from central and local government to invest into the City Centre provides a clear indication to the market of the objectives sought for the City Centre's role, however the City Centre continues to face significant hurdles. An insufficient supply of B and C grade office space, high rebuild costs, and uncertainty coupled with the current dispersal of its previous tenants combine to place pressure on the timely recovery of the City Centre.

The situation experienced by Christchurch is unique in that commercial office activity has been unavoidably removed and relocated from the City centre. For both the ongoing recovery and primacy of the City Centre it is considered necessary for PC14 to facilitate this relative competitiveness and continue with the existing office tenancy threshold provisions.

In order to achieve the economic benefits of a centralised city and facilitate the recovery of the City Centre it is considered necessary to continue with the existing limits on the basis of a hierarchy, with the City Centre possessing the greatest development opportunity followed by the identified KAC's. This hierarchy is based on the primacy of the City Centre in terms of its role and function. The City Centre fulfils a regional role providing a level of profile and potential agglomeration benefits that typically attract and sustain medium to large businesses.

In seeking to facilitate the recovery of the City Centre, businesses over 500sqm GFA are crucial. Given that over 70% of medium to large commercial office businesses were once located in the City Centre there is a clear need for provisions that actively seek to redirect this activity into the City Centre.

As with any intervention, maintenance of the office tenancy threshold is likely to have some economic costs associated with it. By its nature this may result in short-term costs for individual businesses. They are also likely to result in some transactional costs through the

need for some businesses to obtain resource consents. Generally, transactional costs accompany appropriate regulation. In the case of PC14 these costs will inevitably be outweighed through the City Centre's timely recovery.

Additional economic risks associated include:

i. Decreased choice;

ii. Insufficient capacity;

iii. Increased operational costs; and

iv. Impact upon KAC efficiencies.

There is also a potential increase in business costs relating to rents. This occurs in a free market where the agglomeration benefits are recognised and realised by the market and considered in their locational decisions. These increases are generally a market reaction to the increases in productivity achieved. Without intervention into the market through the maintenance of the office provisions there would be no corresponding increase in production to outweigh the potentially higher rent levels.

Overall, the potential to increase business costs is more than met through the increased density while additional economic benefits would accrue to the community as a whole. In Property Economics view the continuation of the 500sqm office tenancy cap remains the most appropriate means by which to achieve the timeliest recovery of the City Centre.

3.5. CCMUZ (INCLUDING SOUTH FRAME) RETAIL RESTRICTIONS

The CCMUZ restrict retail activities to:

(a) the display and sale of goods produced, processed or stored on the site and ancillary products up to 20% of the net floor area on the site used to produce, process or store these goods, or 350m² retail floor space, whichever is the lesser;
(b) second hand goods outlet;
(c) food and beverage outlet;
(d) small scale general convenience store where grocery items are offered for sale with a maximum GLFA of 250m²; and
(e) one supermarket with a maximum GLFA of 2500m² located within the Commercial Central City Mixed Use Zone block bounded by Manchester, Salisbury and Madras Streets.

These provisions are designed to support and not compete with the City Centre in the post-earthquake period. As per Figure 4, retail activity within the City Centre has not recovered to its pre-earthquake levels and represents a sector where opportunity for retail growth should be preserved. Maintaining the established retail restrictions would further support the City Centre in its recovery and further acknowledge the City Centre's primacy in the hierarchy of centres.

Additionally, the CCMUZ's role and function is not to act as a centre location but to support the City Centre in its recovery. The restrictions support the CCMUZ's role and function as a support zone for the City Centre.

3.6. TOTAL CENTRAL CITY RESIDENTIAL TRENDS

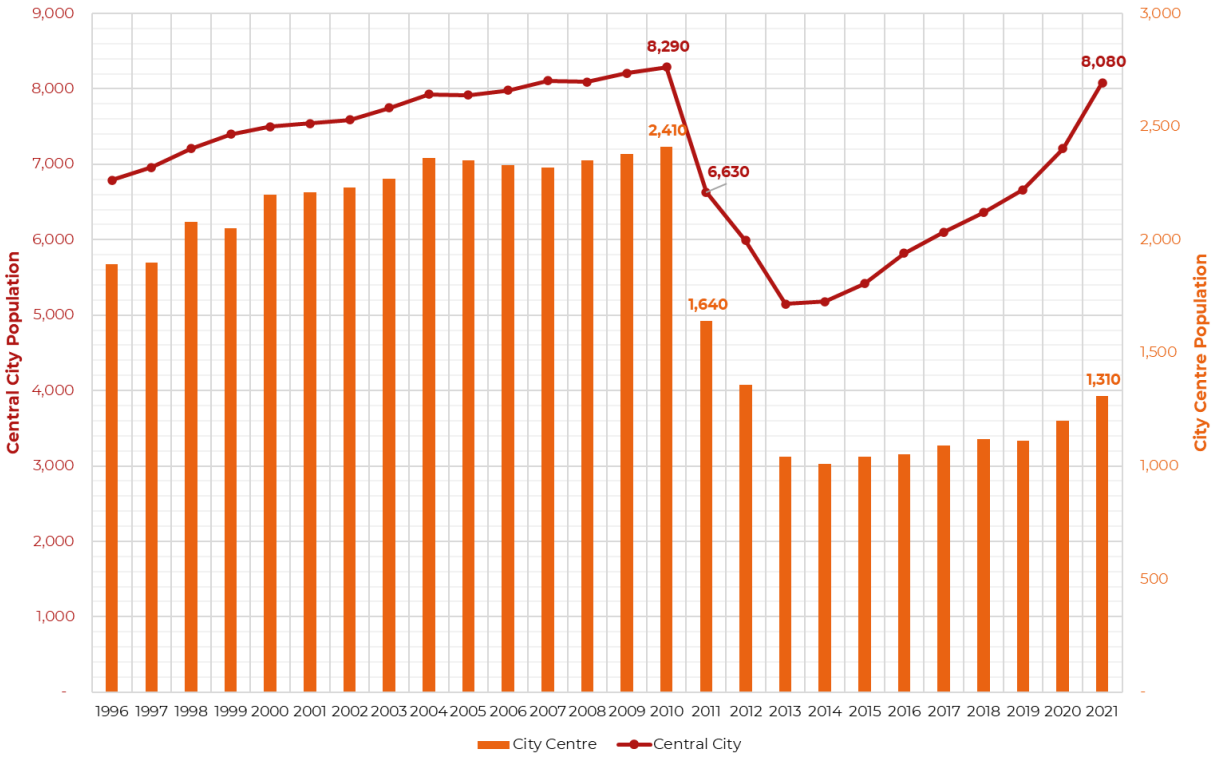
The following figure shows the trends of the residential population base in the Central City over the last 25 years. Growth pre-earthquake was steady albeit low and slow. The February 2011 earthquake had a marked negative effect on the Central City's population base across both the City Centre and balance of areas the make up the Four Avenues.

In respect of the Central City outside the City Centre, the population base has rebounded to almost its pre-earthquake level being only a net 3% below 2010. This indicates the majority of the residential redevelopment in the Central City has predominantly been on its fringes.

While the City Centre decreased by 1,100 people, a net decline of 67%, during the initial post-earthquake period, the subsequent recovery has been very slow and still nowhere near its pre-earthquake resident population base.

Christchurch as a whole has a population base around +4% higher than pre-earthquake. This further underlines the City Centre as a proportion of the city's residential base has declined and not yet recovered to its pre-earthquake levels. This has led to a more '*spread*' city that reduces economic efficiencies and has a detrimental effect on the City Centre's vibrancy and amenity.

FIGURE 5: CHRISTCHURCH CENTRAL CITY POPULATION



Source: Stats NZ, Property Economics.

PC14 policy seek to increase residential enablement within the HRZ to facilitate additional densification (enabling 32m heights in some areas over the status quo (20m)). However, the HRZ represents an expansive area for the level of likely demand for higher density residential typologies. As such, Property Economics consider a more consolidated area within the HRZ surrounding the City Centre would represent the most efficient location to have a higher level of enabled height to facilitate and encourage a more efficient development outcome. This would concentrate higher residential development in closer proximity to the City Centre, represent a more efficient / productive use of the land and deliver increased vibrancy and amenity in a more consolidated area.

A higher height enablement within part of the HRZ would also assist development feasibilities and result in the higher residential buildings being clustered into a more consolidate area resulting in infrastructure efficiencies, rather than spread around the wider HRZ extent.

3.7. RESOURCE CONSENT TRENDS

It is Property Economics understanding that there have been a limited number of resource consents applied for buildings in the commercial areas of the Central City (City Centre and CCMUZ) that do not comply with the current height thresholds in the respective zonings.

While this could be partly due to the existing regulatory environment being perceived as too onerous and less certain for development investment, within these zones, it is more likely that the demand is simply not there, or is too risky, to sustain a large volume of tall building resource consents. This would suggest that further enablement, even at the margin, is unlikely to result in a material increase of new tower structures being sought.

3.8. MINIMUM HEIGHT CONTROLS

There is currently a Minimum Height Control in place in the City Centre of two storeys. This control was put in place to encourage a higher amenity level, contiguous built form street level and promote the City Centre as a place of high amenity and area of consolidated diverse activity and land use.

An option considered by Council could be to raise this minimum limit to 3 storeys, this approach has the unfortunate effect of discouraging development at lower levels that would otherwise occur and generating an additional cost on some subsequent development. By forcing a landowner to construct a three-storey development now (over a two-storey development), Council is potentially delaying the opportunity for redevelopment within the City Centre as a landowner would be more reluctant to demolish a structure with a larger number of storeys, i.e., the lost improvement value is higher at this point.

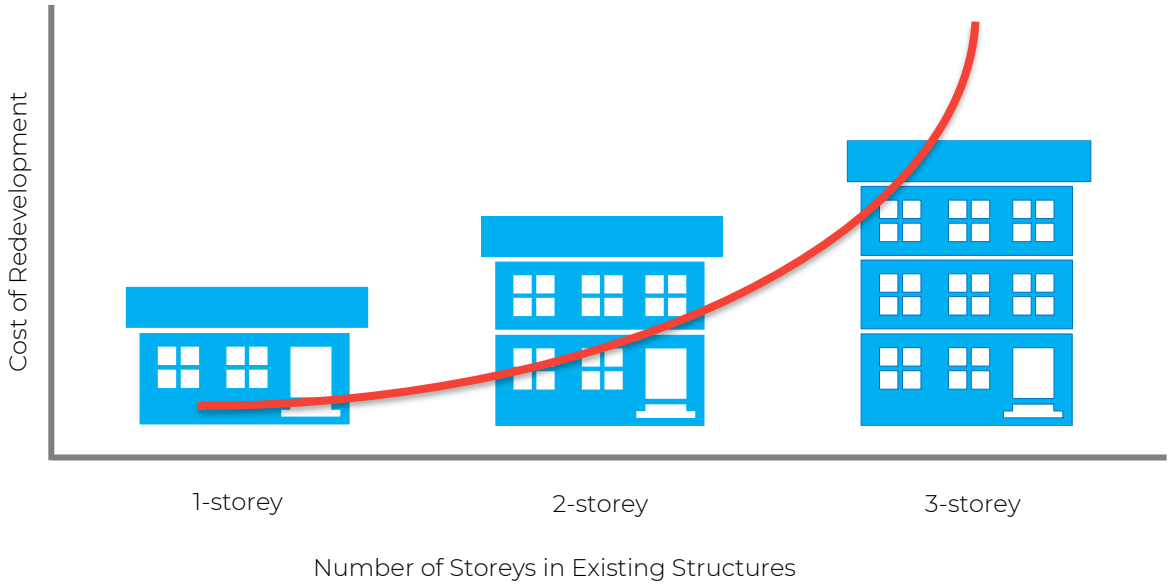
By discouraging redevelopment the approach could have the inverse, of the intended, effect on the amenity and consolidation of activity within the City Centre. The City Centre risks having non-contiguous areas as a result of foregone development opportunity or slower long-term

intensification and development as a result of compelling three-storey development over double storey development.

Council are considering the introduction of a similar two storey minimum into the CCMUZ for similar reasons but also to promote the City Centre by levelling out the advantages of competing commercial zones. By introducing a two-storey minimum in the CCMUZ, Council would be removing a competitive advantage the zone enjoys over the City Centre.

The following figure demonstrates the non-linear relationship between the number of existing storeys and the cost of redevelopment i.e., the addition of a storey increases the cost of redevelopment in a non-linear, increasing fashion, hence why very few tall structures are demolished.

FIGURE 6: RELATIONSHIP BETWEEN REDEVELOPMENT COST AND BUILDING HEIGHT



4. HIGH LEVEL ECONOMIC COSTS AND BENEFITS OF CENTRAL CITY HEIGHT ENABLEMENT OPTIONS

The following outlines the high-level economic costs and benefits associated with the increase in heights for the identified Central City areas, i.e., Central City densification. There may be other relevant costs and benefits associated with increasing building heights in the non-economic fields, but they are not discussed in this section.

These benefits and costs refer are general to increasing height limits. More specific costs and benefits associated within each zoning height limit change follow.

BENEFITS

- **Catalyses development:** Liberalising of land use rights has historically been proven to increase development of associated land. The increase in height limits brings the (re)development timeframe of affected properties forward in time as the return on development is higher (more rent is now achievable).

  There is a second order effect also because development encourages further development. As one parcel is (re)developed, neighbouring properties benefit off the improvement in amenity (assuming development and urban design standards are appropriately set to deliver such outcomes) and are encouraged to (re)develop themselves to maximise returns.

- **Increases the impetus for intensified (re)development:** The ability to build up to a higher level generates an impetus for developers to maximise their build envelope.

- **Increases the impetus for consolidation of activity:** Increases the impetus for consolidating activity (retail, employment, residential, commercial, etc.) into centre locations rather than sporadic development in unplanned areas.

- **Enhanced housing affordability**: Restrictions on building vertical can contribute to housing shortages. More permissive building height restrictions, therefore, can have positive consequences for delivering more affordable / serviceable housing where the construction of apartments and other higher density dwellings become more feasible within the height change area.

- **Increases employment opportunities:** Greater height limits mean more employment GFA opportunities as the level of commercial floorspace increases more people will be employed in the identified area.

- **A stronger sense of connectedness and vitality**: The increased residential and commercial activity density mean that a greater mix of people are in closer contact with each other. This allows for more '*free flow*' of ideas between people and creative thinking.

- Potential for less land / green space take-up: A higher density and agglomeration of business activity means that a greater quantity of activity can take place within the identified area. This would suggest that more efficient use of land for commercial space leaves more land / space available for other uses, such as parks, green space, environmental amenity which the local community can enjoy.
- More efficient land use: Taller buildings mean land is being used more efficiently as the vertical space is being used more effectively. While premium retail / food and beverage space will predominantly remain at ground level, a broader range of commercial and residential options are unlocked through the increased building height limits.
- More flexibility for land users and building tenants: Flexibility is often an attractive part of taller buildings. With the increase of height limits, tenants would be able to expand to other floors within the same building (or potentially on the same floor, particularly in larger floorplate buildings), or sub-let floorspace as needed, with relative ease.
- More efficient infrastructure use: The existing and future infrastructure that is put in place to service local residents in and around the Central City is used by a larger number of people. This includes road / footpath network, community facilities – libraries, halls, parks – power and telecommunications, three waters, etc. The larger number of people in the form of increased employees using these resources on the way to work, increased residents living in apartments and tourists in visitor accommodation in the Central City, the lower the marginal cost of infrastructure.
- Increased internalisation of retail spend and centre spend: The (re)development of properties will encourage increased foot traffic to the area through employment, local residents and tourists attracted by the amenity. This improves the Central City long term as it establishes it as a hub of activity, employment, culture, public transport, community and living.
- Reduces transport costs and associated emissions: The increased density enabled by increased building heights will reduce transport costs as a greater number of locals will be able to access the benefits of the Central City. This has flow-on benefits of lower fuel emissions, and possibly a greater reliance on public transport as more employment options will be collocated on public transit routes.
- Adds profile as a commercial hub: Development and height create a general feel of commercial professionalism that attracts high tier commercial tenants and main brands to the Central City. This profile adds prestige to the Central City location and creates significant economic value for the Central City.
- Adds profile as a hub of residential activity: The development and height create a feel of community and sense of place that can attract a diverse demographic of home buyer and / or renter.

- **Generation of new views and enhanced building profile:** A wider range of views from buildings at differing heights are attractive to commercial tenants that want a good view for their office. This can attract high tier commercial tenants for regional / head offices. Meanwhile, for practical floorspace reasons, and sometimes for image reasons, taller buildings are more attractive to large corporations by providing a high-profile space. This is reflected in a prestige factor.
- **Provide greater market certainty and simpler planning process that lower transaction costs:** Greater heights are allowable within the area but require a resource consent, PC14 will remove some cost and wait time for the resource consent process up to the chosen height limit in the respective areas or make the consent process timeframe shorter / less costly as there is a lower threshold for heights to pass. This also increases market certainty – a critical element to investment in a market.
- **Higher level of specialisation and productivity**: As levels of economic activity increase in the same footprint, so does the ability of businesses to specialise and increase efficiency, due to increased competition. This would also increase the prevalence of knowledge spill overs, increasing innovation density allows businesses to have access to larger markets of suppliers (especially labour supply) and consumers, allowing competition to enhance the quality of inputs and outputs.
- **Potential to safeguard productive land**: A large proportion of urban centres are currently surrounded by the most productive, or versatile, soils, across the country. As urban centres expand into these productive areas there has been a concern that productive land is not being adequately protected. As such, more floorspace being built higher within the same footprint will ensure the district has somewhere for its growing population to live and work– mitigating effects on the future rate of consumption of its productive land resource.

COSTS

- **Increased congestion of road / footpath networks:** Increased density can generate increased congestion. The greater level of foot traffic generated through increased development, increased employment and increased high density residential activity may impact the road network and parking space availability in some Central City locations. The increase in disbenefits, including congestion, is unlikely to be immediately appreciable, so traffic flow mitigation will likely be somewhat mitigated with sufficient planning.
- **Increased levels of crime:** There is a direct correlation between greater numbers of people and levels of crime. This tends to be at all levels of crime from petty theft / public nuisance to serious assaults. Crime can be somewhat mitigated with design outcomes such as more open / visible spaces, more lights, etc., and greater levels of investment in the form of security cameras, guards and police presence.

- Increased pollution / waste: Waste and pollution are also more common in areas with a greater number of people present. Increased road network and foot traffic increase pollutant runoff in stormwater systems and the cubic meterage of waste produced in an area. This can be somewhat mitigated with design (such as increasing the number of rubbish bins and stormwater capture / filtration) and increasing the number of collection days / road cleaning.
- Increased noise: Increasing the amount of people / traffic in an area will increase the level of ambient noise in that area. This can be mitigated with urban design and architecture such as increased greenspaces and trees or greater levels of noise acoustic absorption materials in buildings, thicker walls / glass, etc.
- Increased levels of vagrancy and transient population: Higher density areas attract homelessness and transient populations. This can negatively impact the general amenity of an area and discourage community participation including demand for residential, retail, and employment.

It is worth noting that the costs identified above are all associated with public safety and amenity and can all be mitigated, to some degree, by urban design and good planning policy. Poor quality policy and design can, however, further exacerbate the economic costs associated with increased density enabled by greater height enablement.

4.1. ZONE SPECIFIC ECONOMIC COSTS AND BENEFITS

City Centre Zone Specific - Costs and Benefits

- ⊕ Increasing City Centre Zoned area will generate an impetus for Central City activity (commercial, community, high density residential, and other strategically important collocated activity) to occur within the City Centre relative to lower order suburban centres.
- ⊕ Christchurch City Centre is in the post-recovery period following the 2011 earthquakes and has limitations on height that are no longer necessary from an economic perspective. Increasing height enablement would be a further step signalling the regeneration of the City Centre post-recovery and removing historical development height restrictions that limit the potential economic benefits associated with taller buildings.
- ⊕ Enabling greater heights in the central city area would distinguish this area from the suburban areas of the city as the hub of intensified and diverse activity.
- ⊕ Provide certainty to developers and the public about the role and function of the City location as the most prominent centre in the city.
- ⊖ The extent of City Centre is vast and the liberalising of height enablement may not provide the impetus for intensified development as efficiently as consolidating height to identified, efficient locations within the City Centre. This cost can be mitigated by identifying specific areas within the City Centre for enabling more intensified development / taller buildings and having lower height enablement elsewhere in the City Centre to encourage further consolidation. Care must be taken to ensure the remainder of the City Centre enables heights greater than competing residential, suburban centres, and MUZ zones to ensure it has a competitive advantage over those other zones.

Central City Mixed Use Zone and Central City Mixed Use (South Frame) Specific - Costs and Benefits

- ⊕ Enabling heights will enable a greater level of high density residential and commercial development to occur in a relatively efficient location within Central Christchurch compared to sporadic development occurring in suburban or fringe locations.
- ⊖ May detract some above grade activity away from City Centre area through the enablement of greater heights. This can be limited by height thresholds or district plan policies within the zone, designation or precincts.

Central City High Density Residential Zone - Costs and Benefits

- ⊕ Enabling greater heights limits will allow a greater level of intensification in a relatively efficient location – close to the City Centre.
- ⊖ Enabling greater heights may disturb the zones role and function as being almost exclusively to enable higher density residential forms as additional convenience retail / services may be required with significant densities.
- ⊖ Facilitating greater height enablement may detract additional residential intensification from the City Centre and CCMUZ where a critical mass of activity is anticipated.
- ⊖ Enabling greater heights may increase the level of residential capacity further, beyond the already sufficient levels, which could lead to an inefficient allocation of infrastructure and land resources as well as give rise to uncertainty as to the infrastructure need of areas.

It is worth noting that the costs and benefits are limited by, and subject to, the extent of the zone. Enabling some greater height beyond the status quo within a sub-precinct, or other such geospatial discrimination, of the HRZ may limit the costs but also provide an opportunity for dedicated higher residential development to occur in a more consolidated and efficient manner that otherwise may occur in a more dispersed manner.

Enabling a higher density residential environment within the HRZ, to a limited extent, in the areas closest to the City Centre and / or main arterials in the central city would produce a greater level of directed growth to efficient locations but also enable the HRZ to better compete for residential activity with the CCMUZ.

4.2. ECONOMIC DIRECTION

City Centre Zone:

The City Centre is anticipated to be the hub of activity for the city with a range of activity in retail, employment, residential, visitor accommodation and community. The diverse range of activity and interconnectedness will generate a level of agglomeration opportunities for collaboration and productive efficiency that cannot be found to the same extent outside the Central City elsewhere in Christchurch. The City Centre should therefore be given every opportunity to succeed in its role as the premier location of business, employment and high density living from an economic perspective.

Applying a greater height enablement to the City Centre will solidify the Central City as the centre location of primacy within the city and will generate an impetus for more activity to occur within the Central City. This is due to the Central City becoming increasingly competitive as a development location on a relative basis and would represent the most efficient location for urban intensification. This will encourage a greater level of integration and connectedness within the City Centre that will benefit the city. This maximisation of economic benefits comes in the form of unique competitive advantage (the location with the highest height enablement) and its associated productive and allocative efficiencies.

While applying no height limit would represent the most efficient economic outcome, the additional costs associated with giving buildings greater than 90m in the City Centre a status of RD would be relatively small, primarily when there are likely to be few structures that would achieve these heights in the foreseeable future. This is because the current market for tower structure or high-rise development (residential or office) is limited within Christchurch City.

The enablement of greater heights up to 50m would generate more economic benefits than are currently enabled but they would not maximise the economic benefits of increased height enablement such as a no height limit policy. A 50m height threshold may have a detracting impact on development relative to higher height options due to more constrained development feasibilities. Compared to a 90m height enablement the economic costs associated with a 50m height threshold are likely more substantial as a larger number of developments would be detracted from locating in the City Centre, and potentially Christchurch altogether.

While not all new construction in the City Centre is likely to reach heights over 50m (around 18+ storeys) allowing development beyond this height is likely to provide additional market opportunity to developers to generate a unique offering for the Christchurch 'medium-high-rise' market that currently is not available. It will afford a more economically efficient outcome to be developed in the City Centre.

This increase will improve the ability of the District Plan to meet the objectives of a more efficient, consolidated and intensified urban form around higher amenity and service areas, while providing greater certainty within the residential market and reducing the pressure for less efficient development.

There is no valid economic reason to restrict the level of development within the City Centre to lower heights in the context of the RMA as this could impede the role and function of the Central City and direct intensification to less economically efficient locations.

As discussed earlier, Property Economics could, however, support the identification of a no height limit precinct within a specified area(s) of the City Centre, while maintaining a lower height enablement within the remainder of the City Centre. This is due the extent of the City Centre being vast in terms of development capacity and may encourage sporadic development rather than consolidate development to the most efficient locations. The lower height enablement outside of such a precinct may help consolidate development and encourage intensification and the potential costs of greater density could be more easily and efficiently managed.

While no height limit, from an economic perspective, is encouraged within the City Centre as it enables the greatest level of land use and associated efficiencies and provides the City Centre with the greatest strategic advantage, there may be non-economic (urban planning, design, engineering, etc.) reasons that would necessitate the restriction of heights.

Care must be taken, if Council pursue such a policy setting, that when defining the extent of a no height limit precinct it is as competitive location as possible and all strategic and locational advantage should be given to it to encourage its primacy in the hierarchy of development enablement across the City. This would facilitate the precinct to attract the greatest density development and generate the highest impetus of intensification in an efficient location relative to the balance of the City.

Central City Mixed Use Zones:

A lower height enablement in the CCMUZs, such as the status quo of 17m, would direct greater levels of intensified development into the City Centre, where the District Plan seeks the bulk of the 'tall building' activity to occur. This would help entrench the City Centre as the lead location for commercial activity densification and primacy in the hierarchy of the city's network of centres.

Allowing some level of spill over from the City Centre, up to 32m (around 10 storeys), would enable a general level of increase in intensification across the central area while still directing the most intensified development to occur in the City Centre. Enabling heights up to 32m would also generate some minor detraction effect on the City Centre intensification potential and generate some economic inefficiencies due to the significant increase in capacity that the extent of the CCMUZ represents.

However, the extent of the CCMUZ increase in capacity is somewhat limited by the existence of the commercial tenancy size limitations which in effect lower the potential for commercial buildings beyond the status quo, i.e., it is considered unlikely a building of 32m would be developed for solely for commercial office tenancies under 500sqm in the CCMUZ (unless containing other land uses) given the level of risk involved and market size.

The cap on office GFA would encourage large tenants (medium-large office enterprises requiring over 500sqm GFA) to locate within the City Centre, where they would be preferred, and would help the City Centre continue its post-earthquake recovery.

This is important as zones where residential and commercial activity can be developed need to be considered as a suite of zones from an economic perspective that work together, rather than an assessment of each zone in an isolated manner. A staggered height regime where the City Centre has the highest height potential, flowing down to Central City fringe locations, and then suburban centres and main arterial roads (if appropriate).

The level of development that would be enabled in the CCMUZ may draw some higher density development out of the City Centre to more fringe locations where access to infrastructure and amenity is inferior and the negative externalities associated with intensification (noise, pollution, congestion, crime, etc., ...) are more difficult to manage as the extent is significant.

Very little development is likely to occur up to and beyond 50m, and all of this development would be more efficiently located within the City Centre area. Height limits beyond the proposed 32m are likely to have a significant weighting of detrimental economic impacts on the development of the City Centre that will likely result in a less efficient economic outcome. For these reasons, heights above 32m should be restricted.

High-Density Residential Zone:

In the HRZ allowing building heights up to 32m would enable a high level of intensification to occur in an efficient location while still maintaining the primacy of the centre zoning in the nearby City Centre. Given the extent of the HRZ, the 32m height enablement should be restricted to those areas of the HRZ closest to the City Centre such as in the indicative sub-precinct map provided in Figure 2.

The baseline would maintain a lower height limit of 20m for the remainder of the HRZ outside the sub-precinct so the HRZ furthest away from the centre of activity does not compete as well against the City Centre, CCMUZ or the HRZ with the higher density sub-precinct. A sub-precinct encourages and enables the tallest residential buildings in the HRZ to be consolidated rather than dispersed over the wider HRZ area. This would represent a more economically efficient outcome.

The 32m limit allows development up to around 10 storeys which are significant apartment (or office) block developments, particularly for Christchurch, which has relatively limited apartment product demand.

The 32m limit will continue to distinguish the HRZ from the regular residential (post MDRS) or lower order centres by roughly tripling the level of height enablement. It also helps the zone act as a height gradient between the City Centre and the lower density suburban residential areas.

In order to achieve the range of housing densities identified in the HRZ, it is important that there is a differentiation between the HRZ and other competing zones enabling opportunities for greater densities.

The focus on residential activity and the restriction of height creates a clear delineation between the HRZ, the City Centre and CCMUZ. The HRZ has a focus on high density residential by not enabling most commercial activities and restricting height to 10 storeys, where the City Centre allow greater height enablement and a greater diversity of activities.

The HRZ is still distinguished from the CCMUZ by its strong residential focus that restricts retail and commercial activity.

Enabling greater heights (i.e., no height limit) would enable too much density to occur outside of the City Centre, undermine the City Centre's development potential for this land use and may lead to inefficient outcomes with greater levels of development occurring outside of the City Centre. By restricting height enablement Council may direct intensification to a greater extent to occur within the more efficient City Centre and benefit from a more efficient land use resource and infrastructure spend. HRZ sub-precinct would also compete with the CCMUZ on a similar basis which would be limited to 32m meaning the HRZ would have a strict competitive advantage.

5. SUBURBAN CENTRE HEIGHT ENABLEMENT

An appropriate building height within the suburban centres assessed in this report need to be considered in the context of the wider suite of heights across the residential and business zones. This is important to not undermine the efficient location of higher density residential and commercial activity with more competitive areas for such development that ultimately undercuts the aspirations of densification in and around the Central City area.

The identified suburban centres considered in this report for proposed height limit changes are:

- Hornby
- Papanui
- Riccarton

These centres currently have a zoning of Commercial Core Zone, which is anticipated to become Town Centre Zones (as a default) with the adoption of National Planning Standards. The current height limit enabled by the zoning allows for 6-7 storeys, or roughly 20m. This is the baseline height limit for the suburban centres that are part of this assessment and there are currently only a small handful of buildings in these centres that approach or exceed this height limit. The 20m height limit would continue to be the baseline height for other, smaller suburban (Town) Centres.

Council is considering changing the height enablement in these centres to either:

- 20m (maintain status quo); or
- 22m; or
- 32m; or
- 50m.

Height limit changes for these suburban centres are sought in order to enable additional densities / activity to occur as per the NPS-UD Policy 3(d).

Other centre heights also being considered as part of PC14 are:

- Neighbourhood Centre: 8m → 12m
- Local Centre – Small: remaining 12m
- Local Centre – Medium: 12m → 14m
- Local Centre – Large 12m → 20m

While these centres are not specifically assessed as part of this report, it is important to contextualise changes in the whole centre network of Christchurch City when assessing potentially significant changes in suburban centre capacity. These increases in Permitted

heights of lower order centres (Local and Neighbourhood) have a limited potential to impact demand on higher order centres, such as the City Centre or Town Centres. These costs are likely to be minor as these identified centre locations are still efficient locales, even if they may not be as efficient as Town Centres or the three higher order Town Centres specifically assessed (Hornby, Papanui and Riccarton).

Broadly speaking, the costs and benefits of increasing height limits in these other, lower order centre locations are similar to increasing height limits in the specifically identified centres. Since the change in height limits do not approach those of the proposed heights for City Centre, CCMUZ or HRZ it is unlikely that the impact will be drastic.

All three centres service a wide catchment for retail, recreation, community and residential needs that generates a critical mass of agglomerated activity for additional benefit and amenity to their respective catchments. These are the primary activities that the National Planning Standards indicate that a Town Centre should contain.

Increased height in all three centres is likely to result in a long-term increase in the level of intensification within the centre primarily in residential and commercial uses. The eased restrictions may spur some (re)development in centres which could result in increased retail / commercial office GFA, new community infrastructure and / or increased high density residential (apartments). These all promote the centre as a hub of employment and locations of higher levels of amenity.

While any increase in height limit is likely to notionally facilitate additional development within the respective centre location, the greatest benefit of height increases occurs at the margin i.e., enabling an extra 1m above the existing limit (20m) has a greater benefit than enabling an extra 1m above 32m.

Inversely, an increase in height limit of a competing suburban centre has an increasing disbenefit on other centres (with the City Centre being, generally, the most economically efficient). As the height limit of a suburban centres approaches the height enablement in the City Centre the marginal costs on the City Centre increase exponentially.

The increased impetus to develop the centre may help focus intensification into the centre, which could help with infrastructure management / development, and keep sporadic pockets of higher density development from occurring within residential areas. This would result in a more efficient outcome from an infrastructure use and investment perspective.

The impetus to develop higher density within these suburban centres may also detract from (re)development of the City Centre (and even the CCMUZ and HRZ) as the development land would be, comparatively cheaper and may result in a less efficient resource use and unplanned intensification that could result in infrastructure capacity shortfalls.

5.1. HORNBY

Hornby's Commercial Core Zoning is around 13.0ha and forms part of the Hornby Key Activity Centre (KAC). The Commercial Core Zoning consists of The Hub shopping mall containing circa 20,000sqm of GFA with key anchor tenants of Farmers and Pak'N Save. The surrounding area also has major national brands of The Baby Factory, Briscoes, Rebel Sport and The Warehouse as well as a Dress Smart Outlet shopping mall across Main South Road.

The centre is built out at 1 and 2 storeys or is used as a carpark for the adjacent activity.

Hornby is around 9km from Christchurch Central, or around 15-minute drive.

FIGURE 7: HORNBY CENTRE EXTENT AND ZONING

Source: Bing, Christchurch City Council, LINZ, NZTA.

5.2. PAPANUI

Papanui's Commercial Core Zoning is approximately 18.3ha accentuated by Northlands Shopping Centre at its northern end which is the significant attractor to the centre and has large national banner anchor tenants such as Countdown, Farmers, Hoyts and The Warehouse. The Commercial Core Zoning makes up part of the Papanui KAC. The tail of the zoning, with a large number of smaller, specialty retail, stretches along Papanui Road to the south until Blighs Road.

Papanui is around 5km from Christchurch Central, or around 13 minutes' drive.

FIGURE 8: PAPANUI CENTRE EXTENT AND ZONING

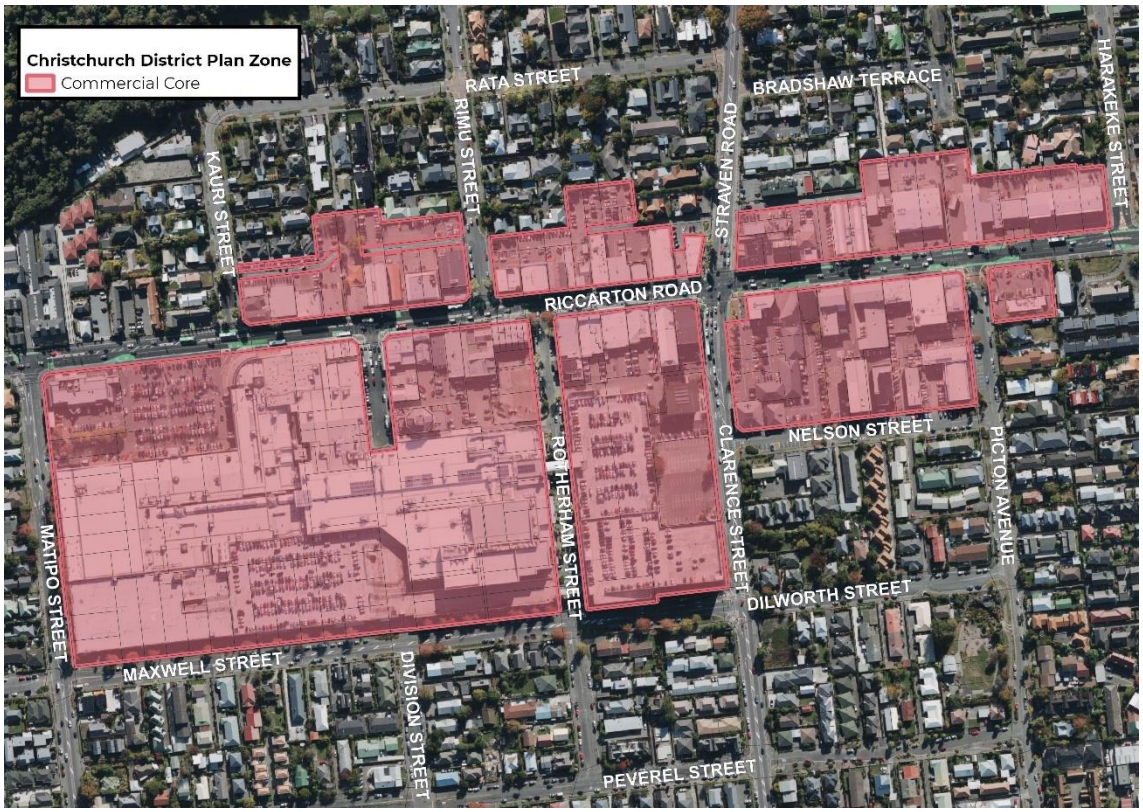
Source: Bing, Christchurch City Council, LINZ, NZTA.

5.3. RICCARTON

Riccarton KAC is comprised of 15.5ha of Commercial Core Zoning with the bulk of activity inside Westfield Riccarton. The shopping mall has around 40,000sqm of retail GFA with many main brands and anchor tenancies: Farmers, Kmart, Noel Leeming, PAK'N Save and Rebel Sport. The zoning extends down both sides of Riccarton Road around 800m.

Riccarton is around 3km from Christchurch Central, or around 10 minutes' drive.

FIGURE 9: RICCARTON CENTRE EXTENT AND ZONING



Source: Bing, Christchurch City Council, LINZ, NZTA.

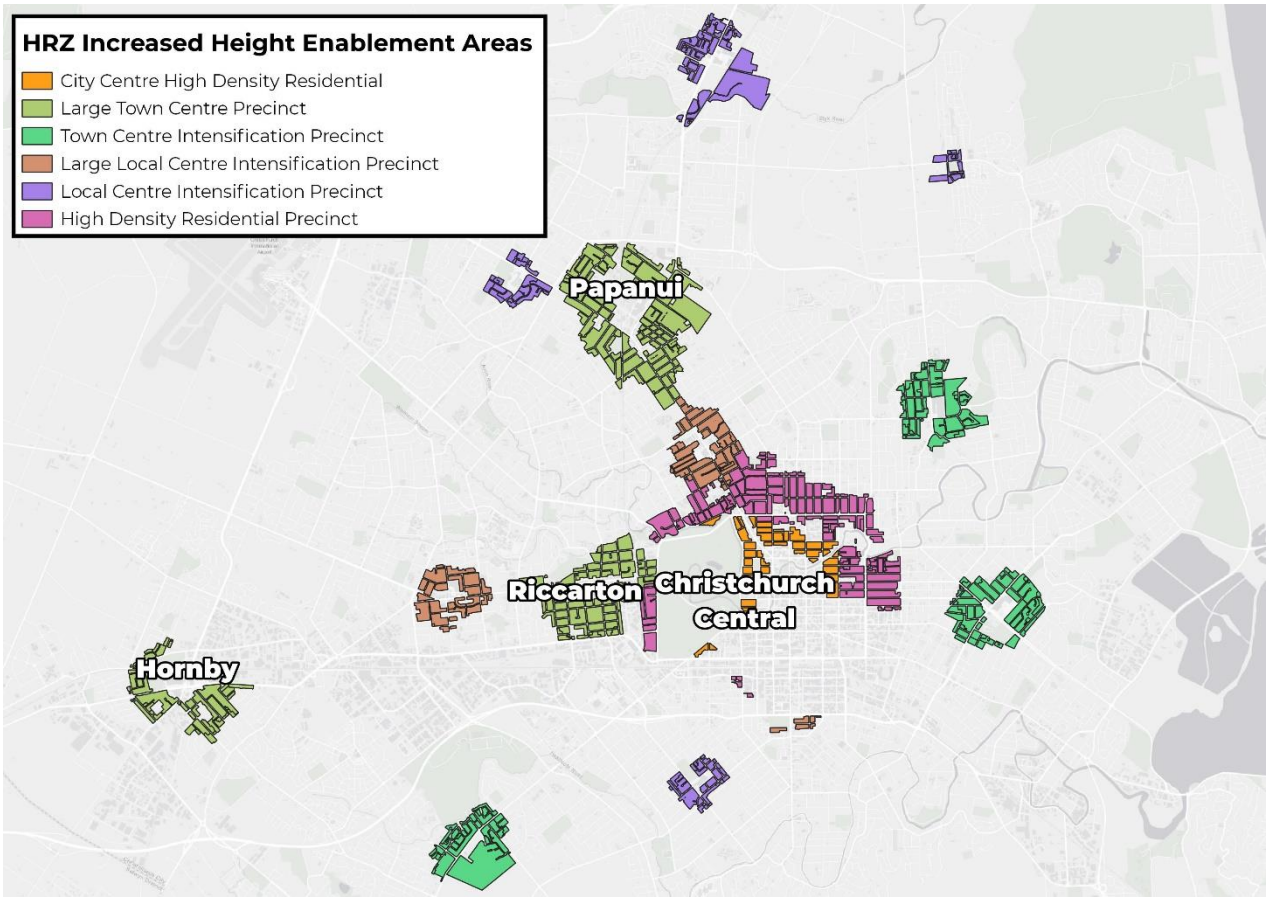
5.1. SUBURBAN CENTRE SURROUNDING HIGH DENSITY RESIDENTIAL

The residential areas in the walkable catchments of Town Centres are proposed to be upzoned as part of the NPS-UD policy of further enablement and development capacity in walkable catchments of higher order suburban centres (Metropolitan and Town Centres).

While this policy is not specifically assessed as part of this report it is worth contextualising the areas of increased residential density surrounding the suburban centre locations that have been identified as higher order centres in the centre hierarchy.

The following figure shows the HRZ areas across Christchurch City that have height enablement up to 20m. The orange area surrounding the City Centre is also specifically identified as an area with height enablement up to 32m. Other HRZ areas have various proposed height enablement as part of PC14 based on the status of the centre or corridor they encourage (larger centres are proposed to have greater levels of height enablement).

FIGURE 10: CHRISTCHURCH CITY HIGH DENISTY RESIDENTIAL ZONES



Source: ESRI, Christchurch City Council.

6. HORNBY, PAPANUI & RICCARTON EMPLOYMENT

The following figure shows the employment counts by broad sector of the centres and respective blocks subject to the increase in heights. This employment count data is measured at the meshblock[5] level which does not perfectly align with proposed height change areas but represents a '*best fit*'.

The employment count provides a high-level understanding of the activity mix and land uses within the area. While it does not identify all activity, such as residential, religious, cultural or community, it provides some understanding of the productive use of the land.

The proposed height-increase options considered, 32m or 50m, may encourage additional employment as the area is (re)developed to greater scale. The increase in heights enables more intense commercial office employment (i.e., more floors → more offices → more employees) and any investment in the built form or increase in foot traffic of the area will encourage further retail activity and employment.

Hornby centre transitioned from a highly industrialised area in 2000 to a retail centre with a mix of other activity including commercial office workers. Between 2016 and 2021, the centre grew by roughly 100 net additional employees which is an increase of nearly 20 net additional employees per annum on average.

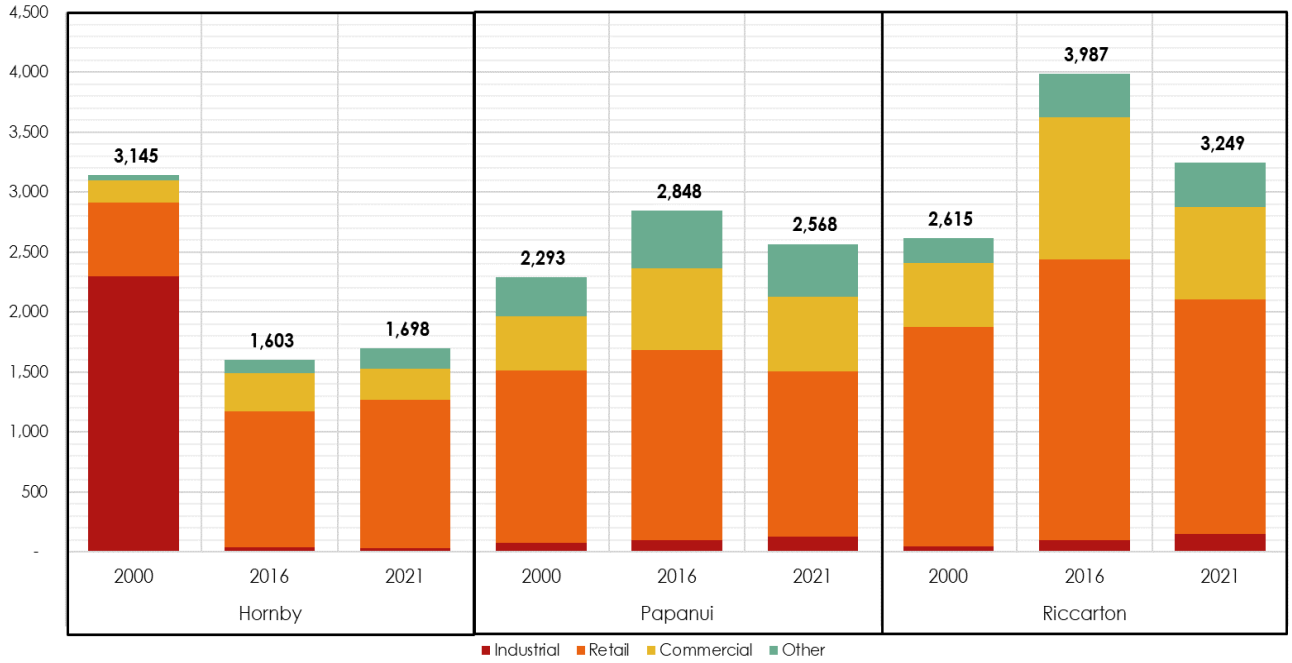
Papanui is a large employment centre with around 2,570 employees as of 2021 with the impact of COVID being a contributing factor to the recent decline in employment within the centre heavily impacting retail trade and food and beverage services.

Riccarton is a large employment centre with around 3,250 employees as of 2021 with the impact of COVID being a contributing factor to the decline in employment within the centre heavily impacting retail trade and food and beverage services. The centre also shrunk substantially between 2018-2019, by almost 200 net employees lost.

Despite the loss of employment in all three centres over the most recent past due to the COVID pandemic, all three centres appear to be maintaining a healthy level and mix of employment. All three centres appear to be robust in terms of breadth and mix of activity, and will likely improve to pre-COVID levels in the not too distant future.

[5] *Meshblocks are the smallest geographical area that Stats NZ publish geostatistical data at. They are roughly the size of a city block but increase in size in more rural areas.*

FIGURE 11: HORNBY, PAPANUI & RICCARTON EMPLOYMENT COUNT BY BROAD SECTOR



Source: Stats NZ.

7. ECONOMIC COSTS AND BENEFITS FOR SUBURBAN CENTRE HEIGHT ENABLEMENT CHANGES

The following outlines the high-level economic costs and benefits associated with the proposed heights for the identified suburban centres. There may be other relevant costs and benefits associated with the proposed building heights in the non-economic fields, but they are not identified here.

BENEFITS

- **Catalyses development:** Liberalising of land use rights has historically been proven to increase development of associated land. The increase in height limits brings the (re)development timeframe of affected properties forward in time as the return on development is higher (more rents are now achievable).

  There is a second order effect also because development encourages more development. As one parcel is (re)developed, neighbouring properties benefit off the improvement in amenity and are encouraged to (re)develop themselves to maximise returns. Such development catalyses other development.

- **Increases the Impetus for intensified (re)development:** The ability to build up to a higher level generates an impetus for developers to maximise their build envelope.

- **Increases the impetus for consolidation of activity:** Increases the impetus for consolidating activity (retail, employment, residential, community, etc.) into centre locations rather than sporadic development in unplanned areas.

- **Enhanced housing affordability**: Restrictions on building vertical can contribute to housing shortages. More permissive building height regimes, therefore, may have positive consequences for affordable housing where the construction of apartments and other higher density dwellings become more feasible within the height change area.

- **Increases employment opportunities:** Greater height limits mean more employment GFA opportunities as the level of commercial floorspace increases more people will be employed in the identified area.

- **A stronger sense of connectedness and vitality**: The increased residential and commercial activity density mean that people are in closer contact with each other.

- **Potential for less land / green space take-up**: A higher density of agglomeration of business activity means that a greater quantity of activity can take place within the identified area. This would suggest that more efficient use of land for commercial space leaves more green space for other uses, such as parks, which the local community can enjoy.

- More efficient land use: Taller buildings mean land is being used more efficiently as the vertical space is being used more effectively. While premium retail / food and beverage space will likely remain at-grade, a broader range of commercial and residential options are unlocked through the increased building height limits.
- More flexibility for land users and building tenants: Flexibility is often an attractive part of taller buildings. With the increase of height limits, tenants would be able to expand to other floors within the same building, or sub-let floorspace as needed, with relative ease.
- More efficient infrastructure use: The existing and future infrastructure that is put in place to service local residents in and around town centres is used by a larger number of people. This includes road / footpath network, community facilities – libraries, halls, parks – power and telecommunications, three waters, etc. The larger number of people come in the form of both increased employees using these resources on the way to work and increased residents / tourists living in apartments in the town centre.
- Increased internalisation of retail spend and centre spend: The (re)development of properties will encourage increased foot traffic to the area through employment, local residents and tourists attracted by the amenity. This improves the centre long term as it establishes it as a hub of activity, employment, community and living.
- Reduces transport costs and associated emissions: The increased density enabled by increased building heights will reduce transport costs as a greater number of locals will be able to access the benefits of town centres. This has secondary benefits of lower fuel emissions, and possibly a greater reliance on public transport as more employment options will be collocated on a public transit route.
- Adds profile as a commercial hub: Development and height create a general feel of commercial professionalism that attracts high tier commercial tenants and main brands to the town centre.
- Generation of new views and enhanced building profile: A broader range of views from buildings at differing heights are attractive to commercial tenants that want a good view for their office. This can attract high tier commercial tenants for regional / head offices. Meanwhile, for practical floorspace reasons, and sometimes for image reasons, taller buildings are more attractive to large corporations by providing a high-profile space. This is reflected in a prestige factor.
- Market certainty and Simpler planning process and lower Transaction Costs: As greater heights are allowable within the area already but require a resource consent, this will remove the increased cost and wait time for the resource consent process up to the chosen height limit in the respective areas, and increase market certainty – a critical element to investment in a market.

- **Higher level of specialisation and productivity**: As levels of economic activity increase in the same footprint, so does the ability of businesses to specialise and increase efficiency, due to increased competition. This would also increase the prevalence of knowledge spill overs, increasing innovation density allows businesses to have access to larger markets of suppliers (especially labour supply) and consumers, allowing competition to enhance the quality of inputs and outputs.
- **Potential to safeguard productive land**: A large proportion of urban centres are currently surrounded by the most productive, or versatile, soils, across the country. As urban centres expand into these productive areas there has been a concern that productive land is not being adequately protected. As such, more floorspace being built within the same footprint will ensure the district has somewhere for its growing population to live and work– mitigating effects on its productive land.

COSTS

- **Increased congestion of road / footpath networks:** Increased density can generate increased congestion. The greater level of foot traffic generated through increased development, increased employment and increased high density residential activity may impact the road network and parking space availability in some suburban centre locations. The increase in disbenefits, including congestion, is unlikely to be immediately appreciable, so traffic flow mitigation will likely be somewhat mitigated with sufficient planning.
- **Increased levels of crime:** There is a direct correlation between greater numbers of people and levels of crime. This tends to be at all levels of crime from petty theft / public nuisance to serious assaults. Crime can be somewhat mitigated with design outcomes such as more open / visible spaces, more lights, etc., and greater levels of investment in the form of security cameras, guards and police presence.
- **Increased pollution / waste:** Waste and pollution are also more common in areas with a greater number of people present. Increased road network and foot traffic increase pollutant runoff in stormwater systems and the cubic meterage of waste produced in an area. This can be somewhat mitigated with the design (such as increasing the number of rubbish bins and stormwater capture / filtration) and increasing the number of collection days / road cleaning.
- **Increased noise**: Increasing the amount of people / traffic in an area will increase the level of ambient noise in that area. This can be mitigated with urban design and architecture such as increased greenspaces and trees or greater levels of noise acoustic absorption materials in building, thicker walls / glass, etc.

- Increased levels of vagrancy and transient population: Higher density areas attract homelessness and transient populations. This can negatively impact the general amenity of an area and discourage community participation including demand for residential, retail, and employment.
- Reduced Impetus for Central City Intensification: The increase in heights in non-Central City locations may reduce the impetus to develop higher densities in the Central City. This would represent an inferior outcome economically as it would result in less efficient uses of infrastructure and does not promote the Central City as the primary hub of activity for the city, as per the District Plan. This cost can be manged through restricting the most intensified development to a Central City location.

7.1. ECONOMIC DIRECTION

Enable heights up to 22m in identified Suburban centres:

Enabling a height of 22m will be consistent with the staggered height enablement approach across the city's zone framework. It is the lower than the City Centre, CCMUZ and HRZ High Density Residential areas, and consistent with the proposed height within the balance of the HRZ.

A 20m height will distinguish the suburban centre locations from the surrounding residential areas and lower order centres in the hierarchy (which enable 12m and 14m buildings) and enable a greater diversity of development. The 20m limit enables a range of residential, commercial and community activity to occur up to around 6-7 storeys which can increase the centres profile and attractiveness.

By allowing a 20m height, Council will promote the suburban centre locations as hubs of activity for retail, employment, residential and community within their respective catchments while still maintaining the primacy of the City Centre, and providing a competitive edge (related to height enablement) in the CCMUZ and HRZ High Density Residential areas, which has a greater level of enablement, and a greater level of impetus for development to occur.

A 20m suburban centres height provides capacity for a larger employment base which may be encouraged to occupy commercial offices or improved retail options in an efficient location through (re)development of the suburban centre.

By enabling height to only 20m, over 32m and 50m, Council is signalling the primacy and promotion of the City Centre as the hub of activity in the city. The 50m limit would enable 12-13 storey development that could significantly detract from development within the City Centre. This is due to this level of intensification experiencing minimal occurrence within Christchurch, even within the City Centre.

8. ECONOMIC OPTION SUMMARY

The following table shows the summary of the economic extent of potential impacts relating to each policy option assessed in this report. These are considered the most pertinent economic trade-offs to weigh-up for each option.

Note that the indicated activity status, P, RD, D, etc. relate only to the policy being assessed (height) and may not meet the same threshold on other policies such as urban design outcomes, traffic, other infrastructure, etc.

Policy	Zone	Options	Economic Extent
Central Christchurch Building Height Options	City Centre	P on height up to 28m and D on height beyond 28m (status quo)	May be less competitive (in terms of heights) than the CCMUZ if heights up to 32m are enabled in these zones. Has significant costs arising from forgone development, increased uncertainty and transaction costs, though these are limited due to the moderate propensity for buildings above 28m to occur in this environment.
		P on height up to 28m, RD on height up to 90m and D on height beyond 90m.	May be less competitive (in terms of heights) than the CCMUZ if heights up to 32m are enabled there. Has some costs arising from forgone development, increased uncertainty and transaction costs, though these are limited due to the moderate propensity for buildings above 28m to occur in this environment. At this level the development potential within the City Centre is considered to enable capacity that is more than sufficient to meet demand in the long-term. Economic costs associated with heights being D beyond 90m represents a high risk but has a very low propensity to occur. This results in a very low economic cost.
		P on height up to 32m, RD on height up to 90m and	Has some minor costs arising from forgone development, increased uncertainty and transaction costs, though these are limited to

		D on height on height beyond 90m.	the few buildings beyond 32m that occur in the City Centre. Only a limited number of developments would have the potential be impacted beyond 32m based on Christchurch's historical development patterns. At this level the development potential within the CBD is considered to enable capacity that is more than sufficient to meet demand in the long-term. Economic costs associated with heights being D beyond 90m represents a high risk but has a very low propensity to occur. This results in a very low economic cost.
		P on height up to 50m, RD on height up to 90m and D on height beyond 90m.	Enables a significant level of activity in the most efficient location. The realisation rate of development over 50m in Christchurch is extremely limited so the transaction costs of this policy are considered immaterial, but this option may marginally impact some future development. At this level the development potential within the City Centre is considered to enable capacity that is more than sufficient to meet demand in the long-term. Economic costs associated with heights being D beyond 90m represents a high risk but has a very low propensity to occur. This results in a very low economic cost.
		P on height up to 90m and D on height beyond 90m.	Enables a significant level of activity in the most efficient location. The realisation rate of development over 90m in Christchurch historically has been zero and therefore the transaction costs tend towards zero. At this level the development potential within the CBD is considered to enable capacity that

			is more than sufficient to meet demand in the long-term.
		No height limit.	Enables the greatest level of activity potential and certainty in the most efficient location in the city. At this level the development potential within the City Centre is considered to enable capacity that is more than sufficient to meet demand in the long-term.
	Mixed Use Zone and Mixed Use Zone (South Frame)	P on height up to 17m (status quo) and RD on height beyond 17m	Enables a significant level of activity within this zone providing significant levels of capacity to meet its needs over its long-term. There is the potential of diverting intensified development from the City Centre and other centre zones if their respective height limits are kept uncompetitive in relation to RD beyond 17m on building height. This represents a significant economic cost.
		P on height up to 17m, RD on height up to 32m and D on height beyond 32m.	Enables a considerable level of activity to occur within this zone providing more than sufficient capacity to meet its needs over its long-term. There is the potential for unequal competitive environment resulting from a 17m P status compared to a 20m (or 22m) P status in suburban centres, given the extent of the CCMUZ and its underlying capacity, it is unlikely to be a material economic cost.
		P on height up to 22m, RD on height up to 32m and D on height beyond 32m.	Enables a considerable level of activity to occur within this zone providing more than sufficient capacity to meet its needs over its long-term. This height is more likely to be competitive with the centre network, outside the City Centre. It is considered, relative to a 17m height limit, that there is an immaterial net economic outcome.

		P up to 32m and D beyond 32m.	Enables a considerable level of activity to occur within this zone providing more than sufficient capacity to meet its needs over its long-term but is likely to reduce the competitive position of the City Centre even with mitigating factors, such as tenancy caps, this level of competition is considered inappropriate and economically detrimental.
		P on height up to 50m and D on height beyond 50m.	Enables an extensive level of activity to occur within this zone providing more than sufficient capacity to meet its needs over its long-term and will substantially reduce the competitive position of the City Centre. Even with mitigating factors, such as tenancy caps, this level of competition is considered inappropriate and economically detrimental.
		P on height up to 90m and D on height beyond 90m.	Enables an extensive level of activity to occur within this zone providing more than sufficient capacity to meet its needs over its long-term and will substantially reduce the competitive position of the City Centre. Even with mitigating factors, such as tenancy caps, this level of competition is considered inappropriate and economically detrimental.
		No height limit.	Enables an extensive level of activity to occur within this zone providing more than sufficient capacity to meet its needs over its long-term and will substantially reduce the competitive position of the City Centre. Even with mitigating factors, such as tenancy caps, this level of competition is considered inappropriate and economically detrimental.
	HRZ within the Central City	P on height up to 11-14m (current baseline) and D on height beyond.	Enables some additional level of residential activity to occur but does not direct growth towards the most efficient locations within the HRZ. Establishes a competitive high

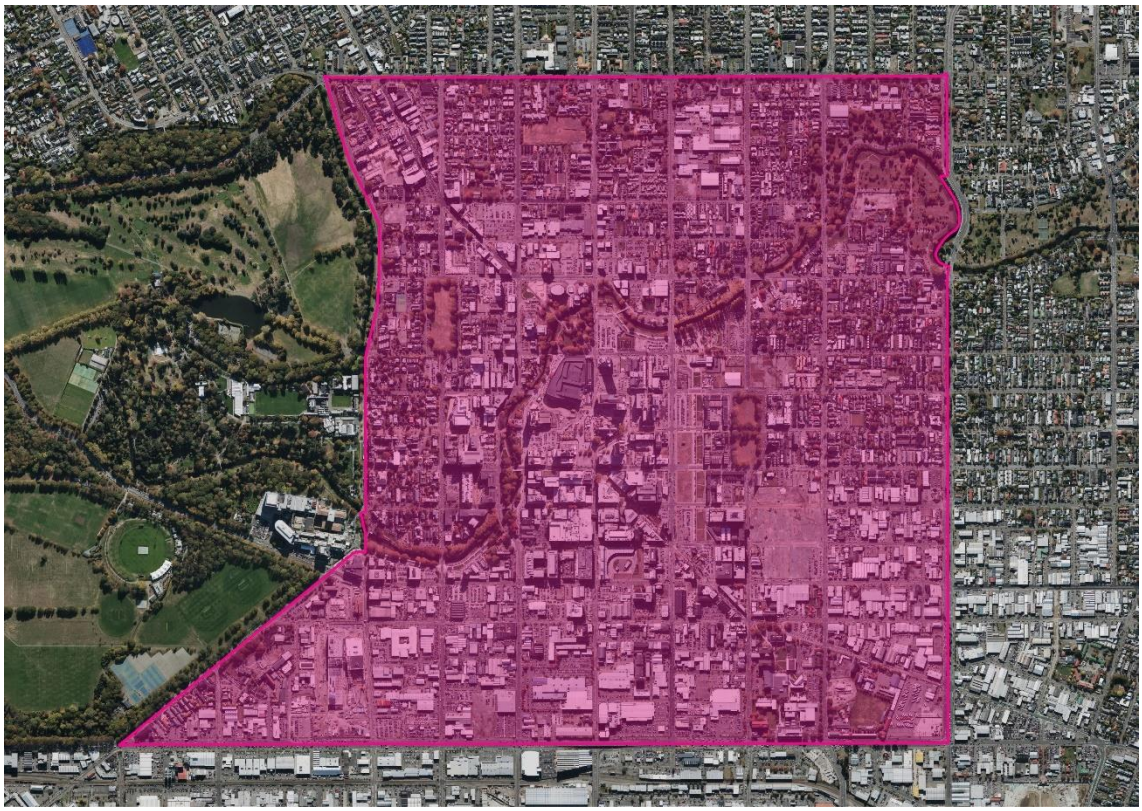
			density residential market within the City Centre and CCMUZ.
		P on height up to 14 and RD on height beyond this, with select areas closest to Christchurch's City Centre enabling heights up to 32m on height. Any height beyond this is also RD but applies greater levels of discretion (more restrictive).	Enables a substantial level of residential activity to occur and directs growth towards the most efficient locations within the HRZ. May detract a small amount of high-density residential development away from the City Centre.
		P on height up to 32m and RD on height beyond 32m.	Enables a substantial level of residential activity to occur but does not direct growth towards the most efficient locations within the HRZ, closest to high order centres. May result in sporadic high-density development which may result in an inefficient distribution of increased density – away from centres.
		No height limit.	Enables sporadic high-density development which will result in an inefficient distribution of increased density – away from centres.
Minimum number of storeys	City Centre	Two or more storey building development as P on a minimum number of storeys and below two storeys as D on a minimum number of storeys.	Detracts low density activity away from the City Centre. May delay long-term intensification due to increasing the costs of redevelopment though there is a low propensity for one-storey development to occur in the City Centre.
	City Centre	Three or more storey building development as P on minimum number of storeys. Below three storeys as D on a minimum number of storeys.	Detracts low density activity away from the City Centre. It is likely to materially impact upon the propensity for redevelopment of sites as the cost increase exponentially by storey.

	City Centre Mixed Use Zone and Mixed Use Zone (South Frame)	Two or more storey building development as P on a minimum number of storeys. Below two storeys as D on a minimum number of storeys.	Detracts low density activity away from the CCMUZ. May delay long-term intensification due to increasing the costs of redevelopment.
		No minimum number of storeys.	Encourages development to occur in the CCMUZ at the expense of the City Centre.
Office Tenancy Cap	City Centre Mixed Use Zone and Mixed Use Zone (South Frame)	Tenancy cap of 500sqm of office GFA	Encourages larger commercial tenancies to establish in the City Centre, the most efficient location for them, and frees up space in the CCMUZ for SME enterprises. In terms of a recovery position current employment data would suggest that only 50% of pre-earthquake employment numbers have re-established in the City Centre.
	Centre Zones other than City Centre	Tenancy cap of 500sqm of office GFA	Encourages larger commercial tenancies to establish in the City Centre, the most efficient location for them, and frees up space in the CCMUZ for SME enterprises. In terms of a recovery position current employment data would suggest that only 50% of pre-earthquake employment numbers have re-established in the City Centre.
Retail Restrictions	City Centre Mixed Use Zone and Mixed Use Zone (South Frame)	Retail in the CCMUZ is restricted to: (e) the display and sale of goods produced, processed or stored on the site and ancillary products up to 20% of the net floor area on the site used to produce, process or store these goods, or 350m² retail floor space, whichever is the lesser;	Restricting retail in the CCMUZ supports the City Centre in its post-earthquake recovery period. The restrictions further support the role and function of the CCMUZ as a support zone for the City Centre and acknowledge the City Centre's primacy of centres.

		(f) second hand goods outlet; (g) food and beverage outlet; (h) small scale general convenience store where grocery items are offered for sale with a maximum GLFA of 250m²; and one supermarket with a maximum GLFA of 2500m² located within the Commercial Central City Mixed Use Zone block bounded by Manchester, Salisbury and Madras Streets.	
Suburban Centre Building Heights Options	Town Centre Heights (Hornby, Papanui, Riccarton)	P on height up to 20m and D on height beyond 20m	This represents a modest increase in development capacity that is unlikely to detract from the City Centre.
		P on height up to 22m and D on height beyond 22m	This represents a modest increase in development capacity that is unlikely to detract from the City Centre. Represents a marginal (positive) impact on feasibility relative to 20m and a marginal increase in locational competitiveness. The Discretionary status represents a height threshold that limits the impact on more efficient locations.
		P on height up to 32m and D on height beyond 32m	This represents a potentially substantial increase in development capacity that is likely to represent a competitive advantage over the City Centre and detract from its future development. This represents a potentially substantial economic cost.
		P on height up to 50m and D on height beyond 50m	This represents a potentially significant increase in development capacity that is likely to represent a severe competitive advantage

			over the City Centre and detract from its future development. This represents a potentially significant economic cost.
	Other Town Centre Heights	P on height up to 20m and D on height beyond 20m	This represents a mandated position to provide for increased capacity across the city.

APPENDIX 1: CHRISTCHURCH'S CENTRAL CITY



APPENDIX 2: CENTRAL SYDNEY

Source: Bing.

Christchurch Central, excluding Hagley Park, overlayed on top of Central Sydney.

Plan Change 14

Section 32: Appendix 4

Potential Industrial Land Transition Assessment

To give effect to Policy 3(c)(ii) and 3(d) of the NPSUD

Christchurch City Council

Technical Report

Date: *30 April 2022*
Version:
Author:
Peer reviewed:

DISCLAIMER:

Christchurch City Council has taken every care to ensure the correctness of all the information contained in this report. All information has been obtained by what are considered to be reliable sources, and Christchurch City Council has no reason to doubt its accuracy. It is however the responsibility of all parties acting on information contained in this report to make their own enquiries to verify correctness. This document has been prepared for the use of Christchurch City Council only. Copyright © 2022 by Christchurch City Council

Christchurch City Council

ASSESSMENT OF POLICY 3 DIRECTIONS FOR INDUSTRIALLY ZONED LAND

1. Introduction

Policy 3 of the NPSUD requires intensification[1] in certain locations, notably in and around commercial centres. This applies to all residential and business zones, unless one of the 'qualifying matters' set out in 3.32 of the NPS applies. The level of intensification (building heights and densities) is prescribed for some centres (e.g. city and metropolitan centres) and for other centres is directed to be at a level "*commensurate with the level of commercial activities and community services in the centre*".

Whilst subpart 6, 3.32(1)(g) of the NPSUD provides scope to exclude low density business areas like industrial zones from the intensification directions of Policy 3, **this is only to the extent that such areas are required to "*meet expected demand*" for those (low density) uses**. It follows that where such land is not required to meet expected demand for those uses, intensification should be enabled in accordance with Policy 3 and the broader outcomes sought by the national direction. Assessment of industrial land development demands and capacity (in the manner prescribed by the NPSUD[2]), is crucial to understanding whether the qualifying matter should be applied.

This report undertakes the necessary assessment to determine whether industrially zoned land located close to commercial centres should be considered for further residential intensification. It should be read alongside the following other technical reports:

a. Central City Land Demand Capacity Report – Lincoln University; and
b. Proposed Industrial General Rezoning Change – Cost-Benefit Analysis – Sense Partners; and
c. Comprehensive Residential Development Precinct Analysis – Urban Design, Christchurch City Council.

The section 32 report for commercial and industrial provisions provides the evaluation of options for further considering the recommendations and advice contained in these reports.

2. Approach to assessment

The following steps have been undertaken:

1. Identification of all *Industrial General or Industrial Park*[3] zoned land within the walkable catchment of the edge of the City Centre zone and adjacent to Town, Local and Neighbourhood Centre zones.
2. Consideration as to whether the intensification directions of Policy 3 should apply to these industrial zones or whether qualifying matters apply. Central to this, is assessment of whether the land is required to meet expected demand for industrial uses.
3. Consideration of the appropriateness of enabling residential intensification in these areas, having regard to matters including:
    a. Whether the site meets the criteria for a brownfield redevelopment 'site' (Policy 16.2.2.1), notably whether the land is 'under-utilised'. This is relevant for determining (at a high level) the value and efficiency of use of the land for industrial purposes and the likelihood or readiness of the land for redevelopment. It also informs the potential district plan

[1] i.e. increasing heights and densities to enable more capacity for housing and business.
[2] National Policy Statement on Urban Development (2020, updated 2022), subpart 3.10.
[3] Industrial Heavy zoned land was not considered based on its inappropriateness for residential activities and should be taken forward as a qualifying matter under clause 3.32(g) and (h).

mechanisms available to facilitate redevelopment i.e. land must meet the definition of 'brownfield' to avail itself to the enablement provided by a 'brownfield overlay' or the 'brownfield site' policy.

b. Whether residential zoning and land use would be compatible with surrounding uses.
c. Whether the land is readily capable of achieving a satisfactory residential environment for future residents through comprehensive redevelopment.
d. Whether there are any significant constraints that render residential intensification unsuitable e.g. natural hazards; and
e. Whether the land is otherwise appropriate for residential use having regard to the wider objectives of the NPSUD and Christchurch District Plan.

4. Identification of the appropriate district plan mechanism/s for enabling greater intensification in appropriate areas subject to the evaluation under section 32 of the Resource Management Act[4].

Any industrial land within the Policy 3 areas that is deemed unsuitable for residential intensification having regard to the above criteria, is recommended to be exempt, pursuant to qualifying matter 3.32(1)(g) of the NPSUD.

The following pages and appendices provide that analysis and make recommendations for changes to the Christchurch District Plan (planning maps and zone provisions).

3. Intensification of industrial zones

Industrial activities are low density business activities that typically only locate at grade, occasionally with ancillary space on an upper floor or mezzanine level. Industrial zones do not typically permit the establishment of offices or residential activities, the activities with the greatest propensity to locate at upper floors and make use of increased height. In the operative Industrial General (IG) zones, retail activity is limited to that which supports the industrial workforce and activities which are either priced out of commercial zones (e.g., second-hand retail outlets) or are inappropriate in centre locations due to their large scale and/or low amenity built form (e.g., trade and yard based suppliers). Standalone offices are not permitted in industrial zones either, to support intensification of commercial centres in accordance with a centres-based framework[5]. Residential activities are generally not permitted in industrial zones because they can give rise to reverse sensitivity issues and/or to protect industrial land for industrial purposes. Whilst industrial zones can be large employment nodes, they are often not well served by public transport and have a workforce that is more likely to drive to work and/or use a vehicle as part of their work (e.g., trades people, service industries etc).

With the current zoning in place, additional height and density of urban form would therefore not add much, if any, further development capacity. Retaining the zoning for less efficient, low density uses, would therefore not make best use of these locations' accessibility to jobs, services and amenities, to the same extent that higher density alternative uses (like residential), would. Whilst industrial zones perform an important function, there is opportunity to better utilise this land by providing more flexibility to transition to more efficient uses in these locations should the market wish to take up the opportunity.

[4] Duty to prepare an evaluation report examining the appropriateness of the proposed provisions and reasonably practicable alternative options.
[5] Objective 15.2.2 of the Christchurch District Plan

A more flexible zone or district plan mechanism which enables existing activities to be retained whilst providing for appropriate and comprehensively designed residential uses, would offer many benefits including provision of housing and enabling people to live close to jobs, services and amenities with less dependence on private vehicles. Existing methods in the Christchurch District Plan that offer greater land use flexibility to facilitate intensification of higher density uses, include the mixed use zones and brownfield redevelopment provisions in Chapter 16 (Industrial)[6].

4. City-wide Industrial Land Supply

At a city-wide level, Christchurch has a significant over-supply of industrially zoned land. A Business Land Capacity Assessment prepared in 2018 to give effect to the directions of the NPSUD[7] confirmed that 482ha of industrially zoned was required to meet long term (30 year) needs and that the City's zoned industrial land supply of 934ha (of which 708ha was serviced), was more than sufficient to meet forecast demands[8].

Table 1: Christchurch City Industrial Land Sufficiency – 2018 Assessment (Property Economics)

Christchurch City	Land Requirement (Hectares)		
	Short term (3 Year Growth)	**Medium Term (10 Year Growth)**	**Long Term (30 Year Growth)**
Total Demand	89	32	482
Total Supply	934	934	934
Less land that is not serviced[9]	327.22	225.60	225.60
Less land that is not suitable[10]	0.96	0.96	0.96
Sufficiency	517	675	**225**

Council has recently updated its citywide business land demand and sufficiency model. A different methodology was adopted for this assessment, and it concluded that the demand for industrial land was likely to be much less than previously forecast. As a result, despite the overall supply of industrial land having reduced since 2018, the new assessment forecasts that the overall sufficiency or surplus, is even greater (at 565ha). Table 2 below summarises the main conclusions.

[6] Objective 16.2.2 and Policies 16.2.2.1 and 16.2.2.2.
[7] Clause 3.19 and Part 4 of the National Policy Statement on Urban Development.
[8] https://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch/Capacity-Assessment-reports/Report-5-Business-Development-Capacity.pdf - Section 9.3
[9] i.e., excludes land that has a servicing constraint over the short, medium or long term
[10] i.e., excludes land that has been assessed by CCC as not feasible

Table 2: Christchurch City Industrial Land Sufficiency – 2022 Assessment (Lincoln University)

Christchurch City	Land Requirement (Hectares)		
	Short term (3 Year Growth)	Medium Term (10 Year Growth)	Long Term (30 Year Growth)
Total Demand	18.4	35.7	119.2
Total Supply	778	778	778
Less land that is not serviced[11]	277.22	175.59	175.59
Less land that is not suitable[12]	0.96	0.96	0.96
Sufficiency	481.42	565.75	**482.25**

The NPSUD also requires councils to make sure that plan-enabled industrial capacity is suitable for different business sectors in terms of location and site size. The 2018 business capacity assessment[13] confirmed there to be sufficient variety of sites to provide for forecast needs particularly due to the significant amount of vacant greenfield land still to be subdivided and developed. Smaller sites were more prevalent in the central city industrial zones. In terms of location, the report found there to be ample industrial opportunities in many different parts of the city, with strong demand for locations on the urban fringe around Islington, Hornby and the airport which benefit from good access to strategic transport and freight networks[14].

It is therefore acknowledged that despite the citywide surplus of industrial land, there may be location- or activity-specific land demands at a more localised level, e.g. industrial land around the air and sea ports or adjoining strategic parts of the rail network, which may justify the retention of industrial land for industrial purposes to ensure that sufficient land supply exists in these strategic locations.

It is also noted there have been recent reports[15] of an increasing scarcity of industrial land available to purchase in Greater Christchurch. Anecdotally, this may be attributable to the current market conditions where for instance large areas of industrial land is available under leasehold terms only (e.g. Christchurch International Airport) or held by developers that make it available only as part of a design and build contract), however the availability of land (including the extent of any land banking) and the tenure or commercial arrangements for development of that land, are beyond the ability of Council to control.

Having undertaken a robust capacity assessment pursuant to the requirements of the NPSUD, it is concluded that there remains a significant surplus of plan-enabled industrial land capacity in the City such that there is no need to preserve all existing industrial land for industrial purposes. There is more than sufficient vacant land available to accommodate new and transferring industrial activity to meet

[11] i.e., excludes land that has a servicing constraint over the short, medium or long term
[12] i.e., excludes land that has been assessed by CCC as not suitable
[13] https://www.greaterchristchurch.org.nz/assets/Documents/greaterchristchurch/Our-Space-consultation/Business-Development-Capacity-Assessment-October-2018.pdf page 66.
[14] Ibid page 71
[15] https://www.colliers.co.nz/en-nz/real-estate-research/colliers-essentials-christchurch-industrial-2021

short, medium and long term needs. There may however be benefits in retaining areas of strategically located land or land with more localised needs and ongoing monitoring of industrial land capacity will inform the need for any future industrial land provision.

5. Identification of areas potentially subject to Policy of the NPSUD

All industrially zoned land located within certain walkable distances of commercial zones has been identified, consistent with the approach adopted for intensification of residentially zoned land generally, as set out in the table below.

Table 3: Plan Change 14 – General Approach to Defining Walkable Catchments

Walkable catchment	Centre Zone	District Plan equivalent
1200m	City Centre	Commercial Central City Business Zone
800m	Town Centre	District Centres of Hornby, Papanui and Riccarton
600m	Town Centres	All other District Centres
400m	Local Centres	Large Neighbourhood Centres of Merivale, Church Corner and Sydenham
200m	Local Centres	All other Neighbourhood Centres

Industrial Heavy (IH) zoned land within these catchments was discounted on account of the anticipated outcomes for these zones being incompatible with residential activity[16].

Industrial General zoned land that immediately abuts IH zoned land was discounted because of its role providing a buffer between residential and heavy industry[17].

There was no Industrial Park zoned land within the identified walkable catchments.

This led to the following potential areas being identified for assessment.

Table 4: Industrial General Zoned Land Located Close to Centres

Suburb	IG zone location
Inner City Industrial General	Large area extending from Addington in the West, through Sydenham, Waltham and Phillipstown*.
Hornby	Smarts Road East* Smarts Road West* Aymes Road* Shands Road*
Papanui	Langdons Road Sawyers Arms Road south* Sawyers Arms Road north Vagues Road* Cranford Street* Cranford Street / Winters Road*
Ferrymead	Area surrounding commercial centre
Woolston	Connal Street / Lane Street Radley Street* Heathcote Street*

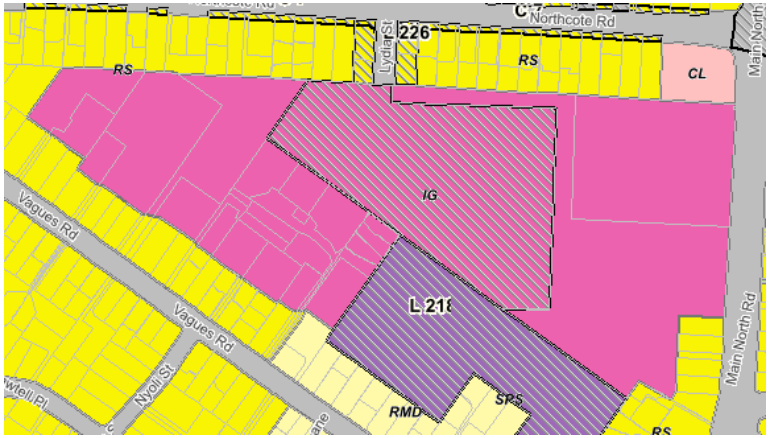
[16] District Plan Policy 16.2.1.3 (a)(ii)
[17] District Plan Policy 16.2.1.3 (a)(i)

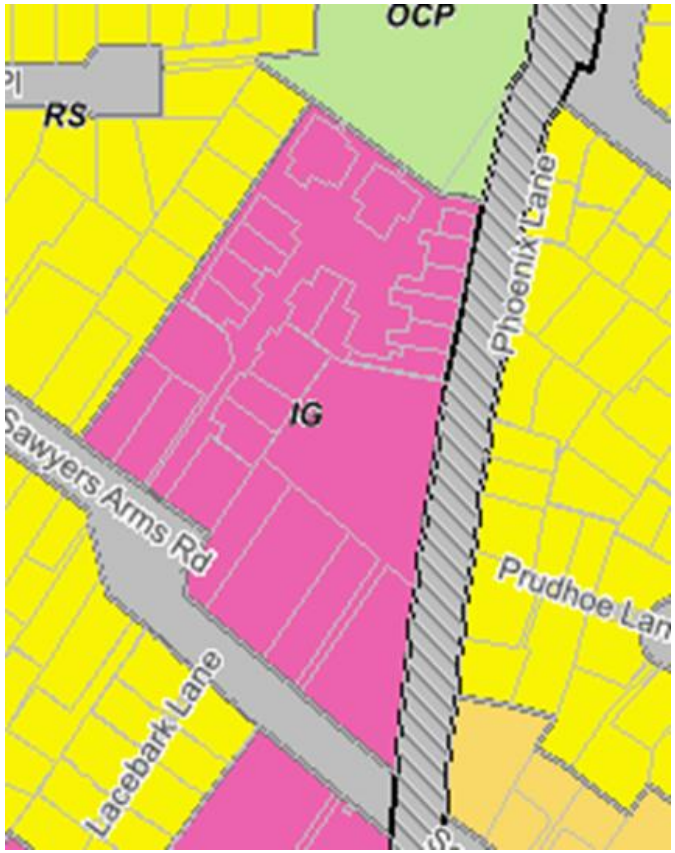
Of these, the sites identified with an asterisk above, are recommended to enable further residential activity. However not the full extent of the 'inner city industrial general' area is recommended to be enabled for redevelopment at this time, primarily on the basis of some localised need for industrial service activities in this location, its large size and lack of readiness and/or appropriateness of some parts of the zone to accommodate housing in the short to medium term. This is discussed more in the assessment that follows.

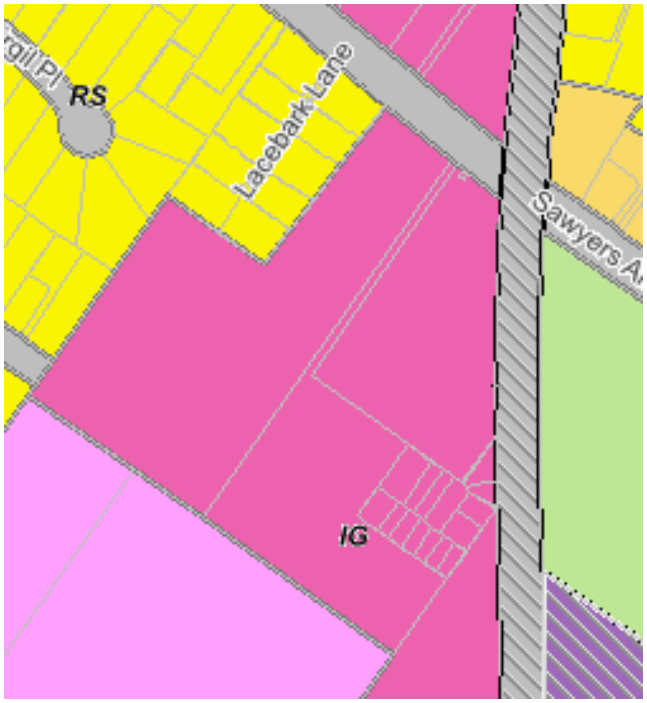
Appendix A provides the assessment. **Appendix B** provides maps of the areas assessed as being appropriate for more intensive redevelopment.

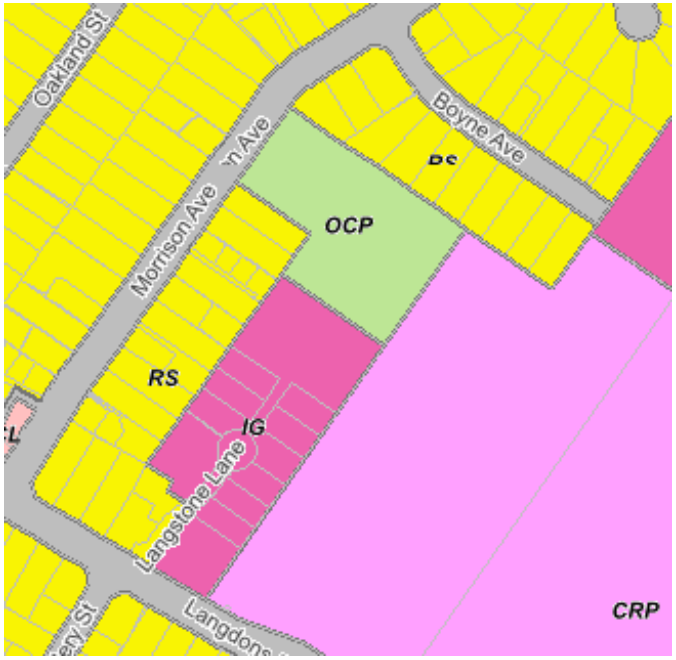
Appendix A

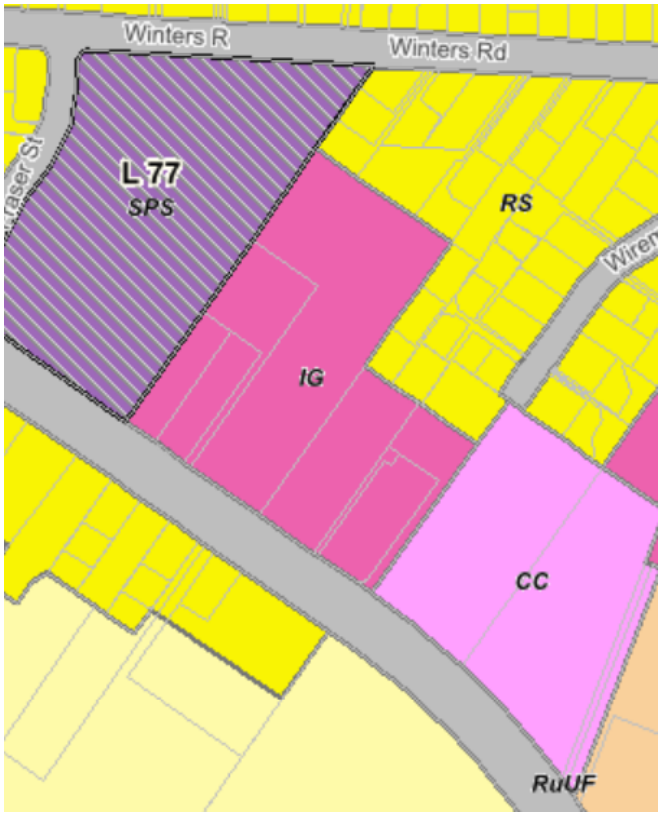
Assessment of Suitability for Residential Intensification

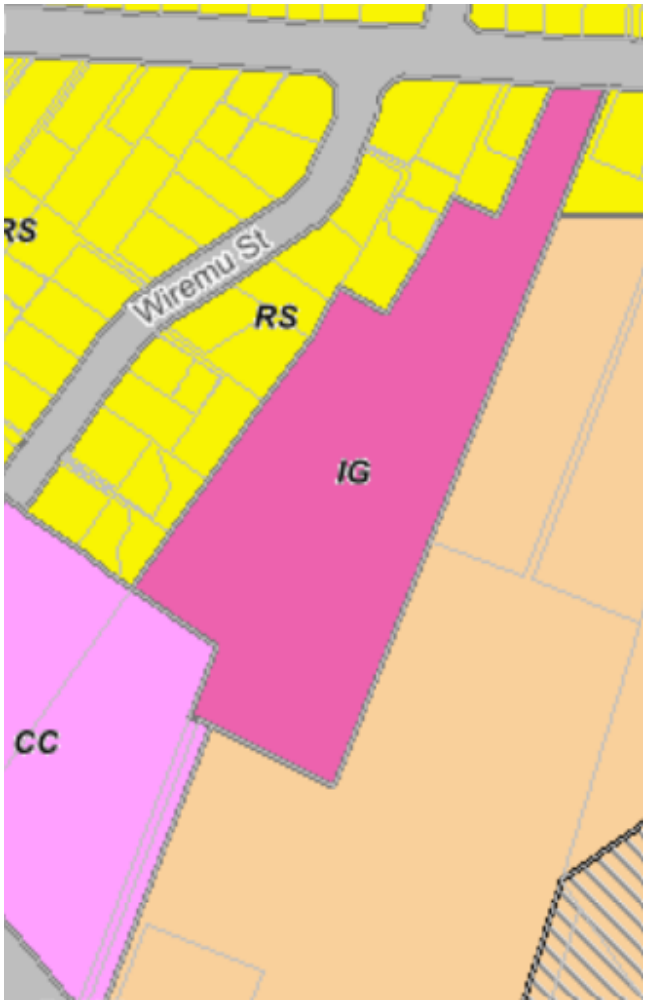
Site ID	Location	Comments
A	**171 Main North Road and surrounding land** 10.9ha (with school and supermarket) **3.8ha** remaining after the school and supermarket development.  	The majority of the site is under development for a new supermarket (Pak n Save) and school (Marion College). The supermarket and school sites are likely to be rezoned in the future to local centre and specific purpose school zone to reflect these new uses. This will leave the smaller part of the industrial zone left, surrounded by residential and community uses. **Assessment of remaining 3.8ha:** **Intensity of use:** Fairly intensive use but inefficient. A range of different businesses including meat processing. Ad-hoc layout. Some vacancy apparent. Approximately half of land in single freehold ownership. The balance in mixed tenure (including cross lease) which may make site amalgamation more complex. **Quality of built form:** Mixed but predominantly low quality. Age of buildings also varies (from 1970s to 2010 approx.). **Extent of built form:** Significant building development but some very dated. Varied (but generally low-medium) land to capital value ratio (LCVR) predominately on account of age / quality of buildings and presence of some vacant landholdings. **Appropriateness for industry:** Rear sites with lack visibility and relatively poor site access. Proximity to surrounding residential and education uses can give rise to amenity conflicts and cause reverse sensitivity. **Appropriateness for residential:** Surrounding area predominantly residential and community use. Some properties have attractive landscaped frontages. Contains a few larger sites that would assist with comprehensive development and site assembly. Close proximity to amenities (shops, schools, supermarket, public transport). Land remediation and assembly likely to be required. Piecemeal redevelopment could exacerbate reverse sensitivity / amenity conflicts but no worse than existing situation. **Recommendation: Enable housing intensification** Whilst land is in active use, the land is currently under-utilised having regard to the range of criteria above, including that its highest and best use is likely to be medium density housing.

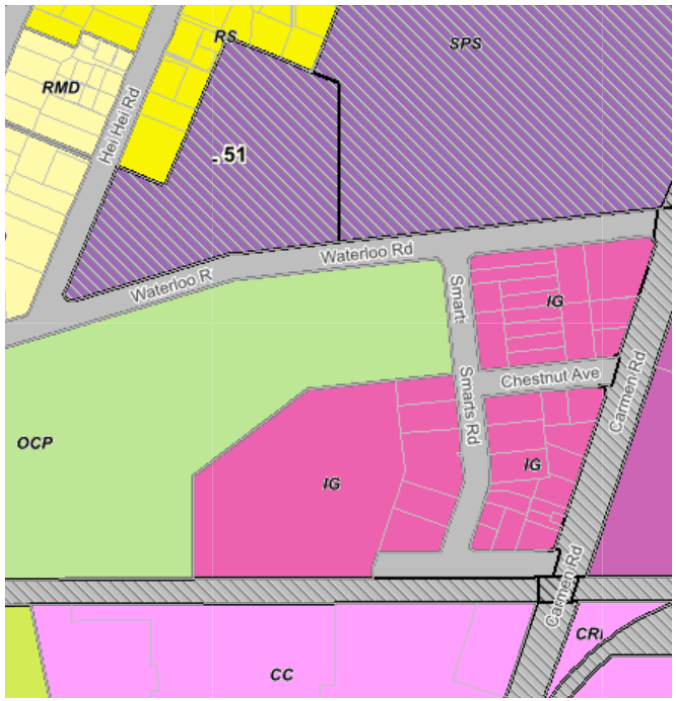
B	**100-118 Sawyers Arms Road** 2.2ha  	**Intensity of use:** Intensively used. 114 Sawyers Arms Road is a relatively modern gated business park containing a range of unit title office / warehouse / workroom spaces with car parking. Fairly fragmented; large number of relatively small land parcels. Occupied by Rainbow Stiches, Andritz Hydro, TTDA, Melrose Kiwi Concept Chairs, Christchurch Steel. Allstor storage units. **Quality of built form:** Business park is relatively modern, two storey units. Some other parcels e.g. storage units, lower grade single height buildings. **Extent of built form**: High site coverage. Very low LCV ratio (circa 20%). **Appropriateness for industry:** Good site visibility and access from Sawyers Arms Road. Significant purpose-built industrial buildings. **Appropriateness for residential:** good accessibility by cycleway and PT to nearby amenities (shops, park, schools etc). Most of site unlikely to be redeveloped such that any balance land would result in piecemeal development. **Recommendation: No change.** Site characteristics especially high land capitalisation, fragmented tenure and relatively modern building age mean it unlikely to be feasible to redevelop. Rely on existing brownfield sites policy framework for consideration of redevelopment potential in future.

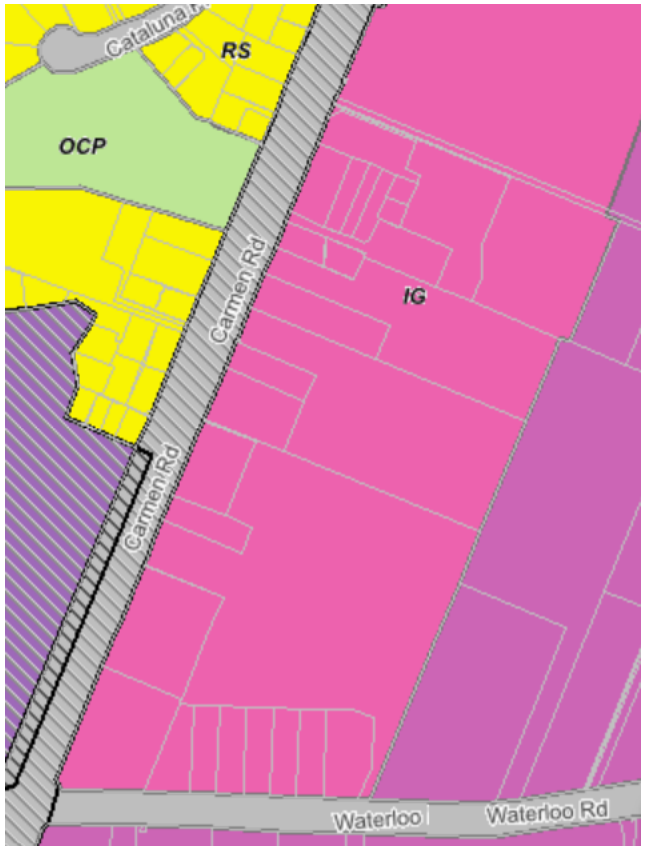
C	**95, 97 and 99 Sawyers Arms Road** 3.2ha  	**Current intensity of use:** In active use – in part intensively. No vacancies observed. North City Church, storage warehousing units, building and home manufacturing and supplies, firing school. **Quality of built form:** Mixed. Garage storage units (low), Church (purpose built in early 2000s), office / showroom / warehouse units. **Extent of built form:** Three medium sized sites (0.73-1.47ha), church site with parking unlikely to relocate. 30-40% Land to capital value ratio. **Appropriateness for industry:** Whilst the land contributes to an industrial hub with industrial land to the north site of Sawyers Arms Road, its arrow frontage and majority of land sited behind the church results in poor street visibility compared to other industrial sites. **Appropriateness for residential:** Very close to amenities (open space, school, shops, public transport etc) and adjoining one side by residential and commercial to the south. Large sites capable of managing boundary effects and achieving good residential layout. Some existing landscaping. Proximity to rail (potential for impacts on and to the rail) but capable of being managed through other district plan controls. **Recommendation: Enable housing intensification** Approximately two thirds of the site has potential for redevelopment. Given large site sizes, surrounding land uses, access and amenities, capable of quality residential redevelopment.

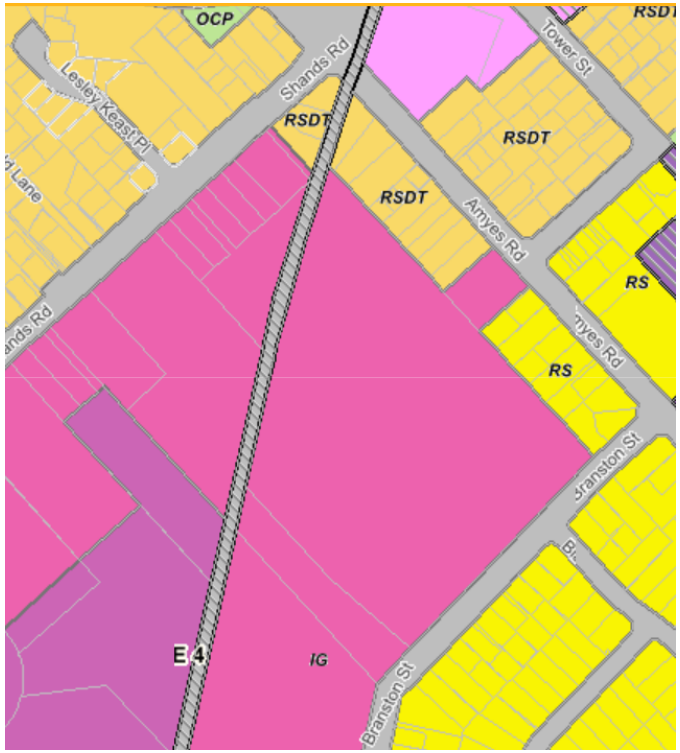
D	**154 Langdons Road, 11A-C Langstone Lane, and 3-10 Langstone Lane.** 1.1ha  	**Current intensity of use:** Intensively used. Directly adjoins Northlink Retail Park, Morrison Ave Bowls Club and residential housing. Currently occupied by Telfer Electrical, Powerserve Electrical, Justin Neil Engineering, Smartlift Systems, First Windows and Doors, Airflow (the HVAC shop) and Turbo Care NZ. Kennairds Machinery Hire on front site. **Quality of built form:** relatively modern and popular business park. Appears to be fully leased. **Extent of built form:** Other than the hire business, fairly high site coverage. LCV ratio is generally low other than 154 Langdons Road which is high, reflecting its use as a machinery hire company (yard based retail) but which is nonetheless an economically important land use that benefits from this highly visible location. **Appropriateness for industry:** small industrial business park in this location proven popular for these types of industries. **Appropriateness of residential:** Well-located in terms of nearby amenities and proximity to Papanui commercial centre and adjoining housing, however site is a narrow purpose built, relatively small, zoned area, in multiple fragmented tenure, making residential redevelopment unlikely to be feasible. **Recommendation**: **No change.** In light of the low LCV, good quality of existing buildings (generally), fragmented nature of (relatively small) sites, rely on existing brownfield sites policy framework for consideration of any redevelopment potential in future.

E	**500-520 Cranford Street** 2.4ha  	**Current intensity of use:** Approximately six properties. Size varies between 1,400sqm and 1ha. Fairly low intensity uses for most of the sites. Car removals cash for cars, Hornby Auto Parts, Roses Auto Electrical, Smart Moves Creative Dance, The Little Hire Company, Caltex Service Station. **Quality of built form:** Mostly older, relatively poor-quality buildings. Ranging from 1950s-80s. One site appears to be currently under-development. **Extent of built form:** Significant site coverage but some low value use (e.g. car parts and storage). LCV ratio varies between 37-50%. **Appropriateness of industry:** Good site visibility for passing trade however bounded to north and west by sensitive activities (housing and school). Historical reverse sensitivity / amenity issues. Well -located for car servicing, repairs and petrol on route to city (might be less so now with opening of the northern arterial). **Appropriateness of residential:** Highly sought-after residential area with good access to city and nearby amenities including the commercial centre, recreational cycleways and schools. Land remediation likely to address contamination. Attractive streetscape. **Recommendation: Enable housing intensification** Age / quality of existing buildings and low intensity land uses along with highly demanded area for residential activity lends itself to residential redevelopment.

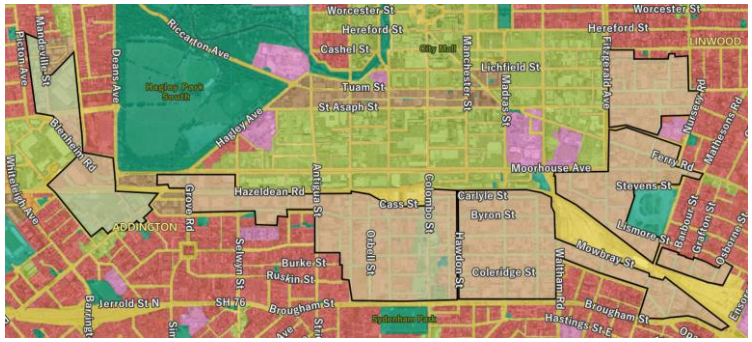
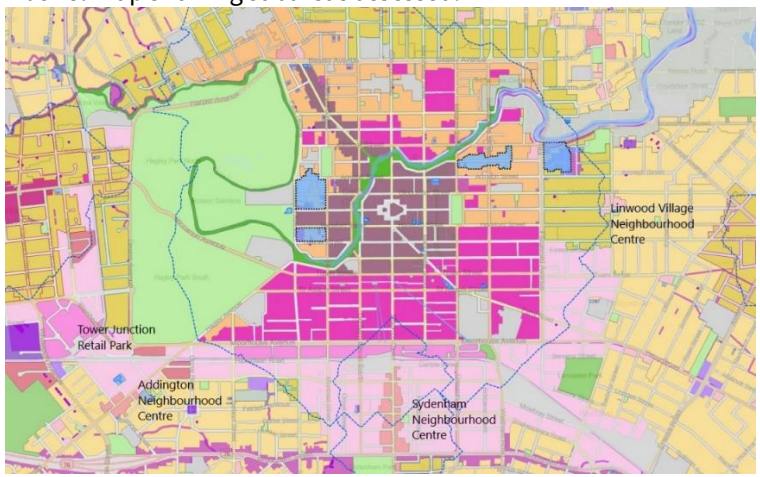
F	**472 Cranford Street** 1.95ha  	**Current intensity of use:** large industrial warehouse building c 1970 in use but low intensity use (Savemart clothing recycling and Chipmunks Children's PlayCentre). Some office space advertised to let. **Quality of built form:** Older industrial warehouse building c. 1970s. **Extent of built form:** Site coverage approx. 1/3 of site. Extensive car parking. Some landscaping. Dual access from Winters Road and Cranford Street. Land to capital value ratio 45%. **Appropriateness for industry:** Site doesn't have visibility from Cranford Street but does have easy access to the state highway network. Dated buildings will be unsuited to many uses. **Appropriateness for residential:** Good amenities for residential land. Close to shops and school with a rural outlook. Large site in single ownership facilitates good comprehensive development opportunity. Some amenity conflicts with adjoining commercial activity – interface amenity issues to address. **Recommendation: Enable housing intensification** Parcel is an isolated industrial site capable of appropriate redevelopment more suited to its location. Age and quality of existing building suggests a relatively limited lifespan. Highly demanded area for residential activity lends itself to residential redevelopment.

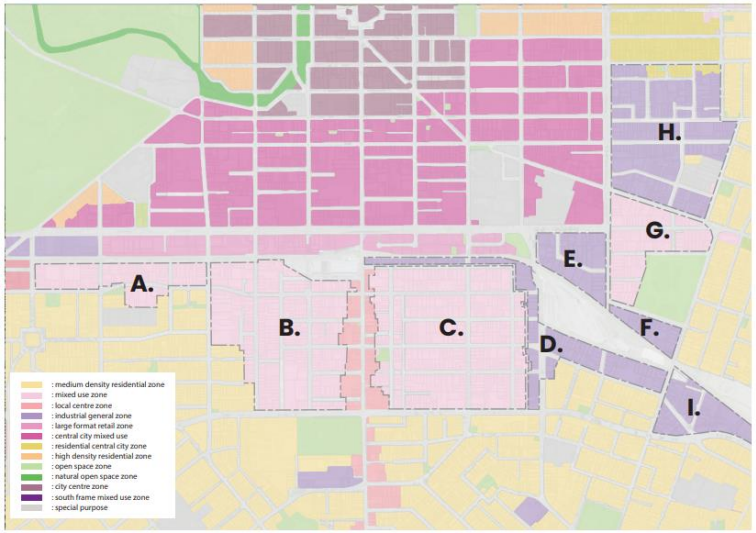
G	**Smarts Road and Chestnut Ave** 4.9ha incl roads 	**Current intensity of use:** To the west of Smarts Road, occupying the largest site and with good siting next to Kyle Park, is Americold, a large highly capitalised cool store warehouse. The balance of the landholdings are much smaller and in various uses, mostly associated with automotive servicing, repairs and parts sales. Hornby High School on Waterloo Road has recently been redeveloped and a new pool, community centre and library is under construction on the corner of Smarts Road and Waterloo Roads. **Quality of built form:** Other than the Americold building, the majority of the buildings are fairly old and poor quality, some dating back to 1940s but most in 1980s and 90s. **Extent of built form:** Fairly high site coverage given small sites. Most have parking. Mixture of freehold, cross lease and unit title landholdings. Some sites have very high land to capital value ratios suggesting redevelopment potential if land zoning and assembly was achieved. **Appropriateness for industry:** Good access to the state highway network and Carmen Road frontage has very good visibility to passing trade. Such opportunities abound in this location however. Small sites limit the range of industrial activities such that car service industries dominate. **Appropriateness for residential:** Given existing and developing amenities in this location, there would be significant benefits for residential redevelopment. Fragmented ownership suggest comprehensive redevelopment opportunities will be limited. **Recommendation: Enable housing intensification** Whilst the land is unlikely to be redeveloped in the short to medium term (particularly the Americold site), the land is well located next to the school, park, pool and community centre (with library) so presents a well-located future opportunity that the overlay may facilitate if sufficient sized land can be amalgamated to achieve suitable comprehensive development sites.

H	**Carmen Road** 10.8ha 	**Excluded** on basis of it being a necessary buffer to the adjoining Industrial Heavy Zone. Whilst it is located opposite a high school, it is not well suited for residential given its location between a busy arterial (State Highway) and Industrial Heavy Zone. It is also located at the far end of an 800m walkable catchment and the quality of that walking route is poor.

I	**Amyes Road /Branston Street (IG land between Branston Street and the Railway Line). 22 and 24 Amyes Road and 16 Branston Street** 4.87ha 	**Current intensity of use:** Former Gough Gough and Hamer site adjoining the Amyes Road residential area. Close to South Hornby School. Adjoins the railway line. Land recently sold to 24 Amyes Road Limited – intentions unknown. Highly capitalised but a large site with about 30% site coverage. Appears to be leased – Sime Darby and TWL Trailer Supply. **Quality and extent of built form:** Significant industrial buildings (circa 2000s) occupy about 1.28ha which appear to be of relatively good quality. **Appropriateness for industry:** Appropriate for industry. Good location in part of a highly sought-after industrial node, with good access to the city and state highway network. The site's location, contiguous to the Hornby residential settlement, can pose some amenity conflicts depending on the use. The site also does not benefit from strong visual prominence, with the main accesses on Branston and Amyes Road, not the more highly trafficked Shands Road. **Appropriateness for residential:** Whilst the site is located in part of a large industrial area, it adjoins existing residential properties on two sides and is very close to many amenities including Hornby commercial centre, schools and churches. Its large size and single ownership provides an opportunity for a well-planned comprehensive redevelopment which integrates well with the surrounding neighbourhood. The site is bounded to the north-west by the railway line, so noise mitigation will be required. **Recommendation: Enable housing intensification** Significant housing redevelopment opportunity, well located to access shops, services and public transport, capable of high quality comprehensive medium density whilst managing boundaries to minimise effects between residents and nearby industry.

J	**Shands Road (area between Shands Road and the Railway line)** [same map as above] 3.5ha	**Current intensity of use:** This land comprising nos. 21-33 Shands Road currently has a split residential and industrial zoning but has been developed as a retail strip. It is in multiple ownership. Current tenants include Hells Pizza, Ministry of Social Development, Stay Well Pharmacy, Vinnies Charity Shop, Henry's Bottle Shop and the ToolShed. **Quality and extent of built form:** Unremarkable retail shops built circa 2000s with frontage parking. **Appropriateness for industry:** Redevelopment for industrial use is unlikely given that it has been developed for purpose built commercial units, part of the site is zoned residential, and there is ample alternative industrial land supply nearby. Like the rest of this industrial area, the land does benefit from good access to the state highway network and has good site visibility on a prominent, busy arterial. **Appropriateness for residential:** site is located close to Hornby Mall and a local school and park but is sandwiched between a very busy arterial with abundant heavy vehicles on one side and the railway line on the other side. The site is however immediately adjacent existing residential activity. Current commercial use of the land and low land to capital value ratio suggests redevelopment for housing is unlikely. However, the current land use is at odds with its zoning such that there may be potential for a future mixed-use redevelopment that may be a more appropriate use. **Recommendation: Enable housing intensification** For the reasons above and that if unsuitable for residential or mixed use, it may support a commercial redevelopment (subject to meeting brownfield policy criteria).

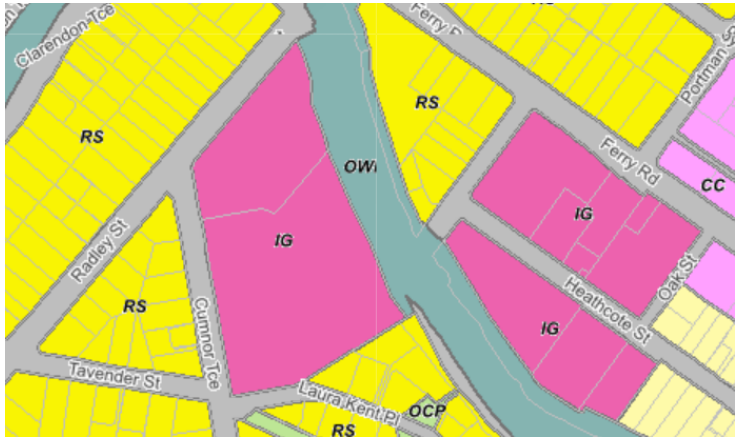
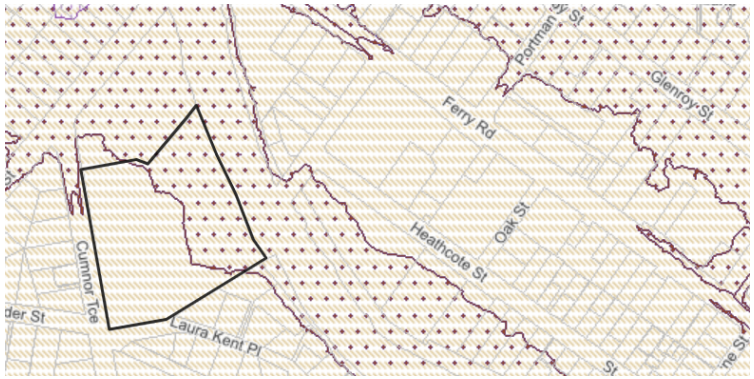
K, L, M, N, O, P	**Inner City Industrial Land** [Phillipstown – Lancaster – Charleston - Waltham – Sydenham – Addington] **Sub-area size:** 22ha Phillipstown within the walkable catchment of Linwood (K) 29.6 ha rest of Phillipstown and Lancaster (L) 5.3 ha Charleston Industrial (by rail) (M) 56 ha (balance of Waltham area – Ensors to Hawdon Street (N) 67.0ha Sydenham (Hawdon to Moorhouse) (O) 31.9 ha Addington (P)  **Above:** map showing subareas assessed.  **Above:** pre-notification engagement zoning map (pink area proposed for potential rezoning to mixed use) and showing extent	The inner-city industrial zones immediately surrounding the four avenues adjoin not only the central city but the smaller suburban centres of Sydenham, Linwood Village and Addington (see map adjacent). A large area of inner-city industrial land was rezoned during the last district plan review to Commercial Mixed-use zone (e.g. around Addington, Mandeville Street and extending along Blenheim Road). Despite its name, the CMU Zone is essentially an industrial zone that recognises *existing* commercial activity and provides for residential development in all parts except the Blenheim Road / Main South Road area). A significant part of the IG zone falls within 400m of Sydenham Local Centre and within 1200m of the City Centre zone (see map) but noting that Policy 3c(ii) does not specify the walkable distance that should be applied. Parts of the IG zone around the inner city that are just beyond these walkable catchment extents have been included and assessed on the basis that their exclusion would otherwise leave pockets of IG zoned land that are equally (or more) suited to residential redevelopment than land wholly within the walkable catchments. This includes the industrial land surrounding Lancaster Park and part of the IG zone in Sydenham that is contiguous with the existing medium density zoned land at Addington. **Current intensity of use:** The intensity of use within the inner city Industrial General zoned land varies greatly within it. Some areas are very capital intensive, whilst others contain large vacant or under-utilised sites (second-hand car sales /storage yards etc). Given the extent of the area it is not possible to generalise about industrial land use intensity. **Quality and extent of built form:** The age of the existing building stock spans a number of decades, indicating that different sites are more likely to be redeveloped at different points in time. An assessment of this land's redevelopment potential in 2018 by council's city planning staff found that there was around 46ha of land with buildings that would be 50+ years old in 2028. 10ha of land was also identified as vacant at this time. This indicates that whilst the whole area is some 200ha in extent, only about one quarter of this would have buildings of an age that would suggest readiness to be redeveloped. **Appropriateness for industry:** Whilst the Sydenham industrial area (along the railway) was one of the city's earliest, typical of other cities internationally, the competition for use of centrally located land over time may see industrial activities displaced to other industrial areas. Large industrial areas exist nearby at Woolston, Middleton and the city fringe. The area continues to be popular for a range of light industrial and service industries in particular, that value the proximity to the central city market and state

	of 1200m walking catchment from City Centre zone an 400m catchment from Sydenham commercial centre.  **Above:** Common Ground assessment of areas deemed appropriate to enable comprehensive housing (in pink) and those recommended to stay in industrial zoning (purple).	highway network. A review of Core Logic data[18] reveals a large number of properties currently for sale or lease reflecting the generous supply of industrial premises in Christchurch, including within the central city area. Despite the current inflexible industrial zoning of land, non-industrial uses such as cafes, galleries, gymnasiums, breweries have been establishing in the area, suggesting that if the zone was further liberalised, a greater range of activities would seek to locate there. An economic assessment by Sense Partners concludes that a more efficient land use in this location is housing, not industrial, and that industrial uses are effectively receiving an implicit subsidy by not facing true rents[19]. They say that this subsidy helps provide jobs in the study area but that it is likely that existing jobs and businesses will move to other locations in the city[20]. **Appropriateness for residential:** Redevelopment of appropriate sites for housing in these areas would provide opportunities for people to live close to the considerable amenities of these centres (by walking and cycling) and in turn provide an increased residential catchment to support the economic viability of the centres. The proximity of this area to the central city, Sydenham and Addington means that the whole area can function as a 15-minute neighbourhood i.e. residents could access all of their day to day needs within a 15 minute walk, bus or bike ride. The existing poor street amenity would, however, likely deter market demand until such time as further investment in street and other infrastructure occurs. Demand for residential development in and around the central city suggests that if such investment is made to improve the amenity of this area, there would be strong market interest. Common Ground Urban Design has undertaken analysis of the Industrial General zone and its suitability to transform over time to a residential-led mixed use zone. Their assessment reviewed land suitability for development using best practice urban design principles as well as land ownership patterns and consideration of potential reverse sensitivity issues. Their conclusions are summarised on the map adjacent but overall considered the area to be appropriate for comprehensive housing development and ideally suited to transition to mixed use residential neighbourhoods over the long term. They recommend that a number of areas be excluded however; most notably land directly adjoining the railway line, the former gas works land (Iverson Terrace) and part of Phillipstown (the areas marked D, E, F, I and H on the adjacent map). The area adjacent to the rail line on Carlyle Street and an area west of Waltham Street was recommended to be excluded to support

[18] Core Logic, RPNZ Database (April 2022)
[19] Sense Partners (2022), Cost-Benefit Analysis of Proposed Industrial Land Rezoning, page 3.
[20] Ibid.

		commercial activity on Waltham Street and manage potential amenity issues on Carlyle Street, however it is noted that existing district plan provisions are capable of achieving these outcomes. Phillipstown was recommended not to be taken forward at this time due primarily due to the benefits of retaining some lower cost industrial land close to the central city and this appears sensible, particularly given the very large area and need for significant investment in street infrastructure which is as yet unfunded. A comprehensive review of land use in this area compared to the Sydenham / Addington areas also notes a slightly different industrial character with the latter having greater diversity of uses (including retail, community and offices) than Phillipstown, and which indicates that a more mixed use character is already naturally evolving in the Sydenham/Addington area that is more ready and likely to support new residential activities. Significantly, both Common Ground and CCC Urban Design experts identify the need to carefully manage new buildings in this area as it slowly transitions, to ensure that the area develops as a future urban zone should (i.e. density done well), to manage potential land use conflicts and improve street and site amenity, particularly with regards to the lack of trees and greenspaces. A separate technical report[21] considers urban design matters in more detail. **Recommendation: Enable Housing Intensification for large part of IG zone broadly aligning with areas A, B C and G on the Common Ground land use plan.**
Q	**Ferrymead** 19ha 	**Exclude** on the basis of its natural hazards (coastal).

[21] Technical Report: Comprehensive Housing Precinct Analysis - Urban Design

R & S	**Woolston** 2.4ha (Radley/Cumnor) + 2.4ha Ferry/Heathcote = 4.8 total  Map (below) showing District Plan Natural Hazard Layer  	**Current intensity of use:** Land use intensity is varied, with recent commercial redevelopment occurring along the Ferry Road block McDonalds restaurant and a service station) but with some longer term vacant land on the Cumnor Terrace block. The large block (9 Radley) has a Floor Area Ratio (FAR) of 0.35, consistent with larger industrial sites. Land between Heathcote Street and the river is intensively developed but much appears to be in very poor condition. It is however located immediately adjoining the Heathcote River where development potential is likely to be constrained by the ground conditions / flood risk to be managed and with potential land contamination. **Quality and extent of built form:** 9 Radley Street contains a large industrial building (SuperHeat) built in the 1970s which will be nearing the end of its economic life (assuming a traditional 50 year build life). The adjoining industrial building at 23 Cumnor Tce appears much newer so may not be available for redevelopment for some time, other than the vacant parcel currently for sale. **Appropriateness for industry:** Not particularly well suited for industrial activities given the predominantly residential surrounding uses, proximity to commercial centre, and amenity opportunity of the river and local open space. There are ample industrial opportunities in wider Woolston Area. The large land parcels on Radley and Cumnor provide opportunities for industrial activities, although the long term vacancy of one land parcel suggests that market demand is low. **Appropriateness for residential:** Possible challenging land conditions requiring remediation (contamination and Geotech). Otherwise these sites have potential for high residential amenity given proximity of Woolston neighbourhood centre and the river with its walking and cycling tracks. **Recommendation: Enable housing intensification** Whilst housing development potential may be limited on many sites within the overlay, some parcels may be suitable for more intensive redevelopment that is better suited to the area. With some poor quality and aging buildings and good existing amenity, the overlay will provide for more redevelopment opportunities of benefit to the wider area.

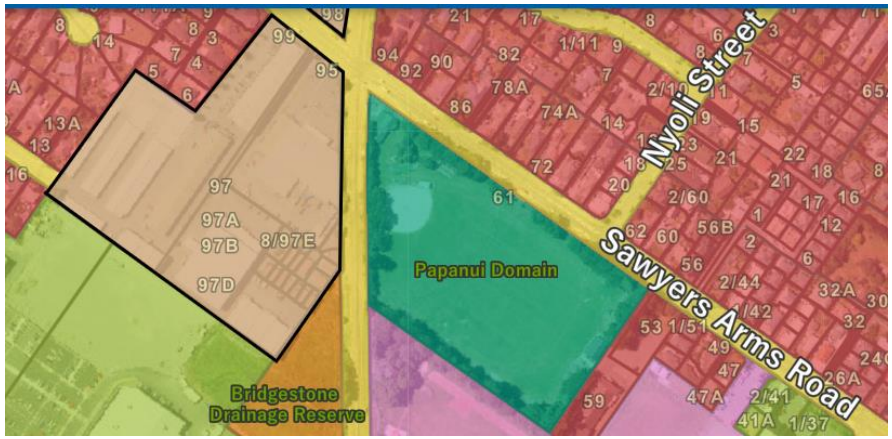
Appendix B

Maps of Areas with Potential for Residential Intensification

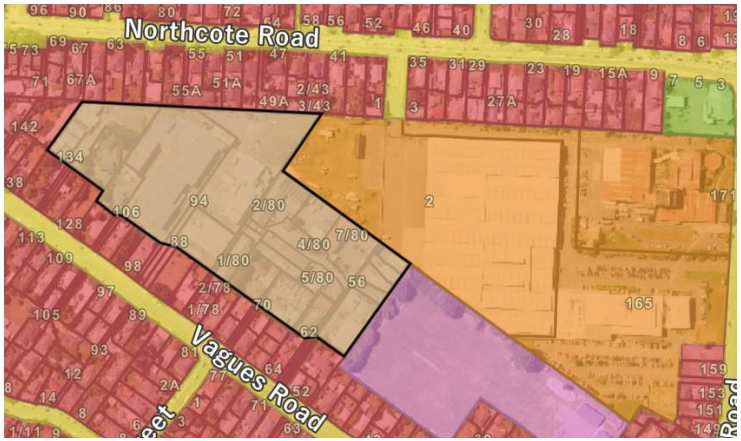
PAPANUI / CRANFORD

Appropriate IG zones to enable residential activity ithin 800m of Papanui / Northland commercial centre (large town centres) and 200m of Cranford commercial centre

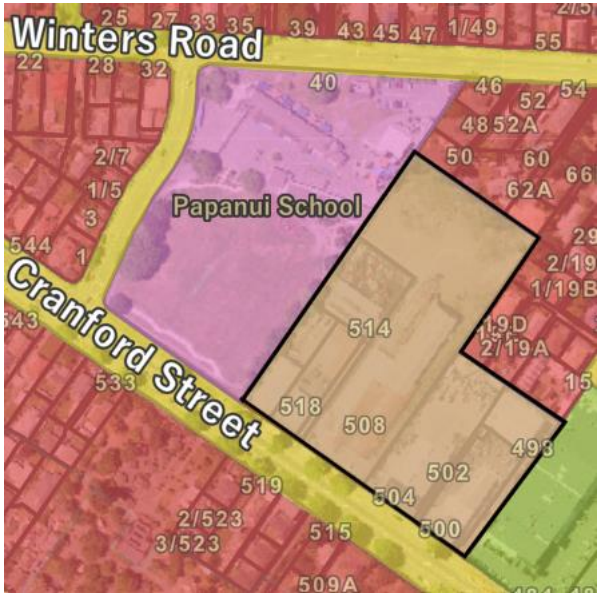
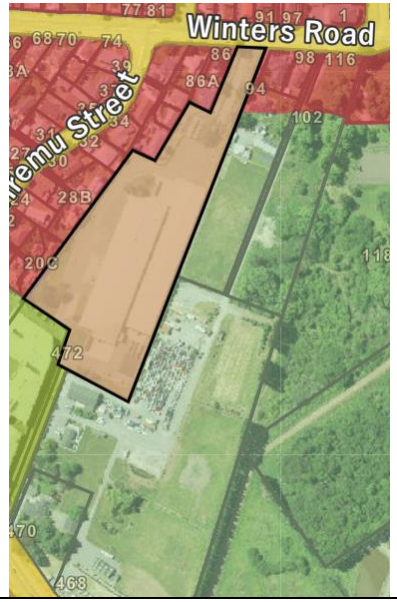
95, 97, 99 Sawyers Arms Road



Vagues Road (varies properties as shown)



Christchurch City Council

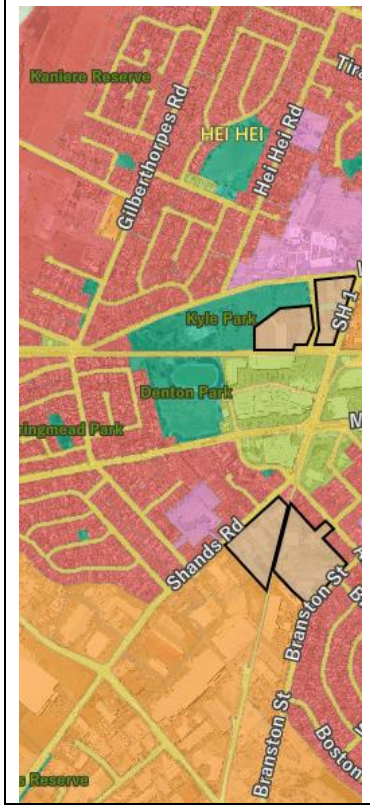
500-520 Cranford Street	472 Cranford Street (also access from Winters Road)
	

Christchurch City Council

HORNBY

Appropriate IG zones to enable residential intensification within 800m of Hornby commercial centre (large town centre)

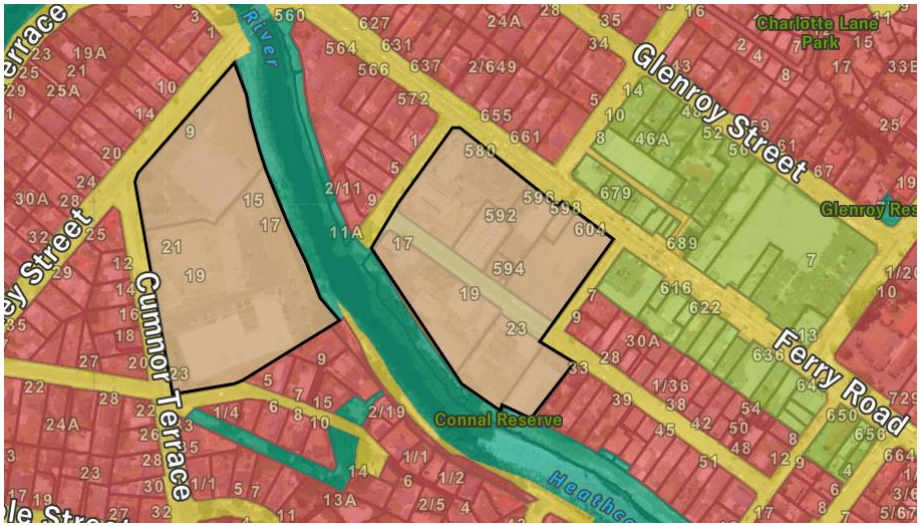
Smarts Road / Aymes Road / Shands Road



Christchurch City Council

Woolston

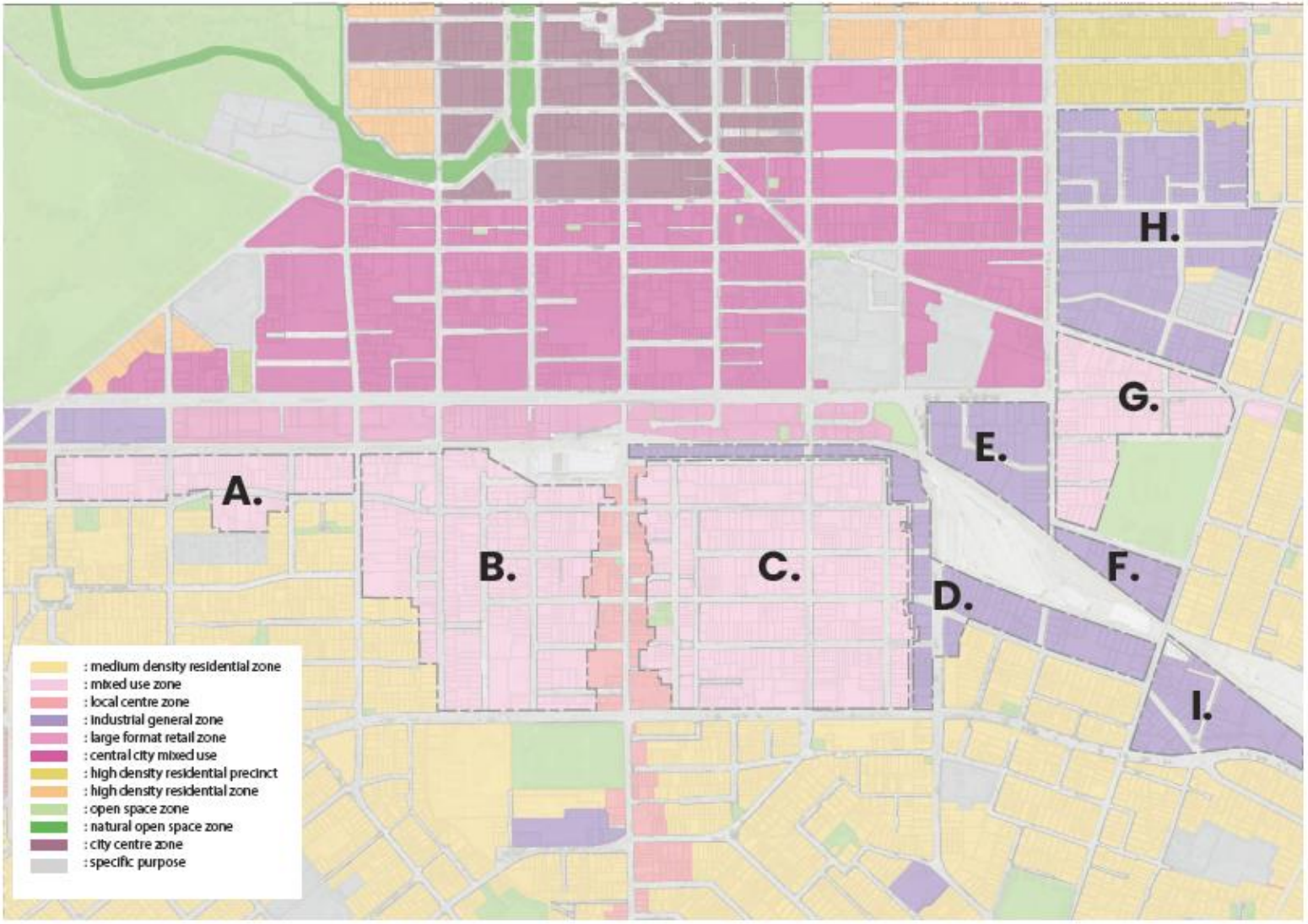
Appropriate IG Zones to enable residential within 200m of Woolston commercial centre



Christchurch City Council

Appropriate IG Zones to enable residential activity within 1500m of City Centre Zone (areas A, B, C and G)

(retain areas D, E,F, I and H in industrial zoning)



Christchurch City Council

Christchurch Central City:

Land Demand Estimate and Business Capacity Assessment

April 2022

Complied by:

Dr David Dyason

Lincoln University

Lincoln University
PO Box 85084, Lincoln 7647
Christchurch, New Zealand
0800 10 60 10
www.lincoln.ac.nz

Table of Contents

1. Introduction

ChristchurchNZ commissioned a study to estimate the land demand and business capacity for the Central City of Christchurch. This study builds on work that was completed in 2021 for the Christchurch City Council on a city-wide level to quantify land demand for the next 30 years. The demand for land is estimated for five land uses namely, retail, office, industrial, warehousing and short-stay accommodation for the Central City study area.

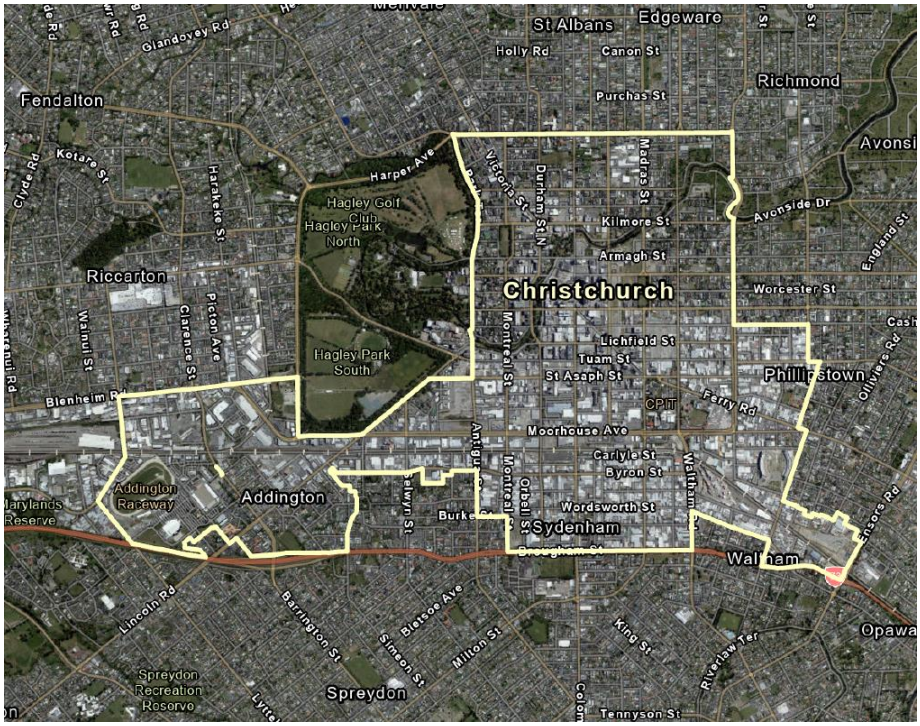
A few adjustments, related to locational attributes for the study area, within the model, are required. As a result, an analysis of various assumptions is undertaken which is the primary purpose of this report.

The following assumptions are assessed for the study area:

- Floor area ratio
- Complimentary uses of land
- Current vacancy rates

Map 1 provides an overview of the study area.

Map 1: Study Area



2. Floor Area Ratio (FAR)

The floor area ratio is used as an indicator of land-use intensity. In other words, how much of the land is utilised beyond its physical limitations, by increasing density. The ratio is derived from Valuation Hub data provided by the Christchurch City Council and it is possible to distinguish the FAR for different activities based on the District Planning Zones. The results revealed the following ratios within the study area (see Table 1) for the five land uses assessed.

Table 1: Floor Area Ratio per land use in the study area, 2020 data

Land use / zoning	FAR
Office	1.34
Accommodation	1.27
Retail	0.63
Warehousing	0.66
Industrial	0.55

The results reveal relatively low levels of use intensity, likely driven by existing vacant land in the study area as well as density differences resulting from planning rules for the various central city planning zones. To improve the results, further in-depth assessment on district plan zoning level took place.

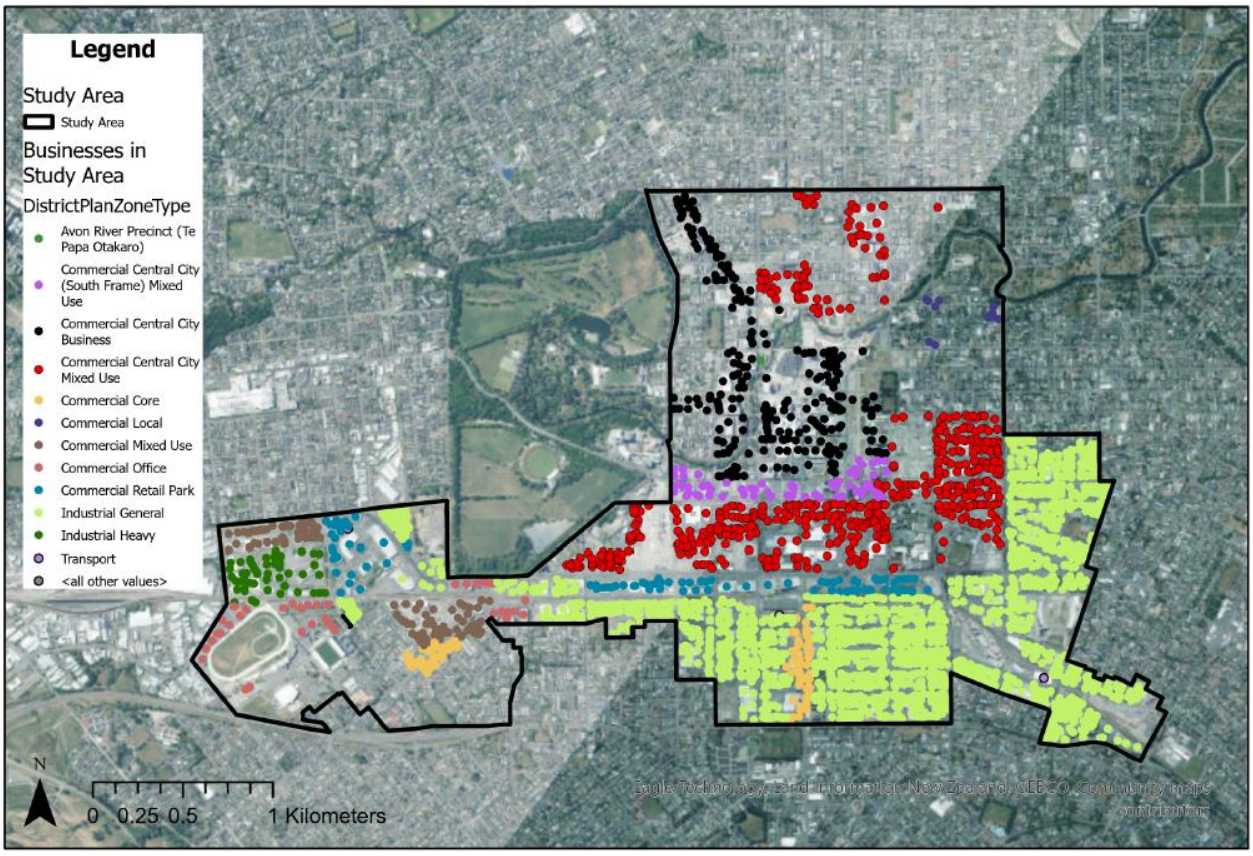
At this level, floor size and site area data for rating units are available per district plan zone, but the location of the business unit could not be verified through the Valuation Hub. Although this verification could improve deeper analysis, the data in its current form provides valuable insight for the assessment. This approach has merit as it considers the planning requirement for the various planning zones in the study area and considers the density of older and recent new developments in the Central City.

This approach does pose a risk, as current levels of occupation could not be verified with the Valuation Hub data. It is expected that the district plan rules will continue to support higher density development in the study area driven by:

- *The current plan change is to implement government direction to increase enabled heights and densities. The government intends to support more up than out.*
- *Council has removed any requirement for minimum car parking. In the past, this may have influenced site coverage and it does appear that more buildings are developed now without a lot of surface car parking i.e. using more of a site for buildings.*
- *The current district plan has a maximum allowable area of parking in the central city (no more than 50% of the site can be car parking).*
- *Council is currently planning on introducing a minimum building height requirement of 2 stories.*

Map 2 provides the location of business units within each of the District Plan Zones.

Map 2: Business units and District Plan Zones, 2021 data



By applying the Valuation Hub data to the district zone type, it is possible to estimate the FAR for each land use per zone. Table 2 reveals the results for the four larger zones in the study area.

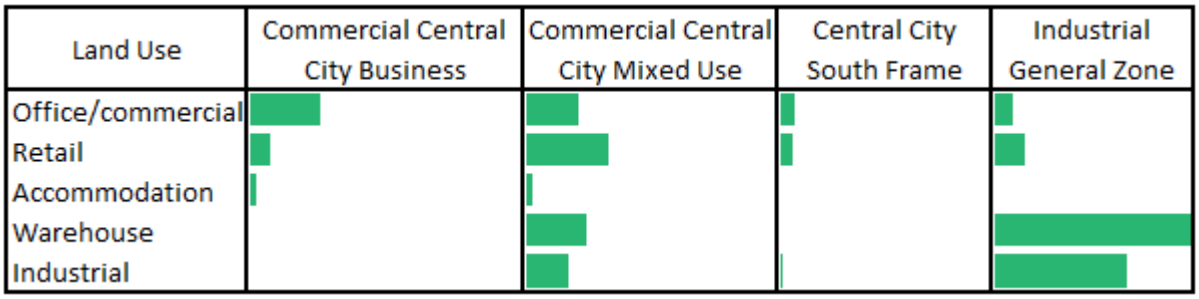
Table 2: Floor area ratio per zone and land use in the study area, 2020 data

District Plan Zoning Area	Floor Area Ratio (FAR)				
Land Use	Commercial Central City Business	Commercial Central City Mixed Use	Central City South Frame	Industrial General Zone	Study area
Office	**2.69**	0.73	2.25	0.70	
Retail	2.09	0.52	1.00	0.37	**0.63**
Accommodation	**4.26**	0.85	-	0.68	
Warehouse	0.87	0.68	1.96	**0.66**	
Industrial	-	0.53	0.32	**0.62**	

The results reveal significant changes to the density and use of land depending on the location and the current zoning plan. The Commercial Central City Business Zone reveals the highest FAR for office, retail and accommodation, a good representation of what is observed within this area with new property developments. The industrial general zone situated to the east and southern area reveals a lower density for warehousing and industrial activity, with larger sites.

The volume of each land use within each district plan zone is illustrated in Figure 1. The results, indicative only, show that the majority of industrial and warehouse activity is taking place in the General Industrial zone, while office activity tends to be more concentrated in the Central City Business and Central City Mixed Uses zones. Some retail and office activity is evident in Industrial General zone.

Figure 1: Land use volume (total m^2) per district plan zone



The following FAR values are applied to the land demand model:

Office: 2.69

Retail: 0.63 (retail takes place mainly on the ground floor, see next section)

Industrial: 0.62

Warehouse: 0.66

Short-Stay Accommodation: 4.26

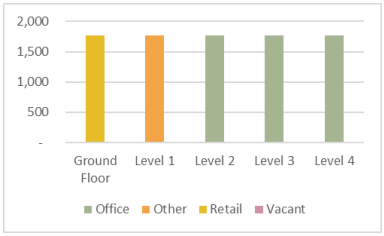
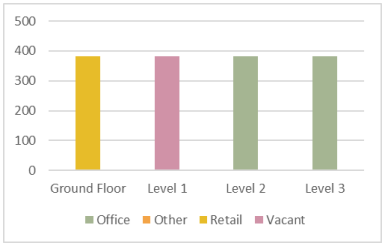
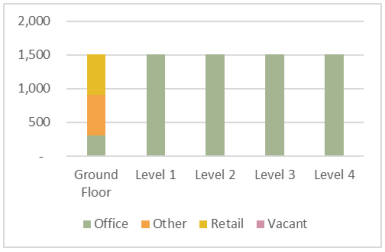
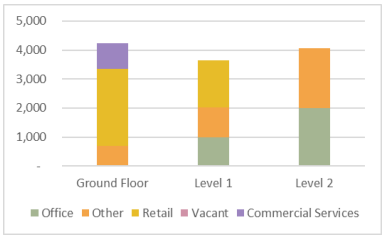
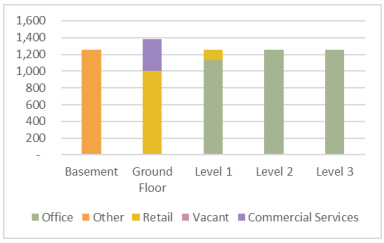
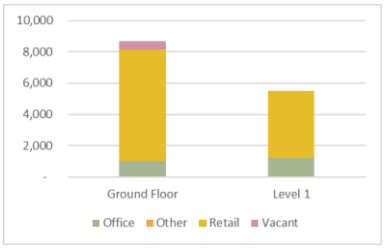
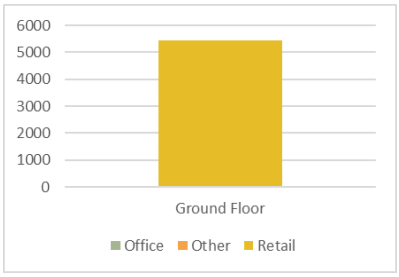
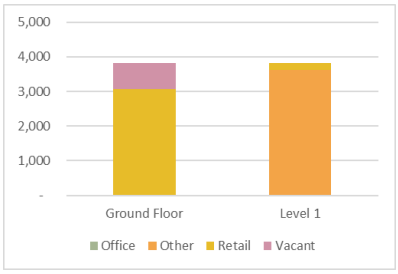
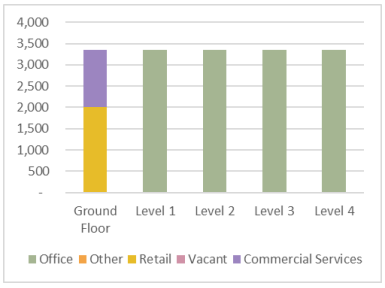
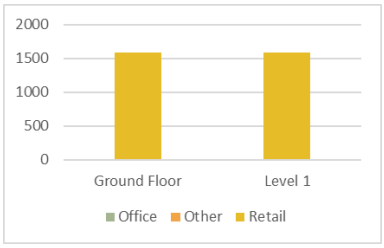
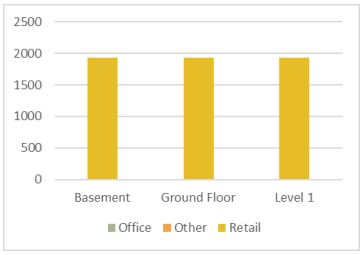
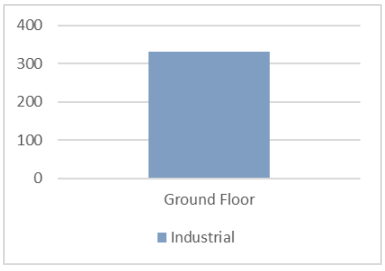
3. Complimentary uses

Property development often comprises of more than one use complementing one another. Examples are evident throughout the study area, where buildings often have a retail component on the ground floor, while the floors higher up are used for office activity. An analysis of complementary uses implies that the development of a building can be divided into primary and secondary use which will then affect the demand for land and space. To assess this, examples of buildings within the study area are used. Table 3 illustrates various buildings throughout the study area and how their floor space is utilised for various activities. The data is sourced from the CCC Vertical Land Use Survey, 2021. It is not the intention to show the activity within all the buildings of the study area, rather, to provide an overview of observable trends in recent new developments.

The following is evident from the assessment.

- Higher density development is associated with a more diverse use in the activity.
- Higher density development is predominantly evident for office and accommodation activity (accommodation is not shown here).
- Retail is mainly on the ground floor while office activity is above ground.
- Where retail is the main use of the building, it tends to have a lower building height (retail is seldom on floors above ground level).
- In buildings where retail is the main activity, there seems to be limited other activity, apart from small scale offices and parking.
- Where the office is the main activity of a building, the ground floor is often used for retail, as a supplementary use.
- Industrial and warehouse activity tends to take place on ground level, while office or other commercial services would take place on floors above ground level (if there are).

Table 3: Assessing complementary uses

Building 1 8,850m^2 Salisbury Street 	Building 2 1,528m^2 Victoria Street 	Building 3 7,525m^2 Hereford Street 
Building 4 11,934m^2 Lichfield Street 	Building 4 6,395m^2 Colombo Street 	Building 5 14,178m^2 Moorhouse Avenue 
Building 6 5,436m^2 Moorhouse Avenue 	Building 7 7,644m^2 Colombo Street 	Building 8 16,765m^2 Cashel Street 
Building 9 3,166m^2 Oxford Terrace 	Building 10 5,784m2 Colombo Street 	Building 11 311m^2 Taum Street 

The results from the complimentary assessment are not expected to change the demand for land dramatically as estimated in the land demand model. This is due to the FAR which has already incorporated the relationships for complementary use. For example, an office building that includes retail activity on the ground floor has a higher FAR rate as a result which accounts for and includes the retail activity. For all practical reasons, the increased FAR incorporates the complementary activity of the property's main use.

4. Vacancy

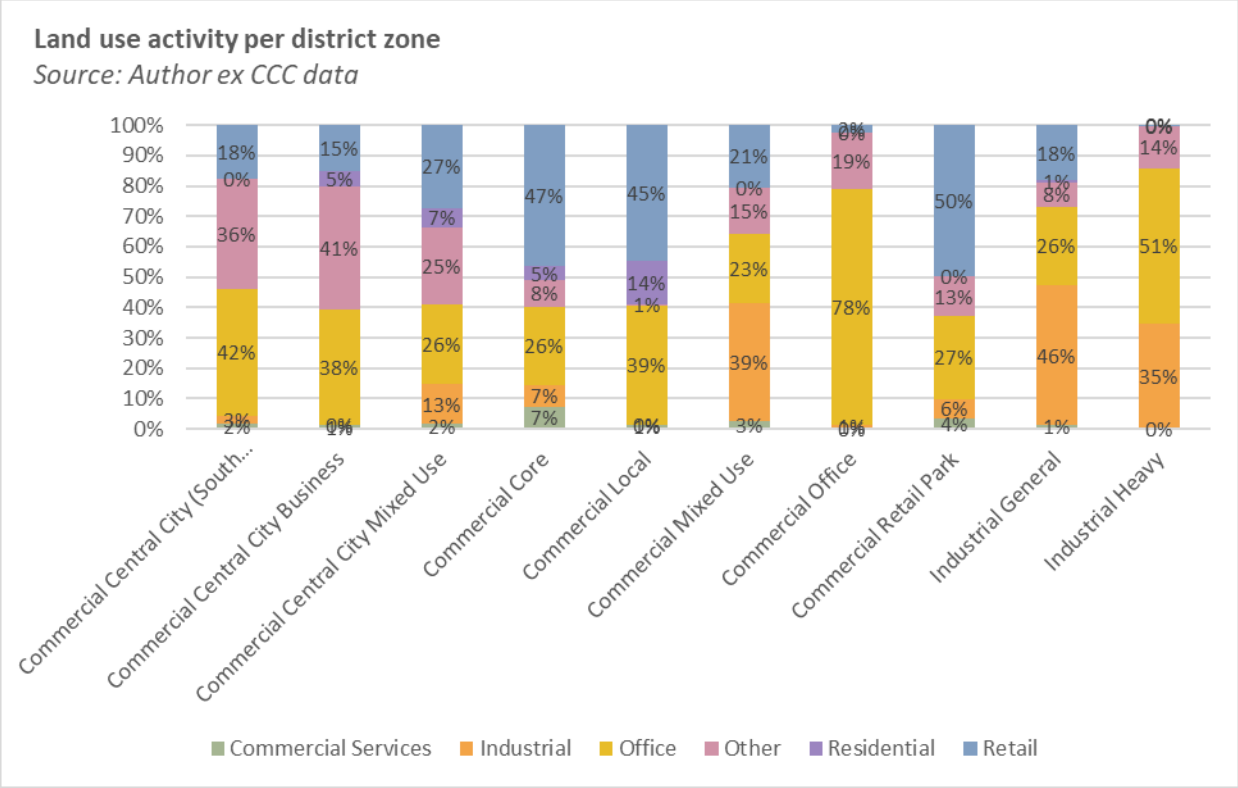
Both building vacancy and land vacancy will be assessed. The building vacancy coupled with the land vacancy represents the potential supply to absorb the new demand for space.

4.1 Building Vacancy

To determine the current business capacity for the study area, the vacancy level in existing buildings needs to be added to the land demand results for each land use. This allows an assessment of effective capacity within the market. The vacancy is calculated from the Vertical Land Use survey, completed in 2021.

The vacancy rate for each land use is derived from the vacancy for each district plan zone. The share of current activity for each district plan zone is used to apportion the vacancy level per land-use type (see Figure 2).

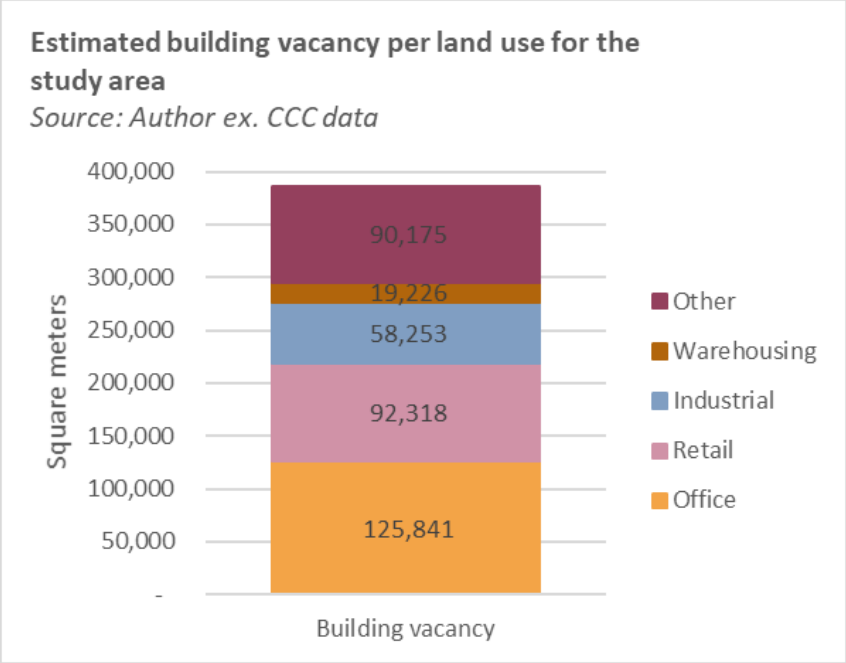
Figure 2: Share of land use per District Zone, 2021 values



Unfortunately, the Vertical Land Use survey does not specify the ideal activity for the vacant spaces captured, and as a result, apportionment of current land-use patterns is seen as the most appropriate approach.

Figure 3 illustrates the vacancy within buildings for the study area, per land use.

Figure 3: Building vacancy per land use for the study area, 2021 values



Total vacancy within buildings amounts to 385,813m^2.

The distribution of vacant space based on the current use of the land suggest that the majority of this vacant space could be used for office (125,841m^2) followed by retail (92,318m^2), 'other' which include amongst other things parking and short-stay accommodation (90,175m^2) and finally industrial (58,253m^2) and warehousing (19,226m^2).

A note on the vacancies.

Property vacancies in buildings are driven by several aspects:

- Business cycles
- Old and unusable stock
- Changing market preferences
- Property management issues

The vacancy numbers observed in the Vertical Land Use survey are affected by these and other factors, and explaining these or identifying the reasons for current vacancy levels are beyond the scope of this report. For example, it is evident from the analysis there is a high vacancy in buildings in the General Industrial zone that could be used for office activity, but these are likely to be at a low quality/grade and do not realistically represent the highest and best use of the site.

Although this vacancy exists in the market it is not likely to be ideally suited to capture new office demand. The demand from the market is more likely to be for better quality offices such as Grade A and A+. As a result, the lower quality office buildings are likely to take longer to lease if better quality and competitively priced Grade A office space is available in optimal locations. This example is true of other land uses as well.

4.2 Vacant Land

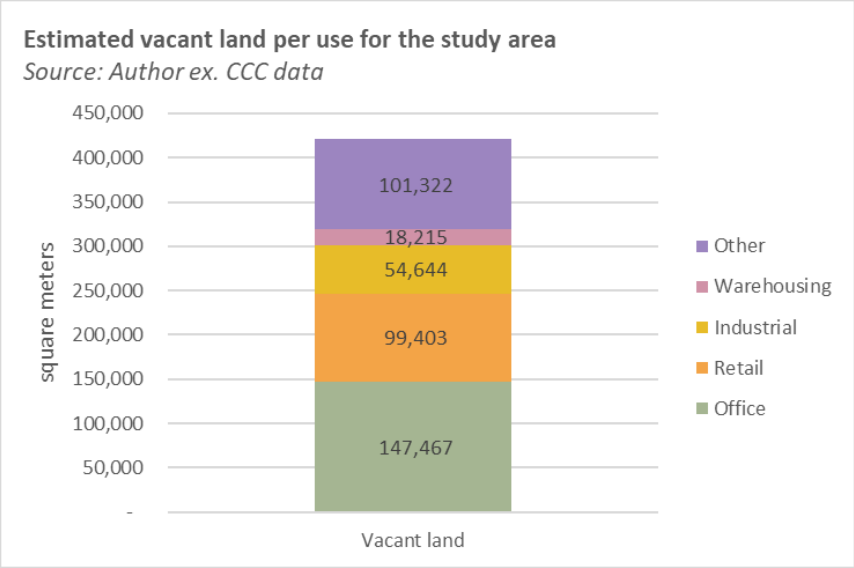
The vacant land register (2022) is used to quantify the available land for future development within the study area. The vacant land register does not stipulate or indicate the highest and best use of the site and the highest and best use of the vacant site could likely change over time, even if vacant.

Allocating land-use to vacant sites is, at this stage, a best guess. It could be argued that if the volume of vacant land outstrips new demand for land as estimated in the land demand model, then supply is sufficient. However, there are currently planning requirements based on the district zones and as a result, the new demand is likely to be impacted by these requirements. Due to the planning requirements and the dynamic nature of the property market with the highest and best use changing over time, assessing the potential use of the vacant land is, for now, assumed to reflect current use patterns.

For this reason, it is assumed that the highest and best use of vacant land will reflect the current share of land use activity in each district plan zone (see Figure 2). This assumption was also applied in the vacant building estimate to ensure alignment of assumptions in estimating building and land vacancy.

Figure 4 reveals the likely use of vacant land within the study area.

Figure 4: Vacant land per land use for the study area, 2022 values



The total vacant land amounts to 436,102m^2 in 2022.

It is highly likely that the distribution estimate for land use of vacant land does not end up as illustrated in Figure 4. The development of vacant land for industrial and warehousing within the central city is likely an overestimate compared to the demand model revealing no new demand.

5. Results

This report aims to provide technical details related to the land demand model and capacity assessment for the Christchurch Central City study area. The technical details mainly focus on the assumptions for the land demand model as well as the current supply estimates. Before the results are provided, a recap of the main assumptions is provided for clarity.

Overview:

- **The study area (Central City) model applies the city-wide Land Demand Model** developed for the Christchurch City Council in 2021. Key assumptions related to the drivers of land use and space demand are provided in the technical report of the city-wide model and not repeated in this report. Please refer to the original report for these assumptions.
- Similar to the city-wide model, the Central City model applies the business growth model (or economic model) and estimates the demand for 'work space' that responds to changing economic activity in the study area.

Space Demand Models:

- The intensity of use for land is based on a floor area ratio (FAR), which represents the size of the building to the land size.
- In the retail model, it is assumed that the Central City will continue to attract 25% of the Christchurch City retail spending market and aligns with the current market share of the node.
- The FAR for the retail model is 0.63 which is based on the ratio for retail activity in the study area.
- Two retail models are presented. One is based on CCC population projections and a second is based on StatsNZ medium population projections.
- The FAR for the office model is 2.69 and is based on the current ratio in the Commercial Central City Business zone.
- The FAR for industrial is 0.62 and based on the current ratio found in the Industrial General Zone.
- The FAR for warehousing is 0.66 and is based on the current ratio found in the Industrial General Zone.
- The FAR for short-stay accommodation is 4.26 and is based on the current ratio in the Commercial Central City Business zone.

Land Demand:

- An assumption related to mixed-use or complimentary use of activity is applied as described earlier in the report. This assumption does not significantly change the land demand volume but has been introduced to highlight the recent trends in the market where new development tend to have a main use which is then complemented by another such as retail or parking. The complimentary use will depend on the location of the building taking into consideration the highest and best use of the site.
- The land demand model is a tool to estimate future demand for land, based on historic and recent market trends. **The model has its limitations** as it applies assumptions and sometimes a best guess or opinion of the market. Errors and **deviations from reality are to be expected** and as a result, it would be good practice to update the model as new data becomes available to adjust future forecasts for land demand.

Land Supply:

- The response to new market demand would be either the utilisation of existing available space (building vacancy) or through new stock that could come in the form of redevelopment of existing buildings or new buildings using vacant sites in the central city.
- The limitations and constraints in calculating the supply have been discussed earlier in the report and relate mostly to the concept of highest and best use. The key assumption applied to the supply assessment is that vacant building space and vacant land are assumed to replicate the current land use pattern within the Central City. This assumption is not ideal but applied to align with previous capacity assessments.
- For example, no new demand for industrial use on vacant sites is expected, however, the supply model allocates existing vacancy for such use as it replicates the current land use pattern for the study area.

The results are summarised in Table 4.

Table 4: Summary of results, up to 2051

	Demand (ha)	Supply (Vacancy, ha)		Total Supply (ha)	Gap (ha)
		Building	Land		
Retail	10.9	12.6	14.7	27.3	16.5
Office	14.7	9.2	9.9	19.2	4.5
Industrial	- 1.1	5.8	5.5	11.3	12.4
Warehousing	0.5	1.9	1.8	3.7	3.2
Short-stay	0.6			0.0	- 0.6
Total	25.6			61.5	35.9

The total new demand for land for the Central City is estimated to be 25.6ha by 2051 while the existing supply from both vacant buildings and floors in buildings (29.6ha) and vacant land (32ha) amounts to 61.5 ha. This leaves additional capacity in the market of 35.9 ha.

This result reveals that there is sufficient capacity in either vacant buildings or floors in buildings to capture new demand as well as sufficient vacant land. However, it is highly likely that the current vacancy level in buildings does not represent the highest and best use or ideal quality for tenants and could potentially remain vacant. In this case, the land vacancy represents a better indicator of capacity.

In conclusion, the results reveal that the Central City has the space capacity, but the high rate of building vacancy suggests that the use of the land is not optimised resulting in efficiency losses.

Plan Change 14

Technical Report - Urban Design

Design for Increased Building Height and Density – Commercial Zones

Christchurch City Council

Technical Report

Date: 10 August 2022
Author: David Hattam
Peer reviewed: Ceciel Delarue

DISCLAIMER:

Christchurch City Council has taken every care to ensure the correctness of all the information contained in this report. All information has been obtained by what are considered to be reliable sources, and Christchurch City Council has no reason to doubt its accuracy. It is however the responsibility of all parties acting on information contained in this report to make their own enquiries to verify correctness.

This document has been prepared for the use of Christchurch City Council only. Copyright © 2022 by Christchurch City Council

Christchurch City Council

Contents

1 Introduction

1.1 Background

The National Policy Statement on Urban Development (NPS UD) requires that Councils in Tier 1 cities, of which Ōtautahi Christchurch is one, enable increased development capacity in commercial zones. As such Christchurch City Council are required to make changes to the operative Christchurch District Plan, primarily through increased building height, and this is the basis of proposed Plan Change 14. The NPS UD also seeks the delivery of well-functioning urban environments. A high quality urban area can be considered an element of a well-functioning urban environment, and urban design a means to both establish and to evaluate this quality through the provision of design principles, and provisions that support these.

In association with the NPS UD, National Planning Standards apply consistent nomenclature and intent. The commercial zone names have been realigned to meet these standards as follows:

Operative District Plan	***Plan Change 14***
Commercial Central City Business Zone	City Centre Zone **(CCZ)**
Commercial Central City Mixed Use Zones	Central City Mixed Use Zones **(CCMUZ)**
Commercial Core Zone (District Centre)	Town Centre Zone **(TCZ)**
Commercial Core Zone (Neighbourhood Centre)	Local Centre Zone **(LCZ)**
Commercial Local Zone	Neighbourhood Centre Zone **(NCZ)**

These zones sit within the framework of the District Plan that contributes to the overall urban form of the city, described within Chapter 3 – Strategic Directions, and recognises the hierarchy of centres approach. In effect this provides for a graduation in the scale, form and extent of activity in commercial centres across the city, with the central city having primacy. Also recognised, is the role of commercial centres as focal points for community and commercial activities, and the centres' importance in respect to city identity, amenity and liveability, and consequently the importance of urban design, which contribute to well-functioning environments.

In addition to the NPS UD, the Resource Management (Enabling Housing and Other Matters) Amendment Act also requires Tier 1 Councils to enact the Medium Density Residential Standards (MDRS). These will apply across most of the city's residential zones, and in effect provide a baseline for development. Where appropriate, and to achieve consistency, consideration has been given to these standards in respect to residential activity in the commercial zones, for example the provision of outlook standards and private outdoor living space.

1.2 Report Scope

The NPS UD directs Councils in Tier 1 cities to enable increased development capacity in commercial zones. This is promoted primarily through an increase in building height, and an enabling approach by activity status. The most significant proposed increases in height are within the Central City, and more specifically the City Centre Zone.

The focus of this technical report in relation to Plan Change 14 is the impacts of increased building height, scale and massing, including impacts of density and design quality, across specified commercial zones, and including residential use. It considers the impacts of additional building

height well beyond that anticipated within the post-earthquake environment of Ōtautahi Christchurch.

The scope of this technical report is limited to the commercial zones of the city where the impacts of increased building height will be most significant, and provides design solutions to address these. Many of the commercial zone provisions are proposed to remain, and as such are not considered in this report in detail.

Minor amendments required to existing District Plan provisions to enable further development capacity, while achieving consistency across zones or areas, are included, although to a lesser extent. This includes reference to TCZ, LCZ, NCZ and residential provisions, and opportunities to enable increased residential capacity, which is also required through the NPS UD.

1.3 Objectives

In respect to urban design and the scope of work required to address the intent of the NPS UD, the following objectives and policies are identified, with consequent issue statements. The analysis and recommendations for subsequent amendments to the District Plan are prefaced on these.

Objective	***Policy***	***Issue Statement***
15.2.4 Urban form, scale and design outcomes	15.2.4.1 Scale and form of development 15.2.4.2 Design of new development	Issue 1: Urban Form *Enabling a legible city form, and ensuring the impacts of high-rise building can be effectively managed.*
15.2.4 Urban form, scale and design outcomes 15.2.6 Role of the City Centre Zone 15.2.7 Role of the Central City Mixed Use Zone	15.2.4.2 Design of new development 15.2.6.1 Diversity of activities and concentration of built development 15.2.6.2 Usability and adaptability 15.2.6.3 Amenity 15.2.6.5 Pedestrian focus 15.2.7.1 Diversity of activities	Issue 2: Central City Environment *Supporting the vitality and quality of the central city.*
15.2.4 Urban form, scale and design outcomes 15.2.6 Role of the City Centre Zone	15.2.6.3 Amenity 15.2.6.5 Pedestrian focus 15.2.7.1 Diversity of activities	Issue 3: Public Realm *Maintaining use, comfort and quality of the public realm.*
15.2.3 Office parks and mixed use areas outside the Central City 15.2.6 Role of the City Centre Zone 15.2.8 Built form and amenity in the Central City Mixed Use Zone	15.2.3.2 Mixed use areas outside the central city 15.2.6.4 Residential intensification 15.2.8.1 Useability and adaptability 15.2.8.2 Amenity and effects 15.2.8.3 Residential development	Issue 4: Mixed Use and Residential Development *Managing the impacts of higher density living for occupants, and ensuring effective transition to high quality residential use.*

15.2.10 Built form and amenity in the South Frame	15.2.10.2 Residential development	

1.4 Methodology

The methodology included evaluation of the likely change, and the impacts of this change and potential solutions, primarily in relation to increased building height. The key tasks were as follows:

1. Background review:
    - Analysis of the Ōtautahi Christchurch context, including existing development scenarios and local case studies;
    - Review of the operative District Plan and other local authority plans and practice within Aotearoa New Zealand;
    - Associated research including the Quality Design Outcomes research into residential development outcomes within the high and medium density residential zones, including mixed use zones in the city;
    - Plan Change pre-notification submissions; and
    - Review of international research and approach to city form and building height.
2. Expert advice and modelling:
    - Development and modelling of built form scenarios using specialist architecture expertise;
    - Research and modelling of local climatic conditions and impacts relative to built form scenarios.
3. Identification of potential impacts.
4. Identification and evaluation approaches to manage impacts where necessary.
5. Review and application of provisions to ensure consistency across zones where necessary.

In addition to the formal aspects of the methodology noted above, consideration was given to the matters raised by design and development professionals through information sessions and presentations. This has further informed both the approach to and design solutions recommended.

1.5 Summary of Recommendations

Zone	***Descriptor***	***Recommendation***
City Centre Zone	Building Envelope	• Introduce building base and tower approach • Retain existing road wall height (21m) and building base (28m) • Allow a 50% increase in road wall height for corner sites. • Increase building height - 90m in City Centre Zone - 45m adjacent to Cathedral Square and for Victoria Street • Introduce maximum tower dimension (40m) and tower site coverage • Introduce tower separation standard

		• Introduce upper floor setback (10% of height for internal boundaries; 7m for street boundaries)
	Assessment Matters	• Building design • Wind effects
	Permitted Activity Status	• Small buildings (subject to new built form standards)
	Residential Activity	• Introduce consistent standards and assessment
Central City Mixed Use Zones	Building Envelope	• Introduce building base and tower approach • Retain existing height as road wall height (17m) • Increase building height (32m) • Introduce setbacks above 17m height
	Residential Activity	• Introduce consistent standards and assessment (Frontage treatments, Outdoor living spaces, Site Coverage, Setbacks) • Introduce communal open space and access standards
	Site Layout	• Amend landscape standards and include tree-planting requirement in landscape strips. • Parking to be behind the building line of the principle building.
	Activity Status	• Introduce restricted discretionary activity status for large scale developments.
Mixed Use Zones (outside Central City)	Comprehensive Residential Development	• Introduce comprehensive residential development standards
	Landscape	• Amend landscape standards
Other Commercial Zones	Residential Activity	• Introduce consistent standards and assessment (Glazing, Outlook spaces, Outdoor Living Space)
	Commercial Activity	• Introduce consistent standards – glazing and access

2 Urban Context

2.1 The Role of Centres in a Well-functioning Urban Environment

The commercial zones form a network of centres in Ōtautahi Christchurch. These centres are focal points for activity and experienced by people on a daily basis, the Central City in particular. As such the centres are a defining characteristic of the structure of the city, contributing significantly to how it functions, and how it is seen and is experienced, on many levels.

Ensuring high quality design of the city's centres is integral to realising the substantial social, economic, cultural and environmental benefits of a high quality, well-functioning environment. As well as the direct benefits of good urban design[1], a sense of civic pride and identity is a key social outcome which creates further economic benefits. The quality of our urban environments, and the contribution they make, results from both public and private investment in the streets, spaces, buildings and features of each centre.

The Central City, as the primary centre of Ōtautahi Christchurch and the sub-region, contributes significantly to civic identity, and national and international recognition of the city. Past and more recent post-earthquake public and private investment and recognition of the natural and cultural context, has resulted in a highly identifiable place, with increasing social and economic vibrancy.

The Otākaro Avon River, with high quality public space adjacent, combined with the fine grained and engaging architecture of the Terrace development, is an example of the value-add of public and private investment in high quality design. In combination, active and interesting buildings and spaces have been created, that draw attention to the natural features of the city, and create a highly identifiable place.

Figure 1: The Terraces (source: Kelvin McMillan).

[1] The Value of Urban Design, CABE/DETR (2000)

2.2 Commercial Centres and Urban Form

Urban form, and the way this is influenced and managed, is integral to ensuring a high quality, well-functioning city. It is of particular importance for the contribution to identity, sense of place and legibility.

Urban form is the evolution of the physical relationship of people occupying a place, over time. The identity of a city is embodied in its built environment at a range of scales and, in the context of this work, includes:

- The city wide networks and systems, including the response to the city's natural and biophysical context;
- The structure of the streets and spaces;
- The type and concentration of land use;
- The scale, form, massing and detail of buildings;
- The quality of the public and private realm.

The city continues to evolve and develop, through decisions made, through public and private investment and the design and use of space.

In Ōtautahi Christchurch, the overall form of the city is in part defined by its hierarchy of commercial centres, within which the city centre has primacy, set within the context of its natural environment, and more specifically the outstanding natural landscape of Te Poho-o-Tamatea/the Port Hills, sea and estuary, rivers and the Canterbury plains.

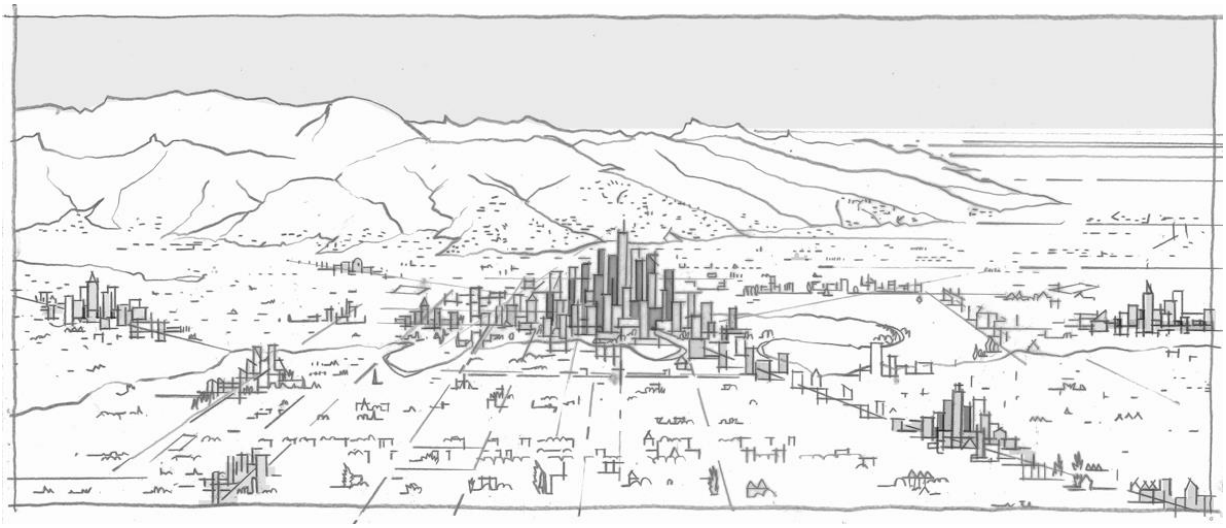


Figure 2: Visualisation of Ōtautahi Christchurch future urban form.

Urban form is most obviously expressed through the scale, legibility and activity within each area of the city and more specifically each commercial centre. These centres are categorised in accordance

with the hierarchy expressed in the National Planning Standards[2], noting there are no centres considered to meet the definition of Metropolitan Centre.

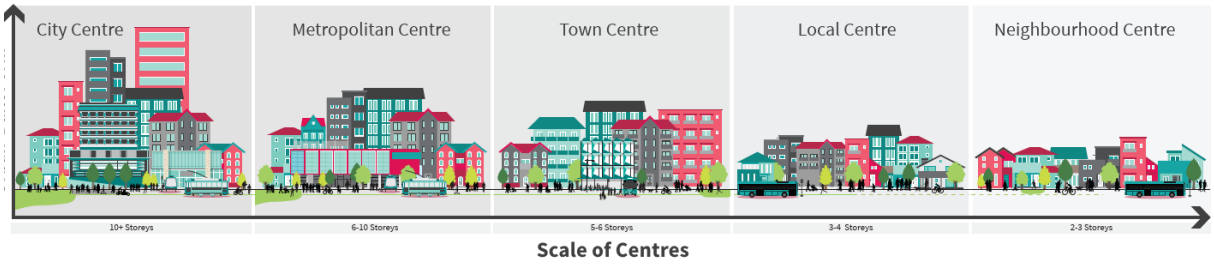


Figure 3: Hierarchy of Centres including building height[3].

2.3 Central City Built Form

The discussion of urban form is principally focussed on the central city as a result of the degree of change envisaged through Plan Change 14 and the potential impacts and issues arising. The context for the central city urban form, and aspects that contribute to a well-functioning central city, include:

- The Otākaro Avon River corridor, a wide, in part naturalised and high quality pedestrian promenade, highly legible and distinctive;
- Significant public spaces, notably Whiti-rea Cathedral Square, Victoria Square, Tākaro ā Poi Margaret Mahy Playground and Cranmer and Latimer Squares;
- The East and South Frames, including lanes and yards, which define the city centre edge in conjunction with the Otākaro Avon River;
- Hagley Park, a significant public open space of heritage, social and environmental value, with views to and from the central city;
- The street grid, oriented to the cardinal points of the compass, with an east-west focus and diagonal streets with cultural significance for Ngāi Tūāhuriri. North-south streets have views of Te Poho-o-Tamatea/Port Hills and the diagonal axis creates small and intimate triangular public spaces (known as the Heritage Triangles).
- A built form of predominantly low to mid-rise, with well-designed buildings and activated street environments.

The Canterbury earthquakes significantly altered both the physical form of the city, and impacted upon the city's communities. Pre-earthquake a bell curve built form was evident, with a defined central city with buildings clustered together, and building heights reducing at the fringes. This shape is no longer discernible, with few of the high-rise pre-earthquake buildings still standing.

Following the earthquake sequence, extensive consultation was undertaken with the community into the type of city people wanted, including the height of buildings and other aspects of form such

[2] National Planning Standards, MfE, 2019
[3] Hierarchy of Centres – Urban and Built Form Descriptors, Boffa Miskell, 2022

as transport and greenspace[4]. In association with advice on economic viability, capacity analysis and other matters, this led to the vision expressed in the Christchurch Central Recovery Plan or a consolidated central city core [5], with lower rise buildings, improved connections and more greenspace. The current District Plan provisions reflect this, with a 28m height limit in the core. One of the key reasons for limiting building heights was to generate a critical mass of development and activity in the rebuild process[6], rather than absorb capacity through a small number of large buildings.

As a result, at present the central city is developing as a mid-rise city of predominantly 3-6 storey buildings, with some exceptions including pre earthquake buildings, as illustrated below (Figure 4). Development is dispersed within the core, although it can still be quite high density. Taller buildings may be built from time to time, but the city is largely maintained at a lower height. This is in contrast to the expectation of the NPS UD to significantly increase development capacity through building heights.

The tallest existing building in Ōtautahi Christchurch is the 23 storey Pacific Tower, at 73m to roof height and 86m to the top of the antenna. Other taller buildings have heights between 10 and 20 storeys. These buildings stand apart from each other in what is otherwise a low-rise city.

Figure 4: Two pre earthquake central city high-rise buildings, noting also the extent of vacant sites in the foreground.

Outside of the central city core, the operative District Plan provides for a gradual transition of height through Victoria Street and the CCMUZ, both of which have 17m height limits (lowering to 14m in adjacent residential areas).

Aside from height, the existing and anticipated form of development within the CCMUZ is considerably different to the CCBZ. The CCMUZ are predominantly former industrial areas which are expected to transition to higher value uses, including residential developments, which are now

[4] Share an Idea community engagement, Christchurch City Council, 2011 (Central City Plan Technical Appendices)
[5] Christchurch Central Recovery Plan Te Mahare "Maraka Ōtautahi", 2012
[6] Economic and other technical advice, Draft Central City Plan 2011 (Central City Plan Technical Appendices)

appearing, albeit containing no or limited commercial activity. They include a mix of building scale and styles.

However, the built character and public space of these zones is largely industrial in nature and does not at present support the quality of environment that anticipated with increased density and changes in use, more specifically residential activity.

2.4 Built Form in Other Commercial Centres and the Mixed Use Zone

There are some 150 commercial centres across the city. Descriptions of the intent of each of the centres is provided both within Plan Change 14 (Chapter 15) in respect to the scale and nature of activities, and in respect to every centre built form type[7]. For the most part there is limited change proposed in respect to building height and associated built form provisions in respect to these centres such that it impacts on urban form.

There is however a more consistent approach needed, as discussed within the introduction to this report, to the application of the MDRS built form standards, and to ensure consistency where it relates to matters such as Crime Prevention through Environmental Design (CPTED) to support activity within the centre.

The exception to this is the MUZ (outside the central city), where a significant change in use to focus on predominantly residential activity is proposed, within walking distance of the central city. Currently these areas comprise predominantly low-rise industrial development, albeit with significant variation in the scale of activity, from small individual buildings to entire blocks. It is anticipated that within these areas, while industrial activity will continue in the short to medium term, it will transition to predominantly residential use over the longer term.

As with the CCMUZ the built character and public space of these areas is largely industrial in nature and does not at present support the quality of environment that anticipated with increased density and changes in use, more specifically residential activity.

2.5 Built Form Descriptors

For the purposes of describing form in regard to scale of the city, the following is referenced within this report in respect to building height:

Low-rise:	1 to 3 storey	Low to mid-rise:	4 to 6 storey
Mid-rise:	6 to 8 storey	Mid to high-rise:	8 to 10 storey
High-rise:	10+ storey		

[7] Commercial Centres NPS UD: Urban Design and Built Form Descriptors, Boffa Miskell 2022

3 Issues

3.1 Issue 1: Urban Form - Enabling a legible city form, and ensuring the impacts of high-rise building can be effectively managed.

3.1.1 High rise versus mid-rise urban form

The NPS UD requires that the Council increase development capacity. Given the degree of change anticipated, this will fundamentally change the form of the city, through the layout, height and massing of building across the city, for both residential and commercial activities.

A higher-rise and more intensive urban form has the ability to change the way that a city looks, feels and functions. It can affect the way the city is perceived, in both positive and negative ways, including city identity and legibility, as previously discussed. For instance some places are renowned for their high-rise buildings and skylines, with New York being an obvious example of this. Other places are known for a consistent mid-rise form, which is prevalent throughout Europe, for example across much of Barcelona, Turin and Freiburg.

The most substantive change to height anticipated through the NPS UD, and which have the most significant impact in respect to city-wide form, will result from the proposed changes the central city zones. Irrespective of demand for high-rise buildings as a response to shortages in capacity, the driver for high-rise buildings may be a preference suitable to a specific use, such as a hotel, rather than being driven by the cost of land and construction.

The current central city low and mid-rise built form and design has been largely successful so far, in encouraging and resulting in human scale activity, attractive and activated streets and a good level of environmental comfort in public space. Development of this scale and form would continue to support an urban form that compliments the natural and built characteristics of the city, with the exception of the visual impact of leaving existing high-rise buildings isolated.

The operative District Plan reflects the community's preference following the considerable trauma and upheaval of the Christchurch earthquake sequence. Large-scale changes to heights represent a change in direction from the city form that was anticipated in the Central City Recovery Plan (CCRP).

The Council needs to implement the NPS UD but also it is also important to respect/recognise the drivers identified in the CCRP and the subsequent District Plan. This includes sensitivity to local circumstances, including the natural form and context of the city, the quality of public realm and level of public investment, and the opportunities that may be created by more intensive mid-rise development.

3.1.2 Visual impacts of high-rise buildings

There is considerable opportunity for redevelopment of under-utilised and vacant sites within the central city, particularly around Cathedral Square and to the south and east of the city within the CCZ. The extent of these opportunities in association with the scale of development from high-rise building, has the potential to reshape the skyline of Ōtautahi Christchurch and overall legibility and identity of the city.

High-rise buildings can be widely visible in the cityscape, from longer distances and from all directions. In effect they can claim sightlines and draw attention away from, or conflict with, more

important aspects of the setting, including cultural and landscape values, for example in Ōtautahi Christchurch, from Te Poho-o-Tamatea, the Port Hills.

In addition, a high-rise building can have significant visual mass, meaning it captures peoples' attention within a view. The height of buildings is significant in both absolute and relative terms. High rise buildings that form part of a cluster can be absorbed into a greater mass of buildings which can reduce the individual prominence of high-rise building, with likely variation and contrast between the buildings. A high-rise building that sits within a cluster may not be obtrusive in itself as a result. However, the same building may stand out if it is located amongst predominantly mid-rise buildings, and the visual dominance and prominence can be more acute if the building is isolated.

In addition to height, to an extent, the dominance of high-rise buildings can be managed through design, to help complement or blend the building into the predominant built form, and addresses nuances resulting the context, as well as being more proactive in ensuring design quality outcomes.

Even if not visually dominant, tall buildings will usually be prominent within the cityscape. The massing, form, scale and appearance, including more detailed design of the roof, facades and at the street level, all contribute to how well or poorly tall buildings address their context.

For the purposes of explanation, visually prominent in essence is when a building is noticeable and draws attention to it, but unlike visually dominant, is not overbearing within the context.

The design of a building, and more specifically the upper levels of tall buildings, including roof form, is of particular importance in managing the impact from distant and mid ground views. Dominance can be reduced by variation in the form, visually breaking the large building form into smaller elements and giving the building a finer grain of detailing.

Variation can also contribute to visual interest of a prominent building. It can be achieved in a number of ways, such as:

- Building modulation, which may include steps in plan or changes in building form and large scale features, contributes to the extent of variation that may be seen, particularly from a distance.
- Articulation (a smaller scale of detailing that may include variation in cladding or colour, small features or some "push-pull" of the facade).
- A fine grain of detailing (e.g. windows, fins and architectural features) applied as an additional level of detail.

3.1.3 Visual impacts of roof forms

The top of a high-rise building is very visible in the cityscape, and landscape context of the city more widely. Within Ōtautahi Christchurch the peaks and forms of Te Poho-o-Tamatea Port Hills provides a recognisable and visually soft backdrop to the city. A built form comprised of blunt-top buildings (Figure 5) can create a harsh skyline which affects the city as a whole. Where the top of buildings is fettered, for instance by setbacks or an architectural roof-form (Figure 6), this can create a more interesting and softer cityscape.

Further, rooftop plant such as air-conditioners and lift over-runs which area common in commercial and high-rise residential buildings, if visible can result in similar impacts to poorly conceived roof forms, reducing the visual quality of the cityscape. Roof top plant can be especially prominent for

high buildings. Integrating the roof plant within the roof form, rather than covering or hiding it behind screens is largely more effective in the buildings contributing to the city scape and skyline.

Figure 5: The upper levels of the building are graduated to provide a more visually interesting roof form.

Figure 6: Buildings with a blunt roof form.

3.2 Issue 2: Central City Environment - Supporting the vitality and quality of the central city.

Building form and design directly affects, and impacts upon, the quality, vitality and enjoyment of the city for people. These effects can be positive to adverse, and experienced from changing perspectives including close up, from afar, from street level, or at height. All contribute to the quality and experience of the city. In addition to height, aspects such as the width of buildings and continuity of street walls can help determine the quality and character of the public space.

Key descriptors have been articulated for each of the Ōtautahi Christchurch centre types, with a future focus[8]. The central city is described as "the pre-eminent centre within the Canterbury Region, representing the heart for business, tourism, cultural, civic, residential and education functions". It is anticipated that as such the central city should have the "highest urban amenity, with landmark buildings that are highly articulated and visually appealing, with a focus on contributing to a high-quality pedestrian environment". That the "built character reinforces human scaled elements, architectural quality and form", with "building that provides a continuous edge and sense of enclosure", engage at street level and are easily understood in, amongst other matters.

3.2.1 Coherence and engagement of the street wall

The existing streetscape in the Ōtautahi Christchurch central city has some variability in building height but predominantly comprises groupings of buildings of 3-5 storeys and 5-7 storey depending on location. The consistency in the street wall and building height creates a sense of visual order in the street form, particularly when experienced from street level, creating a harmony and scale that people can readily engage with. The extent of articulation and modulation also contributes to the potential level of coherence and engagement for users of the street.

This consistency is created by the street wall height as well as the overall height of buildings, and design qualities discussed later in this section in regard to visual interest. It is further emphasised through design decisions such as upper floor setbacks where the height exceeds 21m.

Figure 7: Cashel Mall, looking to the north east, has a strong street wall.

[8] Commercial Centres NPS UD: Urban Design and Built Form Descriptors, Boffa Miskell 2022

Figure 8: Charlotte Street, Brisbane, Australia. Street wall created by requiring a 3-storey podium with setbacks beyond this (source: Google Streetview).

Taller buildings, where the upper floors are not set back from the street, can have a significant visual impact and appear particularly noticeable as they break the rhythm of the street with the verticality of the building dominating and drawing the eye up, away from the horizontal form and interest of the streetscape. A coherent street scene is considered to be achieved by relatively consistent and modest street wall heights, with high-rise buildings set back so that they do not dominate the street wall.

However, if the towers join up, these can create a secondary street wall. This impacts the public realm by reducing the benefits of daylight, sunlight and views of the sky, which in densely built cities can only be obtained through the space between towers. They can also be a source of street enclosure and come to dominate the street by looming above the height of the street wall.

Figure 9: Market Street, Philadelphia, USA. Canyon effect created by high-rise buildings ascending directly from the street (source: Google Streetview).

3.2.2 Visual articulation and blanks walls

Blank walls, lacking visual articulation, can have a significant impact on the quality of a streetscape, the level of engagement and in respect to CPTED, depending on their location.

A particular issue that occurs when a building is built to, or close to the site boundary, is the need for fire-proof walls to abut the boundary of the site. In order to meet the requirements of the building code such walls must be solid, with few or no windows. Consequently these walls do not provide visual interest if they are visible from the street or other public spaces, and can appear very dominant within the street scene, or as viewed from adjacent buildings.

The construction of these walls is an accepted practice in the central city, but as noted is of a low to mid-rise scale, with fairly consistent adjacent building heights lessening the potential impact. The walls generally disappear from sight when neighbouring sites are developed, and if there are fairly consistent building heights, and similar setbacks these walls will not be widely visible. In addition, given the relatively drawn out redevelopment of the central city, in many instances these walls have decorative features to offset the impacts of an otherwise blank wall.

For high-rise buildings, it is more likely that these blank walls will not be built out, and their impact will be more widely visible, with a detrimental impact on both the streetscene and the cityscape.

In their reviews of central city built form, local Council's in both Sydney and Melbourne identified blank walls as a particular issue with both mid and high-rise buildings. In both cases, the recommended solution was to ensure that the buildings are set back from boundaries.

Figure 10: Flank walls with varying facade treatment in Ōtautahi Christchurch.

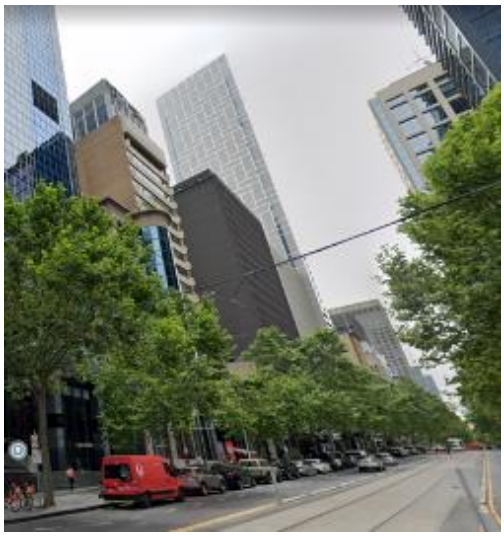


Figure 11: Collins Street, Melbourne. High-rise buildings with prominent flank walls (source: Google Streetview).

Design in respect to the lower levels of a building, as discussed previously, impact upon the level of engagement and visual interest within the streetscene, as well as other factors such as CPTED. Another issue that can occur with high-rise buildings is a reduction in visual quality of the lower levels of a building. This is primarily as a result of the internal use, most often car parking, resulting in active uses migrating up the building, and minimal articulation of the levels of car parking.

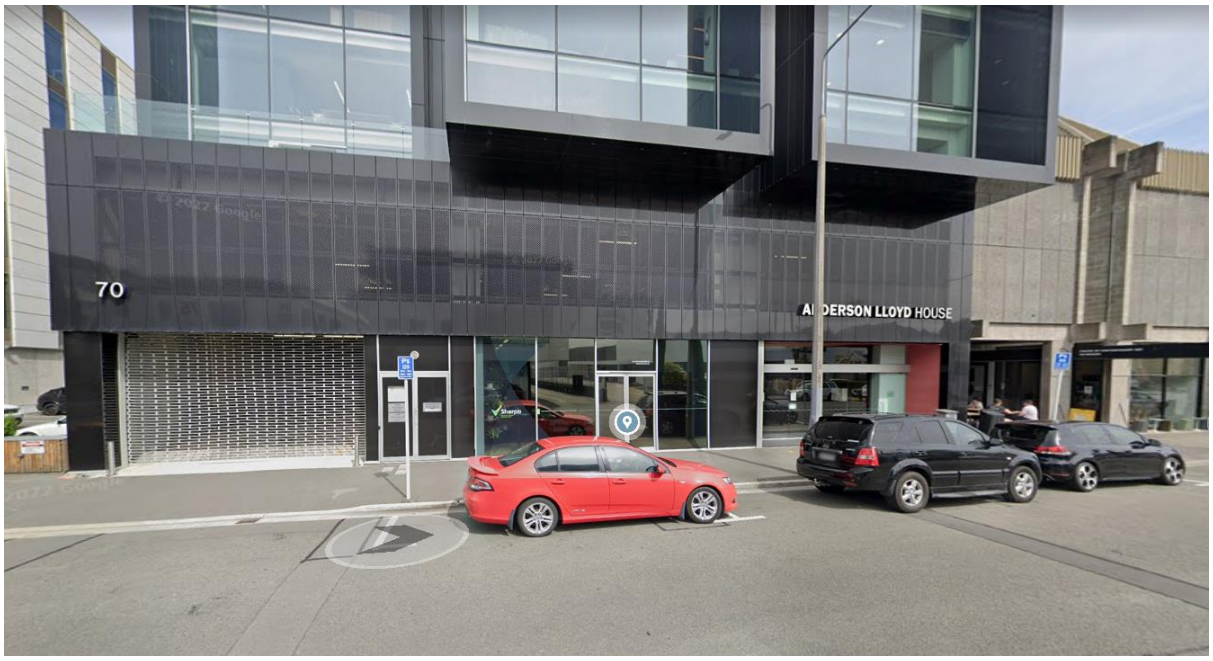


Figure 12: A low-rise local example, but relatively well managed in respect to the combination of glazing, textured elements and modulation above.

Further, in association with car parking, the scale of the vehicle access at street level is emphasised, resulting in lower levels with few or no windows. This leads to a lack of street activation and visual interest, impacting on the streetscene. Again, this was a commonly occurring outcome in the Sydney and Melbourne case studies.

Figure 13: Riparian Plaza, Brisbane. Lower levels are utilised for car parking reduces the extent of engagement from street level experienced in respect to the building adjacent.

3.3 Issue 3: Public Realm Maintaining use, comfort and quality of the public realm.

High-rise building can affect the level of environmental comfort in public and private space, through impacts such as increased shading and by deflecting and concentrating high speed winds.

3.3.1 Access to sunlight and daylight on the street and other public spaces

Solar access within the street corridor makes the city more pleasant and attractive as a place for people to spend time. This is desirable in its own right but also makes a wider range of activities possible. This includes outdoor dining and markets, or just sitting or lingering in public space. In the summer months the central city streets are notably busier than in the winter months, which is attributable to more favourable climactic conditions.

Ōtautahi Christchurch is more affected by solar access (or lack of) than many other comparable cities. It has a relatively cold climate, compared to Auckland or Melbourne for instance, so sunshine is relied on for warmth, aside from the positive physical and psychological benefits that access to sunlight provides. Ōtautahi Christchurch has high annual sunshine hours, in comparison to other temperate cities, for instance Seattle, Vancouver or London, meaning that access to sun brings benefits for a large proportion of the year. As a result, access to direct sunlight is something that directly improves the usability of space in the central city. Higher sun angles in spring, summer and autumn provide more solar access than in the winter.

Solar access is currently managed through a street wall height of 21m and a recession plane of 45 degrees. This street wall height generally allows for good light access, including direct sunlight access to street level throughout the summer.

Figure 14: A solid street wall along Durham Street, Christchurch, of mid-rise buildings.

Where high-rise buildings are prevalent, access to sunlight at street level will be primarily achieved via gaps between buildings. Recession planes at higher heights do not provide sun access because the sun will not for the most part penetrate above the building line. The impacts of shading from individual high-rise buildings may therefore be relatively confined, depending on mass and density.

However, when the high-rise buildings are tightly concentrated, they may block opportunities for sun access throughout the day and potentially for much of the year.

Individual high-rise buildings may also impact on the comfort and quality of key open spaces within the city, such as Cathedral Square, Victoria Square and the Otākaro Avon River corridor depending upon the orientation of development. These locations provide significant open space, and have, or are anticipated to have, a high standard of public realm, developed to encourage and support public use and enjoyment. These areas would be more impacted by overshadowing than other public spaces within the city as a result.

3.3.2 Impacts on the use of Cathedral Square

Cathedral Square has historic significance and is the pre-eminent open space in the central city. It is recognised as a heritage item in its own right, as distinct from the Cathedral, and was established in 1850 as part of the original Edward Jollie plan for the city. Given its central location, cultural and historical significance, Cathedral Square has a high overall significance to the city, more so than any other individual urban public space within Ōtautahi Christchurch.

Over the years there has been considerable investment in the physical quality of the space, to maximise its value to city residents and reflect it importance and the changes in use surrounding it. This emphasis continues, as expressed in a commitment to ongoing improvements in the Square in the Council's budget (which has $9 million committed in the Long Term Plan) and strategies.[9]

Access to sunlight for most of the year is an important component of the functionality of the Square. It allows for year round use of the space both for public events and is a factor in attracting activation to the edges of the Square through spill out uses such as cafes, particularly at the south and east interfaces.

The area surrounding Cathedral Square has historically had lower height limits than elsewhere in the city, predominantly to manage the impacts of shading. For instance, the 1993 City Plan included a line over which buildings were not permitted to shade the Square (Figure 15).

[9] Whiti-reia Cathedral Square Out Long Term Vision, Regenerate Christchurch, 2018.

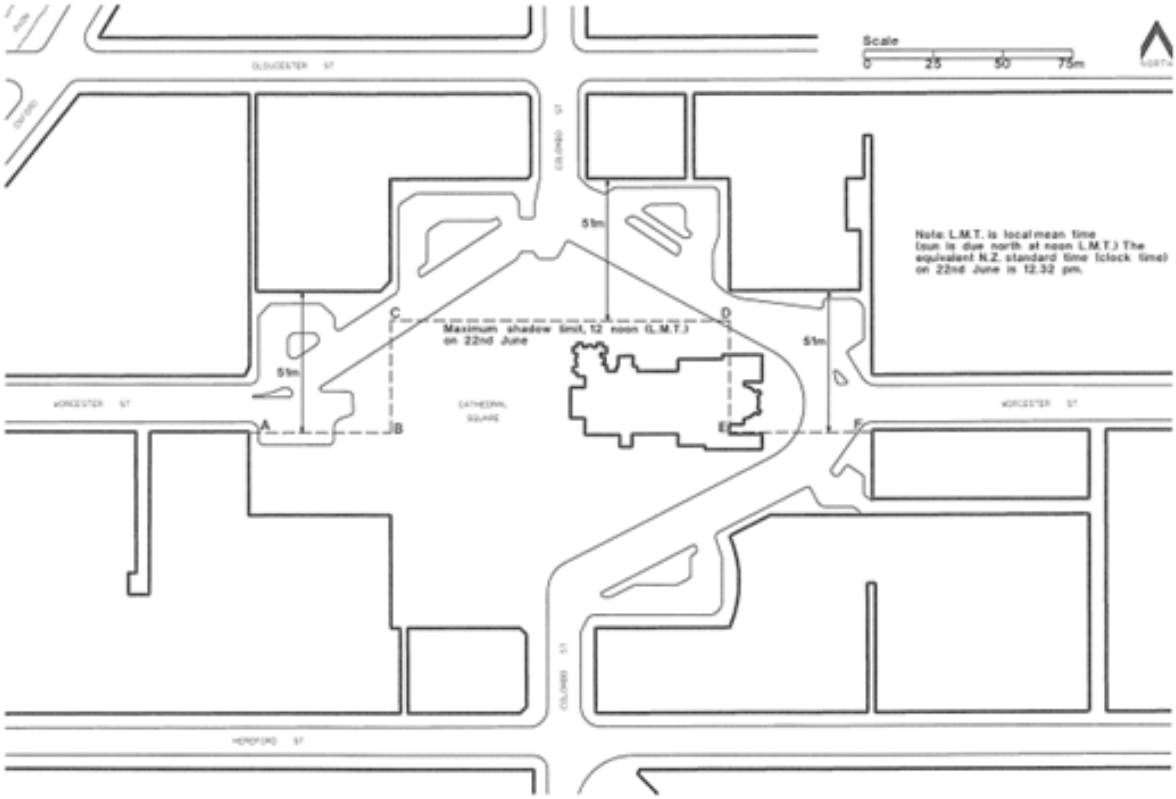


Figure 15: Christchurch City Plan Appendix 1: Central City – Cathedral Square sunlight admission to important pedestrian areas.

3.3.3 Wind impacts of high-rise building

The quality of the environment is important, especially in places where people gather and spend time. This includes the public spaces in the centre including the river, squares and streets.

In Ōtautahi Christchurch there is a background wind speed of 4m/s that blows for nearly half the time[10]. At speeds higher than this, streets can become uncomfortable places. Buildings will have both positive and negative impacts on ground level wind conditions. Buildings can both channel wind and divert higher speed, higher altitude winds to ground level. This can create uncomfortable spaces for people, and there is also a risk of occasional dangerous wind conditions. These effects can be mitigated by building design. Modelling of Christchurch conditions by Meteorological Solutions[11] shows that there is a risk of a deterioration in ground level conditions from high-rise buildings of around 30m high; and a high risk of unsafe conditions from 90m high buildings, through the generation of dangerous wind gusts.

[10] Technical Advice for Wind Assessments for Christchurch City. Meteorological Solutions, 2022
[11] ibid

3.4 Issue 4: Mixed Use and Residential Development - Managing the impacts of higher density living for occupants, and ensuring effective transition to high quality residential use.

3.4.1 Issues related to outlook and natural light

Daylight access and outlook are both important to the liveability and amenity for occupants and neighbours, particularly in more urban areas such as the central city and town centres, and are impacted upon through the proximity and design of buildings.

Ensuring a base level of amenity is desirable in itself and encourages a range of activities in the city, including apartments and short-term accommodation, which support a 24 hour city and contribute to liveability and vibrancy.

High-rise buildings have a more extensive impact on outlook, and consequentially to daylight access, than mid-rise buildings because they obstruct views to all aspects – up, down and across, and more importantly reduce daylight and outlook from these directions.

Whilst people in inner city areas, both working and living, will make compromises for the sake of the advantage of the location, access to some natural light provides psychosocial and amenity benefits, as well as contributing to energy efficiency. Access to natural light is different to direct solar access, which may be more challenging to provide for in a highly built up urban environment.

The issue of access to daylight is one that is a recurring theme in the Sydney[12] and Melbourne[13] studies. Both have a large residential population in their central cities, who contribute to the vibrancy and liveability of these places. Research in respect to both cities has found that internal light and outlook were compromised by the types of development that were taking place. Ōtautahi Christchurch has a similar ambition to increase the number of central city residents.

3.4.2 Residential amenity and design quality in commercial zones

This section discusses the specific issues related to the provision of residential amenity in developments in commercial areas, including the potential trade-offs between public provision and private provision of amenity.

New residential development is anticipated in all commercial zones in Ōtautahi Christchurch, either as part of vertical mixed use developments (likely to be developments with ground floor commercial activities and upper floor residential), or as standalone residential developments in mixed-use zones.

Good design may be more important in commercial areas where there is a greater propensity for land use conflicts between the many different uses that co-exist, that can impact upon the amenity and quality of life of commercial zone residents. This is true in the central city and suburban centres, with a mix of commercial and residential uses, and the mixed-use zones where the predominant uses are industrial and residential uses.

Reserve sensitivity impacts are more likely and extensive in areas transitioning from industrial to mixed-use activity, and more specifically residential use, than for example a mix of residential and

[12] City of Sydney, 2016 *Erection of Tall Buildings in Central Sydney*
[13] Hodyl and Co, 2016 *Central City Built Form Review: Synthesis Report* (Melbourne City Council)

office use. Impacts from industrial use may include noise and other nuisance effects, odour or air pollution, use of heavy transport, and light pollution from activity or signage to name a few.

The existing environments of the CMUZ and MUZ are generally of low quality and lack public space amenity, except where more recent interventions such as the South Frame lanes and yards have been developed. These primarily industrial areas, and more particularly the MUZ, are characterised by no to minimal landscape amenity in the streets, with wide fully paved street corridors, limited access to local public spaces, and variable quality of building and shared boundary walls. CPTED has not historically been factored into site layout and design, with little consideration given to pedestrian users of these areas.

As such, the design quality of any new development, and more particularly residential development, will need to mitigate and be managed within these parameters. For areas transitioning from industrial to residential use, there is a risk that they will become low-quality residential areas that do not meet the aspirations of the plan for residential areas more generally.

3.4.3 Residential development in the central city

New residential development is key to a vibrant central city, and the Council has various strategies to increase the number of residents living in this area[14] (usually referred to as the area within the Four Avenues). A longstanding target is that there should be 20,000 people living in the central city (up from around 8,000 now).

In the last five years, there has been a marked increase in the amount of development in the central city. Progress is being made towards realising the Council's target, and the development of residential activities in the Commercial zoned areas is an important component of this.

Each zone of the central city has different characteristics and issues to manage. If design quality and a relatively consistent level of amenity for residents is to be achieved a nuanced approach may be required in respect to some aspects to raise the bar in some areas, while consistency is needed in respect to a baseline to manage other impacts, for example outlook. Examples in respect to the variability of issues for each zone or sub zone is noted below:

- The CCZ has a very high level of amenity due to its high quality public spaces and wide range of facilities, but has the potential to have greater impacts on daylight and outlook as the result of the potential for much higher-rise buildings.
- The CMUZ (South Frame) is close to the central city and includes a number of smaller scale public spaces that provide amenity, but these may be easily overshadowed by larger scale building.
- The CMUZ generally has very low public space amenity, with limited landscape and open space, large industrial blocks and a generally more potential for reverse sensitivity or nuisance impacts.

3.4.4 Low Quality Residential Development in the Mixed-Use Zone

The Council has conducted monitoring of residential building in the CMUZ[15]. This has shown that built outcomes have not always achieved a satisfactory (basic) standard of design and sometimes are of a poor standard. A variety of issues were identified including safety concerns, poor quality access,

[14] Project 8011 – Central City Residential Programme, Christchurch City Council
[15]Design Outcomes Research Christchurch City Council

lack of privacy and an under-provision of usable outdoor living space. The quality of design resulting was not equivalent to developments in medium density residential zones of the city. Outcomes were very variable, indicating that the regulatory framework has not resulted in consistently good outcomes.

There is therefore a risk of creating lesser quality residential areas in the commercial zones than other areas of the city, through the lack of appropriate design consideration. Good urban design is a key element of a well-functioning urban environment[16] and this applies to all locations where people live.

It was noted that in the CMUZ, there is more scope for very poor outcomes to eventuate. Some of the issues identified in the research were:

- Poor quality communal space;
- Buildings and sites with a basic functional appearance more in keeping with an industrial area;
- Poor site layout which impacts on many aspects of the site and building design, including the size, privacy and usability of outdoor living space;
- Developments without a clear entry or access to the site;
- Issues related to Crime Prevention Through Environmental Design (CPTED).

Figure 16: A recent residential development in the CMUZ, where poor site layout results in vehicle access and parking dominance, minimal landscape quality, and no clear residential entry.

3.4.5 Residential development in the Mixed-Use Zone (outside the central city)

The MUZ lies at the boundaries with, and in walking distance of, the central city. Some of the areas have established services and facilities, and the potential to transition to high quality urban neighbourhoods over time. Broadly, this MUZ is the industrial area from Charleston in the east to Addington in the south west. At present the MUZ is characterised by extensive industrial activity,

[16] Page 2, https://environment.govt.nz/assets/Publications/Files/Well-functioning-urban-environments.pdf

ranging in size, quality and impacts, but is largely a low amenity, low quality environment, with some exceptions in respect to some of the more fine grained industrial building.

As noted the MUZ is very diverse in development form, but less so in terms of the extent of the potential for reverse sensitivity effects of industrial uses on residential neighbours.

Sydenham in particular has potential to develop as a distinctive and liveable urban neighbourhood if the transition is effectively managed. As well as access to the city centre, it has good access to local facilities, both commercial in the Sydenham town centre and recreational in the form of various parks in the area.

Sydenham also has quite an interesting character in parts, derived from older industrial buildings. There may be some potential to re-use smaller character buildings, which would contribute to visual interest and an alternative urban character.

The area includes large street blocks, which are a barrier to good levels of connectivity in respect to pedestrian permeability. However the large parcels offer an opportunity for comprehensive development to manage the issues of transition, and create more energy efficient, low carbon neighbourhoods.

Issues of development quality that are evident in the CCMUZ (discussed below) are also likely to apply in these areas unless appropriate regulation is in place. Furthermore, the impact of the current industrial use may result in defensive site layouts which internalise amenity, or the orientation of buildings to avoid undesirable reverse sensitivity impacts. Whilst this may help residents in the short term, it can entrench an inward-facing and poor quality environment.

4 Potential Approaches

The previous section identifies the issues that could occur with more intense commercial and residential development within the Central City and Mixed Use zones. There are potentially multiple methods to manage the issues, and vice versa one method may be utilised to manage multiple issues. As such they are considered holistically below. Consideration has been given to achieving an appropriate balance between efficiency, effectiveness and viability, and certainty and flexibility, in achieving the desired design outcomes.

Plan Change 14 is focused on enabling development as a result of the NPS UD. As such, and in conjunction with the analysis undertaken, the status quo with some additions was considered the most effective approach at this time.

The first sections below, 3.1 and 3.2, consider the use of built form standards to manage the building envelope. Section 3.3 considers the use of assessment matters.

Residential activities have different requirements to, and are impacted by, non-residential uses. As a result, a more specific activity-centred approach is suggested in section 3.4. In some instances this involves changes to the building envelope, or additional standards or assessment matters.

4.1 Urban Form

4.1.1 Central City

Given the existing environment, there are a number of potential cityscape scenarios that could result from new building construction, which would impact on the form and function of the city, including in respect to visual appearance and the level of environmental comfort. These include:

A A Cluster of Towers or Isolated Towers

A traditional bell curve city form results in part from a cluster of towers concentrated in the city centre, graduating in height to a lower-rise suburban area. This is a result of a level of consistency in height in the centre and in the rings of lower-intensity neighbours that surround it.

Positive impacts of this form are regarded as:

- A legible urban form that allows the shape of the city to be easily read, when viewed from outside of the central city, and seen within its landscape context –Te Poho-o-Tamatea / Port Hills and the Canterbury Plains, the rivers and open space.
- A sense of place created by an engaging skyline comprised of a collection of buildings, each of which is a component of the city form, rather than individual towers being the focus.
- A cluster is an efficient pattern of building and concentrates activities within the central area to maximise economic and social vibrancy.

Figure 17: Sydney Tower Cluster is horizontal in form despite the height of individual buildings.

Tall buildings that sit outside of a cluster of similar scale buildings are a highly visible element of the skyline on their own. These buildings will always be prominent, and if poorly designed, will be detrimental to the skyline and the image of the city, and potentially impact on the highly valued landscape context of the city[17].

In Ōtautahi Christchurch, given the lower rise post-earthquake rebuild and remaining vacant sites, the risk resulting from the visual impact of isolated towers could be significant.

However, new buildings of a similar height to the existing tall buildings would relate well to the scale of the existing buildings. They would help to fill in the gaps in the skyline and appear as part of an integrated mass.

Enabling buildings that effectively bridge the height gap would create a more horizontally oriented urban form and could make a positive contribution to the skyline.

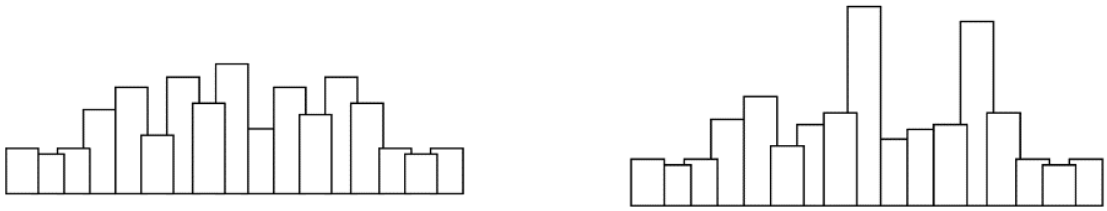


Figure 18: Coherent scale of tower cluster (top) compared with dominant individual towers (bottom).

B Towers that are dispersed or massed

The proximity of towers is a determinant of environmental quality and visual impacts discussed in depth in the sections that follow, as well as a source of form and identity. Some different options for city form have been considered:

- A more dispersed pattern of towers with greater separation, such as is common in Canadian cities, provides for views and better conditions on the ground. However, maintaining the separation distances means that the overall density of towers is low and options for

[17] Ōtautahi Christchurch City Landscape Study 2015, Boffa Miskell and Christchurch City Council

redevelopment are limited. For instance, Toronto requires a separation of 25m between towers[18].

- A more tightly massed form with a lower degree of separation which compromise the aspects described above, but provide more capacity and ease of development. This latter form is common in Australasia (for example in Auckland) and smaller separation distances of 10-12m are common. This scenario has the potential to create a more enclosed street scene, including greater adverse impacts in respect to environmental comfort due to shading and wind tunnel effects, as well as visual dominance resulting from the scale and impact of building on public space.

Due to the pace of redevelopment and likely low uptake of tall high-rise buildings[19] in Christchurch it is considered that a massed form is unlikely to eventuate and the density of towers will remain quite sparse. For this reason, it is considered that the focus should be on managing localised impacts and that requiring towers to contribute to the more restrictive dispersed tower scenario is not justified, because it is likely to eventuate anyway.

Figure 19: Toronto skyline of dispersed towers.

Figure 20: Melbourne skyline of massed buildings.

[18] City of Toronto 2013 – Tall Building Design Guidelines, pp52
[19] Christchurch Central City and Suburban Centres (PC14) Economic Cost Benefit Analysis, Property Economics, July 2022, pp14

C Sensitive and Peripheral Locations

There are some areas in the city where very tall buildings are not considered to be appropriate, due to either the impact they would have on the environmental comfort of certain important public spaces, or because they would not support a consolidated urban form. These areas are:

- Sensitive locations: Cathedral Square and New Regent Street
- Peripheral Locations: Victoria Street

Sensitive Locations

Parts of the central city are more sensitive to the potential adverse impacts of tall buildings, notably key public spaces and particularly those with cultural or heritage value, principally Cathedral Square and New Regent Street.

In these locations, a high level of public amenity attracts people to use the space, resulting in vibrant spaces that contribute strongly to the city's sense of place. The maintenance of a high level of environmental comfort (and a good quality visual environment) in these areas has a city-wide importance which must be considered along with the benefits of clustering, vitality and potential economic impacts of taller buildings. This may be achieved by reducing height limits in the area adjoining public spaces.

In considering this potential reduction in heights, the impact on urban form should be considered. For instance, lower heights around Cathedral Square, at the centre of the city, would potentially create a drop in intensity at what may be a natural location for some of the highest density. New Regent Street is more peripheral would be less notable.

However, as discussed in A above, a tightly massed tower cluster in Christchurch's large City Centre is unlikely and the impact of localised reductions in height limits may not be very noticeable in the actual built form.

Other locations have been considered in relation to whether they should be treated as sensitive locations, but it is not recommended that they should. These are:

- The Otakaro Avon River Corridor. This space is wide and generally orientated north-south (meaning some sun access is guaranteed), or east-west (with limited heights expected on the north side due to zoning or heritage buildings). Whilst it may be partly shaded by development, it is unlikely to be affected by a cumulative level of built form that undermines its environment.
- Latimer and Cranmer Square are not adjacent to the Central City Business zone and will not be affected by buildings above 10 storeys.

Peripheral Locations

The Central City Business Zone is not a compact shape. It is distorted in the north-west where it follows Victoria Street, a ribbon development of office, retail and entertainment activity. This reflects the historic commercial use of the street, rather than its status as part of a consolidated and compact CBD. Victoria Street has never been zoned for tall buildings and its current CCB zoning (with a 17m height limit) reflects its status as a mid-scale extension of the core and a transition between central city activity in the core and the inner suburban residential areas beyond the four avenues.

Buildings along Victoria Street suffered significant earthquake damage and many were demolished, with sites now redeveloped to predominantly 4-7 storeys in height. Given the limited opportunity remaining for development, new tall buildings in the Victoria Street area would effectively be dispersed and detached from the core of the central city, rather than clustering with other taller buildings. As a result any taller buildings would be highly visually prominent within this context.

4.1.2 Development Layouts in the Mixed Use Zones

Block and site layout define the urban structure and outcomes for a neighbourhood, and the resultant urban density and quality. Some development layouts lend themselves to a more intensive urban environment, such as that expected in central areas. The use of certain typologies could assist in managing the impact of the variety of activities expected within mixed use and high density areas.

There are four possibilities for development types that collectively function to manage impacts of the variation in activities across an area, within a street block, or between sites.

A Perimeter Blocks

Perimeter blocks are a conventional way to provide dense urban development. Buildings are located around the perimeter of a street block, enclosing internal open space within the block. On individual sites, buildings are located at the front of the site, with a strong public front – providing an active and interesting frontage through the use of pedestrian access points including lobbies and individual entrances to units, and street facades with a high level of glazing. The architectural response may provide coherence or have individual buildings expressed. Private space is located at the rear, and the buildings may be built across the full width of the site. This pattern of development, widely used in Europe and North America, creates a strong street frontage and allows good solar access and borrowed amenity for buildings and units within the block (borrowed amenity is that which is shared between sites, such as open aspect and clusters of planting or trees near boundaries).

Because a perimeter block form provides rear open space and orientates outlook over a central courtyard, or a deep rear setback, it manages the impacts of developing in transitioning areas (i.e. from industrial to mixed-use) in a much more logical manner than orienting development perpendicular to the street, as is currently found in many of the city's inner city and central city areas. Consequently, a perimeter block typology is effective even if the block is not continuous and provides a building layout that works in both the current and future context. It is also flexible enough to allow for uses to transition in use over time. For example, ground floor workshops or commercial accommodation may transition to residential uses. This is a pattern evident in the well-known perimeter blocks of Barcelona.

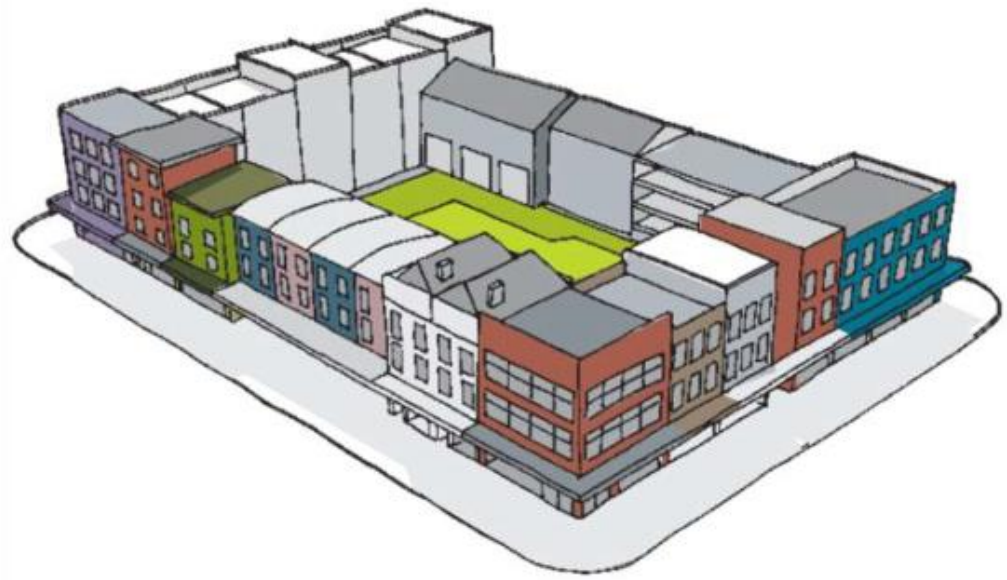


Figure 21: Perimeter block development whereby an interior courtyard is created by buildings oriented to the street.

B Centred Development

A conventional alternative to a perimeter block form, and most often seen in Ōtautahi Christchurch currently, is where the mass of the building is located perpendicular to the street, centred along the length of the site, depending on the site shape and dimensions. As a consequence open space is located to the boundaries of the site, often along the side.

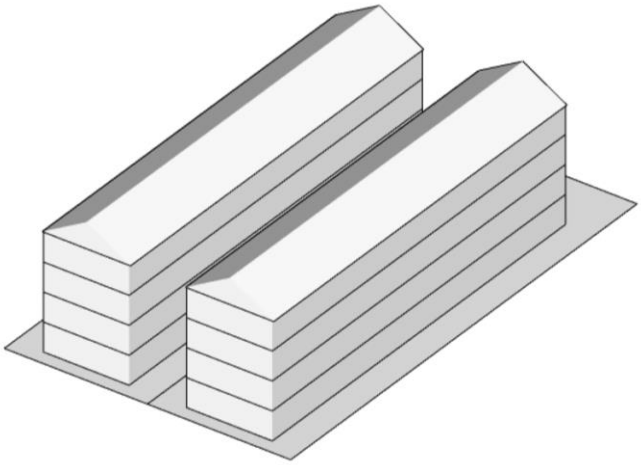


Figure 22: Centred development with outlook to boundaries.

Traditionally a development envelope is created using setbacks and recession planes. Recession planes are less effective with taller buildings (because the sun-angle is below the height of the building for much of the year), and the development form has other potential drawbacks. It can create privacy issues with neighbours because glazing, balconies and consequently outlook is likely to be concentrated to the side boundaries. Activation of the street is also limited as the narrow end of the building provides limited built frontage to the street. It is also an inefficient use of the site.

This form of development works best for smaller scale developments that are less intrusive for neighbours. It does not support more comprehensive development that seek efficient use of land and a higher level of both certainty and quality in respect to site layout.

C Residential Towers

The final typology discussed is residential towers. Tower buildings best suit the central city zones where higher heights are anticipated and the form would sit well with the surrounding commercial environment, where residents are provided with the amenities of the city. In other areas, where these trade-offs are not so apparent, then a lower rise and better co-ordinated form is recommended.

In less dense environments, without good access to services and amenities, tower buildings have some drawbacks:

- They can create impacts on neighbours (e.g. overlooking and shading) especially if built near the boundary.
- They can be expensive to build.
- They have visual impacts (as described in 2.1 above).
- They are not necessarily an efficient use of land. Densities are not as high as might be expected and are often matched by other layouts with moderate height and better integration between sites which also offer better amenity outcomes.
- They are associated with poor mental health[20], especially for those residing on upper levels.

It is recommended that perimeter block typologies are encouraged for mixed-use areas, particularly where the end result is expected to be a transition to predominantly residential areas. This particularly applies to the former industrial areas proposed for re-zoning to mixed use.

4.2 Building Envelope Controls

This method includes a range of setback, recession plane and height controls depending upon the circumstances. The benefit of including a building envelope is that it sets the expectations for development at an early stage. This provides clarity and certainty for developers, neighbours of development and the public as to what is anticipated in a particular environment.

The discussion in section 4.1, in the context of the NPS UD, concluded that the most appropriate city form would allow dense mid to high rise buildings in the City Centre, with careful management of effects. The building envelope should be set to ensure that effects are managed both individually and cumulatively, but noting that some increases in height and density should be readily enabled, at least on larger sites.

The following outlines the proposed building envelopes. The reasons behind the various aspects of the building envelopes are explored later in the report.

[20] See for instance Larcombe D; Van Etten, E; Logan A; Precott, L and Horwitz, P (2019): *High Rise Apartments and Urban Mental Health – Historical and Contemporary Views* Challenges 10(2)

A Central City

In respect to the City Centre zone, the most appropriate package of District Plan controls for managing the building envelope are considered to be:

- A height limit for the base of the building (the lower storeys). Within the City Centre zone the existing height limit is 28m and this is proposed to continue for the building base. For buildings 28m or below, a similar level of development control is proposed to current District Plan provisions i.e. built form standards in conjunction with urban design assessment.

- Road Wall height. A continuation of the existing road wall set at a height of 21m is proposed to continue as this has been successful at maintaining an appropriate level of amenity at ground level for users of the public space.

- An overall (upper) height limit. This would be in addition to the existing 28m height, i.e. the tower above the base height, with a proposed maximum height of 90m. The intent is to provide certainty of the extent of anticipated built form and to avoid significant adverse effects on the city's urban form.

- Upper floor building setbacks. These would apply above 28m and require that buildings above that level should be set back from internal and street boundaries, again to enhance the street environment for people, but also to allow for daylight access and outlook for residential units.

- Tower separation. This is primarily aimed at existing towers or where two towers are proposed on the same site. It would require that separation distances between these towers be similar to what would be required if they were developed on adjacent sites, to manage solar access and views of sky, and building dominance.

- Maximum tower dimension. As with tower separation, this is intended to manage the bulk of buildings at height. Existing towers within the central city mostly have a dimension of less than 40m.

B Mixed-Use Zones

The height and intensity of building in these zones is expected to be less than in the Central City. As a result, a slightly different envelope is proposed for the Central City Mixed Use Zones:

- A height limit for the base of 17m and an overall height limit of 32m
- Upper floor building setbacks of 6m above 17m for internal boundaries
- Maximum Tower Site Coverage of 50% (for the part of the building above 17m).

In the Mixed Use Zone (former industrial land), the following is proposed:

- A maximum height of 15m
- A front setback of 3m

In both zones, different envelopes apply to residential development, in recognition of the different characteristics and requirements of residential and commercial buildings.

C Other Commercial Zones

Amendments to height to implement the National Planning Standards and NPS-UD.

4.2.1 Road Wall Height and Building Base Height

The building base is the lower storeys of the building, usually occupying most of the site and potentially being built to the boundaries of the site. In the current District Plan built form controls, the base can occupy 100% of the building envelope in the City Centre.

The street wall height is the height permitted adjacent to the street. In the City Centre this is currently 21m, with a 45 degree recession plane into the site from the street.

This section applies to the CCMU and City Centre Zones, which have additional height compared to other commercial zones.

Proposed Controls:

Zone	Operative Plan	Recommendations
City Centre Zone	21m Road Wall height with a 45 degree recession plane 28m Building Height	21m Road Wall Height with a 45 degree recession plane. A 50% increase in road wall height to 31.5m for corner sites. 28m Building Base Height
Central City Mixed Use Zone and Central City Mixed Use Zone (South Frame)	17m height limit	17m Road Wall Height 17m Building Base Height

Benefits of the Proposed Control:

In relation to a coherent and engaging street wall:

- a consistent scale of building at the street edge. A 1:1 ratio between the height of the street wall and the width of the street, which provides a balance between openness and enclosure.
- clear delineation between the street wall and taller elements above; and
- A human scale without excessive enclosure.

In relation to sunlight and daylight:

- Allows some access to sunlight in the street corridor throughout the year.
- Improves daylight access

In relation to wind a street wall diverts downdrafts away from the footpath, as shown below:

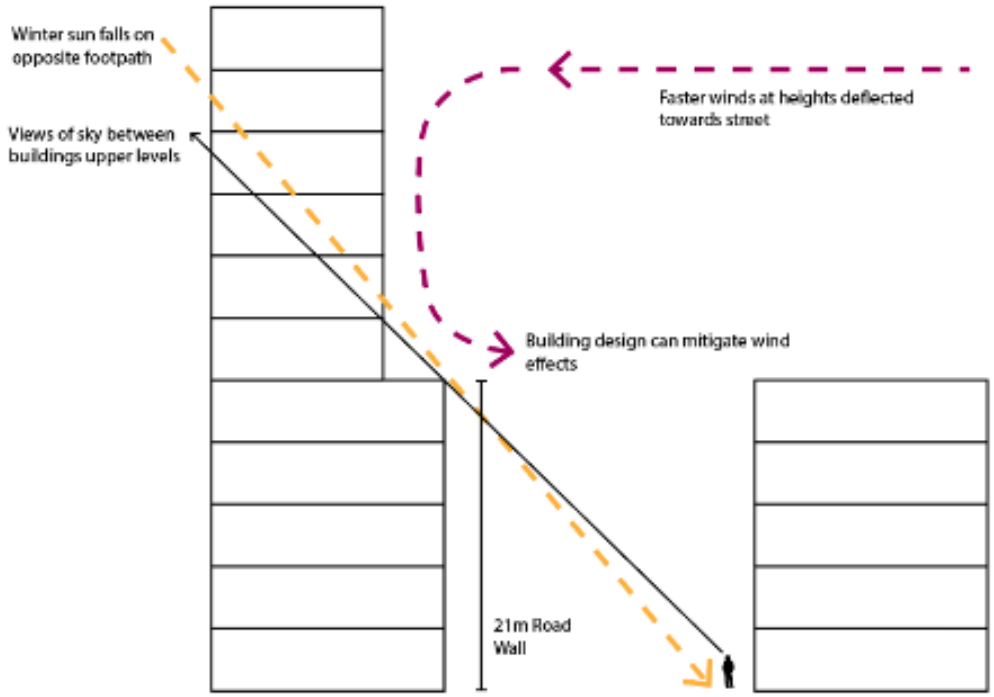


Figure 23: Some benefits of a road wall height - Solar access can be assisted through road wall heights and gaps in the buildings, whilst downdrafts are deflected away from ground level.

Discussion

Central City

In the central city, it is proposed that the current road wall height and recession plane is retained and that the building height becomes the building base height (with separate controls for any tower elements built above this height). The proposed height of 21m with a recession plane would:

- **Relate to the established scale of built form**, generally 3-5 storeys,. This would provide for new development to slot into the existing street scene unobtrusively, with the primary visual element being the base of the building, relating well to the street and adjacent buildings. Taller built elements (towers) would then be located back from the street.

- **Promote access to sunlight and daylight.** Modelling road wall heights (without towers) illustrates that the existing 21m road wall height allows sunlight to fall on the far side of the street (assuming a street width of 20m), as follows:

    - For East-West Streets, sun falls for the majority of the day, 6 months of the year. At the equinox, the shadow tracks the street boundary from 8.30 to 5.30. In the winter (past the equinox), the sun would not reach the street at all, whilst in the summer, it would fall further within the street corridor.

    - For North-South Streets, sun falls on the street for 2 hours 45m (shortest day) and 4 hours 45 minutes (equinox).

- The tables below show the impact of recession planes on the amount of sunlight received on key dates:

Recession Plane	45	60	90 (i.e. none)
Winter Solstice	2hrs 50mins	2 hrs 40mins (-10mins)	2 hrs 15mins (-35mins)
Equinox	4 hrs 40mins	4 hrs 10 mins (-30mins)	3 hrs 40mins (-1hr)
Summer Solstice	6 hrs 30mins	5 hrs 50mins (-40mins)	5 hrs 5 mins (-1hr 25 mins)

Amount of sun falling on the street corridor per day (North-South Street)

Recession Plane	Days with Sun
45	181 (21 September-21 March)
60	162 (30 September-11 March)
90	139(13 October – 1 March)

Number of days with sun falling on the street (East-West Street)

- The tables show that removing the road wall recession plane would have a significant impact on both east-west and north-south streets, with at least an hour less sun on each summer day (a reduction of almost a quarter) on the north-south streets, and 42 fewer days with sun throughout the year on the east-west streets.
- A reduction to 60 degrees would represent a less significant loss of sunlight (by approximately half the amount stated above).

The current District Plan road wall height rule includes a recession plane at 21m rather than a setback, which would create a clearer distinction between the base and the tower and more strongly emphasise the street. However, it was not considered appropriate to reduce the developable volume of the base as this would be less enabling for some types of building

An alternative approach would be to increase the height of the road wall to compensate. However the change in height would be incongruous with the moderate height of existing buildings and therefore not achieve its purpose in terms of coherence. It would also not achieve the level of sunlight and daylight access shown above. For this reason, it is proposed to retain the 21m height and the recession plane.

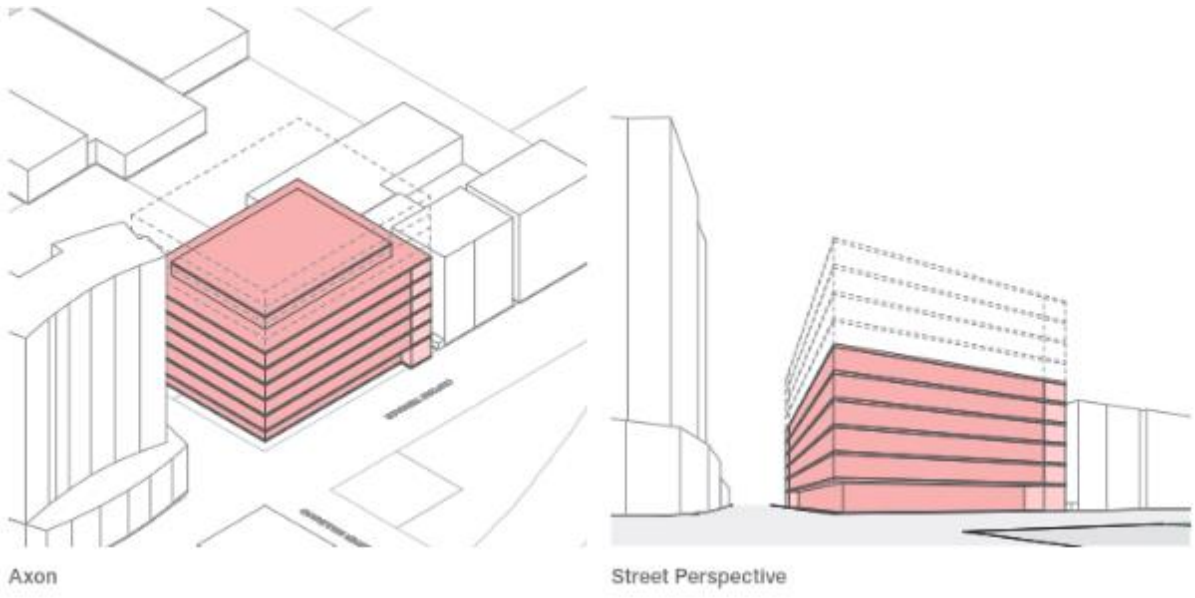


Figure 24: Modelling of the road wall height illustrating integration with existing building heights.

Central City Mixed Use Zones

These areas have a very eclectic character and this is likely to continue in the medium term, with a variety of lower scale of buildings being the dominant building type. Retaining a road wall, with a small setback above the existing height will ensure that taller buildings have reduced visual dominance effects on the street environment in particular.

The proposed approach is to retain the existing height limit in the CCMUZ as a trigger for assessment, but to allow for greater height as a restricted discretionary activity to manage any visual and amenity impacts.

So far, there are few buildings in the zones that reach maximum height due to the types of activity within the area. However this is likely to change as the opportunity for residential activity is taken up.

An increase in height was considered above the existing 17m, but was not proposed. The permitted site coverage is very high and in a mixed use environment, buildings built across the majority of the site may have adverse visual effects to the street environment and neighbouring sites, which can be addressed by setbacks to the street and internal boundaries. Unlike the City Centre, a widespread adoption of higher buildings is not expected, meaning that tall base buildings may be isolated and visually prominent.

Corner Sites in the City Centre

The Architectus analysis recommended more flexibility in the road wall height for corner sites in the City Centre. This would:

- Allow more ability to respond to the corner in terms of legibility. Corner sites are often landmarks.
- Recognising that some potential adverse effects are reduced at corner sites. For instance there is more space for sunlight to be received and these sites can also visually absorb taller forms more easily.
- Enable more capacity and development options for those sites.

For these reasons, it is recommended that an increase in road wall height is permitted around the corner. This increase should relate to the corner and not simply to areas close to the corner i.e. it should wrap the corner and not be detached from it.

An increased height for the road wall at corners is common in other cities. An example of this approach is Melbourne, where corner sites may have twice the street-wall height of mid-block sites.

There is also the issue of horizontal scale to consider. If a site is particularly long or wide, then a very large building could result which would be dominant in the streetscape. A maximum extent from the corner of 30m is recommended for the relaxation in road wall height.

In considering the scale of a road wall height increase, the following was considered:

- How the building will relate to the scale of the 21m road wall

- How the building will relate to the existing scale of buildings. The city is newly rebuilt and the existing buildings will be in place for many years to come. The new road wall exemption should not visually dominate the existing form of 3-6 storeys.
- How the building would relate to the public space. The road wall is the main mechanism to manage the impact of the vertical scale of tall buildings. Although corners have more space to absorb these taller forms, they should still maintain a comfortable level of enclosure and not be dominated by tall buildings. The building will also be visible from within the street (ie the other side from the corner).
- Tower setbacks would apply above 28m, which would manage the impact of the taller building on neighbouring sites, along with design assessment matters.

An increase in scale of the road wall of 50% would allow for a height of 31.5m without a setback, similar to the current permitted height (28m) and almost the same as the proposed maximum height in the zones adjacent to the central city (CCMU and HRZ). Whilst taller than most buildings in the central city, this scale of increase would still relate visually to the existing buildings and the modest scale of street wall (often between 3 and 5 storeys). This is the recommended option.

An increase of 100% would be 42m or roughly 12 storeys. This would be a tall building in the context, amongst the tallest in the city at present. Doubling the road wall height is likely to lead to buildings that are quite dominant of neighbours even if they are built to the permitted road wall height. In the Christchurch context, with modest street walls, these buildings would risk appearing especially dominant and for this reason, this option is not recommended.

4.2.2 Building Height

Proposed controls:

Zone	Operative Plan	Recommendations
City Centre Zone	28m	90m *(28m building base height, and 21m road wall height)*
Cathedral Square	28m	45m
Victoria Street	17m	45m
Central City Mixed Use Zone	17m	32m *(17m building base height)*
Mixed Use Zone	15m	20m

Benefits of the Proposed Controls:

- Enable additional development capacity (residential and commercial), while managing the effects of high-rise buildings (including wind, shading, and visual dominance)
- Integrate existing and future high-rise buildings into the city form
- Maintain high quality public realm
- Recognise the sensitivity of specific locations
- Recognise the centres hierarchy through the urban form, including the primacy of the city centre and importance of design quality
- Recognise the importance of landscape and cultural context to the city

Discussion

City Centre Zone

The NPS-UD is premised on a centres based approach. The central city has primacy within the hierarchy of centres in Ōtautahi Christchurch. Policy 3 of the NPS UD directs that in city centre zones district plans enable '*building heights and density of urban form to realise as much development capacity as possible, to maximise the benefits of intensification.'*

A range of building heights have been considered, including unlimited height. The proposed height for the Ōtautahi Christchurch City Centre Zone is 90m. This is based upon analysis to evaluate alternative heights and consider the impacts and benefits in relation to the urban form of the city, and the range of issues outlined earlier.

The following matters are considered relevant to building heights in the central city, and are also covered within the issues section:

1. **Integrated urban form and skyline:** Introducing new high-rise buildings of a similar scale to the existing high-rise buildings (50m-80m) in the city centre will help create a cluster of buildings of similar heights and more coherent form for the city as a whole.

2. **Isolated buildings:** Current demand for high-rise buildings is limited and if built, are likely to be constructed over a period of many years. Therefore individual buildings may be prominent for quite some time, in relation to the surroundings.

3. **Building dominance:** There is no specific height at which buildings could be considered dominant within the city centre, however heights of 50-80m are similar to the existing high-rise buildings and would contribute to their integration into the skyline.

4. **Shading:** High-rise buildings can create substantial shading. However, over a certain height (depending on the scale of the space that is shaded) additional height would not have a significant impact as most of the available sunlight within a high-rise urban environment comes through voids between the buildings. Shading has therefore not been a key consideration in determining heights, and increases in the building setbacks will in part compensate for additional shading from high-rise buildings. The exception is Cathedral Square as a key public space in the city, which is detailed below.

5. **Wind impacts:** Wind impacts increase substantially with height, as detailed in technical advice from Meteorology Solutions prepared for PC14. Modelling shows impacts are greater at 90m than at 30m, and that high-rise buildings risk creating dangerous gusts at ground level. Whilst it may be possible to manage effects through mitigation, at 90m or greater the creation of dangerous wind conditions may not be feasible to mitigate.

6. **Visual Quality of Buildings:** The existing tall buildings are not necessarily well designed or visually interesting in themselves, for instance, they often have little modulation or articulation. If they formed part of a cluster, the shape and form of individual buildings is less important as they are a component of a larger form. For the reasons listed in section 2.2, good design is critical to support city form, sense of place and identity.

7. **Development capacity:** Capacity within the central city and the economic cost implications of building heights limits have been considered within the Property Economics advice prepared for PC14. While no height limit may be encouraged from an economic perspective, this advice recognises that there may be non-economic reasons (including urban design) for height limits, and that the implications of a 90m height threshold would be very low.

The following illustrations show the existing city centre form and potential impact of development on the skyline.

Figure 25: Modelling of the current Christchurch skyline.

The current city skyline has a small number of taller buildings, which are prominent in the skyline. A continuation of the current height or a modest increase would not integrate these existing buildings into the skyline, and would not be consistent with the approach required by the NPS UD.

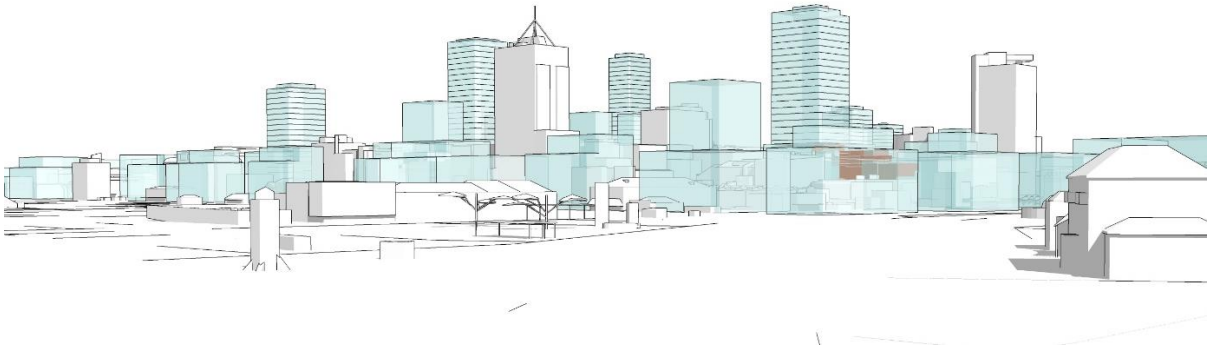


Figure 26: Modelling of the Christchurch skyline with some moderate height buildings and some tall buildings up to 90m.

An increase in height to 90m would enable buildings at a height that would relate visually to the existing built form. It would also manage the potential for individual buildings to be dominant, whilst allowing significant increases in capacity. Maintaining a connection to the city centre existing form is regarded as an important element in the establishment of the future city form.

Whiti-reia Cathedral Square

A maximum height limit of 45m is proposed for some sites adjoining Cathedral Square.

Shading analysis has been undertaken as part of the Plan Change 14 process and is summarised below[21]. This demonstrates that there would be significant shading over the majority of the square if buildings of 90m in height were constructed on its fringes. Shading effects would be substantially reduced with a 45m height limit. The analysis also identified that heights would only need to be

[21] Lower Height Limits: Victoria Street and Cathedral Square Qualifying Matters

lower for the sites immediately surrounding Cathedral Square and not for the wider area, in particular the southern and eastern edges where mid-day and afternoon sun falls.

Under the Christchurch City Plan (1995), height limits were reduced around Cathedral Square to 45m (from 80m). This recognised the significance of the Cathedral and importance of Cathedral Square as the heart of the city and principal civic open space.

A height limit of 45m would enable additional height above the current 28m, while managing impacts on environmental comfort. It would also respect the significance of the Cathedral, the character and heritage values of the space.

Figure 27: Shown here at 2.30pm, 90m buildings shades much of the Square on the equinox (left), whereas there would be much less shading from 45m high buildings (right). Note the impact of gaps between the buildings.

A potential area for lower height limits is:

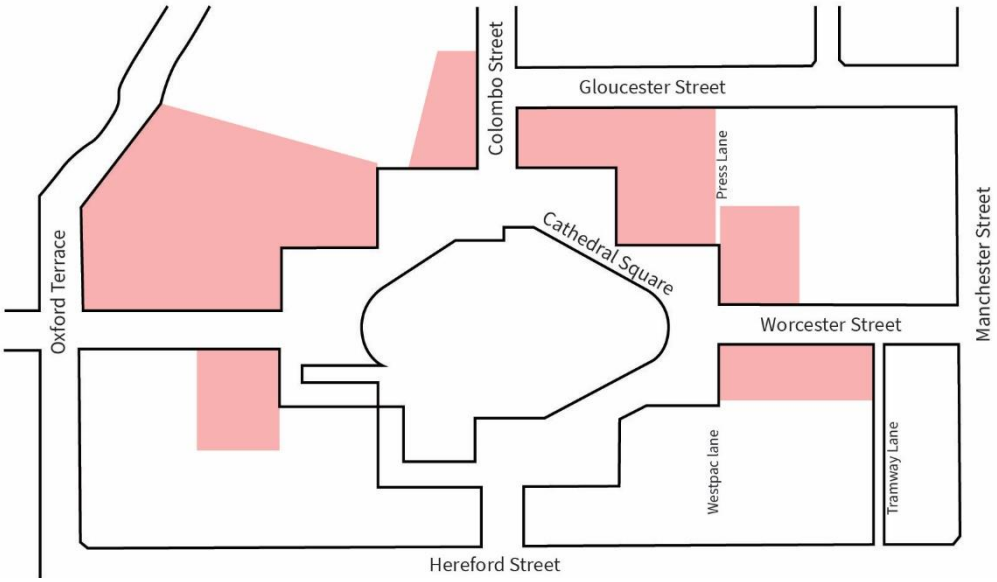


Figure 28: Sites where a 45m height restriction is recommended.

Victoria Street

A maximum height limit of 45m is proposed for Victoria Street.

A range of alternative heights have been considered, with modelling and analysis undertaken to consider the following[22]:

1. The impact of Victoria Street's built form on the consolidated form of the central city and associated legibility impacts, and potential dispersal of activity.
2. The effects of increased height on the surrounding residential areas.
3. The likely length of any period of change given the limited availability of sites due to substantive post-earthquake rebuilds.

Other amenity effects such as the pedestrian experience at street level were considered to be addressed through the City Centre Zone built form standards, including street wall height, and are equally applicable to Victoria Street.

The findings of the analysis noted the following:

- A 45m height limit would be significantly taller than surrounding residential heights of 32m, but not so much that it would be visually dominant.
- A 60m building height would appear out of proportion in relation to the residential context and form of existing development.
- The ribbon nature of the street reduces the opportunity for a consolidated form or cluster of taller buildings to establish, increasing the risk of isolated visually dominant buildings, if there is a higher height limit.
- Although transition between a height of 45m for Victoria Street and 90m for Central City would be quite evident, this would reinforce the primacy of the City Centre zone and not be more significant than the transition proposed to the remainder of the city surrounds.

The High Density Residential zone surrounding Victoria Street will allow for 32m high buildings. Development of these sites could help absorb taller buildings to some extent. However, as with the commercial area, much of the adjacent residential area has been renovated or recently redeveloped. As such there is limited opportunity for large scale apartment buildings in the area, particularly when the availability and affordability of land elsewhere in the city is considered and preference for townhouse forms. In addition, both land fragmentation and age of housing within the area will also likely limit wholesale residential redevelopment in the coming decades.

It is acknowledged however, that the area to the west of Victoria Street is likely to be more attractive for high density residential development than to the east because of the proximity to Hagley Park. A recent consented retirement village[23] provides for 5 to 8 storey (max 25m in height) buildings across two sites. This would help to integrate taller buildings into the cityscape, but not very tall buildings of 60m or more (which would be at least double the height of neighbouring buildings).

Overall, there is a risk of visual dominance from both 60m and 90m buildings because of the contrast with existing and planned built form. The isolated and ribbon nature of the street makes this less appropriate and manageable than in a compact consolidated core area, and the advantages of

[22] Lower Height Limits: Victoria Street and Cathedral Square Qualifying Matters
[23] RMA/2020/673

greater height is less apparent than in the central area. There is also a higher risk of isolated and visually dominant buildings being established that would be prominent in their own right, with fewer opportunities to integrate them into a consolidated mass of towers. This risk is increased by the lack of opportunities for redevelopment within the Victoria Street area.

For these reasons a 45m height limit is recommended for Victoria Street.

The study produced views of each scenario from above and Hagley Park, where views of the tall buildings will be quite apparent. The views are as follows:

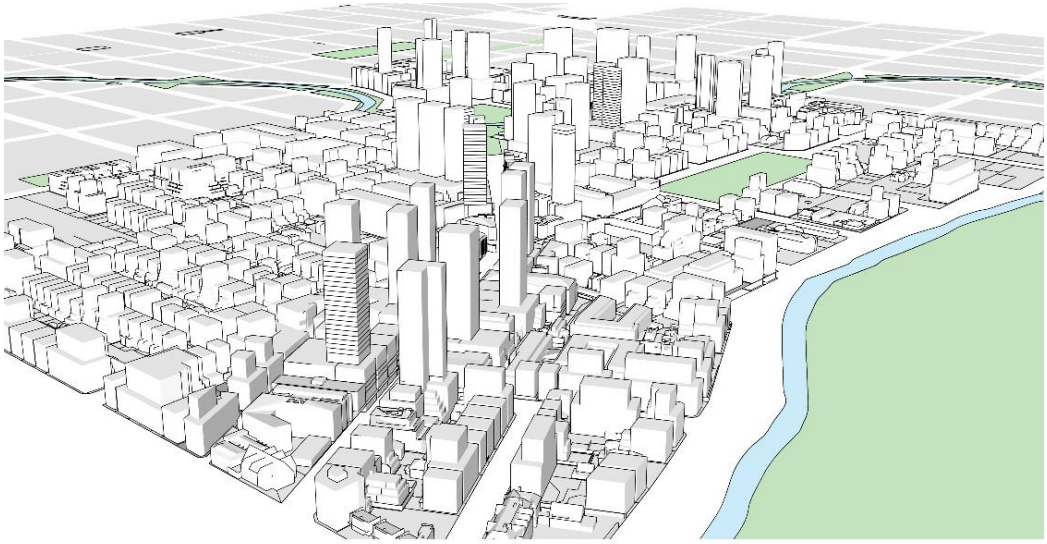


*Figure 29: **90m:** An extension of central city in form. Strong contrast in built form with the surrounding existing and future context.*

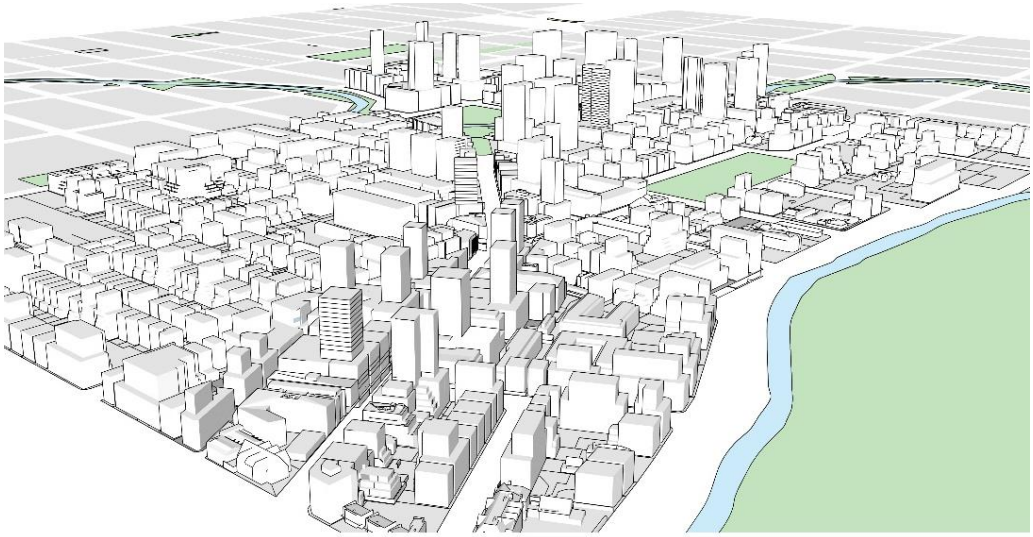


*Figure 30: **60m:** A good level of height transition between the surrounding residential and the Central City 90m form.*

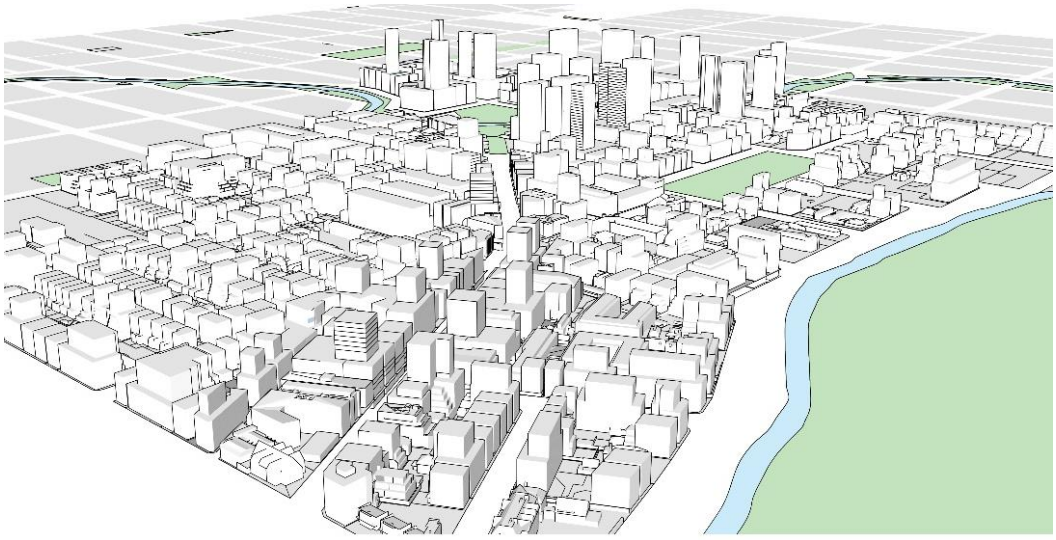


*Figure 31: **45m:** A lower level of buildings integrate with the Victoria Street surrounds, and the central city stands out more prominently.*

Central City Mixed Use Zone

A number of factors are relevant to the consideration of increased building heights in the CCMUZ including:

- **Integrated Urban Form:** Mid-rise buildings contribute to a transition from the suburbs towards a more intense urban core. Whilst moderate height (for instance of up to ten storeys) would contribute to this transition, Sporadic tall buildings in this area would adversely impact the skyline and city form;
- **Continued presence of low height buildings:** The mix of activities means that there will continue to be many low-rise buildings in the area. Most demand is expected to be for low to mid rise buildings in the short and medium term meaning that there is an increased risk of isolation of tall buildings in this area;
- **Building Dominance:** Because of the generally modest scale of building expected, any tall buildings may be visually dominant, especially on the periphery of the area (away from the central city);
- **Shading, Privacy and wind:** Taller buildings in residential areas create more intense impacts on the living environment (shading, privacy and wind);
- **Development Capacity:** The highest intensity of use is expected in the central city and taller buildings on the fringe may compete with this (as described in the Property Economics report);
- **Visual Quality of Buildings:** Because taller buildings are prominent, the management of visual quality is important (but can be managed by other Plan provisions, especially if the change in scale is modest).

These factors generally point to a moderate scale of building in the mixed-use zones. The NPS UD requires buildings of at least six storeys in walkable catchments, which forms a baseline for a height limit for areas close to the central city. However, some additional height is considered appropriate and desirable in areas closest to the City Centre Zone, where it will integrate with the change in scale

expected in that area. Whilst taller buildings may occur in the City Centre, they are not expected to be common in the foreseeable future, so a modest step is considered most appropriate. A height of 32m (10 storeys) is therefore proposed to:

- Integrate with current low-rise form
- Provide plentiful opportunity for development
- Provide a step between the low-rise and mid-rise residential areas and the taller buildings of the City Centre
- Retain the primacy of the central city

There are some areas that may be more suited to taller buildings. Te Kaha, the multi-use arena precinct, is one area because of the height and bulk of the proposed building. Taller buildings around the stadium would help to integrate it into the built form of the city and reduce its visual impact. Provision can be made for taller buildings in these areas through policy direction, assessment matters and future neighbourhood planning.

Mixed Use Zone

The above discussion describes a step in height provided by a ten-storey CCMU zone to the central city. As described, the NPS UD requires a height of six storeys. It is expected that the mixed use zone would transition to a predominantly residential area over time. It is in many ways equivalent to the High Density Residential Zone, in its location and expected intensity of use. In line with this and following the direction in national policy, a height of 6 storeys (20m) is recommended in this zone.

4.2.3 Tower setbacks and Separation

Definitions:

Tower setbacks and separation are aimed at ensuring a degree of separation between buildings and respond to the issues identified in the previous section. A tower comprises the upper levels of a tall building that are set back from the property boundaries. The following controls relate only to the upper floors of buildings, above the permitted height for the zone.

Proposed controls:

Zone	Operative Plan	Recommendations
City Centre Zone	N/A	Front Boundary Tower Setbacks to be 7m. Internal Boundary Setbacks above 28m to be 10% of the total building height. 12m separation between towers on the same site.
Central City Mixed Use Zone and Central City Mixed Use Zone (South Frame)	N/A	3m setback from the street boundary. 6m setbacks from all boundaries.

Benefits of the Proposed Controls

1. Reducing the visual dominance of upper floors when seen from the street, by setting them back behind a street wall;
2. Avoiding secondary street walls above the road wall (which result from adjacent towers being joined together). A side setback ensures that this does not occur by requiring a degree of separation between them.
3. Creating visual interest by ensuring that buildings do not abut boundaries with blank or superficially detailed firewalls. If buildings are located at the boundary, there are few options for high quality cladding because of fire regulations. Gaps overcome this issue and provide certainty that side walls will not be built out in future. This ensures that there is a functional use for glazing into the future.
4. Ensuring that there are gaps between the towers, allowing for through views of sky and managing the density of tower development generally.
5. Managing environmental comfort because gaps between buildings are the principle way that sun can reach the ground in cities that are dominated by tall buildings. Gaps are also essential in dissipating wind (rather than concentrating it on the street).
6. Ensuring outlook and sunlight access within each building.

Discussion

Tower setbacks address a number of the issues identified and are a key method to manage the impacts of tall buildings by ensuring a degree of separation. However, tower separation and setbacks might impact on viability by reducing the buildable area, potentially making buildings more difficult or expensive to construct. The balance of costs and benefits is discussed below.

City Centre Zone

Front Tower Setback

Front setbacks between the base and the tower particularly contribute to:

- Coherent Street-scene (allowing the street wall to be dominant in views, to maintain a human scale).
- Impacts on the public realm (sunlight and daylight access, enclosure and views of the sky and management of wind).

Front setbacks would be in part dictated by the recession plane for the street wall, which ends with a 7m setback at 28m. One option would be that the tower rises from this point – in effect a 7m front setback. This would have the benefit of being consistent with the existing practice and the rest of the rules.

Reductions in the setbacks below 7m could be considered but a rule specifying a reduced setback would undermine the effectiveness of the recession plane, not just in tall buildings but in every case

(because if a tower set closer to the street than 7m can breach the recession plane, then there is no reason that any upper floor should not).

A 7m setback is considered appropriate to visually separate the building base from the tower and is consistent with other cities. The Melbourne report[24] includes a comparison of street setbacks from cities around the world and notes that they range from 3m (certain wide streets in New York and Singapore) to 10m (Perth). A setback of 10m was adopted for Melbourne[25] with discretion for it to be reduced to 5m.

In their report, Architectus discuss the option of zero setbacks for towers on corners to allow for design flexibility. In consideration of these factors, it is proposed to allow for increased flexibility by increasing the street-wall height at corners. This allows for mid-rise buildings to be built to the corner, but tall (and more imposing buildings) would need to be setback, at least at upper floor level. This is discussed in full in 4.2.1.

Tower Internal Boundary Setbacks

Increasing the distance between towers would help to manage each of the issues outlined above, with the exception of the first (reducing the visual dominance by setting upper floors behind a street wall).

For some issues, (2 and 3 in the above list) a basic setback of 4m from internal boundaries would be sufficient to ensure an adequate degree of management. This would overcome the need to build firewalls suitable for a common boundary and allow a range of cladding materials to be employed. It would also be enough to visually separate the towers and prevent the appearance of a continuous street wall.

However, for tall or bulky buildings quite large distances would be required to resolve some of these issues. For example, good solar access, avoiding shading, would require that there are significant clear areas (voids) above the street-wall to ensure that there was sunlight on footpaths for a good proportion of the day and a proportion of the skyline that was not occupied by buildings. The impact of wind also increases with height and increased setbacks will help to filter it.

Similarly, the degree of internal daylight access is related to the scale of built form overall and would be reduced more by taller buildings.

The impact of setbacks on development potential is an important consideration. For instance, large 6m setbacks would take a more significant proportion of a smaller site and would in some circumstances affect the viability of development overall (it would not be worth building a tall building on a narrow site because the floorplates would be too small).

Another consideration is whether the setbacks should apply at 28m height. The impacts increase with height, so breaches of the setback rules at 30m will not be as significant as for taller buildings (of, for instance, 60m) because they will not be as widely visible.

The Architectus analysis found that 6m setbacks would generally allow a reasonable development to take place on a larger site (for example 50m x 40m). This generally demonstrates that large development can be accommodated with the setbacks on larger sites.

[24] Pp102

[25] Schedule 10 to Clause 43.02 Design and Development Overlay, Melbourne Planning Scheme

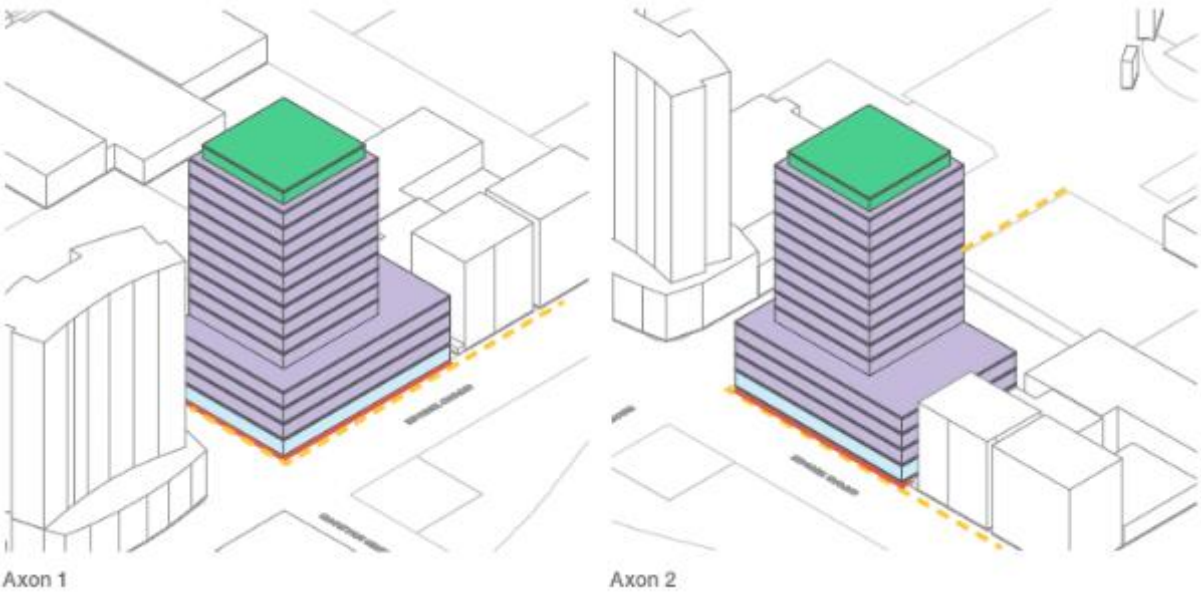


Figure 32: Modelling of a tower building on a large site, with setbacks.

From the above discussion, a number of options have been considered:

1. **Setbacks to be 4m with 8m tower separation.**
   The 4m setback achieves an improved outcome in managing the identified effects compared to no setback. It resolves the visual impact issue of flank walls and allows some light into building interiors. It will at least partially resolve a number of other issues (allowing some views of the sky and contributing to reduced levels of visual dominance). However, daylight penetration to the ground would be limited, especially from tall buildings that blocks out more sky, and the setback would not be in proportion to the impact of taller towers

2. **Setbacks to be 6m with 12m tower separation.**
   A 6m setback would be quite effective at managing the issues, allowing for visual separation between the towers, avoiding the perception of a secondary street wall and allowing for some daylight penetration to street level. As for the smaller setback, it would remove the driver for blank walls and generally reduce the visual dominance of towers by allowing for through views of the sky or other buildings in the cluster. The drawback with this option is that it may discourage medium height buildings which have reduced impacts compared to taller ones.

3. **Setbacks in proportion to height.**
   Because the impacts of tall buildings increase in proportion to height, applying increasing setbacks to taller buildings would manage the level of impact effectively.

   The effects are created by the massing as a whole (not simply the increase in massing at a certain level). Consequently, the setbacks should apply to the whole tower form, rather than reduce with height as in a recession plane. This could be implemented by means of a formula (for example setbacks above 28m are 1/10th of the building height).

Option 3 is considered the best option overall, requiring the whole of a larger tower to be further setback from boundaries in proportion to the height and the impact created. In practice this may mean that such buildings require a larger site, but this is due to the increased impacts that these buildings create. It would allow for medium height buildings to be built more easily, whilst also managing the increased impacts of taller buildings.

Tower Separation

The use of setback rules will ensure that there is some separation between towers on adjacent sites. However, there may be instances where two towers are constructed on the same site. To avoid the matters discussed above, these should have a similar degree of separation to towers built on adjacent sites. Two options were considered:

1. A simple separation rule, that towers should be 12m apart.

2. Calculating the separation using a formula based on the setback being a combination of 10% of tower height for the two towers, similar to the recommendation for setbacks. For example:

    - Tower 1 height 50m (would require a 5m setback)
    - Tower 2 height 60m (would require a 6m setback)

    In this case the combined separation would be 11m.

Both the approaches are considered appropriate, but the advantage of the simple rule is that it is easy to understand and apply. However, if set too close, it would lead to more visual dominance from tall towers; and if set further apart it may lead to inefficient use of sites.

A pair of tower on a larger site will inevitably have more space around them (because they will be subject to the setback rules on all sides) and as a result the risk of dominance is considered low. For this reason the simple rule is recommended.

Setbacks in the Mixed Use Zones

Tower Internal Boundary Setbacks

In the CCMU and CCMU(SF) zones, upper floor setbacks of 6m are proposed. These are in proportion to the scale of building in the zone and would take into account the other building form controls (the lower road wall and height limit and 50% site coverage for upper floors). They would allow for slightly higher levels of sunlight access and outlook to what is proposed for the City Centre Zone. This is a recognition of the nature of the zone, with lower overall amenity and accessibility and the expected transition to a more residential area.

Smaller setbacks were considered for the mixed use zone for upper floor buildings, for instance 4m. The reason these were not recommended is that the mix of uses for taller buildings is expected to include a high proportion of residential activities, both on upper and lower floors. These are particularly affected by the impact of tall buildings on adjoining sites, especially from overshadowing and overlooking. Including upper floor setbacks helps to manage these impacts.

Figure 33: Potential Setbacks for Central City Mixed Use Zone (Architectus)[26].

Tower Street Setbacks

A street setback would make a contribution to reducing dominance of tall buildings by setting towers back from the predominant street wall. This may be quite inconsistent along the street if the ground floor is setback (which is recommended for residential developments), instead of being built to the boundary. As a result it is recommended that the setback should apply to upper floors in relation to the base, rather than the street, in order to create a street wall and to reduce the visual dominance of the upper floors.

4.2.4 Tower Dimensions and Site Coverage

Tall buildings can be visually dominant as a result of their bulk. This is a result of the width of the building as much as its height – for example a continuous medium height building of 12 storeys can be imposing, in part because there may be little visual relief and separation of the built form. Setbacks are designed to address this issue on separate sites, but a large site could be developed with a bulky building which may have a significant impact on its own.

Central City

Existing taller buildings in Christchurch usually have a maximum horizontal dimension of 40m (above the base). This includes the tallest buildings (Crown Plaza and Pacific Tower) and the Distinction Hotel. These slender buildings allow views of sky and solar access around the sides of the building.

The bulk of buildings on medium sized sites would be managed by setbacks, but for larger sites, bulky towers or medium height buildings may result (eg 10 storeys). A maximum tower dimension

[26] Ibid, pp22

would require either that there was careful management of bulky buildings (via a consent process), or that larger buildings are split into two separate towers in order to meet the standard.

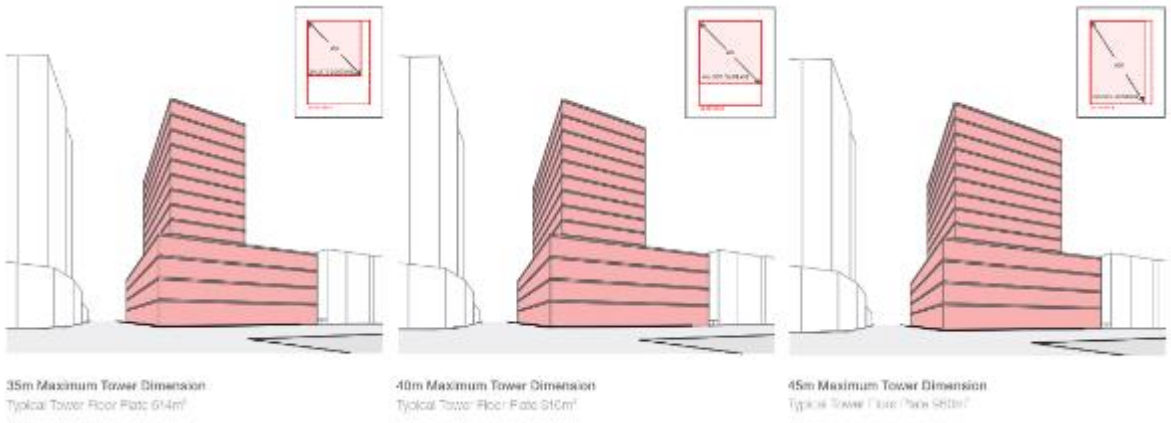


Figure 34: Modelling of Tower dimensions (Architectus) [27].

The construction of such tall bulky buildings is likely to be infrequent, but if developed they would have an outsized impact on the immediate area and the wider cityscape. The proposed tower dimension allows for a usable floorplate of a size that is not often exceeded (around 800m^2). It compares with similar cities, for example Toronto has a maximum floorplate of 750m^2.

An alternative method of managing this issue would be to include a site coverage control, potentially a maximum of 50% over the 28m height threshold. This would also manage the bulk of buildings and ensure that the amount of open space around the site increased in proportion to the tower.

Comparing the approaches, site coverage is more restrictive than a tower dimension on sites less than 2000m^2, but less restrictive on larger sites (which are expected to be more unusual). It is also a less direct way to control the impacts (which are as much to do with the bulk of buildings in themselves as opposed to the proportion of site that is built). As a result, a tower dimension is recommended.

Central City Mixed Use Zones

In the Mixed Use zones, mid-height buildings of 6-10 storeys are expected rather than towers of 8-30 storeys. This more modest scale of development relates better to the street, and there are fewer concerns about visual dominance and the impact on longer views, for instance.

Taller buildings in the mixed use zones are also likely to be predominantly residential, because the size of commercial tenancies is restricted. This will bring with it a set of assessment criteria which require space to be set aside for ground floor landscaping and outdoor communal space, as well as an expectation for solar access. This is in itself likely to limit visual impact at height. Furthermore, 4m setbacks at height will also tend to reduce the bulk of buildings on most sites.

However, there are a number of large sites in these zones. Setbacks are unlikely to reduce the impact of bulky buildings on these sites because they will only create gaps at the edge of the site. In this situation, a site coverage limit would manage the overall bulk of the building. A tower

[27] Architectus Pp11

dimension is not considered necessary because the height is low in relation to the City Centre zone – there will not be the potential for bulky building at height.

4.3 Floor Area Ratio

Introducing a Floor Area Ratio was considered as part of this plan change, but has not been recommended.

Floor Area Ratio is often used as a way to manage density in commercial zones. It is not a built form control as such, but is used to set the quantum of development on the site and indicate to the market a reasonable expectation of development density. The FAR limit is often used as a trigger for the negotiation of higher quality buildings or value capture so it is not an absolute limit.

The current rules in Ōtautahi Christchurch (assuming 7 storeys are built) would allow for an FAR of just under 7 because there are no setbacks or other restrictions on site coverage. An international comparison of FAR is shown below[28]. This was created during the Melbourne Central City Built Form Review (which noted very high FAR amongst new buildings and proposed an 18:1 control for Melbourne).

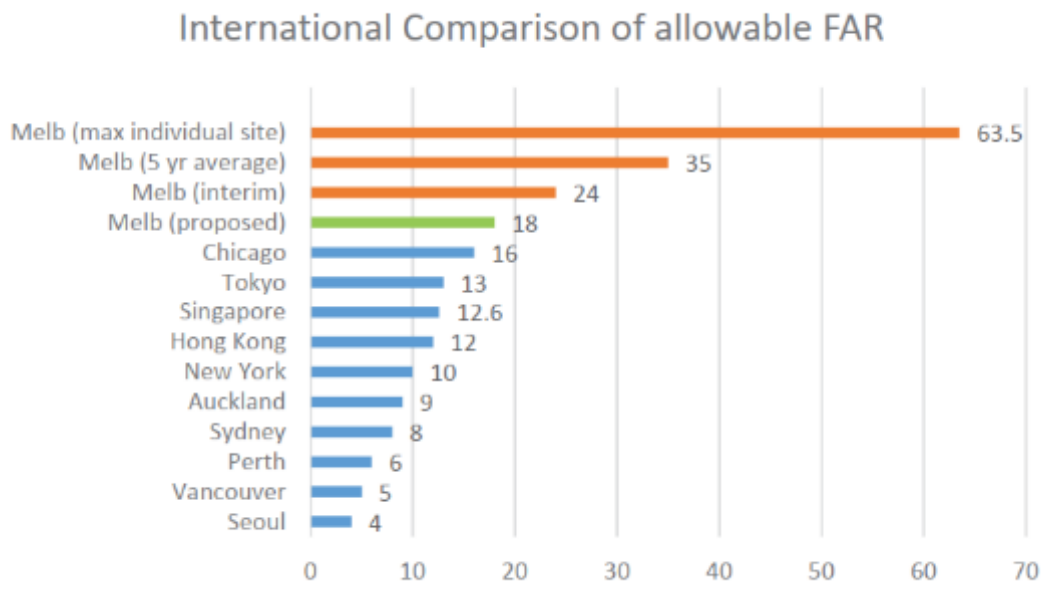


Figure 35: International Comparison of FAR (prepared for Melbourne Central City Built Form Review).

[28] Central City Built Form Review: Synthesis Report, Hodyl and Co, 2016 (Melbourne)

Modelling of the proposed built form standards is shown in the diagram below, for a 2000m2 site and a 1050m2 site (a common 21m wide site).

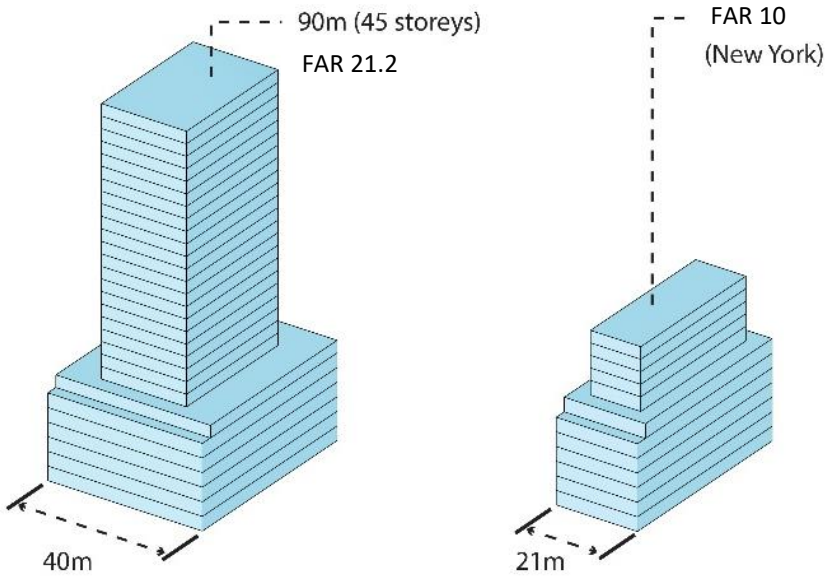


Figure 36: Modelling of Ōtautahi Christchurch Development Envelopes and Floor Area Ratios for a 2000m2 site (left) and a 1050m2 site (right).

These show that FAR could be over 21 for the large site and 10 for the small site. The former is greater than any of the comparison cities used in the Melbourne Review, whilst the latter is around average amongst the cities (equivalent to New York), despite the small size of the site (development is restricted by the setbacks, which increase with height).

It would be harder to establish towers on sites narrower than 20m because the width of the floorplan would likely become uneconomic to build. The FAR would therefore drop to 7 for narrow sites, which is more than Perth (and slightly less than Sydney). Whilst there would be room for negotiation in those cities for increased FAR, some increases in height above the limit are likely to be granted in Ōtautahi Christchurch, for instance with reduced setbacks.

It is worth noting that the cities in the comparison were capital cities, equivalent to Auckland, rather than regional cities, which would be expected to have less intense floor area ratios due to less intense demand. The proposed rules for Ōtautahi Christchurch would place it amongst the most enabling cities in the world, despite its relatively small size and lower level of demonstrated demand for tall buildings or central city floorspace in general.

A FAR control has not been recommended because it is considered that the built form controls manage the envelope effectively, and the base allows for a generous starting point. A mid-range FAR (such as 10) would risk introducing inflated development expectations for small sites that could not be met through the envelope, or artificially limiting the development of larger sites.

4.4 Permitted Status for some Small Buildings in the City Centre Zone

The following built form standards are recommended to apply only in the City Centre Zone, for sites with a width of 21m or less. Buildings on these sites that comply with the standards would have permitted status.

Proposed controls:

Zone	Operative Plan	Recommendations
City Centre Zone	N/A	Built frontage: 100% Min/Max height: 11m/21m No vehicle access Separate residential access to street (if residential is provided) Minimum glazing to street: 75% (ground floor) / 30% (upper floors, per floor) Ground floor street frontage to be split into bays 8m wide or less.

Benefits of the Proposed Controls

1. Allows an easier consenting process for low-risk proposals (small buildings with well activated facades).
2. Ensures the buildings are designed with a high level of visual interest and street engagement.

Discussion

Small mid-block buildings on small sites without vehicle access are of low risk in respect to impacts on the city centre environment. It is considered that these can be effectively managed with built form standards, to reduce the need for resource consent processes.

Small buildings provide vertical articulation by virtue of their scale, and with the addition of standard matters including setbacks, glazing, pedestrian access and weather protection where important, will provide a level of certainty to the outcome, without disrupting continuity or engagement with the street.

Corner sites should be excluded as they contribute substantively to the legibility and view shafts of the central city, and as such require careful design management.

Vehicle access, as noted above, is also excluded as its provision can undermine the quality of a street or public space, including reducing active street frontage, creating voids within the building facades and safety issues, both in respect to moving vehicles and in regard to CPTED matters. A study in Sydney[29] of 15 small sites found a very strong correlation between vehicle access and poor street

[29] City of Sydney, 2016 *Erection of Tall Buildings in Central Sydney*

activation. For this reason it is recommended that vehicle access does not have permitted status in the plan (and impacts are managed through the consent process).

Taller buildings have more widespread impacts and the potential for more intense impacts locally and consequently do require more scrutiny to manage their impacts. Built Form Standards can be inflexible and lead to unexpected outcomes, as well limiting the opportunity to look more broadly to design alternatives that assessment rather than standards can provide.

Suggested built form standards for a narrow mid-block building, and rationale for this are as follows:

- Maximum width of site or site frontage: 21m. This ensures that the standards only apply to small buildings. This achieves variety along the street by ensuring that it is comprised of a number of distinct buildings, and that if a relatively monotonous outcomes results for any individual building, it is confined to a small portion of the street amongst a variety of built outcomes.
- Built frontage: Requirement to build to the street boundary for 100% of the site frontage.
- Minimum /maximum height: Minimum height of 11m and maximum height of 21m. To support the continuity and definition of the street wall. Transitions to higher levels introduce an additional area of complexity that may not be managed well by reliance on built form standards.
- No vehicle access to site for the reasons outlined above.
- Where residential use is included in the building's mix of uses, a separate residential access must be provided from the street or lane. This is to ensure safe passage to the street from the front door, as well as activation of the street or lane, avoiding convoluted and potentially dangerous access for instance through narrow external passages or via service yards.
- Ground floor articulation – if the building is wider than 10m then the ground floor shall be split into bays of no more than 8m wide, separated by an external wall or pillar of at least 0.3m in width. This ensures a layered approach to design at ground floor, to create a level of visual interest, in association with glazing and the maximum building width.
- Transparent glazing: Minimum of 75% on the ground floor between 0.5 and 3m height on the primary street façade to ensure continuity of the commercial edge and provide for visual interest and safety. A minimum of 30% otherwise where adjacent to other publically accessible space.
- Evenly distributed glazing – each façade to have a minimum of 30% glazing for each floor above ground level. This also relates to ensuring a degree of coherence, that there are not areas of the building with blank facades. Evenly distributed glazing is also more likely to create a visually coherent façade and ensure visual interest within the building facades. The exception is where the building abuts adjacent buildings forming the street wall.

The diagram below shows how this is proposed to work, and the built outcomes it would encourage.

One concern with this approach is that it could lead to fully glazed frontages, which would comply, but can be flat and plain, offering little interest or definition. The risk of this is tempered because the rules would only apply to narrow buildings and the 8m bays would apply to buildings over 10m in width. Over the course of the street, it is still expected that some variation would occur.

Initially, a 15m site width was considered, in line with the Sydney recommendations[30] and common site widths in Christchurch. However, it was found that there were few sites of this width, and that a common width was around 20.5m. Consideration was given to whether this was an appropriate site width to achieve the level of interest and verticality in the street. Although there is some risk that wider buildings may not have the same level of visual interest, and that this would not be mitigated by regular changes in form through the construction of different buildings, it is also considered that the risk is acceptable in the context of a changing street scene and the matters that are provided (such as a basic level of glazing).

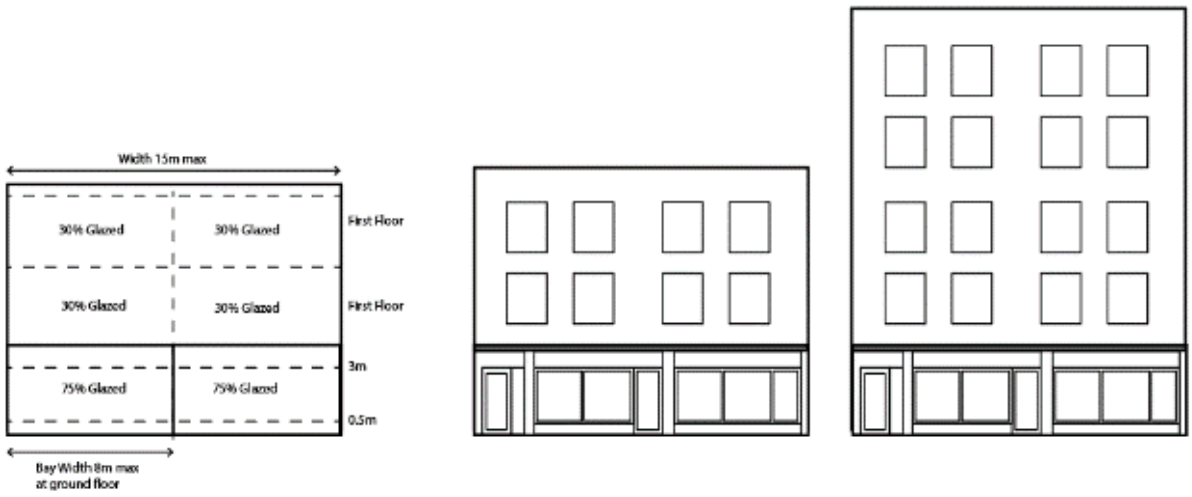


Figure 37: Illustration of proposed small lot built form standards and expected building response.

[30] ibid

4.5 Site Controls in the Mixed Use Zones

4.5.1 Landscaping in the Mixed Use Zones

Proposed controls:

Zone	Operative Plan	Recommendations
Central City Mixed Use Zone	2m landscape strip where building not built to the frontage, and 5% of site area landscaped (can include perimeter landscaping).	3m landscape strip where building not built to the frontage, and 5% of site area landscaped (can include perimeter landscaping). 1 tree for every 250m^2 of site area. 1 tree per 10m of perimeter landscaping and 1 tree for every 250m^2 of site area. Root spaces (1.5m * 1.5m) and canopy spread areas (4m * 4m)
Central City Mixed Use Zone (South Frame)	2m landscape strip where building not built to the frontage, and 5% of site area landscaped and 10% landscaping (in addition to perimeter landscaping). 1 tree per 5m of perimeter landscaping.	3m landscape strip where building not built to the frontage, and 5% of site area landscaped and 10% landscaping (in addition to perimeter landscaping). 1 tree for every 250m^2 of site area. Root spaces (1.5m * 1.5m) and canopy spread areas (4m * 4m)
Mixed Use Zone	1.5m landscape strip where building not built to the frontage.	3m landscape strip where building not built to the street frontage. 1 tree per 10m of perimeter landscaping.

These rules are proposed in response to the issue of the poor level of amenity of the general environment described in 3.4.

Benefits of Proposed Controls

- Increased environmental quality for people living, working and passing through the areas
- Supports transition of mixed-use areas from industrial zones to a high quality living environment

Discussion

Although the zone is for mixed use and a residential character is not expected, the quality of the general environment is a significant issue, and a higher quality living environment is important because of the number of residents present and expected in the zone.

The increasing uptake of residential development also results in an increase in the number of people who use the streets. Some areas are also important routes to inner suburban areas (for example to Phillipstown via Ferry Road or to Sydenham). Whilst the use has traditionally been industrial, the quality of environment does not reflect the importance of these streets as part of the movement network and the increasing emphasis on active transport.

Landscaped areas

It is proposed to include increased landscaping requirements in the Mixed Use zones, to match those in the South Frame, being 10% of site area. There are a variety of activities present in these zones, although buildings tend to be residential or industrial with some provision of car parking. In both these instances, some landscaping is beneficial to either the occupants, given the somewhat harsh appearance of the environment, or to mitigate the impact of more industrial type activities on the street scene.

A 5% requirement was considered (as in the existing Commercial Central City Mixed Use Zone) but has not been recommended because it does not provide a substantial landscape component that would offset the built appearance of the zone.

Landscape Setbacks

Landscaped setbacks of 3m are proposed where buildings are not built to the street front. This would provide a substantial amount of landscaping biased towards the front of the site and establish a higher quality character more suited to a mix of uses.

This is greater than in a residential zone, but the quality of the mixed use zone is also less than in a residential zone (and with dense development may support a high number of residents). As outlined in section 3.4.2, the opportunity to change the environment is limited by the existing street form.

Tree and canopy spaces

To offset the harsh environment and be consistent with and compliment the transition to a mixed use environment, tree planting is recommended at the rate of 1 tree per 250m^2 of site area.

Trees are an important component in changing the physical environment from its current basic functional state suitable for industrial use, to a more typical city environment which supports a range of uses, further supporting emissions reduction and mitigating the impacts of climate change.

Trees provide many benefits including:

- Provide shade in summer
- Remove pollutants from air and water
- Contribute to a more walkable, liveable and sustainable city
- Create greener, vibrant and more enjoyable neighbourhoods
- Improve urban ecology and help mitigate climate change

- Provide engaging community, recreational and social spaces[31].

Trees require a certain minimum area to be able to flourish, both for roots and the canopy.

Whilst roots can extend under hard paving, they do need access to aeration and water, and require a minimum area for this and an appropriate soil medium to thrive. An area of 1.5m x 1.5m is generally enough for small and medium trees, but medium to large scale trees, which will have the most impact in these areas, require a greater area, and as such the full 3m is proposed to allow for this and to assist with under planting.

To flourish and achieve maturity, a small to medium tree of the scale intended should be planted in an area where it has enough space to grow. In practice, the minimum area is 4m x 4m, which will allow the canopy of a small canopy tree, or a small columnar tree.

4.5.2 Location and Management of Car Parking

Proposed controls:

Zone	Operative Plan	Recommendations
Central City Mixed Use Zone	Outdoor Storage or Servicing to be behind the principle building and screened by 1.8m high landscaping or a fence.	Outdoor Storage, Servicing and Parking to be behind the principle building and screened by 1.8m high landscaping or a fence.
Central City Mixed Use Zone (South Frame)		
Mixed Use Zone	Outdoor Storage or Servicing to be screened by 1.8m high landscaping or a fence.	

Benefits of proposed controls:

- Increased environmental quality for people living, working and passing through the areas.
- Supports transition of mixed-use areas from industrial zones to a high quality living environment.

Discussion

If car parking is located in the front of the site it disrupts the relationship between the building and the street by creating areas of hard surface, and dominating views of the building, and reducing the potential for activation and overlooking from a building to the public space of the street. Whilst frontage landscaping can assist in improving its appearance, its purpose is to disguise and mitigate the parking activity taking place on the site, and can result in less safe areas for users of the site and the street. Even if well landscaped, large areas of parking do not create a lively and engaging street scene.

As with commercial or industrial sites, car parking does not create a positive threshold for residential development, and would not provide an effective semi private transition, or provide amenity, to the public space of the street. Whilst in residential areas, some visible parking is characteristic, this is in

[31] Christchurch City Council Urban Forest Plan

the context of the much higher levels of general amenity and is usually offset by higher levels of planting overall.

To improve the amenity, safety and activation of the street in the mixed use areas, car parking should be well integrated within the site layout, and located to the side or rear of the primary buildings on the site, or be accessed via a rear laneway. It is recommended that rule and accompanying assessment matter restrict parking to behind the front building line (if external) and so that it does not occur in the front 10m of the building (if internal)

4.6 Wind

Proposed Control

Zone	Operative Plan	Recommendations
City Centre Zone	Assessment matter	For buildings greater than 30m in height: Buildings shall not result in cumulative wind speeds within 100m of the building for more than 5% of the year greater than: 4m/s on footpaths or public spaces; 6ms/ on carriageways; and additionally shall not result in wind speeds exceeding 15m/s for more than 0.3% of the year.

Benefits of the proposed control:

The proposed control would ensure maintenance of the comfort and safety of public space.

Discussion

Various scales for the assessment of wind exist, with broadly similar outputs. The London LDDA scale has been used for Christchurch wind modelling as recommended by Meteorological Solutions[32], as a basis for assessment of wind impacts. It categorises places as suitable for various activities depending on the average speed of the wind, for a certain period of time (refer to diagrams below)

At present, the wind speed in the public spaces and footpaths of the city indicates that they would mostly fall into either the "occasional sitting" (4m/s) or "standing" (6m/s) categories. This acknowledges that there is a background wind in the city, but that the city centre is usable (and pleasant) most of the time.

A 4m/s wind speed cannot be obtained over the whole city, but as much as possible the conditions on these spaces should be maintained and faster 6m/s winds be channelled into the road. The assessment should show that the current conditions should be maintained.

[32] ibid

A 5% incidence has been used in Ōtautahi Christchurch (as opposed to a 2% incidence sometimes used) to acknowledge that strong winds blow for much of the time in the city.

A Gust Equivalent Mean measurement has been used for wind speed, rather than an average. This is a calculated value based on the gust speed (which is more determinative of environmental comfort than a raw average).

The scale also includes dangerous winds which might blow for short periods of time but could have serious consequences. These sometimes occur even where the 5% wind speed is within the acceptable threshold. It is also recommended that these are managed in the assessment (so that they do not occur).

Some areas (notably Cathedral Square) do not at present have the level of wind comfort that would be desired, but this can change over time. For instance the Square may be more sheltered by buildings in time, and as more trees are planted, which is an effective way to mitigate the impact of wind at ground level.

The London LDDC standard for existing building scenario, added 30 m buildings, and added 90 m buildings (using maximum of mean and GEM wind speeds)

A	2.5 m/s	< 5%	Frequent Sitting
B	4 m/s	< 5%	Occasional Sitting
C	6 m/s	< 5%	Standing
D	8 m/s	< 5%	Walking
E	8 m/s	> 5%	Uncomfortable
S	15 m/s	> 0.022%	Unsafe

Figure 38: Wind Modelling shows existing conditions at the Hereford Street / Colombo Street intersection (top); and the potential impact of a 30m or 90m building at the north west corner.

4.7 Use of Assessment Matters

Bulk and location standards are widely used in planning because they are easy to understand and provide greater certainty than assessment matters as to the outcomes anticipated. Bulk and location standards can be used to shape development, providing triggers for further assessment. However they are not be absolute limits on the amount or form of development. Relying purely on bulk and location requirements for buildings rarely creates the best overall outcome. Every design scenario cannot be anticipated for every site, for example irregular shaped sites could have significantly reduced development envelopes under some circumstances.

Assessment matters provide the opportunity for greater recognition of the context and nuance that might be applied to individual developments. Further they provide the ability to add more specific design intention that can further mitigate building bulk, or address specific design issues.

4.7.1 High-rise Buildings in the Central City

The use of built form standards has been discussed in earlier sections of this report to manage building height. The building envelope provisions suggested for the various zones are aimed at managing the fundamentals of the building mass and form so that more detailed design matters should be simple to address.

However, standards to define a building envelope are a relatively crude mechanism to apply in isolation and would not in itself be enough to ensure that high quality design, commensurate with that expected for the central city environment, is achieved.

Proposed Provisions

Use of a combination of building envelope standards and assessment matters to manage the visual impacts of high-rise building and effects on the public realm.

Benefits of the Proposed Provisions

The following benefits of the combined approach of building envelope standards (discussed earlier within this report) and assessment matters:

- Provide for a complementary transition between the low to mid-rise buildings and high rise buildings through the use of the street wall height in combination with more considered approach to the design detail that impacts on the quality and use of the street.
- Diminishes the impact of the high-rise towers through the use of setbacks, and design elements which reduce the visual bulk of the buildings.
- Consistent road wall height reinforces the relationship and scale of building with the public space of the street.

Discussion

The operative District Plan includes some assessment matters for the design of buildings. However, high-rise buildings are more widely visible in the city-scape, as well as having the potential for more intense impacts locally. Because of this, they require more careful management via design controls.

An alternative is the application of building envelope standards alone. This provides a far greater degree of certainty for the developer i.e. only a quantitative assessment applies, but not to the community in regard to the quality of the outcome.

In respect to both however, quantitative standards alone do not provide the flexibility for the developer either, such that building envelope standards can be challenged or trade-offs applied if better design outcomes are achieved through the design quality proposed. However, there is also the risk that designers attempt to manage effects through superficial means such as sacrificial windows or shallow façade treatment, rather than creating a functional building that works with its setting.

As such to provide both certainty, and the design quality that retains architectural integrity, assessment matters should address the following:

1. For visual impacts, ensuring that:
    - Through the use of the street wall, high rise buildings complement low and mid-rise building. The street wall should be the primary visual element of the building when seen from street level. Building elements that comprise the street wall should be well-designed and contribute to the comfort, vitality and interest within the street.
    - Bulk above the street wall is well managed, potentially through conventional architectural means like glazing, modulation and articulation, applied such that it reduces the impact of the scale of the building.
    - The building considered as a whole has been designed to contribute visual interest.
    - The impacts of rooftop plant and servicing are well-managed so that they are integrated into the roof-form as a whole and are not prominent when seen from the ground or at a distance.
2. To manage impacts on the public realm:
    - That important public spaces (e.g. the Otākaro Avon River, Cathedral Square) are not shaded by high-rise buildings, individually or cumulatively and that there is some access to sunlight at street level.

4.8 Residential Activities

The Plan Change proposes an increase in the amount of residential activity that can take place in the commercial areas due to the additional height and density proposed. As a result, some changes are recommended that will apply across the commercial zones, relating to increased residential use in those areas and based on the MDRS.

The Mixed Use zones are former industrial zones where residential activities have been permitted, but the area does not support a good quality environment that could be described as well functioning. The most significant impact of the NPS UD changes in the mixed-use zones is likely to be the opportunity to develop more intensive residential buildings. Section 3.4.4 notes that there are issues with the quality of residential developments currently being built in the mixed-use zones and describes the need to transition the environment to one that supports residential activity.

The proposed changes to residential development in the commercial areas are as follows:

- Some amended built form standards in Commercial zones, aimed at providing a consistent framework for development, in accordance with the level of density permitted
- Changes to built form standards in the mixed-use zones, in combination with restricted discretionary assessment larger developments (more than 3 units). These are intended to

contribute to the transition of these areas from a utilitarian industrial environment to one that supports a mix of uses including residential.

- A new assessment framework for comprehensive development in some areas currently zoned for industrial use.

4.8.1 Built Form Standards – All Commercial Zones

Proposed controls:

Zone	Operative Plan	Recommendations
City Centre Zone Town Centre Zone Neighbourhood Centre Zone Local Centre Zone Central City Mixed Use Zone Central City Mixed Use Zone (South Frame) Mixed Use Zone	3m setbacks for windows and balconies. Minimum balcony sizes as follows: CCB: 5m^2 balcony, of total outdoor living space of 10m^2 CCCMU and SF: 10m^2 balcony of 20m^2 in total. Suburban Centres: 6/10/15m^2 (1/2/3 bedrooms)	Glazing: 20% per floor for facades facing a street Outlook spaces: 4m*4m for living rooms, 3m*3m for bedrooms Minimum Balcony Sizes and dimensions: City Centre: 8m^2 balcony, of total outdoor living space of 10m^2; Mixed Use Zones: 8m^2 balcony, of total outdoor living space of 20m^2; Suburban centres: 8/10/15m^2 (1/2/3 bedrooms)

Benefits of proposed controls:

- Ensure a good standard of indoor and outdoor living environments for residents
- Provide some passive surveillance to centres to contribute to a sense of safety for potential residents and passers-by.

Discussion

Three built form standards are proposed across the commercial zone and missed use zones. These are aimed at managing the potential for increased residential activity in the areas, as well as achieving a degree of standardisation across the zones. These are discussed below:

A Glazing

The MDRS specifies a minimum 20% glazing for facades facing a street. This would be expected to achieve both a level of surveillance across a neighbourhood and some visual interest in the front façade. The expectation for residential in commercial areas is that it be applied to each storey of the building, rather than across the whole façade. This is to:

- support external design attributes such as visual interest across the facade.
- ensure passive surveillance from upper floors.

The intent for glazing would not be achieved if, for instance, it was provided only at the ground floor through shop display windows.

Passive surveillance is especially important in a commercial centre, and particularly adjacent to public or shared space. These areas are where crime is concentrated, because they provide increased opportunities for it. Whilst having more people living in the centre is beneficial, the need for good oversight is an important component of making a centre feel safe for residents, especially at night. Ensuring that glazing is provided on all levels increases the length of time a space is likely to be overlooked, as well as the number of eyes on the street.

B Outlook Spaces

The provision of good sunlight and daylight access is an important part of ensuring that housing has a high level of internal amenity. Outlook spaces are proposed as follows:

- 4m x 4m for living rooms (the same as the MDRS)
- 3m x 3m for bedrooms (MDRS requires a 1m x 1m space)

The equivalent MDRS provisions are 4m x 4m for living rooms and 1m x 1m space for bedrooms whilst the Operative district plan requires a 3m boundary setback for windows and balconies.

The MDRS provisions were developed in the context that they would apply to housing with relatively low heights in relatively lower density zones i.e. suburban rather than urban areas. The living room outlook spaces of 4m x 4m for living rooms would provide a basic level of light access for occupiers, even in commercial areas where shared amenity and outlook will be limited. However, the 1m x 1m bedroom outlook will not be effective because there is a risk that windows would be almost entirely built out in a future environment by buildings with high site coverage and zero setbacks. It is for this reason that an outlook space of 3m x 3m is proposed for bedrooms.

The Sydney and Melbourne studies[33] both highlight poor access to light in commercial areas as a particular concern regarding the living environments created in the city centre, citing significantly compromised residential amenity.

Although there has been little development of mixed-use buildings in other commercial zones, the same conditions exist in these areas as in the central city, especially in the Town Centre zone, which have the potential for more height. These areas also have a lower standard of general amenity than the residential zone, in part due to the general environment and in part due to lower amenity requirements for site development. Residents are consequently more reliant on internal amenity. As well as the benefits of standardisation, there are good amenity reasons to ensure that a reasonable level of outlook is provided in these areas.

C Balcony Size and Dimensions

The MDRS specifies a minimum dimension of 1.8m for balconies, with a minimum size of $8m^2$. This is a sufficiently wide dimension to be usable for everyday needs but is not generous. In commercial areas, it is proposed to maintain this size, with the following exceptions:

[33] City of Sydney, 2016 *Erection of Tall Buildings in Central Sydney*
[33] Hodyl and Co, 2016 *Central City Built Form Review: Synthesis Report* (Melbourne City Council)

- In the suburban centre zones, larger balconies are required for larger apartments, for instance a 3 bed apartment requires 15m^2. This takes into account occupancy and is necessary because there is not always good amenity in these areas.
- In the City Centre zone, 10m^2 is proposed as a minimum for outdoor living space, with the option for 2m^2 to be provided communally. The 2m^2 additional area (above the standard 8m2) means that larger developments may provide ground floor communal areas which provide space for trees and larger planting as well as more variety.
- In the mixed use zones, the balance of 20m^2 is expected to be provided as communal space, with 8m^2 provided as a balcony. This will provide a high level of general amenity in these developments and is discussed in detail below.

4.8.2 Built Form Standards – Central City Mixed-Use Zones (Residential Activity)

Proposed Controls

Zone	Operative Plan	Recommendations
Central City Mixed Use Zone	Maximum Fencing Height: 2m (if at least 50% transparent) or 1.2m (otherwise) Minimum ground floor outdoor living space 20m^2	Front Setback: 3m Max Fencing Height:1m for 50% of frontage; 1.5m or 1.8m for remainder Outdoor Living Space location (not in the front setback if on ground floor) Minimum size of outdoor living spaces: 20m^2 (4m dimension on the ground floor) Site Coverage: 50% Minimum Side Setbacks: 4m; except for side boundaries within 21m of a street boundary (0m minimum setback)
Central City Mixed Use Zone (South Frame)	Maximum Fencing Height: 2m (if at least 50% transparent) or 1.2m (otherwise) Minimum ground floor outdoor living space 10m^2	

Benefits of Proposed Controls

- Reinforce the street edge and contribute to the amenity and safety of the street, while lessening the impacts of high-rise building
- Ensure passive surveillance of the street to provide for a safe pedestrian environment
- Ensure engagement with and activation of the street, and greater consideration of the quality and safety of shared access for residents
- Ensure a good standard of indoor and outdoor living environments for resident

- Offset reverse sensitivity impacts of adjacent industrial activity
- Diminishes the impact of the high-rise towers through the use of setbacks, and design elements which reduce the visual bulk of the buildings
- Consistent road wall height reinforces the relationship and scale of building with the public space of the street
- Balance the extent of building on the site to the provision of open space to reduce the impacts of building dominance and ensure outlook and access to sunlight and daylight.

Discussion

A combination of new built form standards are intended to manage both reverse sensitivity impacts of the transitioning zones from industrial to residential use, while contributing positively to a higher amenity and safer public and private spaces. In addition a degree of standardisation is proposed to ensure consistency across all residential activity in terms of outlook and private outdoor living space.

Frontage Treatments

In common with other zones, the design outcomes research[34] identified that the street front for mixed-use developments was sometimes poor quality, due to prominent fencing and a low level of glazing; or creating issues with privacy for residents.

Where the Mixed Use zones differ from residential zones is the low quality of street environment, with wide and busy roads, few street trees and a more vehicle dominated environment typical for a former industrial zone. This street environment is reinforced by industrial type buildings, car parking and signage, which do not create an interesting or engaging street scene, and overall the environment is harsh.

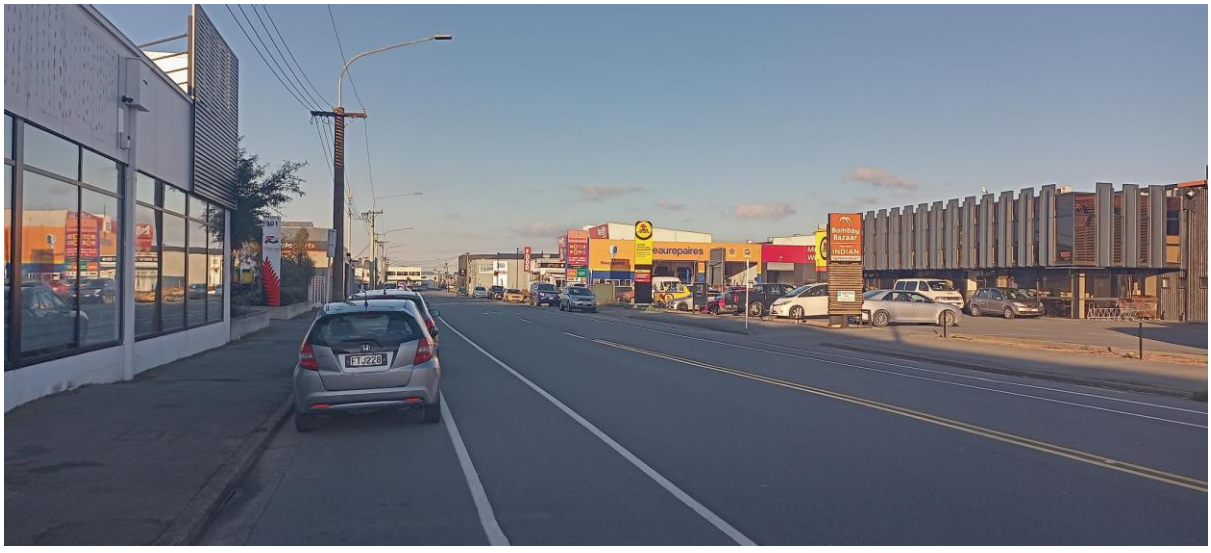


Figure 39: The CCMU zone has little amenity within the public space of the street.

In order to manage the impacts of this environment, the frontage of residential developments is especially important. Good treatment of the frontage will reduce the impact on residents and help

[34] Christchurch City Council (2020) *Medium and High Density Housing in Christchurch Urban Design Review*

to transition the areas over time so that they are more consistent with a good residential environment.

The need for this stems from the increased presence of people in the area, as well as the impact on residents in their homes.

Front Setbacks

A key aspect of this process is that there should be some space for trees to grow in the front setbacks. Trees will soften the appearance of the street in general as well as providing for some visual richness and access to nature. They are an effective way to manage the transition from the very basic attributes of the present environment to one that supports a resident population.

In order to support tree growth, a setback of 3m is needed to allow for a degree of canopy spread, without causing nuisance to residents. This would be sufficient to allow a medium size tree with a 6m wide canopy to be planted behind the boundary and to spread to the front wall of the house. Whilst trees are often planted in 2m setbacks in residential areas, there is a risk that they will interfere with the house which may lead to them being removed or reduced because there is not enough room for them to reach a natural shape. The larger setback will also provide more separation between the house and the street which will allow for more privacy within the houses.

Whilst Council could plant more street trees (and may do so in some areas) in practice it is constrained by the cost of doing so in an existing street, and competition for space from underground servicing. Relocating kerbs to provide space for tree-pits and planting is also an expensive process. Whilst Council may be able to fund a street upgrade program, it has not done so and to upgrade all the streets in the various mixed-use areas would be prohibitively expensive. The only realistic way to provide a street environment appropriate to residential use is to ensure that it is provided onsite at the time of redevelopment.

Fencing

Fencing blocks views to housing and landscaping and would reinforce the harsh appearance of the street. Tall front fencing is also associated with higher rates of crime because it aids concealment, as well as reducing street surveillance.

The current fencing rules in the CCMUZ allow fences to 2m high with 50% transparency. In the Design Outcomes Research[35] this rule was found to be problematic because the transparent fencing was often screened, for occupants' privacy. For the residential zone, a new proposed approach allows for solid fencing for half the width of the site (excluding access), with the rest of the site to be open or low fencing.

[35] Christchurch City Council (2020) *Medium and High Density Housing in Christchurch Urban Design Review*

Figure 40: Open frontage with fenced outdoor living space to the side.

Location of Outdoor Living Space

The location of outdoor living space in front of housing adjacent to the street creates a conflict with the creation of an open and interesting streetscene, because of the strong desire of residents for privacy in these spaces. This encourages the screening of frontages, which is widely seen around the city.

In the mixed-use zones, with the lack of amenity and hard physical environment, these spaces are needed to create a transition between the public realm and the residential activities as well as to contribute to the improvement of the street environment over time. The use of the space for outdoor living conflicts with this purpose.

Outdoor living space is sometimes placed at the street front but it is not usually essential that it is. The mixed-use zones generally have the advantage of wider sites than found in residential zones, with more flexibility in site planning. Whilst there can be advantages to placing outdoor living space at the front of the site in terms of solar access for sites south of the street, it can also often be located at the side of units. There is also often a price to be paid in terms of privacy and noise in mixed-use areas, which means that the front of the site is not a particularly pleasant environment for residents.

There is also a risk that with a 3m front setback, this will be used for outdoor living regardless of orientation, leading to outdoor living spaces on the south boundary next to a busy street with no privacy. This will not achieve the intent of higher quality street frontages.

Size of Outdoor Living Spaces

20m^2 of outdoor living space is currently required for each residential unit. This can be provided half as a private balcony, regardless of whether it is above ground, and half as a communal space. This is inconsistent with the rest of the plan and the MDRS where a larger space is required on the ground

floor. In practice it has led to situations where the only outdoor space provided is a small setback next to the carpark. This is a very low standard of provision.

Figure 41: These units have outdoor living spaces in front that comply with current CCMU requirements but are not very usable and lack privacy and amenity.

Current residential zones in Christchurch require a 4m dimension outdoor living space if provided on the ground floor. This helps to allow for some separation between dwellings and helps to create space for solar access. It also allows for planting around the edges of the space – a typical usable area for a patio is 3m x 3m which allows for a dining table and circulation.

The MDRS requires a dimension of 3m. Whilst this allows for a patio, it does not allow for good light access where there are taller buildings such as those expected in the mixed-use zones.

Unlike residential zones, there are no recession planes in the mixed-use zones. A 4m dimension of outdoor living space would to some extent make up for this by providing outlook and sun access through the individual site layout. It would also provide for a better quality, more usable space.

Figure 42: A 4m wide outdoor living space allows room for a patio and some narrow planting strips.

It is currently standard practice in consent processing to allow for some of the outdoor living space to be provided as a communal space, usually the excess area once the minimum dimension has been applied[36]. It is recommended that this rule is retained for private upper floor balconies. The cumulative area of additional outdoor living space for larger buildings can create a high quality shared space.

If a large development occurs, then some shared amenity on the site makes a strong contribution to the quality of development, for example by created a "third space" – a semi-public area for residents which creates a transition between the home and the exterior. This would result in many of the qualities of a residential environment but in microcosm (on the site rather than the neighbourhood), and would offset the visually harsh nature of the setting (generally dominated by hard surface).

There is only a 10% landscape requirement proposed for the zone, which includes residential units. In the case of residential developments the landscaping provided should be around communal areas, for example it may be located in front setback areas and in association with driveways. This means that it should be in addition to that of private areas such as outdoor living spaces). The purpose of the (relatively small) landscape requirement is to ensure public and communal amenity, as for any site in the zone. Many residents will also choose to landscape private areas, but these are not necessarily visible from the public realm and therefore are not contributing to the wider amenity of the development or the area to the same extent as more visible landscaping.

[36] See for instance rule 14.5.2.5 in the Christchurch District Plan

Site Coverage

For developments that are predominantly residential, a site coverage limit of 50% is proposed. This would match that within the High Density Residential zone.

A site coverage limit ensures that there will be some separation between buildings somewhere on the site, potential space for planting and views of the sky. A high quality of residential dwelling does require that there is some access to the sun which can only be provided by openness around the building. This is somewhat different to a commercial or industrial building where larger floorplates with reduced access to the sun are more accepted.

Moderate site coverage will also help to manage the dominance of built form across a site and neighbourhood. It also helps to manage overlooking and maintain space on the site for other uses, such and outdoor living and servicing. These matters are important components of a residential living environment.

Increases in site coverage can often result in compromises in the allocation of space at ground level. There is competition for space for parking, servicing, landscaping, outdoor living and for living space. This can result in ground floor spaces that are unsafe and unpleasant, for example with narrow passageways and entrapment spaces, or dominated by vehicle infrastructure and servicing. Often the root cause of these issues is the amount of development on the site rather than any particular design or site layout issue.

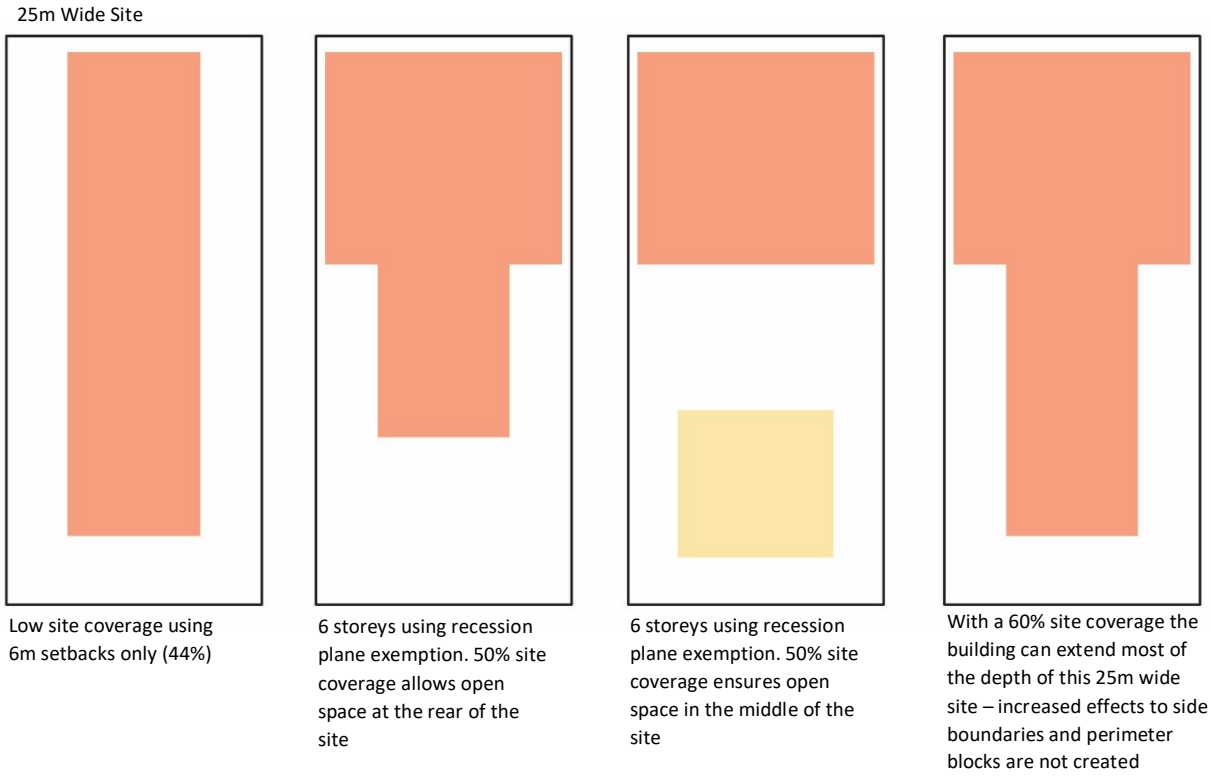


Figure 43: Limiting site coverage on a wider site to 50% ensures there is some openness within and around the site. The recession plane exemption encourages this to be at the rear of the site and the two rules together facilitate perimeter block development.

The absence of site coverage in the Mixed Use zones is to allow for flexibility for non-residential uses. These uses include commercial activities with larger floorplates, such as showrooms, and are derived from the previous industrial use of the site. Whilst it is intended that these uses continue to operate in the zone, there is also an intention to provide for a high quality living environment over time. As a result it is only recommended that site coverage limits apply to predominantly residential developments.

Including a site coverage limit is consistent with the concept of providing for a perimeter block style of development because it encourages development to the front of the site (to take advantage of where the footprint is most efficiently deployed). It is also a way to manage the quality of residential developments whilst not impacting on the commercial development potential of a site. It assists with the transition to a more high quality environment in general, with high density residential characteristics.

Side Setbacks

As described above, residential development requires a degree of space and separation. This is most easily achieved by ensuring building separation at the boundaries in the form of a conventional setback. A 4m setback for ground floor buildings is consistent with other proposed rules (outlook spaces) and allows for a moderate amount of light penetration and some direct sunlight into the space at least some of the year. It also benefits neighbouring sites and will assist in transitioning to a higher quality environment.

Section 3.1.2 discusses the advantages of different development layouts and the advantages of perimeter block typologies. In order to enable this form of building, it is recommended that:

- building setbacks do not apply to the front 21m of the site (to allow 18m of building depth on the boundary)
- residential buildings can be attached to neighbours in this zone.

Above the road wall height level, 15m in the Mixed Use zone and 17m in the Central City zones, a larger 6m setback is proposed. This is in recognition that higher levels will create increased enclosure and obstruct sun access, and have the potential to create privacy impacts on neighbours.

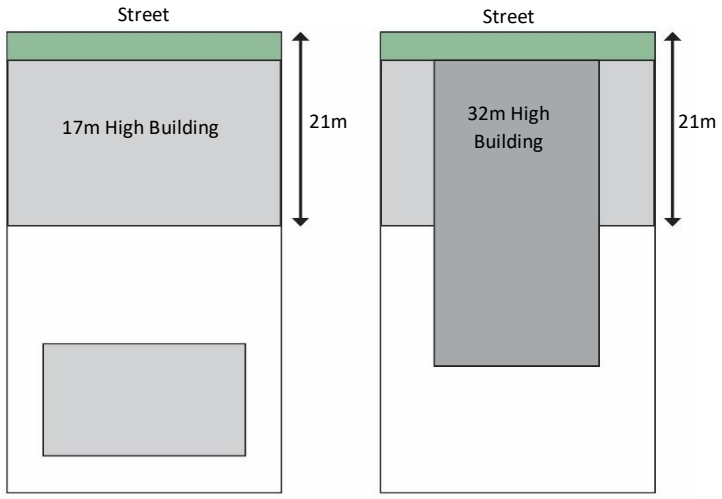


Figure 44: Building footprint on a mixed use site showing coverage of different building levels.

4.8.3 Mixed Use Zones – Inclusion of Residential Design Principles

The Design Outcomes Research[37] shows a clear link between the quality of outcomes for multi-unit complexes and whether or not an urban design assessment was carried out, both across zones (with the different rules in place) and time.

In order to improve outcomes it is recommended that urban design assessment is included for larger developments of more than 3 residential units in the mixed-use zones. Urban design assessment allows for a holistic view to be taken of a development rather than reliance on a set of criteria that can struggle to deliver outcomes given the wide set of circumstances which must be anticipated. This is particularly the case in a mixed-use environment where the surrounding form and land-use is not predictable.

As well as being consistent with other zones, an allowance for 3 units would allow for ancillary residential use, for example a caretakers (or owners) flat at an industrial premises.

The Residential Design Principles are a well-established and comprehensive set of assessment matters that are used in the operative District Plan. They appear well understood, albeit have some areas where their intent can be tightened, but have been demonstrated to achieve a satisfactory standard of urban design and residential amenity.

Proposed Provisions

The retention of a refined set of Residential Design Principles.

Benefits of the Proposed Provisions

- Standardised approach to the assessment of multi-unit residential development in the city.
- At least satisfactory residential design outcomes achieved.

Discussion

The Design Outcomes Research[38] noted that there were variable outcomes in the Commercial Central City Mixed Use zone sample. These outcomes are related to the low level of regulation in the zone, which does not require good outcomes, as well as being a result of some of the issues created by the harsher general environment (which encourages inward facing development). These issues are addressed in the design principles, which are aimed at ensuring a well-rounded consideration of the development in its context. The recommendation of the Design Outcomes Research[39] was that the Residential Design Principles be applied for residential development more generally, and in particular in the Mixed Use Zones.

At present, the only exception to the use of the design principles would be the City Centre zone. The reasons for this are:

- There is less evidence that the assessment framework is resulting in poor outcomes. The Design Outcomes Research was not undertaken in that zone, principally because there were no recent large scale developments completed at the time of the research. Of the three large developments completed since the research was undertaken, the typologies are

[37] Christchurch City Council (2020) *Medium and High Density Housing in Christchurch Urban Design Review*
[38] ibid
[39] ibid

different to those in other zones and the findings of the report may not be relevant to the City Centre Zone.

- The risk of poor outcomes is considered to be lower in the City Centre zone. There is already (and will continue to be) assessment of the built form via the urban design assessment matters. This includes a requirement for an active street scape with residential not generally permitted on the ground floor fronting the street. The higher standard of public amenity in the City Centre means that there is always high quality open space within a short distance.

4.8.4 Comprehensive Housing Development

The provision of standards and assessment matters to provide for future focussed comprehensive housing development as the predominantly industrial area on the southern and eastern fringe of the central city transitions to residential use.

Proposed Provisions

A comprehensive package that includes a combination of built form standards.

Zone	Operative Plan	Recommendations
Mixed Use Zone (Comprehensive Housing Precinct)	Nil	• 20m height limit • Min. site size 2000m^2 • Min 25m street boundary width • Min 4 storeys and 25% building footprint and 50% of street frontage is apartments • Max car parking ratio of 0.25/unit • 10m wide pedestrian access requirements • Additional standards related to glazing, outlook and open space • Application of the Residential Design Principles.

Benefits of the Proposed Provisions

- Reduction in the potential for reverse sensitivity effects from adjacent industrial uses.
- Provision of on-site amenity commensurate with expectations across other commercial and residential zone.
- Provision of well-connected future focused low, emissions neighbourhoods.
- Certainty in the development envelope.

Discussion

The discussion in Section 3.4 outlines the opportunities, and difficulties, in the transition through redevelopment, of the industrial areas to residential use around the fringes of the central city, more specifically including areas of Charleston, Sydenham and Addington. The conclusion was that far greater management is required to effectively achieve this given the existing environmental

constraints of these areas. The intent of the transition is from largely low grade industrial use to high quality, safe and attractive low emissions residential neighbourhoods.

In response, Council has carried out an analysis[40] of how to best manage new residential development. The report recognises:

- The industrial nature of the areas and the potential reverse sensitivities that may occur when providing for residential activity. As such it is recognised that small scale piecemeal redevelopment of sites is unlikely to manage these effects and deliver high density, high quality outcomes.
- The need to reduce the necessity to borrow amenity from side or rear boundaries, given these industrial areas typically include buildings built right to the boundary, and an absence of trees and landscaping.
- The policy direction to reduce greenhouse gas emissions including through small-scale building reuse, innovative forms of residential living, and more walkable neighbourhoods, which includes increasing permeability for active transport.
- The advantages of maintaining consistency with other zones, specifically through using the Residential Design Principles where possible.
- The importance of the provision of large scale open space in environments that are not currently well served by public open space, or which is not easily and safely accessed given the quality of the industrial street environment.
- The opportunity that is provided by such a large area of transition to residential use and therefore the need to maximise that opportunity through the use of minimum heights and efficient development types.

A comprehensive approach is a key part of this transition as it ensures that sites will be large enough to achieve an appropriate level of amenity on-site, without relying on levels of neighbourhood and public realm amenity which will not be present in the short term at least. The minimum size and dimension are critical to achieving this. Further to the above matters, the report recommends[41]:

A series of built-form standards to codify recommendations into the District Plan. Similar built form standards to the Central City Mixed Use Zones to manage issues such as outlook and passive surveillance. This includes:

- Glazing
- Outdoor Living Space of 20m, not to be located in front of the unit.
- The street interface to be managed by a 3m landscape setback and perimeter blocks enabled through zero side setbacks at the front of the site.
- Internal setbacks otherwise of 4m.

This approach is aimed at shaping the form of development in the industrial areas in recognition of the current state of the environment and the achievement of a future high quality residential environment.

As with other areas, built form standards will set a baseline for development on the site, with assessment matters to establish the layout functions as intended. The site size and dimensions

[40] Plan Change 14 – Mixed Use Zone – Provisions Modelling Report, Christchurch City Council, July 2022
[41] ibid

proposed will ensure that suitable sites are assembled, although smaller sites can be considered through an assessment pathway.

The Residential Design Principles are a comprehensive framework for the assessment of residential development. As such they are proposed as the basis for assessment in this zone. However, given the different nature of the environment compare to a residential zone, some additional consideration is required. Specifically this is aimed at the intention to transition to a high density residential environment whilst managing the effects of the current industrial context.

It is also noted that the area is within the walkable catchment of the Central City, and provides a substantive opportunity to support initiatives that address climate change and housing choice. As such this is recognised through the further matters below.

Suggested additional matters should consider:

- The extent to which alternative forms of housing and / or a range of housing types and sizes, are provided, particularly mid to high rise apartments, that meet a diversity of future occupants' needs at the densities anticipated for the zone.
- Whether the development prioritises active and low carbon modes of transport for example by linking with existing and planned cycle routes, providing shared parking areas, plentiful secure bicycle and micro-mobility storage and EV charging facilities.
- Whether energy efficient, environmentally sustainable and low impact urban design initiatives are applied and used in the development.

5 Conclusion

The analysis in Section 2 considers the impact of increased development density, commercial and residential, across the Commercial Centre and Mixed Use zones of the city. The analysis particularly focusses on areas where the greatest level of change is expected: the introduction of high-rise buildings in the City Centre Zone; and, greater height and density in the Mixed Use Zones, including the opportunity for comprehensive housing development. The impact of additional height and density on other Commercial Centre Zones is also considered, although the degree of change in these areas is not as significant.

The analysis in Section 3 proposes a response to these issues in these zones, while recognising the strategic intent in respect to the city's urban form. The response proposed increases building height in the various zones, considers how buildings might be clustered to respond to the city context, but with it proposes a nuanced approach to achieve quality design outcomes. This includes the means to ensure the comfort and vibrancy of public space, through the application of assessment matters.

In all cases, the existing District Plan building envelope standards were used as a minimum from which more development is proposed to be enabled, than is currently provided for in the operative District Plan. Again this more directly applies to the City Centre and Mixed Use Zones. More modest increases are proposed in the suburban Commercial Centre Zones, which were already more consistent with the direction of the NPS UD.

Consideration has also been given to how the predominantly industrial area outside of the central city can transition to predominantly residential activity over time, to accommodate larger numbers of residents in a high quality environment.

Further changes are also suggested to create greater consistency across the commercial zones in respect to residential amenity, and more specifically outdoor living and outlook space, commensurate with that of the MDRS as a baseline.

Overall the intent of the proposal is to provide for more, high quality development in the commercial zones of the city, such that Ōtautahi Christchurch remains a well-functioning urban environment.

Proposed industrial land rezoning

Cost Benefit Analysis

Wednesday 20 July, 2022

SENSE PARTNERS
DATA LOGIC ACTION

Context

Sense Partners has been engaged to conduct a cost-benefit analysis (CBA) of a proposed plan change. This proposed plan change consists of changing inner-city land from industrial general (IG) zoning to mixed use (MU) zoning.

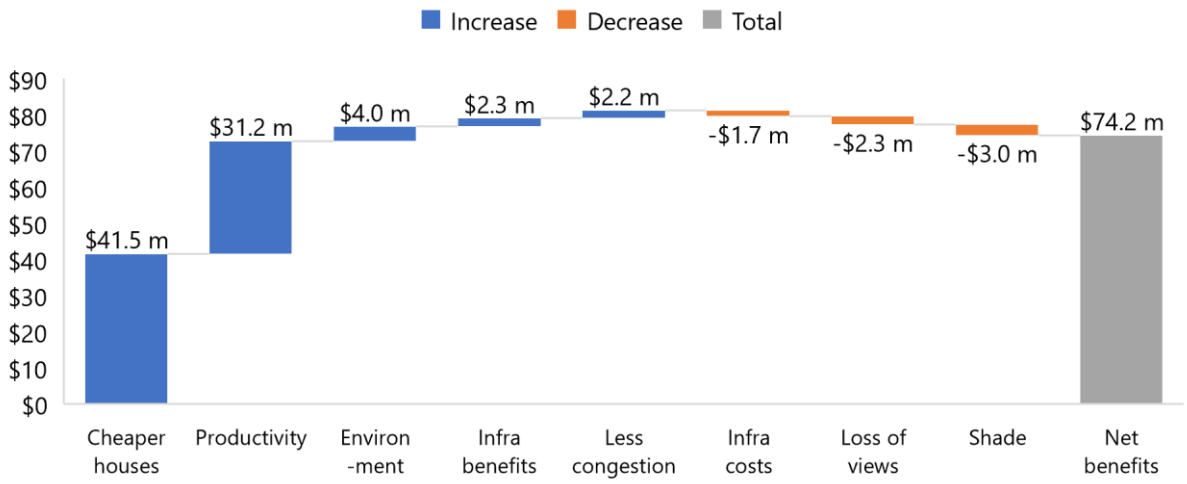
This report outlines the two proposed options, estimates the likely outcome of each option, and then compares these outcomes to infer the total net costs and benefits of the proposed changes.

Key points

Enabling medium density housing south of the city returns benefits that exceed costs

- Our central assessment suggests enabling medium density across a broad area south of Christchurch,[1] would enable 3,910 extra dwellings and return net benefits of $74.2 million dollars (see Figure 1) with a benefit-cost ratio of 11.65.
- Small but persistent returns to productivity improvements generate material benefits over time with smaller benefits to the environment, congestion, and infrastructure.
- Increasing housing supply lowers house prices, a little. More people can transact in the housing market at prices below their willingness to pay for a home. These extra transactions deliver benefits.
- But sales that would occur – regardless of the increase in housing supply – do not add benefits. This is because these sales are simply transfers between buyers and sellers of houses and net to zero. This is standard practice in CBA analysis.

Figure 1: Our analysis shows clear benefits from enabling medium density housing



Current land and house price trends suggest medium density will take time to develop

- We augment a simple development model with land and house prices trends and find the timing of likely medium density (4-6 stories) is likely to be 10-15 years away.
- Take up rates are also expected to be slow initially since other build types – including 1-3 storey townhouses – will return higher yields.
- Our base case suggests 3,910 additional dwellings in the study area – about one-third of the magnitude of extra dwellings suggested by the Medium Density Residential Standards Cost Benefit Analysis – in 15 years' time.
- This time to development reduces the present value of both benefits and costs to the zoning change.

[1] In this report, we define medium density as 4-6 storey dwellings.

- Using the 6 percent real interest rate recommended by New Zealand Treasury to discount future costs and benefits implies $1 million in 15 years is equivalent to a little about $417,265 in 2022.

Alternative policies and choices by non-market providers could increase pace of change

- It is perhaps not that surprising that the zone is unlikely to realise this form of housing for some years – the 4-6 storey format is not well catered for, not just within the zone but right across the city.
- It is not about commercial feasibility. While some types of the 4-6 storey format may not be commercial feasible today, we expect changes in land and construction costs to make the format feasible soon.
- But other build types – including 1-3 storey townhouses – are likely to continue to provide higher returns based on current trends in land and construction costs.
- Policy options to promote medium density could include mixed typologies where townhouses might cross-subsidise some apartments, if diversity of build type is important to council.
- Non-market providers, such as Kainga Ora, might be willing to take on short-term risk for longer-term rewards, could play a role in reducing risk for developers who may be unwilling to be the first to move to a new build typology.

Some outcomes are difficult to quantify but are encompassed by offsetting gains

- Some costs, that we leave unquantified, relate to the opportunity cost of using sites for residual housing purposes instead of industrial uses.
- Land price differentials show a more efficient land use is housing not industrial uses that are effectively receiving an implicit subsidy by not facing true rents.
- That subsidy helps provide more jobs in the study area. But unemployment is low, and it is likely that these jobs and businesses – including for example the significant areas of industrial land at Woolston and Middleton – will move to other locations in the city. This creates change for individual workers, Aggregate employment impacts are small.
- Increased commute time for these workers will be small relative to the commuting savings from allowing more residents to locate close to jobs in the city centre.

Outcomes are uncertain, so we consider a low and high case that also show net benefits

- There are many uncertainties when assessing future development over such a long period. Key uncertainties include the uptake rate, timing of development and cost of providing infrastructure.
- Table 1 shows a low, base and high case for the preferred policy option 2 and a less ambitious option 3 that retains some land for industrial purposes within the study area, return high net positive benefit-cost ratios.
- Our preferred based case returns net benefits of $74 million. Benefits tend to scale such that if fewer houses are realised, both benefits and costs decline, and the project remains a net positive proposition.

Table 1: Our analysis suggests material benefits from zoning changes

	Option 2			Option 3		
	Low	Base	High	Low	Base	High
Policy Impacts						
Extra people	2,976	4,887	4,887	992	1,629	1,629
Extra dwellings	2,380	3,910	3,910	794	1304	1304
House prices	-$15,484	-$25,438	-$25,438	-$5,166	-$8,484	-$8,484
Quantified Benefits						
Cheaper houses	$15,377,019	$41,502,259	$55,539,385	$1,711,539	$4,616,260	$6,177,597
Infra benefits	$1,382,235	$2,270,815	$2,879,059	$460,745	$756,938	$959,259
Less congestion	$1,344,388	$2,195,121	$2,812,461	$444,290	$728,964	$934,926
Environment	$2,455,113	$4,033,165	$5,165,144	$819,468	$1,344,388	$1,722,568
Productivity	$19,027,125	$31,172,693	$39,925,165	$6,315,498	$10,391,446	$13,307,962
Total benefits	$39,585,880	$81,174,052	$106,321,214	$9,751,540	$17,837,997	$23,102,312
Quantified Costs						
Infra costs	$1,005,411	$1,652,100	$2,093,977	$335,686	$551,249	$697,992
Loss of sun	$1,224,265	$3,016,234	$5,099,827	$408,088	$1,005,411	$1,699,515
Loss of views	$934,654	$2,300,434	$3,889,547	$311,003	$766,811	$1,296,089
Total	$3,164,331	$6,968,769	$11,083,351	$1,054,777	$2,323,471	$3,693,596
Summary						
Net benefits	$36,421,549	$74,205,284	$95,237,863	$8,696,763	$15,514,526	$19,408,715
Benefit-Cost ratio	12.51	11.65	9.59	9.25	7.68	6.25

Contents

Figures

Tables

1. Overview

1.1. Context

Objectives of the proposed plan change

Objective 2 of the National Policy Statement on Urban Development (NPS-UD) requires councils to support competitive land markets:

> "Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets."

And Objective 3a makes clear that district plans need to: "enable more people to live in, and more businesses and community services to be located in, areas of an urban environment… near a centre zone or other area with many employment opportunities".

Intensification of land use in and around commercial centres can help achieve these objectives. To this end, Christchurch City Council is assessing the current use of IG zoning in the vicinity south of the central city.

Where IG land is required to meet industrial demand, it can be exempted from intensification as a qualifying matter under the NPS-UD. An assessment of industrial land sufficiency in Christchurch has found that the supply of industrial land is sufficient to meet demand. There is in fact a significant surplus of industrial land within Christchurch (see Table 2). In addition, the only location specific demand for industrial land is at the port in Lyttleton.[2]

Table 2: There is ample industrial land to meet future demand
Industrial land sufficiency estimates

Christchurch City	Short term (3 years)	Medium Term (10 years)	Long Term (30 years)
Demand (ha)	18.4	35.7	119.2
Supply (ha)	499.8	601.5	601.5
Sufficiency (ha)	481.4	565.8	482.5

Source: Dyason (2022)

This means that much of the surplus IG land in Christchurch should consider whether to rezone the area to enable a higher density of residential activity.

[2] See Dyason 2022.

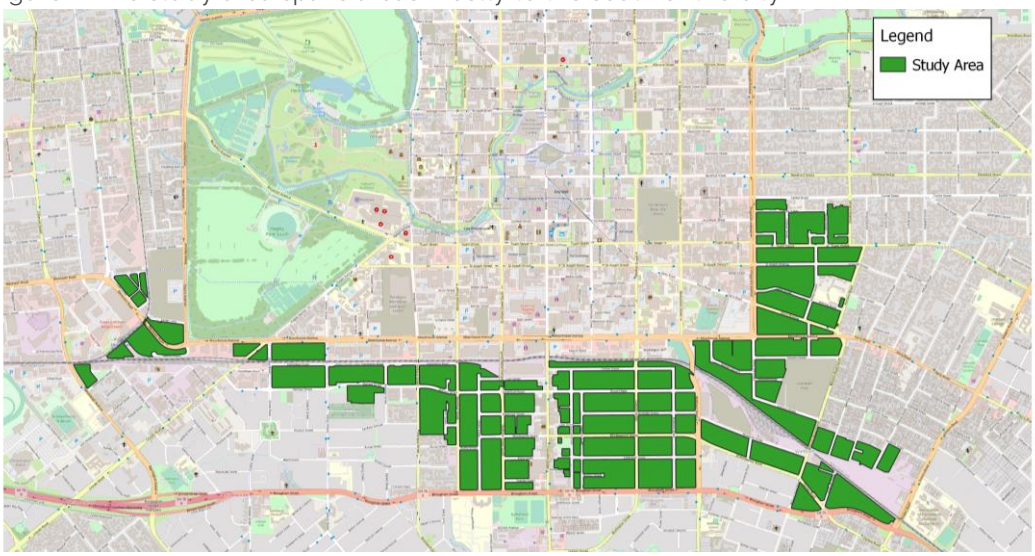
2. Scope

2.1. Study area

We focus on the suburbs covered by the industrial zoning

The study area covers the industrial zoning concentrated to the immediate south, and south-east of the city centre. The area extends south to Brougham Street, west to Whiteleigh Avenue, east to Ensors Road, and north to Cashel Street. Figure 2 below shows the study area, including the existing CMU zone at Addington.

Figure 2: The study area spans areas mostly to the south of the city



Source: Openstreetmap, Christchurch NZ

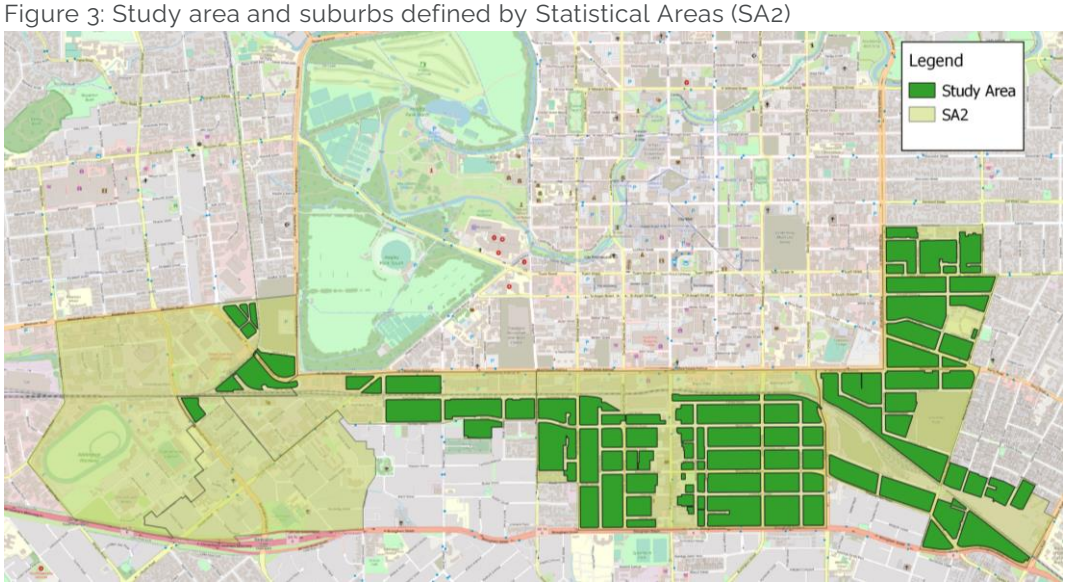
We use Statistics New Zealand's definition of suburbs – specifically Statistical Area 2 (SA2) – to show the characteristics of the study area. The study area has been aligned with five Statistics New Zealand suburbs areas or SA2s. These are listed in Table 3 below and depicted in Figure 3 overleaf.

Table 3: Study area and statistical areas (SA2) – SA2 References

Area	SA2 reference	Population (2021)	Workers (2021)
Lancaster Park	328800	280	4,000
Sydenham Central	328100	400	7,400
Addington North	326400	10	4,850
Addington West	326100	2,700	1,100
Tower Junction	325500	230	6,900

Source: Statistics New Zealand, Census data and Business demography data

Figure 3: Study area and suburbs defined by Statistical Areas (SA2)



Source: OpenStreetMap, Christchurch NZ, Statistics New Zealand

2.2. Options

Option 1: status quo

The first option is to retain the current industrial general (IG) zoning unaltered. This is the base case to which the alternatives will be compared to assess costs and benefits. There are many activities permitted in this zone which are also permitted activities in the Option 2 and Option 3 zoning. Table 4 below summarises the activities which are permitted in IG and are not permitted in option 2 –mixed use.

There are site-specific permitted activities which do not apply to IG zones more broadly. It is assumed that these site-specific settings will remain unaltered regardless of broader zoning. As such these are excluded from the analysis.

Table 4: Summary of permitted activities – Industrial General

Permitted activities	Specifics
Industrial activity	Includes manufacture, assembly, and repair. Excludes mining/quarrying, aggregates processing, and heavy industrial activity. The latter is anything likely to generate air emissions.
Community corrections facility	N/A
Ancillary activities	Some ancillary commercial and food and beverage outlets etc

Source: Christchurch City Council, Operative District Plan

Option 2: A full rezoning

The second option is to rezone the entire study area to mixed use (MUZ), enabling housing in across the entire study area. This is essentially the Commercial Mixed-Use Zoning in the operative district plan, with some proposed changes[3]. The permitted activities associated with MUZ are summarised in **Error! Reference source not found.** below. The MUZ zone is intended to allow a more permissive use of land. This includes retaining the option for industrial uses and introducing the option for residential activity.

The current CMU zoning includes allowances for industrial activities in specific locations. These are the CMU zone on Blenheim Road and Main South Road. It also includes allowances for residential activity in specific locations. These are the CMU zones in Addington, Mandeville Street, and New Brighton.

The current allowances for residential activity in the CMU zones are subject to several spatial and built form requirements. The plan change proposes to amend these to, unlike the operative plan, allow housing-only schemes.:

- permit (without resource consent) up to three units above another permitted activity only;
- enable (via a consent process), comprehensively designed residential development throughout the mixed-use zone.

Option 3: A partial rezoning

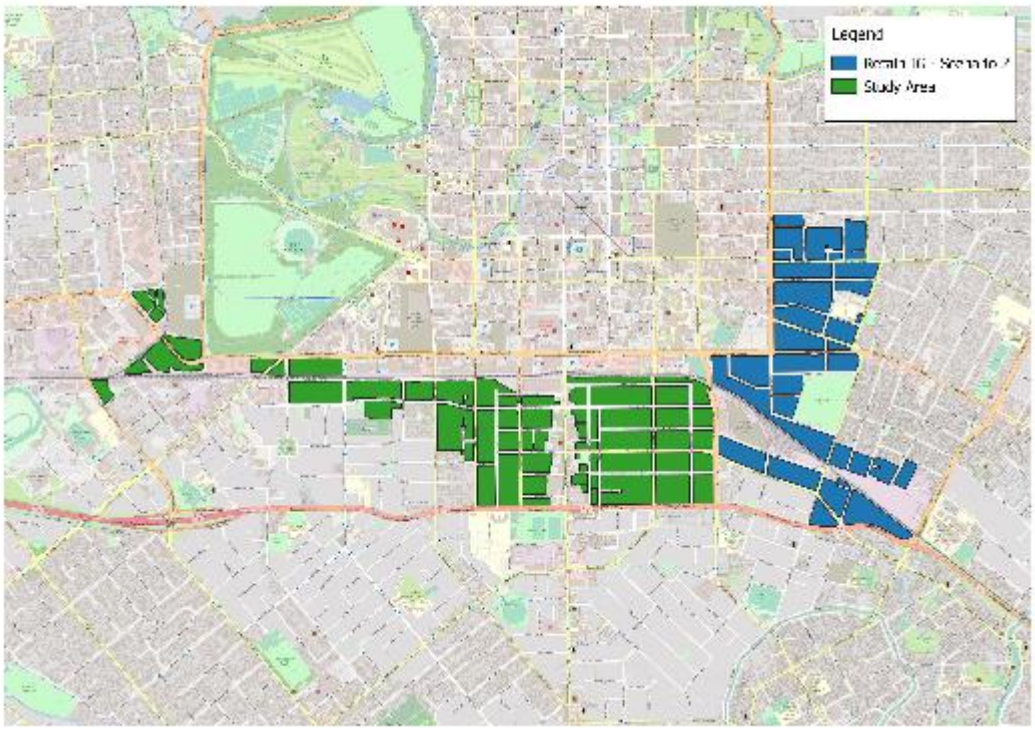
The third option is a hybrid of the first two options. This involves retaining the IG zoning in some areas and rezoning the rest to MUZ. There are two proposed areas for IG retention, with the intention only one is selected in the final option. These are shown in Figure 4 below.

- Scenario 1: retention of IG between Waltham Road and Hawdon Street.
- Scenario 2: retention of IG between Waltham Road and Ensors Road.

This option would retain the possibility for the allowance of residential activity in specified locations as in option 2. The exception may be allowing residential around Lancaster Park, which would remain IG under scenario 2.

[33] Council is proposing to change the name of the Zone from Commercial Mixed Use Zone to Mixed Use Zone to align with the standardized zone names in the National Planning Standards.

Figure 4: Partial IG retention options



Source: OpenStreetMap, Christchurch NZ

3. Options assessment

3.1. Summary

We assess benefits and costs relative to option one

We assess three core benefits and one primary cost for each of option 2 and 3. These benefits and costs are estimated relative to option 1, which is used as the base case or status quo.

There are other benefits and costs that could be associated with urban development. However, these are not assessed as they are considered either marginal or difficult to measure reliably.

Table 5: We restrict our analysis to core costs and benefits only

Qualitative assessment of key benefits and costs

Option	Benefit/cost	Relative magnitude
Option 2 (Full rezoning)	Benefit: housing supply increase	High
	Benefit: agglomeration benefits	High
	Benefit: reduced transport cost	High
	Cost: Infrastructure costs	Medium
Option 3 (Hybrid)	Benefit: housing supply increase	Medium
	Benefit: agglomeration benefits	Medium
	Benefit: reduced transport cost	Medium
	Cost: Infrastructure costs	Low

Source: Sense Partners

We use adjacent suburbs and the city centre as comparators

To understand the impact of the proposed changes, we compare the study area to other parts of Christchurch. We select two areas for comparison.

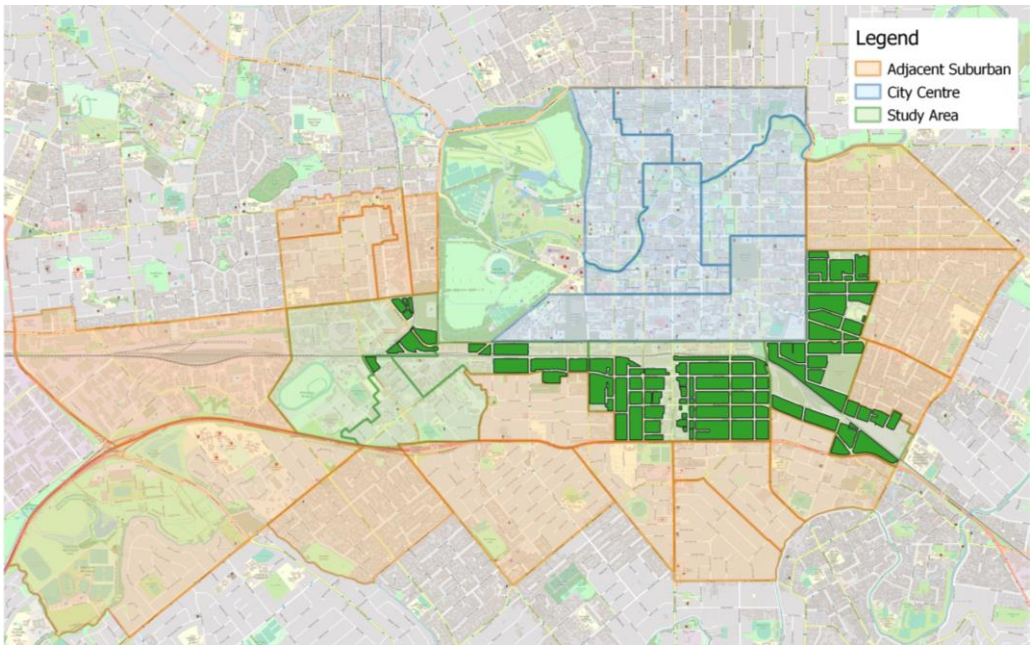
The first is made up of the city centre, excluding Hagley Park. This is a unique urban form in Christchurch, as it is higher density and the economy is oriented towards commercial, retail, and hospitality. This urban form is like the type of residential activity that will be enabled under the proposed changes. This makes it a good comparator from a population perspective.

The second is an aggregation of SA2s surrounding the study area. These are primarily lower density residential areas, with concentrations of commercial, retail, and hospitality, as well as some industrial areas (see Figure 5 and Table 6. The proposed changes do not allow further retail or commercial activity outside of the Sydenham commercial centre. If rezoned, the economy of the study area may more closely resemble the pattern found in these suburbs, making it a good comparator from an economy perspective.

By considering these two areas, we may get a sense of how the study area may evolve if the rezoning is implemented.

Figure 5: We compare the study area to the city centre and suburbs

Selected areas, SA2



Source: Statistics New Zealand

Table 6: Population by suburb, comparator areas by SA2

Name	SA2 reference	Population (2021)
City Centre		
Christchurch Central-South	327100	870
Christchurch Central	326600	130
Christchurch Central-East	327000	2,940
Christchurch Central-West	325700	1,180
Christchurch Central-North	325200	2,920
Adjacent Suburban		
Phillipstown	328900	4,320
Linwood west	327900	5,360
Charleston (Christchurch City)	329600	1,530
Waltham	329900	2,050
Sydenham North	329400	2,180
Sydenham West	328700	1,330
Sydenham South	329700	2,840
Addington East	327400	3,130
Spreydon North	327600	4,000
Spreydon West	326900	3,180
Hillmorton	325000	2,930
Middleton	323500	210
Riccarton South	324400	3,850
Riccarton Central	324200	70
Riccarton East	325200	1,250

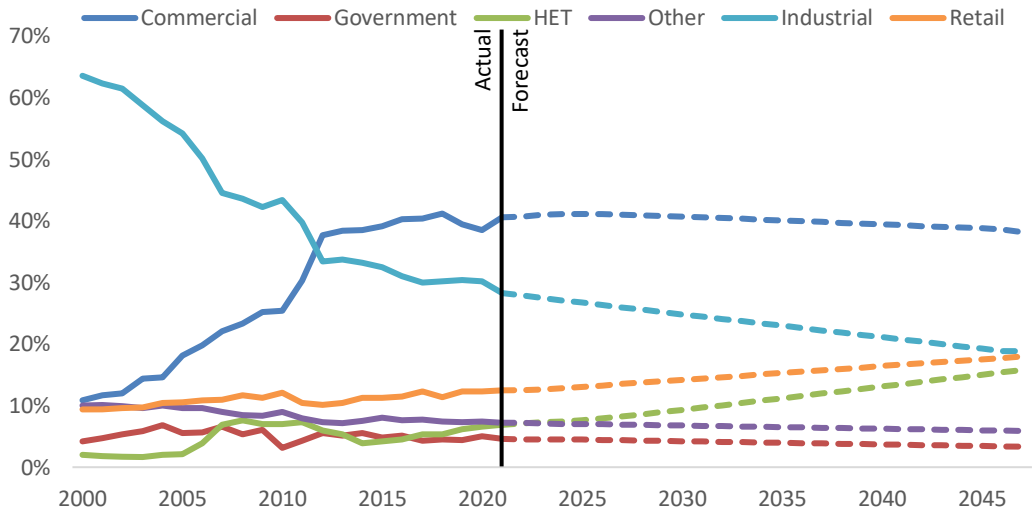
Source: Statistics New Zealand

3.2. Option one: Status Quo

Industrial zoning will restrain growth in the commercial sector

Under option 1, land use will be primarily restricted to industrial activity and ancillary activities. To understand how land use may change over time within these constraints, we use an economic model to project future demand based on recent historic data. Figure 6 shows a sharp decline in the share of industrial jobs in the study area between 2000 and 2010.

Figure 6: Expect demand for industrial land to continue to decline



Source: Sense Partners

Statistics New Zealand data indicates there were 10,818 industrial jobs in the study are in 2000. This had fallen to 8,494 jobs by 2010. Falling job numbers only partially explains the shift in shares. Importantly, commercial jobs increase from 1,849 in 2000 to 4,981 by 2010.

This reduction in the share of industrial jobs reflects the fact that the study area is a more valuable location for commercial sector jobs than for industrial jobs. Since the 2010 earthquakes, the share of jobs in the commercial sector has stabilised.

Existing IG zoning largely restricts commercial activity to those activities which are ancillary to a main site use of industrial activity. For example, a manufacturing facility (primary activity) with additional office space to support (ancillary activity) the work taking place on the factory floor. This may also include a retail shop that sells what is produced or processed on site.

Because of this constraint, commercial jobs can only grow if there are industrial jobs to which they are ancillary. Otherwise, current land use regulations imply that activity cannot take place. As a result, we have had to adapt the model to account for this constraint.

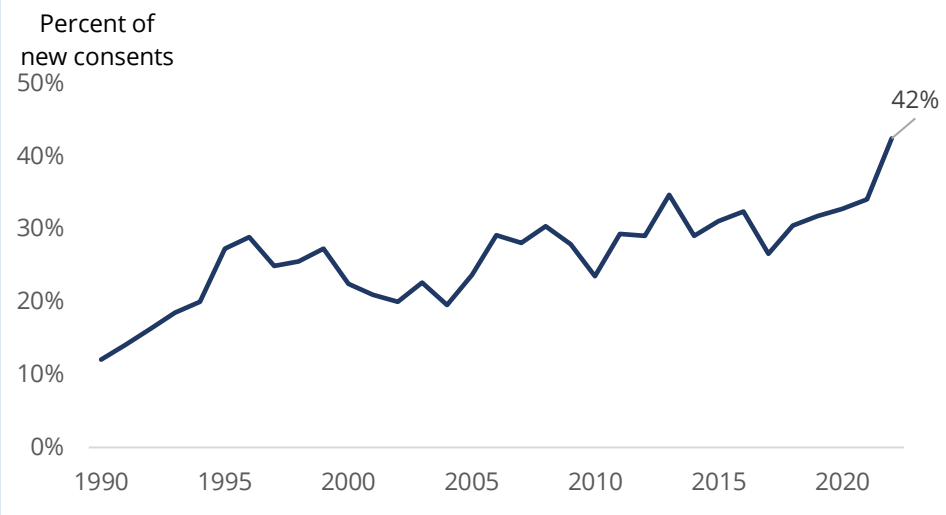
This means that the share of commercial employment is likely to remain around the levels it has maintained since 2011. As the population in surrounding areas grows, this is likely to lead to spill over demand for retail and Health, Education and Training employment. Growth in these sectors will take place along the existing commercial corridor along Colombo Street.

Box A: The shift towards logistics and warehousing

The trend to e-commerce is increasing demand for logistics and warehousing. COVID-19 and the persistent ability for many to work from home, has further boosted the trend towards distributing goods and services through e-commerce channels.

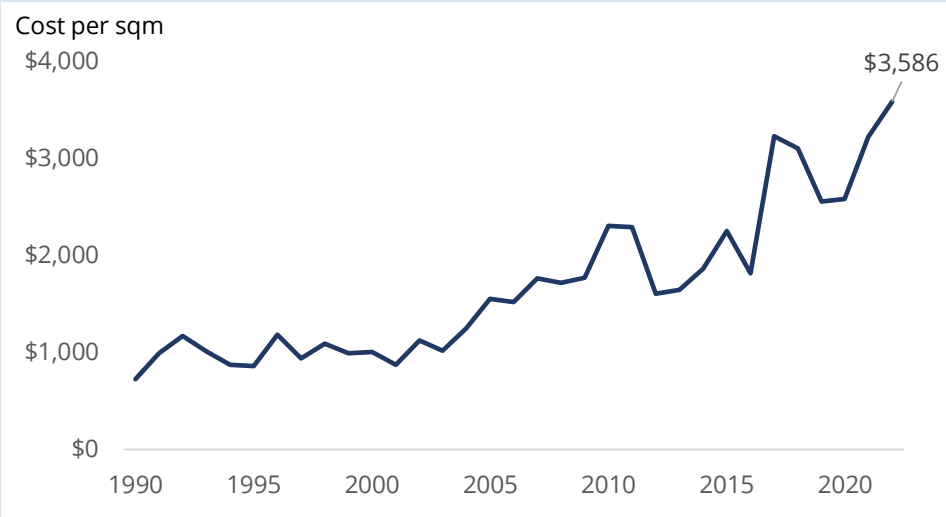
This unanticipated demand for logistics and warehousing, increases demand for industrial land to support these new demands. Figure 7 shows new consents for storage buildings as a share of non-residential buildings, spiked higher in the year to April 2022. New warehouses are increasingly sophisticated. Figure 8 shows spend per square metre is increasing.

Figure 7 Storage buildings are an increasing fraction of commercial buildings
Storage buildings (number) as fraction of new, non-residential consents, New Zealand



Source: Statistics New Zealand

Figure 8 Warehouses are increasingly sophisticated adding to build costs
Storage buildings, cost per square metre of new builds, New Zealand



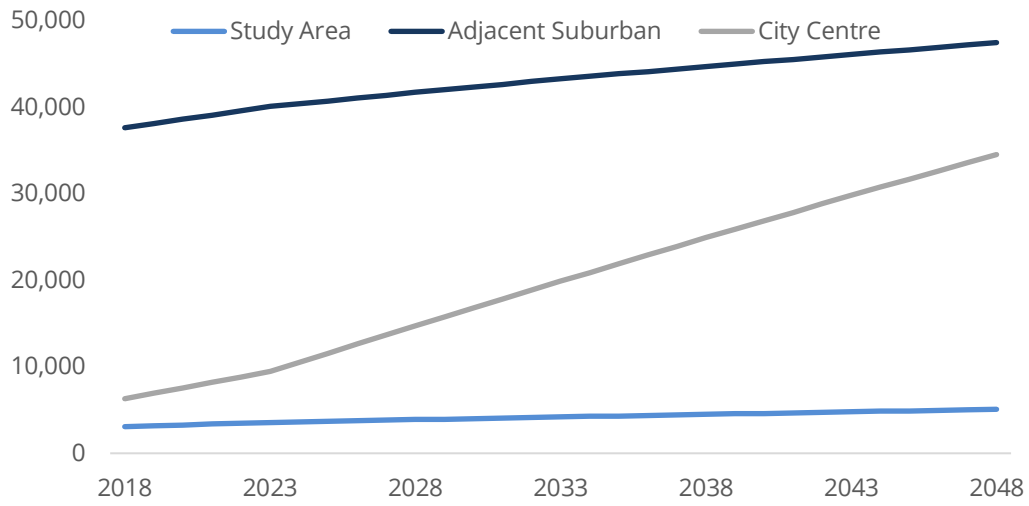
Source: Statistics New Zealand

Existing projections show little population growth in the study area

Without zoning change, expect little population growth and the population of the study area under option 1 will remain low. Any retail business looking to relocate to the study area will need to contend with a low local customer base, the cyclical nature of a workday customer base, and the need to attract people in from elsewhere on weekends.

Figure 9 below shows Statistics New Zealand's high population projections out to 2048, that use the 2018 census as input data. The study area has an estimated population of 3,380 people in 2021 and is projected to grow at an average annual rate of 1.7% - a higher rate than the adjacent suburbs. The city centre is expected to grow rapidly, at an average annual rate of 5.8%, from an estimated 8,206 people in 2021 to over 34,000 people by 2048.

Figure 9: Study Area Population Projections embed some additional population growth
Statistics New Zealand population projections, high, 2018-base



Source: Statistics New Zealand

3.3. Option two

Land use in the study zone will shift to residential

Table 7 below shows estimates of land values in the study zone by land use. Industrial land, at $467.10/m^2, is the least valuable land in the area. This indicates that industrial uses are less valuable than alternative uses in this location. Because the land is restricted to these uses, buyers are less willing to pay for the land, and so the value is low.

In contrast, land in the study area zoned for residential has a much higher land value, at $531.25/m^2. This indicates buyers are willing to pay a higher price, which implies they value residential activity more than industrial. Other land uses, particularly retail or offices, are higher value activities. However, the proposed rezoning will not expand allowances for these activities. Amenity value in the area might increase residential land values.

These numbers indicate that residential activity is the highest value use of land that will be allowed under the rezoning. This means that if the rezoning under option 2 is implemented,

that much of the land will shift toward residential uses. This conclusion if reinforced by the estimates of building height, measured as the floor-to-building plate ratio (FBR).

Building upwards is costly. Greater building heights on land zoned for a particular activity are another indication of the value of that activity in that location. The FBR for residential is 1.4, higher than the FBR for industrial land at 1.1.

Table 7: Residential is A Higher Value Use of Land Than Industrial Activity
Measures of urban form

Land Use	Land value ($/m^2)	FBR[4]
Industrial	$467.10	1.1
Commercial	$530.14	1.1
Retail	$708.95	1.1
Offices	$610.56	2.8
Residential	$531.25	1.4

Source: Sense Partners analysis from Christchurch NZ data

Aggregate travel costs across the city will likely fall

There are three factors which suggest that option 2 will lower transport costs. These are:

- proximity to the city centre,
- urban form,
- public transport service coverage.

The study area is closer to the central city than many suburbs zoned for medium density housing. Statistics New Zealand data indicates there are 215,355 filled jobs in Christchurch city as of 2021. The Christchurch City Council dashboard shows the 41,930 central city jobs.[5] The city centre has the highest concentration of jobs in the city, at 7,843 employees per square kilometre.

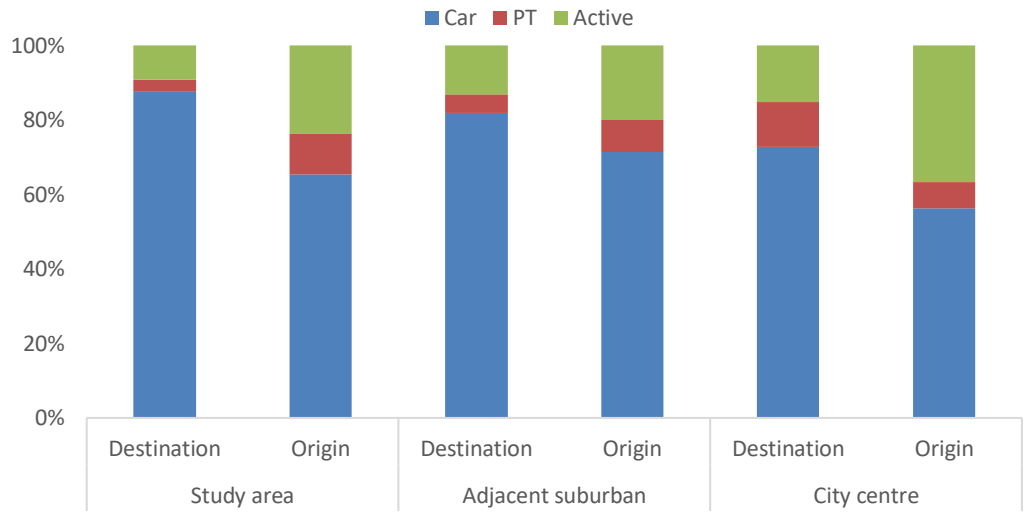
This proximity to a major source of employment implies lower transport costs. People working in the city centre, who would otherwise have had to live further away, are able to enjoy shorter commutes.

Urban form is a factor that influences mode shares of transport. Higher density brings more people within walking and cycling distances of day-to-day destinations. This is seen in the higher mode share of active modes and public transport for residents of the city centre (see

[4] Floor to building plate ratio. Indicates the average heigh of buildings in floors (including ground floor).
[5] See https://ccc.govt.nz/culture-and-community/central-city-christchurch/our-progress

Figure 10). Origin indicates journeys made by residents of each area. Destination indicates journey made by people travelling to that area, including residents.

Figure 10: Active and Pt Modes Have A High Share In The Study Area
Mode of travel, 2018



Source: Statistics New Zealand

With urban form expected to shift toward that seen in the city centre, we also expect that transport patterns will reflect those in the city centre. This implies mode shift toward walking, cycling, and public transport. Typically, people would only shift modes from car-based travel if the alternative mode was less costly in some respect than taking a car[6]. As a result, this implies a reduction in the cost of travel.

Going into further depth on public transport, Figure 11 overleaf shows the service coverage across the reference areas. The colours indicate how far away any given point in the street network is from the nearest bus stop. This is grouped into four bands.

- 100m: between 0m and 100m distance to the nearest bus stop
- 200m: between 100m and 200m
- 500m: between 200m and 500m
- >500m: over 500m distance to nearest stop.

The distance to the nearest stop is one factor that will determine the quality of the service provided, and thus ridership. The more closely spaced stops are, the shorter the walking distance from any point to access the service. However, this comes at the expense of a slower service due to more frequent stopping.

[6] This is not necessarily the case where the cost of driving has increased because of moving into the area. However, there is nothing to indicate that the cost of driving from the study area to the city centre would be higher than the cost for driving from further suburbs to the city centre.

Further spacing of stops can speed up a service, however this does not necessarily reduce coverage. People are willing to walk further distances to access a faster service. Achieving the balance must also consider service frequency, or how often buses run along the route.

Most of the study area lies within 500m of a bus stop. Whether this is sufficient will depend on the frequency of the service and the travel time to the desired destination. 500m may be a small distance for able bodies people to travel to access a frequent and fast service. For a slower service, and for disabled people, 500m may be too far to travel.

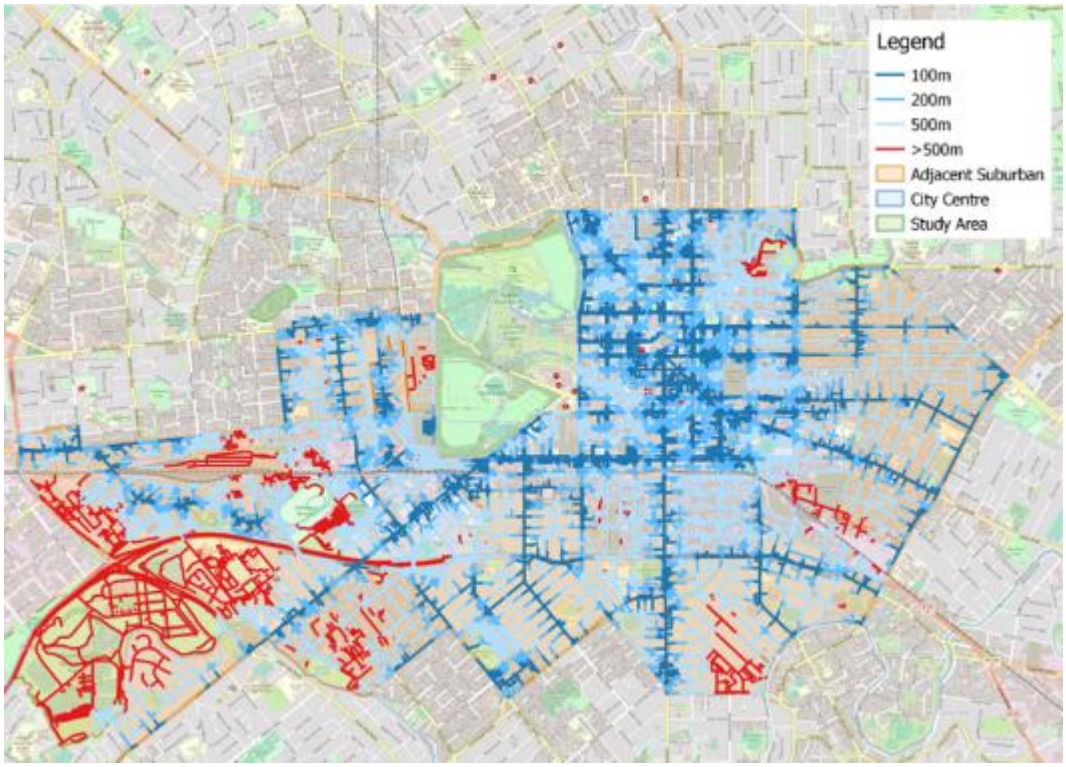
Adjacent suburbs have more patches of low coverage than the study area. Compromises in service coverage increase further from the city centre. This implies that residents closer to the city centre will have access to better public transport services than residents further out. As a result, enabling more housing in the study area will enable more people to take advantage of these services. This area will contribute to greater uptake of walking and cycling as a mode of transport given the cycling infrastructure in the area and the proximity to City centre.

The economy of the study area will likely mirror nearby suburbs

Figure 12 shows the estimate of the number of employees and businesses in each area. The data label above the blue columns also shows the average number of employees per business, a proxy measure for size. The data label above the red column shows the number of employees per square kilometre. This gives an indication of the spatial intensity of employment.

Figure 11: Service coverage depends on distance to stop and quality

Public transport service catchments



Source: Openstreetmap

The study area and the central city both have a high concentration of employees to land area, at 6,100 and 7,843 people per square kilometre respectively. This is, of course, a direct outcome of planning decisions. The central city and study area are both zoned for employment generating activities. Restrictions prevent businesses from setting up in the predominantly residential zones of the adjacent suburbs.

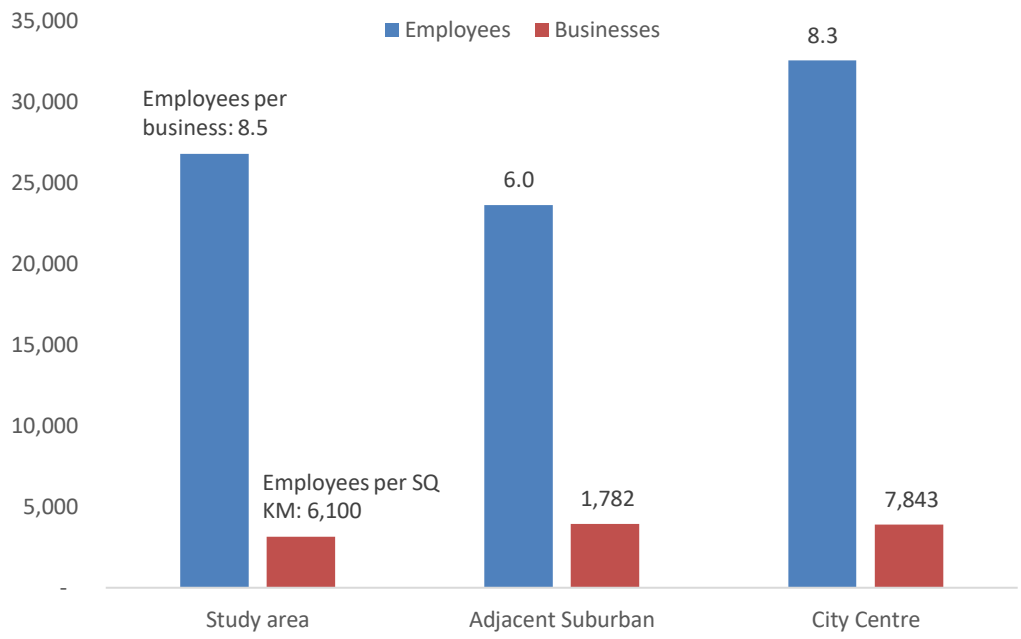
The proposed rezoning in option 2 will not allow for commercial or retail activity in areas currently zoned IG. As noted above, land use is expected to shift toward primarily residential uses. This means the number of jobs in the area is likely to drop towards something resembling the adjacent suburbs. This means fewer industrial jobs per km^2.

The sectoral composition of jobs is also likely to shift toward something resembling the adjacent suburbs. This is because the expected urban pattern of primarily residential use is interspersed with town centres where permitted, thus more closely resembling the adjacent suburbs. Existing land zoned for retail, hospitality, and commercial within the study area will function as these town centres. This includes the Sydenham commercial zone along Colombo Street.

Figure 13 below shows the number of jobs in each of the five largest sectors in each area. The largest sector in the study area, shown by the bottom blue bar, is professional, scientific, and technical services, with 4,690 jobs. The letter denotes the ANZSIC industry classification.

Figure 12: Adjacent suburbs have fewer jobs and smaller businesses

Employee and business count, 2018



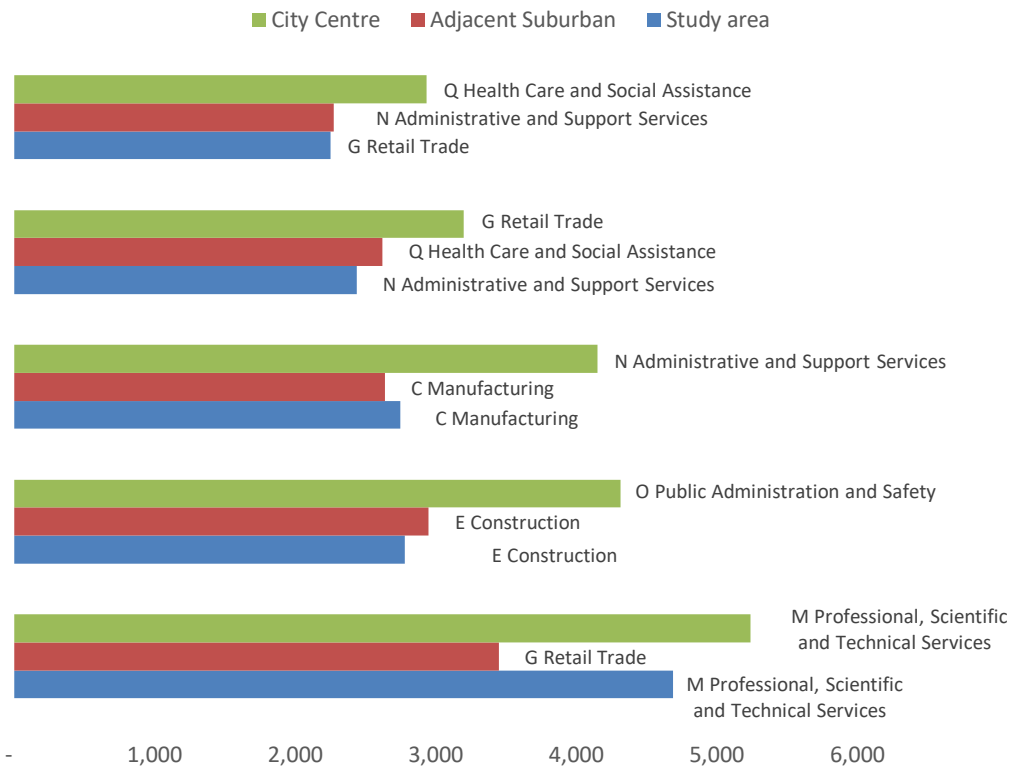
Source: Statistics New Zealand

If the study area is rezoned, the number of jobs in manufacturing will fall. Land will be used for its most efficient use, housing rather than industrial activity. Given this we would expect

employment in this sector to fall although some retail activity could be expected to offset these moves in the location of employment.

Note that the adjacent suburban area is much larger than the study area, so while jobs numbers are currently similar in some sectors, the spatial intensity of employment (jobs/km^2) is much lower.

Figure 13: Employment in the study area mirrors the Central city
Employee count by sector, top 5 in each area, 2018



Source: Statistics New Zealand

The transition will be gradual over a period of decades

Historically, the study area was primarily residential up until the mid-1950s. Figure 14 shows that in about 1945, the area was primarily residential homes, closely resembling surrounding suburbs.

Figure 14: The Study area was zoned for residential until the mid-1950s

Source: Canterbury Maps Open Data

The Town and Country Planning Act 1953 was New Zealand's first primary urban planning legislative tool[7]. Coinciding with the passing of this act, the urban pattern in the study areas begins to change. This is likely the result of a rezoning to industrial uses taking place.

The transition toward industrial uses was gradual. It is not until the 1990s that aerial footage shows no easily visible trace of residential activity. Figure 15 below shows aerial footage of the study area circa 1970. Much of the land has been converted to industrial uses but there are pockets of residential land, around the intersection of Gasson and Coleridge Streets.

[7] https://www.environmentguide.org.nz/activities/land-use/a-brief-history-of-town-planning/

Figure 15: The study area in 1970 shows some sites converted to industrial uses

Source: Canterbury Maps Open Data

On this basis, we do expect the shift from industrial to be gradual. The amount of land yet to be developed in the city centre proper means that some demand could be readily absorbed there. Alongside the more broader upzoning entailed in the Medium Density Residential Standards (MDRS), this may slow the conversion to residential in the study area.

3.4. Option three

Where permitted, land use will shift to residential

The types of benefits under policy option 3 are likely to be the same as options 2. However, since the policy spans a much smaller area, expects both costs and benefits to be of a lower scale due to a portion of the land being retained as IG zoning.

As with option 2, the higher value of land zoned residential implies that land use will shift toward residential where it is permitted. If a portion of the study area is retained as IG, then naturally that land will remain restricted to industrial uses.

The reduction in travel costs that option 2 brings is dependent on the number of additional dwellings the option enables. With less land rezoned to allow for residential activity, fewer dwellings will likely be provided. This means that the potential travel cost savings are lower with only a partial rezoning.

4. Method

4.1. Framework

Broad approach

Assessing the likely impact of the proposed policy change is challenging. To address the objectives of the NPS-UD -that include ensuring well-functioning urban environments and promoting competitive land markets – the policy seeks to embed a particular build type (four storey plus apartments) that are not currently a material element of Christchurch's urban form.

Enabling a particular build type is different to the commercial feasibility of a specific type of residential building. To make progress on the costs and benefits of the proposed policy we proceed with the following three step procedure:

- Step 1: Assess likely uptake rate for 4+ storey apartments
- Step 2: Assess likely change in the number and distribution of people across the city
- Step 3: Assess likely costs and benefits

Implicitly we are also assuming there is sufficient demand for housing based on Statistics New Zealand population projections for not just Christchurch but other regions. When housing supply increases, demand can be realised from both within the city and people living elsewhere that seek to benefit from lower housing costs than would occur without the increase in housing supply.

Estimating costs and benefits from the proposed zoning changes requires assessing the likely uptake rate for the proposed building type (4 storeys and above) not just today, but into the future.

Assessment of uptake rates based on the current environment suggests that in the future, buildings above six stories in the range of suburban centres explored, are feasible. However, for some years, other build types are commercially preferred over apartments of six stories and above since they return a higher yield given the cost of land and dwelling construction.

We focus on thinking about the likely path of the relative prices of housing and land, and how that can drive changes in the feasibility of different build types over time.

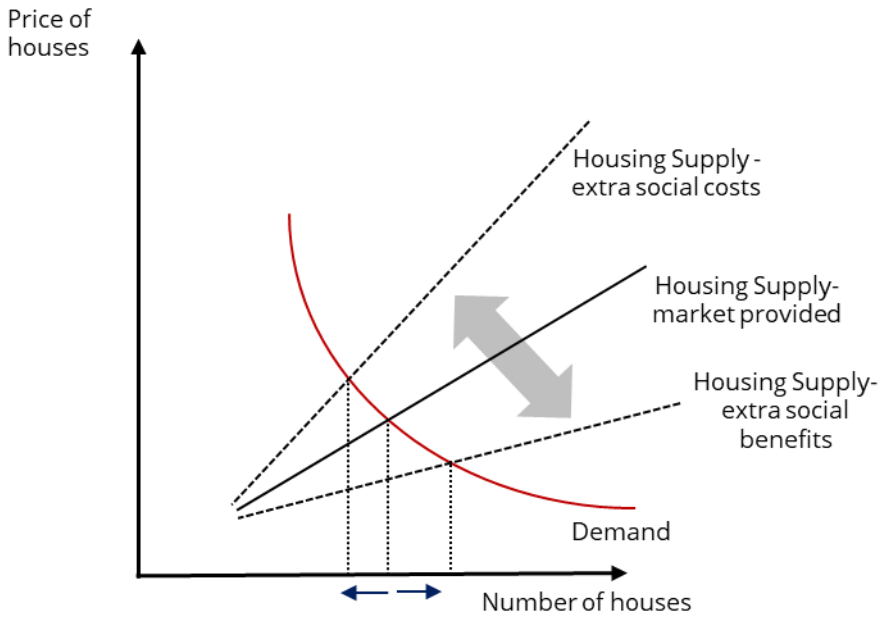
With the development sites in hand, then we can assess range of costs and benefits including:

- more efficient labour markets and knowledge spillovers that increase productivity and increase economic activity
- changes in commuting times that can increase or lower congestion depending on the nature of impacts
- environment costs that accrue form different urban forms
- impacts on local amenity including views and sunshine lost

- the opportunity cost of using the industrial land for other purposes.

What is critical is to evaluate, not just the commercial benefits of each project, but the wider social benefits – and costs – of the proposed zoning policies. Social impacts are likely to be broader than the impacts on prices alone (see Figure 16).

Figure 16: We seek to quantify social costs and benefits not just house price impacts



Source: Sense Partners

Step 1: Assess the uptake rate

To realise our analysis, we use a simplified version of the feasibility model developed by MBIE.[8] We restrict our analysis to the next thirty years, but this requires assumptions on:

- Demand for housing
- Commercial feasibility of 4+ storey apartments
- Relative profitability of different build types including detached, duplex, terrace, 2-3 storey apartments, 4-7 storey apartments and 8-12 storey apartments.
- Relative movements in the cost of land and construction costs that impact profitability

[8] The model is available on-line at https://www.hud.govt.nz/.

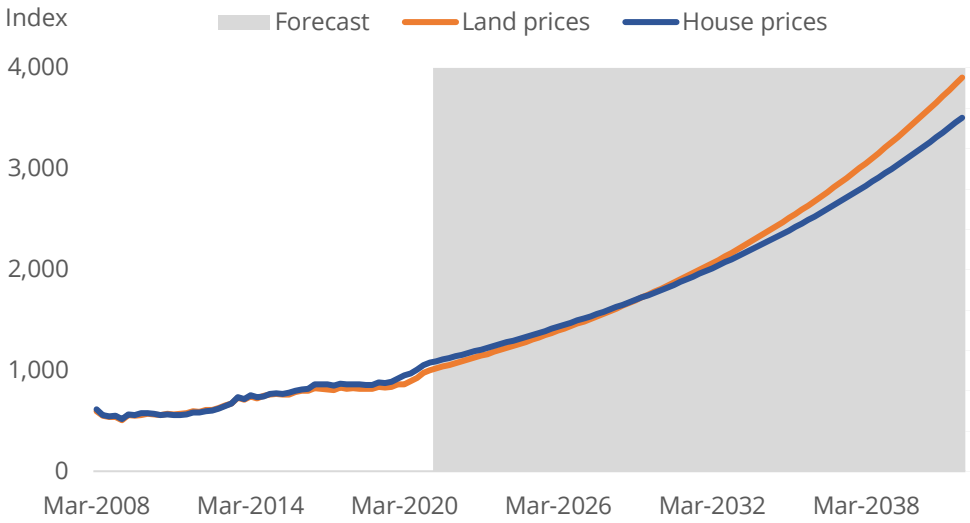
The development of different build types is sensitive to the relative cost of land and construction. When the land costs rise, the relative profitability of dense build forms rises. Figure 17 shows that growth in land prices outstrip growth in house prices over history.

Figure 17: History suggests land prices will grow faster than the price of housing
Relative land prices selected New Zealand cities (historical growth rates, Mar 1996- Mar 2021)

Source: Sense Partners

We use these growth rates to show expected Christchurch land and house prices in Figure 18.

Figure 18: Expected land prices Christchurch



Source: Sense Partners

Then we compute to show the change in profitability of build type over time in Table 8. It takes several years before apartments above 4 storeys are more profitable than traditional builds like detached, duplex or terraced-housing models. Other factors (including access to finance

for example) matte. But we use the model to guide our timing of when development occurs in the study area.

Table 8: The relative price of land drives profitability of different build types

Relative development profiles applying land cost estimates in MBIE's development model

	Detached	Duplex	Terrace	Apartment 2-3 storeys	Apartment 4-7 storeys	Apartment 8-12 storeys
Land costs						
2021	$859,280	$880,000	$901,220	$922,952	$945,208	$968,000
2026	$1,191,729	$1,220,465	$1,249,895	$1,280,035	$1,310,901	$1,342,512
2031	$1,652,799	$1,692,655	$1,733,471	$1,775,271	$1,818,079	$1,861,920
2036	$2,292,255	$2,347,530	$2,404,138	$2,462,110	$2,521,481	$2,582,283
2041	$3,179,112	$3,255,772	$3,334,281	$3,414,682	$3,497,023	$3,581,349
2046	$4,409,087	$4,515,406	$4,624,289	$4,735,798	$4,849,995	$4,966,947
2051	$6,114,929	$6,262,383	$6,413,392	$6,568,043	$6,726,422	$6,888,621
Other costs						
2021	$1,106,607	$1,916,042	$2,474,050	$5,136,339	$14,332,68	$27,429,501
2026	$1,412,343	$2,445,409	$3,157,585	$6,555,414	$18,292,54	$35,007,766
2031	$1,802,547	$3,121,030	$4,029,968	$8,366,554	$23,346,44	$44,679,766
2036	$2,300,557	$3,983,313	$5,143,373	$10,678,07	$29,796,63	$57,023,962
2041	$2,936,159	$5,083,829	$6,564,392	$13,628,23	$38,028,89	$72,778,631
2046	$3,747,365	$6,488,397	$8,378,013	$17,393,46	$48,535,57	$92,886,025
2051	$4,782,693	$8,281,022	$10,692,70	$22,198,95	$61,945,05	$118,548,72
Sales						
2021	$2,504,348	$3,592,174	$4,226,087	$7,513,043	$17,739,13	$30,052,174
2026	$3,327,737	$4,773,222	$5,615,556	$9,983,210	$23,571,46	$39,932,841
2031	$4,421,843	$6,342,580	$7,461,859	$13,265,52	$31,321,38	$53,062,110
2036	$5,875,673	$8,427,918	$9,915,197	$17,627,01	$41,619,34	$70,508,070
2041	$7,807,498	$11,198,88	$13,175,15	$23,422,49	$55,303,11	$93,689,979
2046	$10,374,47	$14,880,89	$17,506,93	$31,123,43	$73,485,87	$124,493,72
2051	$13,785,43	$19,773,48	$23,262,92	$41,356,30	$97,646,84	$165,425,23
Profit						
2021	$538,461	$796,132	$850,816	$1,453,753	$2,461,234	$1,654,673
2026	$723,666	$1,107,348	$1,208,075	$2,147,761	$3,968,021	$3,582,563
2031	$966,496	$1,528,896	$1,698,421	$3,123,702	$6,156,865	$6,520,424
2036	$1,282,860	$2,097,075	$2,367,687	$4,486,828	$9,301,236	$10,901,825
2041	$1,692,228	$2,859,279	$3,276,480	$6,379,577	$13,777,19	$17,329,998
2046	$2,218,025	$3,877,087	$4,504,628	$8,994,167	$20,100,31	$26,640,751
2051	$2,887,814	$5,230,081	$6,156,828	$12,589,30	$28,975,36	$39,987,894
Percent						
2021	27.4%	28.5%	25.2%	24.0%	16.1%	5.8%
2026	27.8%	30.2%	27.4%	27.4%	20.2%	9.9%
2031	28.0%	31.8%	29.5%	30.8%	24.5%	14.0%
2036	27.9%	33.1%	31.4%	34.1%	**28.8%**	18.3%
2041	27.7%	34.3%	33.1%	37.4%	**33.2%**	22.7%
2046	27.2%	35.2%	34.6%	40.6%	**37.7%**	27.2%
2051	26.5%	36.0%	36.0%	43.8%	**42.2%**	31.9%

NB Bold font shows profitability for 4-7 storey apartments higher than detached housing

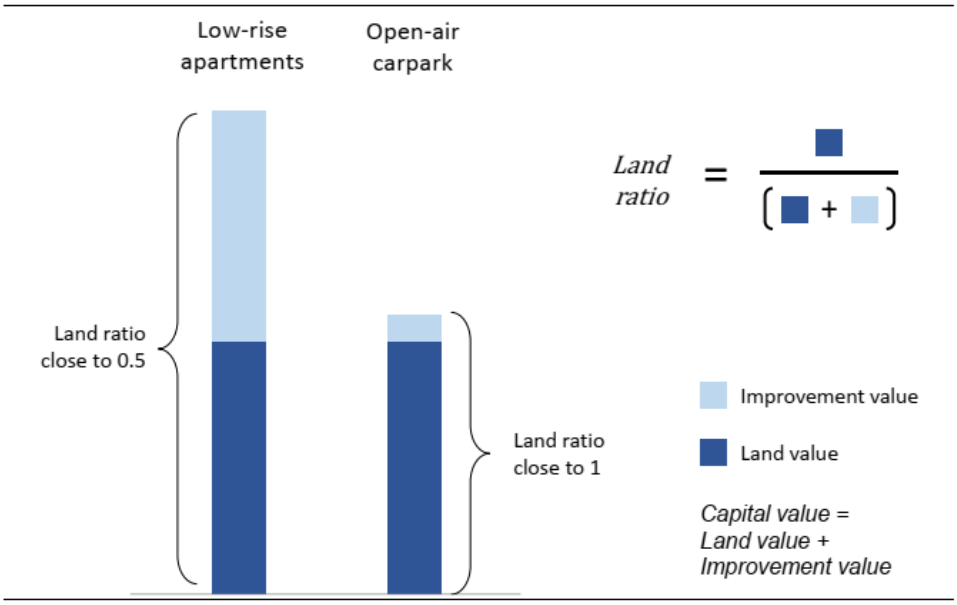
Source: Sense Partners

Table 8 underpins our assumption that it takes 15 years before 4-storey plus apartment building starts to be realised within the study area. The analysis in Table 8 is a city-wide market analysis. Sites closer to the CBD are likely developed for apartments prior to the study area.

But conversely, other developers that might have longer investment horizons (such as Kainga Ora or Christchurch NZ) could develop sites earlier than the market, bringing forward development a little. So we accompany our baseline with a high apartment development profile that begins in 10 years' time.

Then we examine the likely development sites with the study area by calculating the quality score (that uses land value, capital value, distance to the CBD and parcel size) for each site. Figure 19 shows that sites that can be more readily developed, such as open-air carparks have higher quality land ratios that help drive the quality score we construct.

Figure 19: The quality score suggests sites with little capital are ripe for development

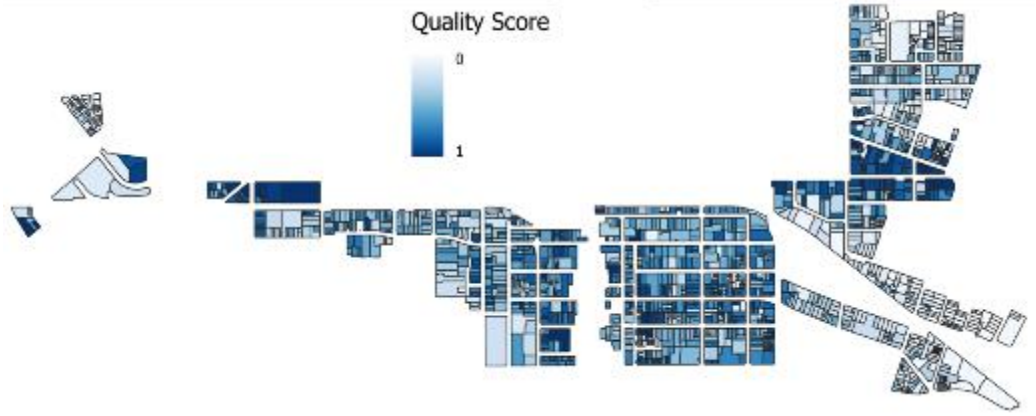


Source: PWC and Sense Partners (2021)

We map the quality score (see Figure 20) for the study area. Our analysis suggests a gradual increase in development over time and we lock this profile into our CBA analysis. This is supported by the histogram of the quality score (Figure 21) that shows a range of outcomes and the histogram of parcel size (Figure 22) that shows many small parcels in the study area.

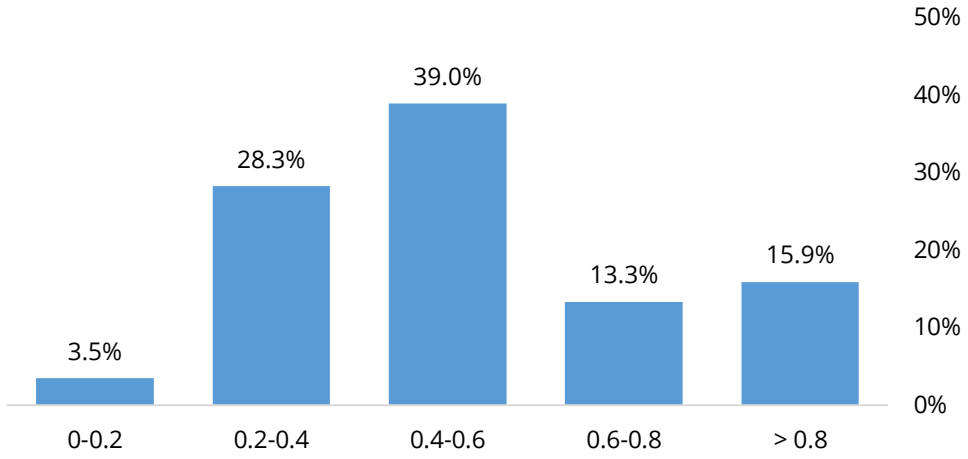
We map the quality score (see Figure 20) for the study area. Our analysis suggests a gradual increase in development over time, in line with population growth, that produces a total of 4,887 new dwellings in the study area over a 20-year period, beginning in 15 years. A more fast or rapid "high" scenario enables the same number of dwellings but starts in 10 years' time. We also test a low scenario that embodies a weaker development track with 2,976 dwellings.

Figure 20: The quality score helps map likely sites for improvement



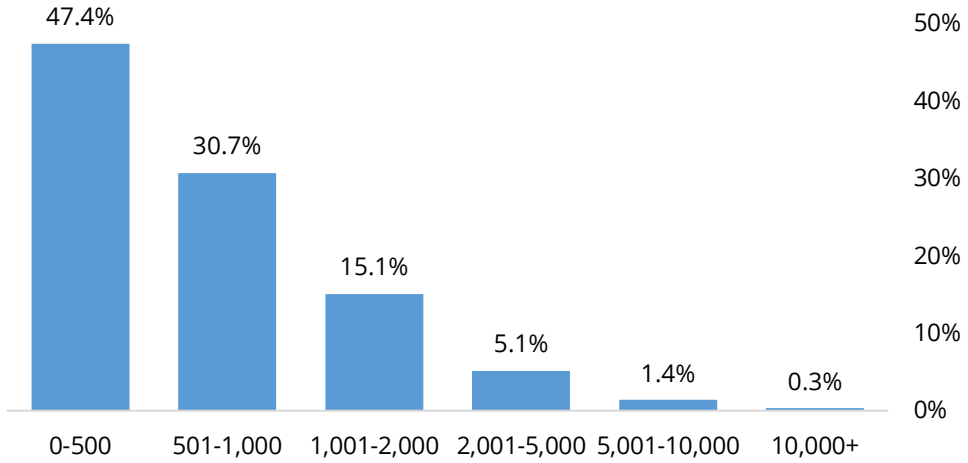
Source: Sense Partners

Figure 21: The distributions of the land ratio suggest a variety of sites
Distribution of the land ratio for parcels in the study area



Source: Sense Partners

Figure 22: The many small sites within the study area may be harder to develop
Distribution of the parcel size in the study area



Source: Sense Partners

Step 2: Assess the number of residents added to the city

Both policy options rezone land for residential purposes, increasing the supply of land for housing purposes and lowering the cost of housing.

This will draw people to the study area from two different sources:

(i) from people living in other locations in the city, perhaps either living with family or renting that on the margin, which can now establish a household;

(ii) new residents attracted to Christchurch from other regions.

It is difficult to be precise about the relative strength of each source of demand. We know from migration data that relative house prices are a strong attractor to a region. Equally, we can see new household formation in the data. We follow the approach in the MRDS CBA and average across both sources. Using Statistics New Zealand's expected family size for Christchurch in 2038 of 2.5, this implies a total of 12,218 people living in the study area under the base and high scenarios with half of this population drawn from outside the city.

Step 3: Assess likely costs and benefits

We use the broad framework from the Medium Residential Density Standards Cost -Benefit Analysis to identify the most pertinent costs and benefits to quantify. They include:

- Housing
- Agglomeration Benefits
- Transport costs
- Environment benefits
- Infrastructure benefits

4.2. Housing

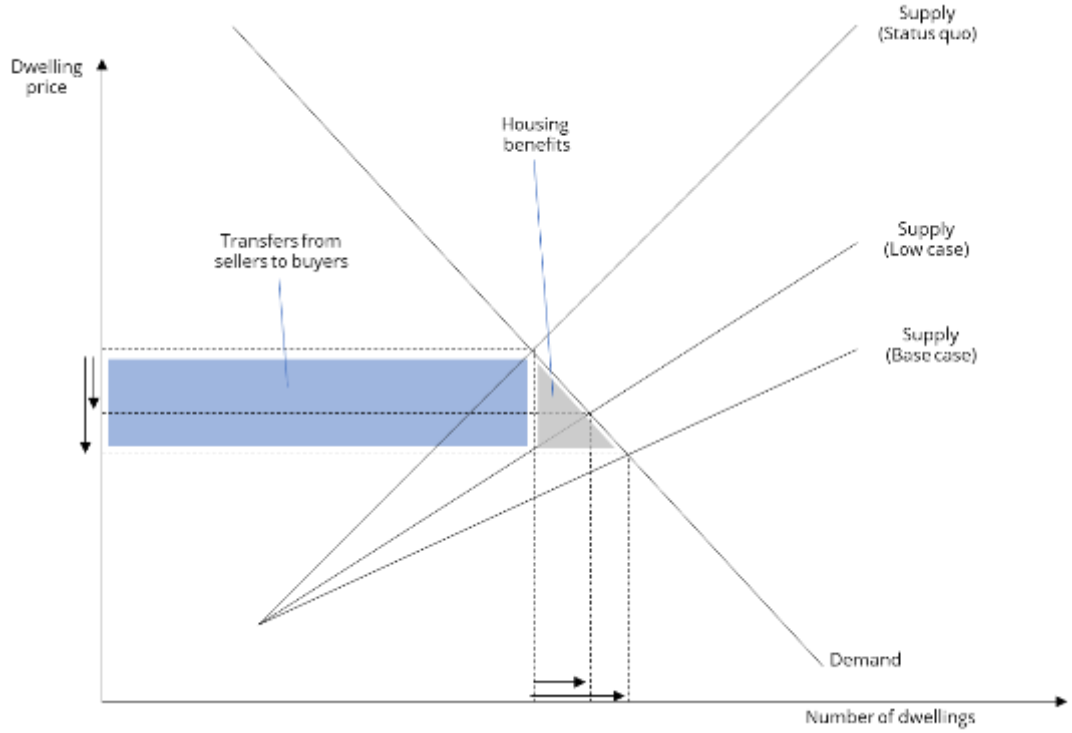
Increasing the supply of housing will lower prices. But most house sales are transfers from sellers to buyers. The impacts of lower prices of these transactions are net zero – good for buyers but not for sellers.[9]

But economic benefits do arise from the increase in the volume of transactions made possible by the increase in the stock of housing in the city. For these additional transactions, the difference between the willingness to pay and the price level are economic benefits.

[9] Decisionmakers may still wish to think about equity issues. We calculate the size of these transfers but then follow standard CBA procedures and set these issues to one side.

Figure 23 shows both the economic benefits (grey area) and the transfers (blue area) that we seek to calculate. We use the estimates of the price elasticity of demand for Christchurch to calculate these impacts.[10]

Figure 23: Housing benefits accrue from new transactions, not transfers



4.3. Infrastructure costs

Urban development typically requires the expansion of infrastructure. This includes roads, public transport, three-waters, electricity, telecommunications, and community infrastructure (parks, pools, and playgrounds). We focus on those elements likely to result in a cost to ratepayers, namely transport, three-waters, and community infrastructure. In this area, street amenity from pocket parks and general green area is likely to be high and should be included in costs.

Infrastructure costs can be lumpy. This is because upgrades to expand network capacity occur only periodically. When they do, they must expand to allow for growth over a suitable period. The total cost of the upgrade cannot be allocated just to the new residents who triggered the upgrade. Doing so would give a free ride to future residents who do not tip network capacity into upgrade territory. The cost of lumpy infrastructure must be smoothed over time and fairly allocated amongst residents new and old.

[10] We use the estimate of -1.332 used in the MRDS CBA (see PWC and Sense Partners 2021).

This does mean that developer contributions (DC) only cover a portion of the total cost of expanding infrastructure network capacity. MRCagney et al. (2016) estimate that as little as 73% of infrastructure costs of urban intensification in Auckland are covered by DCs. So omitted developer contributions could count as a cost.

We follow the MRDS CBA approach and consider additional infrastructure costs not covered by development contributions. This requires thinking through the infrastructure costs associated with building more dwellings at high urban intensities rather than the typologies that would exist in the absence of the zoning change. We assume that if the zoning change did not enable additional apartment dwellings, then a mix of brownfield and greenfield dwellings would be needed.

The new dwellings come with infrastructure costs we assess using the estimates of unrecovered developments costs of infrastructure from the MRDS CBA. These are costs.

We then consider the infrastructure costs for the greenfields development that would occur in the absence of the rezoning. These costs are no longer incurred and are rezoning benefits.

4.4. Agglomeration

Agglomeration benefits occur where people and firms are in closer proximity to each other. This reduction in economic distance yields benefits beyond immediate reductions in the cost of travel. These benefits include:

- **Deeper labour markets.** More potential workers within an economic commute means a larger pool to recruit from. This improves the chances of an ideal match between employer and employee, benefiting both.
- **Greater knowledge transfer.** Proximity of firms allows easer transfer of knowledge between workers and firms. This includes spontaneous collaboration between firms.
- **Economies of scale and network.** Being closer to more suppliers and customers means firms have more choice in who they buy from and sell to.

We calculate agglomeration benefits using the standard equation:

$$\Delta Productivity = \left(\frac{New\ city\ size}{Old\ city\ size}\right)^{elasticity}$$

This is a simple, one step process when applied to population forecasts in 2048. The key variable is the elasticity. There is a high level of uncertainty on the scale of agglomeration benefits, as it is usually highly contextual.

Rather than use MRDS CBA estimates provided Maré and Graham (2009)[11], we use new, recent estimates provided in Donovan et al. (2022) that are close to 0.04 for Christchurch city.

We follow the approach in the MRDS and omit hard-to-measure agglomeration benefits in consumption that occur when residents can access a variety of goods and services made

[11] Maré, David C. & Graham, Daniel J., 2013. "Agglomeration elasticities and firm heterogeneity", *Journal of Urban Economics*, Elsevier, vol. 75(C), pages 44-56.

possible by dense urban locations.[12] On balance these benefits are too hard to quantify but should be considered as modest upsides to our benefits estimates that are likely smaller in magnitude than the productivity estimates.[13]

4.5. Congestion and environmental impacts

Congestion

To estimate the benefits of the proposed zoning policy we rely on the costs of congestion estimated for Christchurch in the MRDS CBA. This work estimated an annual cost of congestion of $295 million dollars.

Since the suburbs in the study area are less commuting intensive than dwellings in greenfields areas, the reduction in commuting costs from the rezoning are benefits to the rezoning activity. We calculate the size of these benefits by examining the relative number of people living accommodated in brownfields accommodation rather than a mix of brownfield and greenfield accommodation.

Environmental impacts

To assess the environmental impacts, we use the values discussed at length in analysis provided by MR Cagney on the costs and benefits of urban development. We use values updated for inflation from the MRDS CBA we show in Table 9.

Table 9: Environment costs of urban development associated with different urban form

Costs	Brownfield	Greenfield
Loss of per-urban land		$201.61
Air quality[14]	$289.41	$242.80
Freshwater quality		$135.49
Coastal water quality	$	$149.25
Total	$289.41	$725.15

Source: MR Cagney et al. 1996, PWC and Sense Partners 2021

[12] See Ahlfeldt and Pietrostefani 2019 for example.
[13] See Donovan et al. 2022.
[14] Differences in air quality might be expected to change over time with take-up of electric vehicles.

4.6. Industrial land benefits

Using the land identified in the study area for housing comes with the opportunity cost of foregoing use of the land for industrial purposes. McDonald (2011) lays some of the relevant costs that include:

i. Relative tax takes from industrial land relative to residential uses

ii. Labour market benefits of industrial land use

iii. Transport benefits from workers who live near the industrial area.

We do not document relative differences between (i) and (ii). Right now, land values for industrial land are much lower than the comparative use as residential land. So relative local tax takes will be higher if the rezoning proceeds.

There can be value in terms of labour market outcomes from using the land for industrial purposes, but a specific set of conditions needs to apply, in particular, underemployed labour is needed, but at least for now, there are few unemployed workers within the Christchurch labour market compared to history. It is unlikely that the zoning change will increase unemployment in the city. Instead, firms will move to locations further out from the city centre where land costs are cheaper.

But transport cost can matter. On one hand, new residents benefit from the reduction in vehicle kilometres travelled (VKT) experienced by those who can relocate to the study area, closer to work in the city centre.

While the supply of land is fixed, the supply of houses is not. Greater urban density allows more houses to be built in proximity to amenities. This means more people can afford to live close to amenities and opportunities without having to pay high transport costs.

Zoning restrictions place an additional, artificial constraint on the supply of housing. This increases the cost of housing throughout the city and forces people to live further away from amenities and opportunities. As a result, they must pay higher transport costs to reach those amenities and opportunities.

The city centre is the focal point of the urban economy and has the highest concentration of economic opportunities. It can also support a high concentration of many types of amenities, such as hospitality and retail, and community facilities which benefit from economies of scale.

Removing restrictions on residential activity and allowing greater density in the study area will enable more people to live closer to the city centre, and its amenities and opportunities. In line with the Alonso-Muth-Mills model, we expect this will lower housing costs and transport costs.

A closer look at commuting costs

The first step is to calculate the VKT in a typical morning peak. We use Statistics New Zealand data on SA2 level population and SA2 level travel patterns. For each SA2, the proportion of the population who commute to work by car each morning is calculated using the transport data. This excludes those who are passengers in the vehicle.

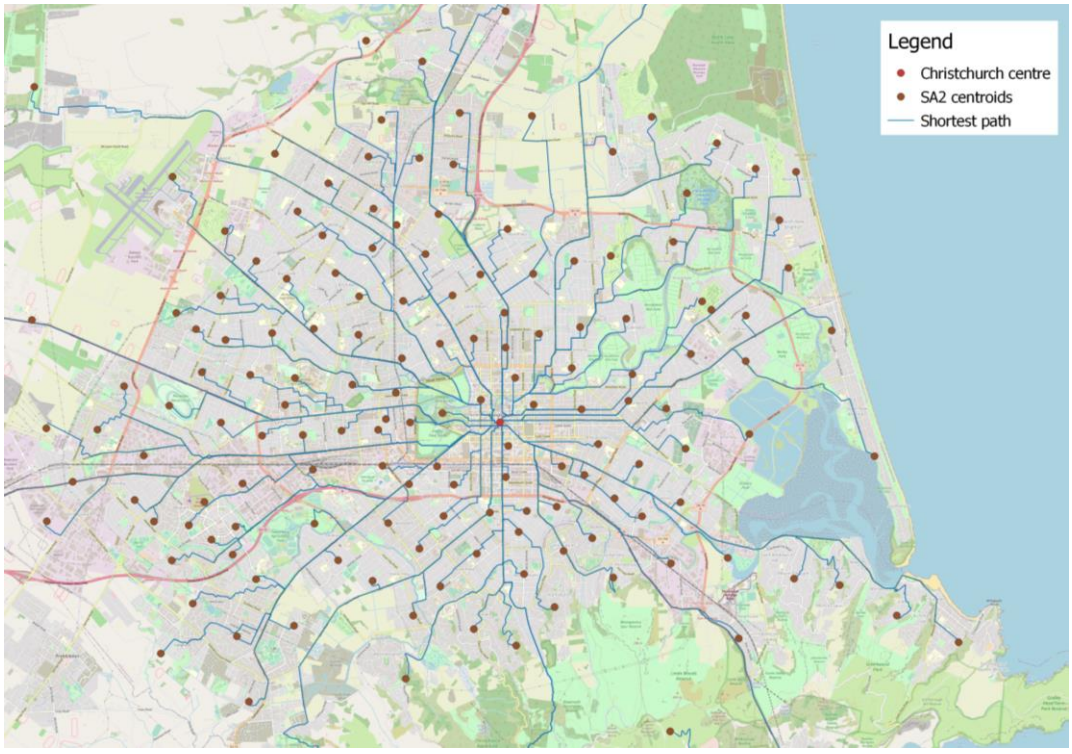
The average proportion across all SA2s in Christchurch, 0.53, is then applied to all SA2s uniformly when calculating the number of individuals commuting by car. QGIS and street network data from Open Street Maps is used to calculate the distance each commuter takes. This is done at the SA2 level, using a shortest-path algorithm that calculates the distance from the centre of the SA2 to the city centre. This is shown in Figure 24 below.

The distance in each SA2 is multiplied by the number of people commuting by private or company vehicle in each SA2 to get total VKT in a single peak.

Thinking about the change in the spatial distribution of workers and residents

The increase in population arising from the increase in dwellings calculated in the housing benefit analysis is used next. Of the increase in the population of the study area, it is assumed that half of this increase consists of people who would otherwise have lived somewhere else in Christchurch.

Figure 24: We Calculate Distance to the Centre of the City
Shortest path from SA2 centroids to city centroid



Source: Sense Partners, Open Street Map

We also assume that the individuals who would move to this city-centre adjacent area most likely work in the city centre. If they had to live elsewhere, we assume they would have commuted into the centre. As a result, those individuals who would have lived elsewhere now have a shorter commute to the city centre.

As an estimate of where these individuals would otherwise have lived, we assign half the increase in study population to each of the SA2s in Christchurch. This is based on each SA2s

share of projected future population using Statistics New Zealand 2018 high population growth projections.

Then we examine the likely profile of commute time in the city when jobs are moved from the study area location to the perimeter of the city.

To value the commute times, we use the marginal cost per VKT calculated by Wallis & Lupton[15]. This is adjusted for inflation to Q1 2022. This yields a marginal cost of $0.76. This is applied to the reduction in VKT each year to estimate a monetary value to the reduction. A discount rate of 5% is applied when calculating a net present value.

We find that the benefits of smaller commute times for residents in the city area is likely to outweigh the costs for workers at industrial sites displaced to the edge of the city. Smaller commercial operators might be expected to relocate to nearby cheaper locations.

Given the number of uncertainties that underpin precise distributions of where firms and residents locate, rather than providing quantitative estimates we simply note that this exercise provides evidence that commuting costs are improved by the zoning change.

5. Results

5.1. Option two: A full rezoning

Impacts

For option two, the full rezoning of the study area, we present the results of our analysis in Table 10. The first section of the table shows the impacts on the number of dwellings in the study area and the number of extra people in the study areas – living in apartments of 4-6 storeys.

Since we assume that half the people that are attracted to the study area come from within the city and half from outside the city, the implied city-wide population change is half the numbers report in Table 10.

[15] See Wallis and Lupton 2013.

Table 10: Our analysis suggests material benefits from option 2, a full rezoning

Element	Low	Base	High
		Policy impacts	
Extra people	2,976	4,887	4,887
Extra dwellings	2,380	3,910	3,910
House prices	-$15,484	-$25,438	-$25,438
		Benefits	
Cheaper houses	$15,377,019	$41,502,259	$55,539,385
Infrastructure benefits	$1,382,235	$2,270,815	$2,879,059
Less congestion	$1,344,388	$2,195,121	$2,812,461
Environmental impacts	$2,455,113	$4,033,165	$5,165,144
Productivity	$19,027,125	$31,172,693	$39,925,165
Total benefits	$39,585,880	$81,174,052	$106,321,214
		Costs	
Infra costs	$1,005,411	$1,652,100	$2,093,977
Shade	$1,224,265	$3,016,234	$5,099,827
Loss of views	$934,654	$2,300,434	$3,889,547
Total costs	$3,164,331	$6,968,769	$11,083,351
		Summary	
Net benefits	$36,421,549	$74,205,284	$95,237,863
Benefit-Cost ratio	12.51	11.65	9.59

NB Dollar values are in the present value, 2022 dollars
Source: Sense Partners

Benefits

Table 10 sets out the benefits we quantify. Since the economic benefits only accrue to new dwellings, we find that the change in house prices generate small benefits compared with other impacts. In our base, case $1,318,000 are delivered through house purchases where the buyer pays less than their willingness to pay.

But this masks large transfers in the housing market. The implied price change delivers a transfer of wealth from sellers to buyers of $438 million in the low case and $719 million in the baseline and high case.

Infrastructure benefits occur when housing occurs at relatively efficient sites. Listed benefits accrue from council not having to bear the cost of infrastructure provision at more expensive greenfield sites.

Two factors make the reported numbers appear lower than might be expected. First, the numbers relate to unrecovered development contributions only, costs that might be expected to be incurred by the community. Second, since our analysis suggests the proposed development takes many years before becoming commercially preferred, future benefits are heavily discounted. Recall that a $1 million dollars of costs or benefits realised in 25 years' time is worth a little under $300,000 in present value terms.

Our analysis also provides estimates of the benefits of reduced congestion and lower impact on the environment from medium density dwellings that attract people from a mix of brownfield and greenfield sites. These numbers are equivalent to the analysis within the MRDS CBA that derives a per capita congestion estimate that is then scaled down for brownfield urban development relative to greenfield development. Improvements in congestion amount to $1,334,000 in our base case and better environmental outcomes are $2,451,000.

The lion's share of benefits come from changes agglomeration impacts. These impacts come from deepening labour markets, greater knowledge transfers and economics of scale that occur when a city grows. These benefits are small for any worker in any particular year – less than $20 a year extra income. But since the benefits apply to all workers in the city each year after the development occurs, total benefits are large.

Costs

We set out three key costs we quantify in Table 10: (i) infrastructure costs, (ii) shade and (iii) loss of views.

Infrastructure costs are the counterpoint to the benefits identified in Table 10: unrecovered development contributions for brownfield intensification. On a net basis, note that the proposed rezoning delivers net benefits in terms of infrastructure.

We also include costs for shade and views.

At first blush, this can appear odd since the apartments are new. But relative to the alternative of greenfield development, the average dwelling is expected to have less sun and less expansive views. We have calculated these costs by rating down the costs and views in the MRDS CBA for Christchurch for intensive urban development.[16]

5.2. Option three: A partial rezoning

In addition to the full zoning, we calculate costs and benefits from the partial zoning change set out in option 3 and display these results in Table 11.

[16] This work is based on city-specific samples, in this case 100 properties from within Christchurch. With more knowledge of which sites will be developed, our in-house model, Icarus, which we use to calculate impacts of sun and views with more specificity.

We find smaller impact since the scale of the partial zoning change is expected to result in one-third of the number of new dwellings in the study area based on the size, location and quality of the land partially rezoned.

Fewer dwellings reduce both the benefits and costs of the rezoning. Impacts are not always precisely one-third smaller because of small non-linear impacts in the CBA analysis.

In the base case, the partial rezoning results in over $6 million of net benefits. Notably, the CBA is scalable: Benefit-Cost ratios are high and similar to the full rezoning case.

Table 11: Our analysis suggests smaller benefits from option 3 a partial zoning change

Element	Low	Base	High
Policy impacts			
Extra people	992	1,629	1,629
Extra dwellings	794	1304	1304
House prices	-$5,166	-$8,484	-$8,484
Benefits			
Cheaper houses	$1,711,539	$4,616,260	$6,177,597
Infrastructure benefits	$460,745	$756,938	$959,259
Less congestion	$444,290	$728,964	$934,926
Environmental impacts	$819,468	$1,344,388	$1,722,568
Productivity	$6,315,498	$10,391,446	$13,307,962
Total benefits	$9,751,540	$17,837,997	$23,102,312
Costs			
Infra costs	$335,686	$551,249	$697,992
Shade	$408,088	$1,005,411	$1,699,515
Loss of views	$311,003	$766,811	$1,296,089
Total	$1,054,777	$2,323,471	$3,693,596
Summary			
Net benefits	$8,696,763	$15,514,526	$19,408,715
Benefit-Cost ratio	9.25	7.68	6.25

Source: Sense Partners

References

Ahlfeldt, G. M. & Pietrostefani, E. 2019. "The economic effects of density: A synthesis" Journal of Urban Economics, 111(C), 93-107.

Donovan, Stuart, Thomas de Graaff, Arthur Grimes, Henri L.F. de Groot, David C. Maré, 2022, "Cities with forking paths? Agglomeration economies in New Zealand 1976–2018", *Regional Science and Urban Economics*, Volume 95

Dyason David 2021, Christchurch City Council Land Demand Model Technical Report – Version 1 (draft), 7-26-2021

Dyason David 2022, "Christchurch Central City: Land Demand Estimate and Business Capacity Assessment, April.

Maré, Dave and D.J. Graham 2013, "Agglomeration elasticities and firm heterogeneity", *Journal of Urban Economics* 75 pp 44-56

McDonald, John F. 2001.""Cost-Benefit Analysis of Local Land Use Allocation Decisions," *Journal of Regional Science*, Wiley Blackwell, vol. 41(2), pages 277-299, May.

Mills, E.S. 1967. "An Aggregative Model of Resource Allocation in a Metropolitan Area", *The American Economic Review*, Papers and Proceedings, Volume 57, Issue 2, pages 197- 210

MRCagney, BECA & Covec. 2016. "Cost benefit analysis of policy options for a National Policy Statement on Urban Development Capacity". Job Number: NZ2052, Prepared for Ministry for the Environment. Auckland

Muth, R.F. 1969. "Cities and Housing: The Spatial Pattern of Urban Residential Land Use", Third Series: Studies in Business and Society, University of Chicago Press, Chicago.

PWC and Sense Partners 2021, "Cost-Benefit Analysis of proposed Medium Density Residential Standards", Report for the Ministry for the Environment, https://environment.govt.nz/assets/publications/Cost-benefit-analysis-of-proposed-MDRS-Jan-22.pdf

Wallis, I. and D Lupton, 2013. "The cost of congestion reappraised." *NZ Transport Agency research report 489.*

SENSE PARTNERS

DATA LOGIC ACTION

Plan Change 14

Section 32

Mixed Use Zone – Comprehensive Housing Precinct Analysis

Christchurch City Council

Technical Report

Date: (**26 July 2022**)
Version: v.5
Author: Nic Williams
Peer reviewed: Josie Schroder

DISCLAIMER:

Christchurch City Council has taken every care to ensure the correctness of all the information contained in this report. All information has been obtained by what are considered to be reliable sources, and Christchurch City Council has no reason to doubt its accuracy. It is however the responsibility of all parties acting on information contained in this report to make their own enquiries to verify correctness.

This document has been prepared for the use of Christchurch City Council only. Copyright © 2022 by Christchurch City Council.

Christchurch City Council

1. Summary

1.1 Transitioning Industrial General to Mixed Use Zone (out of central city)

1.1.1 The purpose of this report is to provide an overview of modelling undertaken to consider District Plan provisions that support the transition from areas of industrial activity to high quality, high density residential activity, through the provision of a Mixed Use Zone (MUZ), and Comprehensive Housing Precinct.

1.1.2 It is proposed to rezone existing Industrial General Zones (IGZ) that are within the walkable catchment of the Central City, and that are not required for future industrial needs or have substantive redevelopment risks, to a MUZ, in conjunction with a Comprehensive Housing Precinct. This includes areas of Sydenham, Addington and Charleston. Given the close proximity of these locations to the Central City, the intent is for a transition to high density, quality residential neighbourhoods, which contribute to innovative and new housing areas and low emissions neighbourhoods, as well as support the primacy of the Central City.

1.1.3 Currently these areas are primarily occupied by industrial and service activities and lack the amenity that might be anticipated for residential activities, including basic landscape and streetscape qualities. As such, a 'density-done-well' approach is proposed to ensure that developments provide sufficient on-site amenity and functionality to offset reverse sensitivity effects and lack of amenity resulting from the industrial character, as well as contribute to a safe and attractive neighbourhood.

2. Assumptions and Approach

2.1 15.2.3.2 Policy – Mixed use areas outside the Central City

2.1.1 The design assumptions tested were developed with the policy context as their basis. The policy context seeks to support the transition from IGZ to MUZ within close proximity of the Central City, into high quality residential neighbourhoods by enabling comprehensively-designed, high density residential activity. Growth of retail and office activity in the MUZ is proposed to be limited to support the primacy of the Central City, and to ensure the viability and clustering effect of commercial activity in the established network of centres. In addition, to achieve policy direction to ensure greater housing diversity, lower cost forms of housing and density uptake, a minimum number of storeys and apartments as a development type, is included within the draft provisions package.

2.1.2 The proposed policy recognises the industrial nature of the areas proposed for rezoning and the potential reverse sensitivities that may occur when providing for residential activity. As such it is recognised that generally small scale piecemeal redevelopment of sites is unlikely to effectively manage reverse sensitivity effects on-site and deliver high density, high quality outcomes. Rather development of scale is required. It is also recognised that many of the sites/blocks within the IGZ areas are substantive and have the potential to impact on the future form and function of the area as a whole, including on transport options.

2.1.3 To capture the opportunity and manage effects, the District Plan provisions proposed focus on the size and dimensions of the site, while addressing options to achieve safe and legible site layout, and high quality on-site amenity. In combination, a good site layout and onsite amenity reduce the need to borrow amenity (privacy, outlook, daylight/sunlight, views to

landscape) from side or rear boundaries, given these industrial areas typically include buildings built right to the boundary, and an absence of trees and landscaping.

2.1.4 Other policy direction is to reduce greenhouse gas emissions including through small-scale building reuse, innovative forms of residential living, and more walkable neighbourhoods, with a focus on perimeter block development. The latter focuses development patterns to face the street, rather than side-boundaries, and locating open space to the rear/interior of the block. This establishes safe, attractive and engaging streets, where people are more likely to choose to walk, scoot or cycle for local trips, and more amenity provided across blocks to the interior.

2.1.5 Lastly, these provisions have also been informed by research about quality intensification and monitoring of quality outcomes in other zones, particularly CCMU. The provisions also seek to maintain consistency with outcomes in other residential zones. As such reference is made to the Residential Design Principles in Chapter 14 of the District Plan.

2.1.6 First informed by actual and realistic comprehensive developments, an iterative design approach has been undertaken to evaluate and amend the proposed provisions. Appendix 1 of this report provides an evaluation of consented residential developments in Ōtautahi Christchurch. These developments are located within residential or mixed use zones, and were evaluated against proposed District Plan provisions, and more specifically proposed Matters of Discretion, with the intent to determine the site quality pre-requisites for enabling well-functioning, high quality residential development. Further, this work identified aspects of the design that contribute both positively and negatively to the overall design outcome.

3. Modelling Parameters

3.1 Minimum standards for comprehensive residential development

3.1.1 Utilising the range of development outcomes discussed above, the following key site layout components were tested to determine how both high quality and medium-high density developments could be enabled. These key components included:

i. The size and width of a site capable of high quality, medium-high density development;

ii. The extent and dimensions of communal open space minimums;

iii. Minimum proportion of apartments proposed[1];

iv. Maximum length of building along the side boundary;

v. Frequency of through shared pedestrian site links between the large, currently impermeable blocks.

3.1.2 *Size and width of sites*

The objectives for the zone (i.e. more density, greener, less accommodating the car onsite) lend themselves particularly well to a perimeter block form of development. The benefits of a perimeter block development include:

- Efficient use of site widths which better enables apartments;

[1] Current developer preference for faster sales in Christchurch is typically for terraced houses rather than apartments. However, apartments can yield 4+ x households in the same amount of space than townhouses.

- The creation of continuous street frontages which support safe, engaging and attractive streets (which in turn support walkable neighbourhoods);
- Improved residential privacy given no overlooking onto the side boundaries (only into the subject site and out to the street;
- Flank walls currently exist in this IG zone, so this urban structure knits into the existing pattern of development, however with greater onsite shared amenity.

Site depths in Sydenham for example are typically 50 metres deep, however it is acknowledged other sites may be deeper than this. As noted earlier, to maximise density uptake and the scale of development intended, a minimum proportion of apartments are proposed to be required. To maximise the use of apartments fronting the street, a minimum of five, single aspect apartments per floor, at a typical width of 4-metres each, is practicable for an affordable walk-up typology. When a minimum 3-metre wide access way from the street through to the middle of the development is included, this results in a minimum site width of 25 metres.

A minimum street frontage width of 25 metres is therefore proposed and identified in 15.10.2.9.a. To achieve good on-site amenity for these comprehensive, higher density redevelopment sites, 200m^2 of communal open space (at a ratio of no greater than 1:3) would provide a minimum size of open space. This size and proportion would allow for medium to larger scale trees contributing to amenity, offsetting reverse sensitivity effects and greenhouse gas emissions, and for passive and more active use by occupants. At a minimum of 10% of the site area, this equates to a minimum site size of 2,000m^2 site overall.

3.1.3 *Size and width of communal open space*

A 10% minimum site area as communal open space + top up 12sqm /apartment as open space was tested, and the result for an apartment only typology was that approximately half of the development site would need to accommodate communal outdoor space. This proportion of open space is not considered to be effective in achieving high-density residential living.

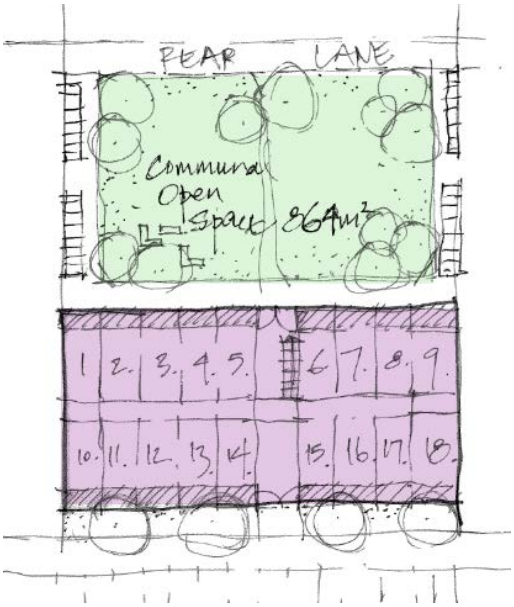


Figure 1: Scenario testing of 10% communal open space + 'top up'12sqm (assuming a balcony area of 8m^2 and total OLS of 20m^2), results in a very large communal open space of up to approximately half the site.

Furthermore, land values[2] of approximately $1,100/m^2$ are expected within the Sydenham area at the time of writing, which is comparable to some central city sites (Madras Square sold for $1350/m^2$). If demolition costs are accounted for, these sites are likely to need a reasonable net developable area to become feasible for redevelopment. As such, a minimum 10% communal open space (with a max cap at 20%) is considered both practical and likely to be feasible.

In terms of width, for medium sized sites, the initial 8-metre wide width for communal space worked well in providing amenity for residents' use. However, the larger sites site layouts resulted in very long and narrow communal open space, which did not provide adequately for comfort (including potential wind effects), use and recreation requirements. In response to this a 1:3 width to length ratio standard was tested, and considered effective, and as a result has been included to provide for flexibility of use of the communal space, and to create some variation in communal space for larger sites.

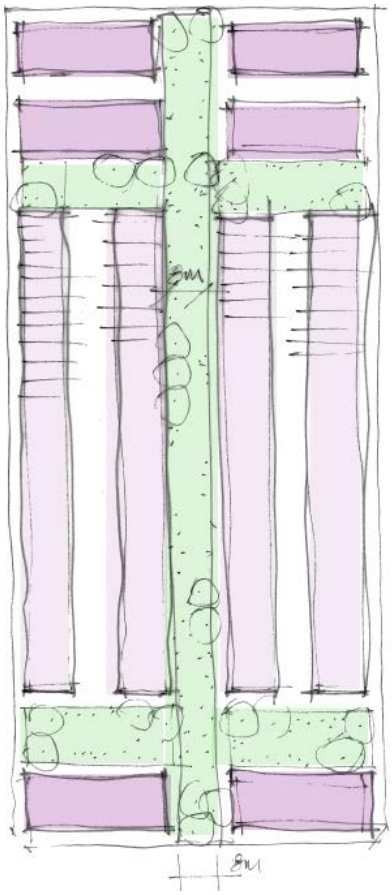


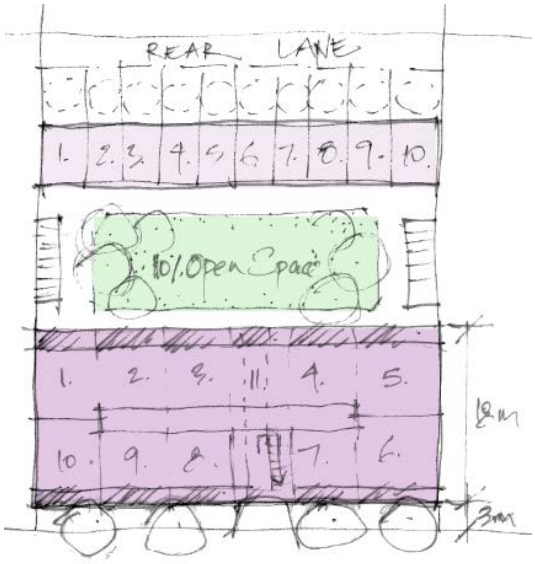
Figure 2: Scenario testing of an 8-metre wide dimension of communal open space on large sites could result in the unintended consequences of very long and narrow communal open spaces.

[2] CBRE estimates, and e-sales figures for land values within the Sydenham area, July 2022

3.1.4 *Minimum percentage of apartments proposed*

A range of housing typologies were applied including the most common in Ōtautahi Christchurch – the 2 and 3 storey townhouse. This resulted in highly monotonous development with minimal variation both from an occupant and built form/street scene perspective, and in regard to potential extent of activation at street level, rather than amenity gained from activity at each level i.e. apartments.

In response to both a minimum number of storeys (4) to reinforce the street edge/activation and maximise the opportunity for high density development, a minimum proportion of apartments across the site via building footprint areas was tested. This resulted in both a minimum proportion of the footprint and a minimum proportion of frontage width required for apartments being considered fundamental, in association with a perimeter-style block development. Measuring via buildable footprint area is considered easier to calculate than a minimum percentage of the site or a percentage of apartments overall.



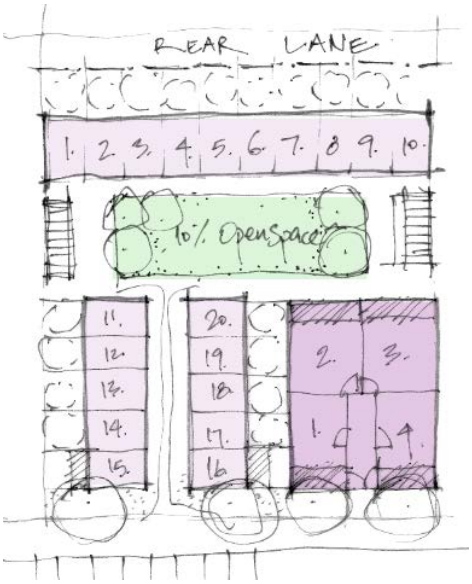


Figure 3 (above left): Over 50% building footprint as apartments = 10 terraces and 39 apartments.

Figure 4 (above right): Min. 25% building footprint apartments = 20 terraces and 10 apartments which results in a transitional ratio of 1:2 apartments to terraces. Note in this scenario, without a minimum street frontage width of apartments, this outcome may not contribute well to reinforcing the street edge and achieving the benefits of a perimeter block approach.

3.1.5 *Contribution to the street scene/ creation of perimeter blocks and resultant maximum length of building along the side boundary*

A 3 metre landscape setback, with trees at a rate of 1 per 10m, is proposed from the street. A 3m width provides for sufficient canopy growth for a medium size tree of a form that could provide canopy cover and amenity for both the adjacent street and to the site. The setback also provides sufficient space for root growth (in association with the provision of underground lateral services), under-planting and a transition from the public space of the street to the private space of the interior of the residential units, offsetting impacts of potential visual intrusion via glazing. Evidence shows that this area has one of the lowest tree canopy rates in Christchurch[3]. Additionally, trees contribute to amenity, offset emissions, and reduce impacts of sun and wind, particularly within older industrial general areas where there is an absence of trees.

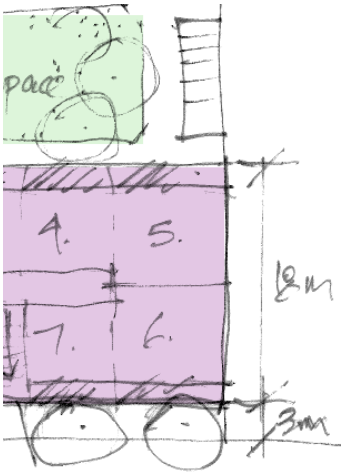


Figure 5 (right): Zero lot building on the side boundaries of 18-metres, results in a maximum building on the boundary back from the street of 21-metres, given this includes the 3-metre landscape setback.

In addition to minimum percentage of apartments, front loading sites and the creation of perimeter blocks reinforces the street edge, and contributes to street scene quality, as well as Crime Prevention Through Environmental Design (CPTED).

When considering single aspect apartments (fronting into the site and out to the street) with an internal core / corridor access, an additional 18 metres back from the street provides for two rows of squarer 5.5 x 6-metre deep apartments, plus 1800mm deep balconies and a 1500mm wide corridor. As such a 21-metre zero lot side boundary from the street edge has been provided for apartments to strengthen the street edge.

3.1.6 *Frequency of through-site links between the large, impermeable blocks*

The IGZ street blocks are large and generally impermeable, in respect to the pedestrian access routes, due to the nature and scale of the light industrial activities.

In addressing the policy matters relating to prioritising low carbon modes of transport, i.e. active transport such as walking and cycling, creating regular through-site links is important to provide a more walkable block pattern and distances in these areas, given they are well located near commercial activity and services, as well as the Central City.

A 8 metre wide access link provides for 2 metres of landscape each side, and a 4 metre wide central shared path (street authority standard for a shared path), or variations to this. This

[3] Morgenroth, J (2019), *Tree Canopy in Christchurch NZ 2018/19: Report Prepared for the Christchurch City Council*, P7.

accounts for CPTED, resident privacy adjacent, as well as opportunity for low impact design features, such as stormwater management facilities.

The scenario below is an example of how a large 2 ha block (real life site) could be made more walkable with 8-metre wide lanes at every 65-metre (approximate) intervals resulting in block perimeter distances equivalent with what would be found in a fine grained, walkable neighbourhood.

In addition, given the policy intent for reducing greenhouse gas emissions and focus on active transport options, car parking on-site was not prioritised, but was considered in the design outcomes. As a result car parking has been included at a ratio of 0.25/unit.

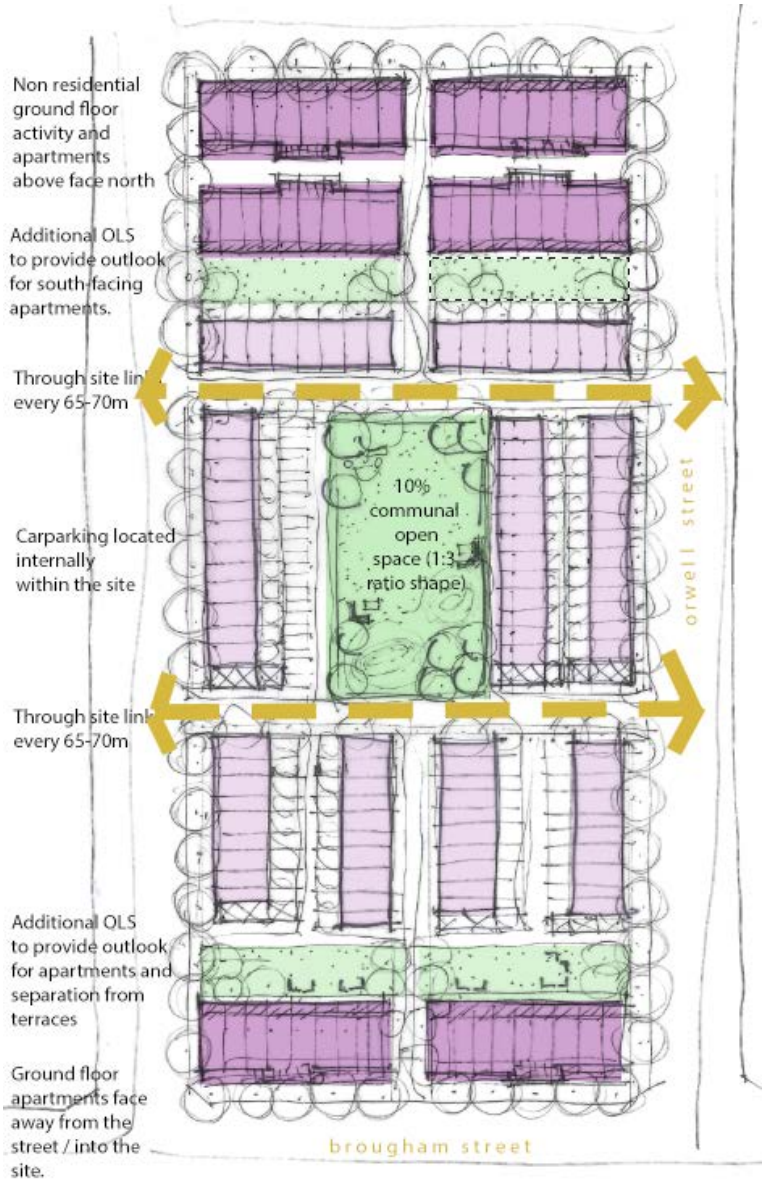


Figure 6: Possible scenario of a 2 ha. site close to the Central City, which includes a minimum 25% building footprint of apartments (at a minimum of four storeys), 1:3 ratio of 10% communal space, required 3m setback for tree planting and through-site links for walking cycling (8-metres) and a small extent of on-site parking.

4. References

Appendix 1 – Comprehensive Redevelopment in the Mixed Use Zone (outside the Central City).

[Image source: Big Yard, Berlin, establishes a pattern of active edges and quiet cores to support both a walkable network of streets and good internal amenity]

Appendix 1: Comprehensive Redevelopment in the Mixed Use Zone

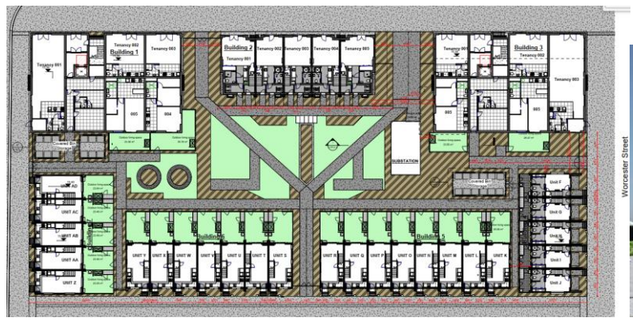
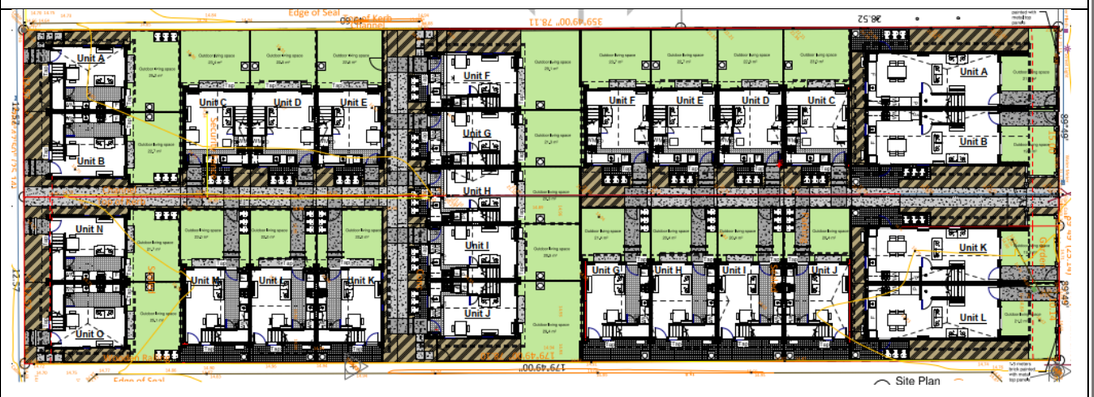
(Out of the Central City)

Christchurch City Council Urban Design Team

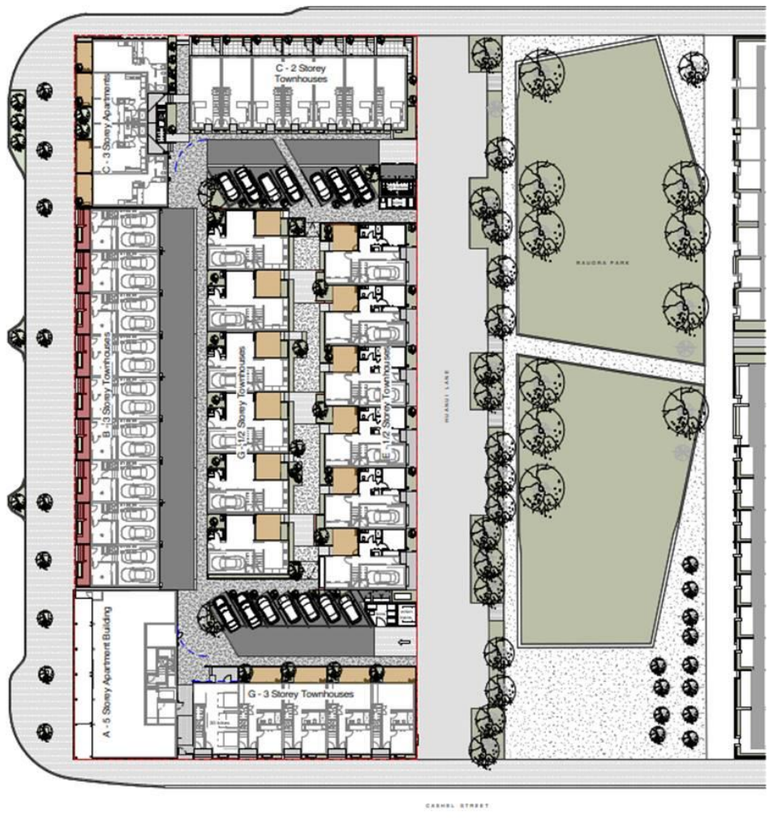
25 July 2022

Case Study Analysis

This analysis summarises various consented developments across a variety of residential or mixed use zones in Ōtautahi, Christchurch to determine the site quality pre requisites for enabling well-functioning residential developments in new Mixed Use areas outside of the central city. Each site is then tested against how it would measure up against the proposed assessment matters relating to the proposed Mixed Use Zone outside the Central City (currently Industrial General Zones).

	Address (RMA number)	Site Size (and street frontage)	Current Zone	Unit type / mix	Walkable proximity central city	Special features	Image
01	**36 Welles Street, Central City** (RMA/2015/1398)	**8,010sqm** (46m)	City Centre Mixed Use	100 Apartments and 13 terraces. Total = 113 = 141DPH.	Within South Town precinct of the Central City which includes a good mix of office, shops, hospitality and South City (supermarket).	Wider, landscaped walkways, however no communal open space as such but a small landscaped area at the southern end in front of the car parking.	
02	**132 Worcester Street, Super Lot 11** (RMA/2022/2050)	**4,739sqm** (48m to Worcester and Hereford and 100m to Manchester and Huanui Lane)	Commercial Central City Business	72 Apartments, 25 terraces (and 5 mixed res / com and 6 commercial spaces) Total = 97 = 204DPH.	Within the Central City core = close to a maximum range of amenities. As part of a wider master planned precinct, the site boasts direct adjacency with Rauora Park, a high quality open space to offset post-quake transition from business to residential.	Communal open space of 450sqm (15 x 30m) provided = approx. 10% of total site area. Mix of apartments onto Manchester Street and terraces fronting the quieter Rauora Park. Ground floor commercial tenancies facing Manchester and the key corners to avoid outdoor space fronting the street on the ground level.	 
03	**240-244 St Asaph Street, Central City** (RMA/2020/463)	**1,964sqm** (25m to both St Asaph and Southwark Street to the south)	Commercial central Mixed Use Zone	27 x terraces only. 137DPH	Within central City and mix of office, shops, hospitality and South City.	No communal open space or access ways that provide a high quality level of landscape amenity. Some ground floor outdoor living space fronting the street. Many terraces face the side boundary (but comply with the 4m setback) to address north and west orientations only.	

04	**99 Corsair Drive, Hornby** (RMA/2018/267)	**5,275sqm** Long frontage to Mackay Street	Residential New Neighbourhood	54 apartments and 11 duplexes.	The wider Master Plan established a 10-metre wide through site link to Wigram Skies Town Centre which offered the developer a high amenity frontage for apartments to front onto.	Some outdoor living spaces fronting the principal street with visibility of washing lines reduces privacy and pleasantness of the street. Numerous narrow access ways between the buildings create an unsafe movement network through the development. Positively though, all 1 bedroom apartments offer 4sqm of internal storage space and dedicated and sheltered bike parking.	
05	**198-204 Main North Road, Redwood** (RMA/2021/3111)	**4,897sqm** Long frontage to QE11 Drive and two frontages to Main North Road of	Residential Suburban (EDM mechanism being opposite new Pak n Save and associated shops + bus routes)	15 terraces and 13 duplex dwellings	Little surrounding amenity as the RS area is in slow transition. QE11 Drive adjacent is noisy and there is no access off this edge. Awaiting Pak n save development opposite but nearest established Centre is Papanui down the road.	The development has been divided into two separate sites which results in a number of issues relating to vehicular access and the inability to share communal open space. Outdoor open space fronts Main North Road. Poor pedestrian access generally from the street to the front doors – especially for the south.	
06	**32 Cashel Street, Central City** (RMA/2001/0214)	**1,017sqm** (20m)	Residential Central City	12 x apartments	Central City location between Rolleston and Montreal Streets boasts ideal central city living location	Two blocks of three-and-a-half level apartments proposed with spaces in between for car parking and circulation. Existing mature trees in the front yard have been retained which improve outlook and street amenity. Balconies face the side boundaries (3.6m offset), which can dilute a sense of privacy for adjacent sites.	 

07	**22 Cashel Street, Central City** (RMA/2017/2459)	**835sqm** (15m)	Residential Central City	6 x apartments	Central City location between Rolleston and Montreal Streets boasts ideal central city living location	Two blocks of three levels of apartments proposed with spaces in between for car parking and circulation. Existing mature trees in the front yard retained to improve outlook and street amenity. Balconies only face forward to the street and internally within the site, which offers a high quality (maximising privacy for onsite and adjacent sites) built form contribution to the street and neighbourhood.	
08	**184 Hereford Street, Central City (SL 10)** (RMA/2021/644)	**4, 826sqm** (100m to Manchester Street and Huanui Lane; 47m to Hereford and Cashel Streets)	Commercial Central City Business	63 Units (26 + 37 townhouses) and 72 parking spaces.	Central City location between Manchester Street and Rauora Park boasts ideal central city living location.	No communal open space and accommodation of the car (more than a 1:1 ratio of cars to units) through the internal circulation of the site results in reduced onsite amenity. The long length of garages may also contribute to a CPTED issue given the lack of passive surveillance from the length of double garages. The pedestrian access way in from Huanui Lane to access the internal block of townhouses is less than 2-metres wide and does not include any landscape space for trees to contribute to a high level of amenity. The balcony depths are sufficient, a good mix of typologies, large commercial corner and the architectural style is interesting and engaging.	

Analysis of case study sites against the proposed assessment matters for PC14 Mixed Use Zone (outside the Central City – current IG areas)

This table assesses which of the above seven case studies would meet the proposed assessment matters below

a. ***In respect to the Mixed Use Zone (outside the central city):***

1. ***Whether it is demonstrated that the site is of a size and its dimensions enable a comprehensively planned and designed residential or mixed use development, which will achieve a high quality living environment, which includes:***

Policy / site no.	01 Welles	02 SL11	03 St Asaph	04 Corsair	05 Main North	06 32 Cashel	07 22 Cashel	08 SL10
a. managing reverse sensitivity impacts of adjacent uses on-site;	√	√	X	√	X	X	√	√
b. contributing to infrastructure requirements identified within an Outline Plan for the area in which the site is located;	Not reviewed	Not reviewed	Not reviewed	Not reviewed	Not reviewed	Not reviewed	Not reviewed	Not reviewed
c. a mix of building and unit types, including apartments of 4 to 6 storeys;	√	√	X	X	X	X	X	√
d. communal space of a size and quality that is adequate for the scale and density of the development proposed;	X	√	X	X	1/2	X	X	X
e. pedestrian access that supports the legibility of the development and meets CPTED principles;	√	√	1/2	X	X	1/2	1/2	X
f. provision of space to contribute to shared rear access lanes, greenways, and street to street connections, existing or planned;	√	X	X	√	X	X	X	X
g. provision of adequate space for servicing and storage, including bike parking, that will meet residents' needs;	Not reviewed	Not reviewed	Not reviewed	Not reviewed	Not reviewed	Not reviewed	Not reviewed	Not reviewed
h. provision of sufficient street frontage to enable a high quality residential interface with the street; and	√	√	X	X	X	X	X	√
i. provision of sufficient areas for landscaping including medium to large scale trees across the site.	X	√	X	X	√	√	√	X
TOTAL SCORE OUT OF RELEVANT SITE LAYOUT ASSESSMENT MATTERS	**4/7 Welles**	**6/7 SL11**	**0.5/7 St Asaph**	**2/7 Corsair**	**1.5/7 Main North**	**1.5/7 32 Cashel**	**2.5/7 22 Cashel**	**3/7 SL10**

Observations

1. Larger site sizes do not necessarily result in comprehensive redevelopment. This can often depend on the developer / architect and the degree of influence a public good authority may have – refer to the notably different scores between Super Lots 10 and 11 in the East Frame. In general however, larger site sizes and more regular site shapes with wider street frontages have more site layout options available to them for quality comprehensive development, than narrower or smaller sites. For example, the location, shape and type (green open space, series of courtyards or rooftop) of communal open space can be designed in a way that is sunny and sheltered from the wind, whilst also maximising the solar gain from locating apartments and terraces to the north, west or east. **Recommend:** Minimum site size of 2000-2500sqm with a minimum communal open space of 200sqm, including a minimum shape factor ratio of 1:2-1:3.
2. Communal open space. Given the absence of street trees or onsite amenity, as well as the existing form of development with sheer walls alongside boundaries, development sites need to borrow amenity from within their sites. **Recommend:** 10-15% of total site are be dedicated to central communal space. This can be in the form of a central courtyard, green space or roof garden. It can also provide for some of the total landscape apace area.
3. Sites with greater street frontage have greater ability to secure outlook / privacy / amenity so site width is very important. **Recommend** Minimum 25-metre site width which allows for 5 x 5m apartments across the street front (access can be under one of the above apartments). This sets up a solid side wall interface (zero lot line) which is commensurate with the existing style of site layout for the Industrial General sites.
4. Non-residential activity on the ground floor of the street edge creates a safer, more interesting and walkable neighbourhood than ground floor residential. Ground Floor residential is often separated by a solid fence around north or west facing-facing patio / OLS which creates tensions between engaging with the street and securing privacy for residents**. Recommend:** Either ground floor areas fronting streets be non-residential or no outdoor open space fronting the street for ground floor residential living. This ensures good privacy for residents (with outdoor living or patios at the back / inside of the development) as well as good opportunities for passive surveillance from the street from kitchen windows and front doors.

Figure 1 – Example of the Welder mixed use apartments on Welles Street with retail tenancies (unlet) at ground floor and apartments above with north-facing balconies.

Mixed Use Zone District Plan private outdoor space requirements for each residential unit:

- 25m², min dimension 3.0m, ground level, accessed from living space, or
- 8m², min dimension 1.6m, balcony, accessed from living space, or
- 10m², min dimension 2.0m, roof terrace, accessed from living space

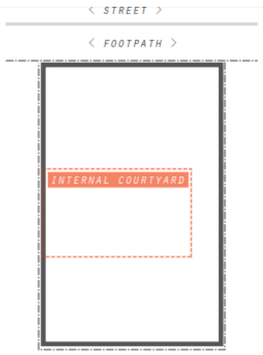


Fig 9. Internal courtyards

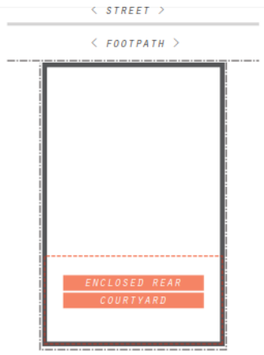


Fig 10. Enclosed rear courtyards

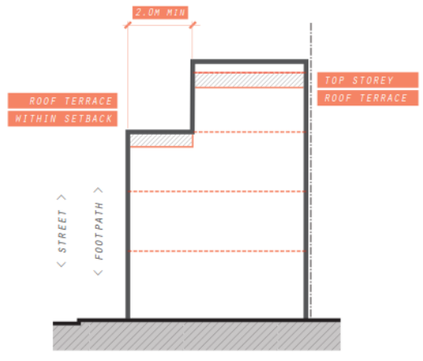


Fig 8. Roof terraces

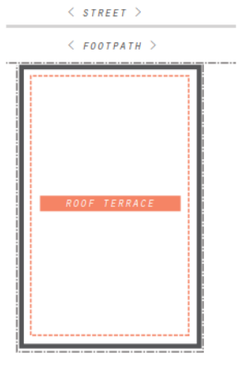


Fig 11. Roof terrace

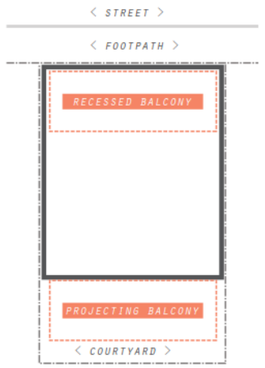


Fig 12. Balconies

Figure 2 – Vinegar Lane Design Guide – illustrating different types of communal open space: rooftop, courtyard or balconies.

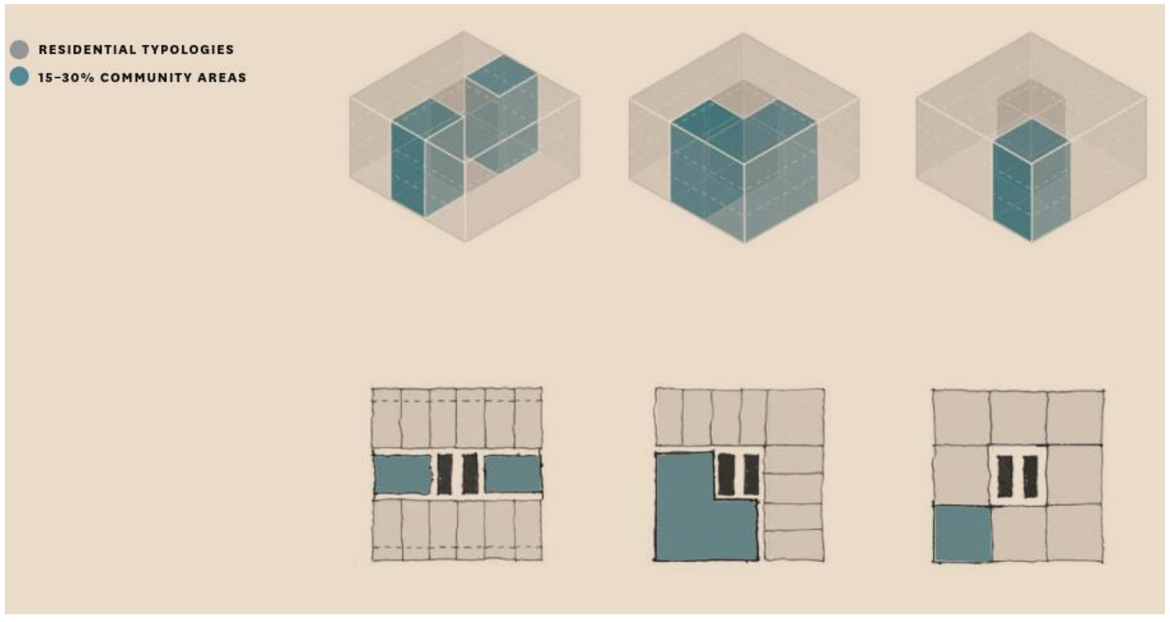
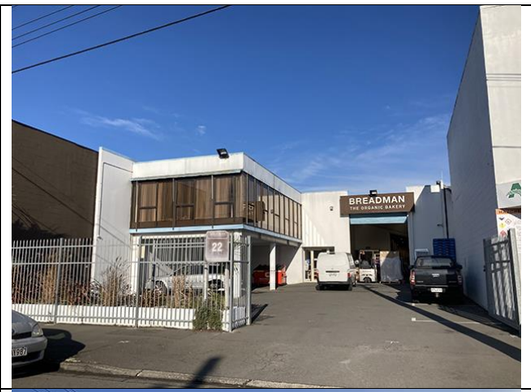


Figure 3 – How to locate community space areas to support socialisation (Jason Twill Presentation to CCC)

Industrial General area qualities

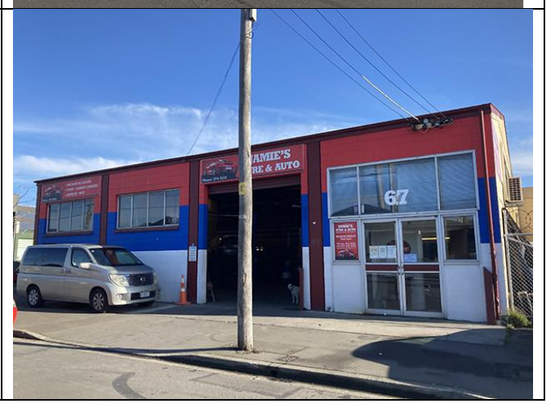
- Christchurch's light industrial neighbourhoods are often located near railway lines given potential historic access opportunities, but more recently the noise of lower aesthetics of these locations.
- Principally daytime activity only which includes a high proportion of jobs, economic transactions, easy car access, noise and smells (paint) and as a collective, offers synergies between associated businesses.
- After 5pm these areas are typically dark, quiet spaces with the exception of the odd band practice activity in converted factory spaces.
- Street lighting is often at a minimum given most sites are either fenced off or locked buildings utilise the full frontage width of the site.
- Similarly, given the importance of truck access and street parking, as well as the lack of residential living in these areas, the level of street amenity is very low (no street trees and footpaths often not continuous).
- Overall these areas do not offer any pre-requisite qualities capable of accommodating quality residential development, except for areas within a close walkable proximity to a local centre or corridor such as Colombo Street.

Sydenham existing context







References

1. RMA application plans
2. Vinegar Lane, Ponsonby Design Manual (Mixed Use Zone)
3. Jason Twill's PPT on Community led living Christchurch
4. The Isaac Surrey Crescent, Ockham Development, Auckland https://www.ockham.co.nz/the-isaac/
5. South Town "Urban Oasis" https://www.thewelder.nz/

Christchurch City Council Research Report

REINZ is delighted to present this research report which will provide data relating to Christchurch's housing market to inform the consideration and selection of geographical areas where intensification will be enabled. Data has been sourced from the REINZ database which combines data from unconditional sales from real estate companies, settled sales from councils, data from LINZ, NZ Post, and realestate.co.nz. This report is based on the questions put to us within Section 3 of the Housing Demand in Christchurch Consultant Brief and those questions will form the different sections within this report.

New Builds – What is being built?

To begin we will look at your own data but maybe in a way that you have not viewed it before. District Valuation Record (DVR) data from councils has an indication of the Building Age of each property the council knows of. This indication is only at a decade level but given we are only 1.25 years into the current decade, we can look at the data marked for this decade and know that it is a new build, one that has been built in 2020 or early 2021. Looking at this data gives us a sense of the new build activity that has happened already.

REINZ purchases Christchurch City Council DVR records, and we add our own extra information to that data, such as suburb and category. This allows us to map your data against Fire Service localities and the following map (Figure 1) shows you where the most dwellings have been built since the beginning of last year.

Figure 1 – New Builds built since 2020

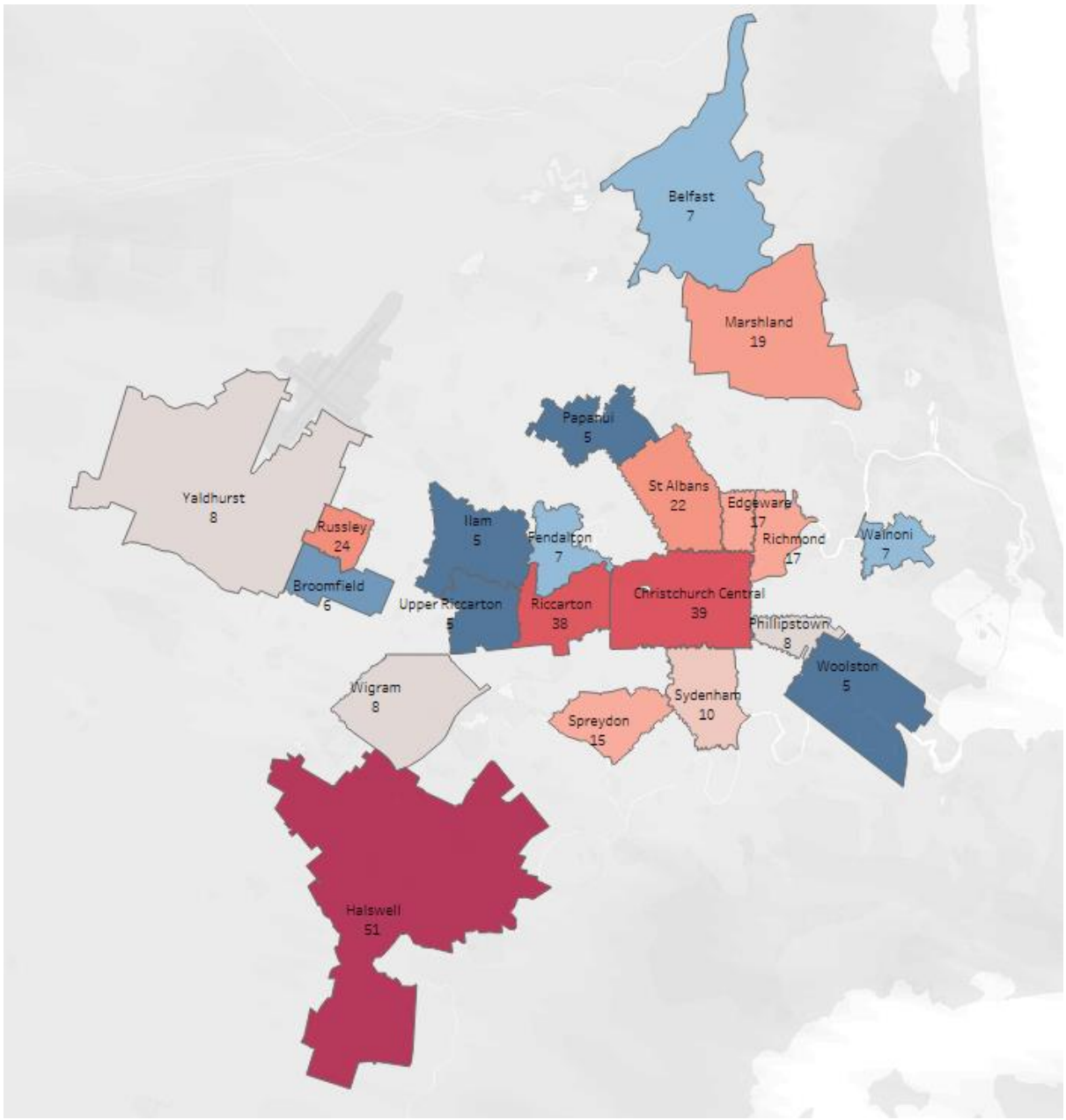


Figure 1 shows the suburbs where 5 or more dwelling units of use (a unit of use is an area that someone can live in) have been built since the beginning of 2020. We see that the Central City and adjacent suburbs have seen most of the new builds in this time. However, there are some farther out satellite areas of note. First and foremost is Halswell which saw approximately 13% of new build activity by itself. To the west of the city, we see a Russley/Yaldhurst/Broomfield cluster with Russley being boosted by one construction of 16 Units of Use. To the north of the city we see a Marshland/Belfast cluster.

From the same data we can see that

- 56% of all units of use were stand alone residences, 26% were attached Units (a.k.a. Flats), 17% were Townhouses and the remaining 1% were Apartments
- 32% of the Units of Use had one parking spot available and 33% had two
- 43% of the Units of Use had a deck, 40% did not and 17% were unknown
- 98% of the Units of Use had no view and 98% were built on level ground (as opposed to a slope)
- 43% of the Units of Use had a floor area of between 50-99 metres squared, 41% between 100-199 metres squared and 11% between 200-299 metres squared.

The second part of the analysis for this section is to look at what New Builds have been sold in the same period. We do not expect there to be the same number as some new builds are built by those intending to live in them and not sell. Some of the sales are sales off a plan and therefore the buildings are not yet in the Council data. REINZ new build data also has a risk of being understated as the field to indicate new build status is not a compulsory one. The data is collected via a tick box so an unticked box could mean it is not a new build or that it is unanswered. This field therefore relies on the diligence of our member agents to fill it out correctly. Nonetheless, it can give an insight into what is happening in the Christchurch New Build market as there is no reason to believe any potential under-reporting would be specific to one or two areas of the city.

The following map (Figure 2) shows what suburbs are seeing sales of dwellings marked as new builds.

Figure 2 – New Builds sold since 2020

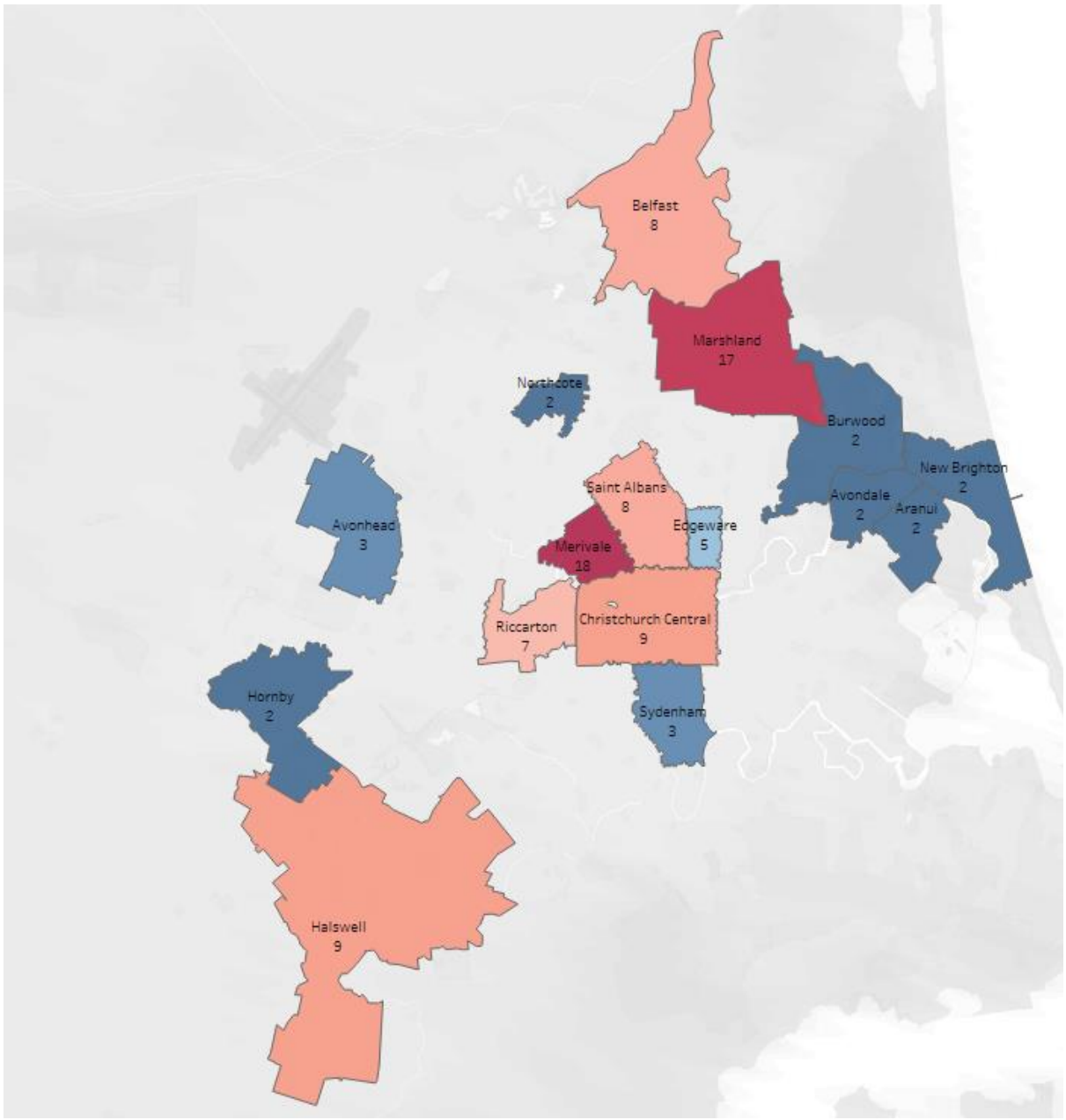


Figure 2 shows suburbs where 2 or more sales of New Builds have taken place since the beginning of 2020. Firstly, we note that the central city and adjacent suburbs are where the bulk of this activity is taking place. It is interesting to note that Merivale has had the most sales out of all the suburbs and yet was not represented on the council new build map. This could indicate many sales happening off the plan in this area. The west of Christchurch is not as represented in the sales map as in the prior map but Halswell in the southwest once again is shown to be an area of notable activity. To the north we see Marshland as the suburb with the second highest number of new build sales and along with Belfast it is well represented on both maps. The sales map reveals some activity in the northeast which indicates some demand in that area.

Prepared by Real Estate Institute of New Zealand (REINZ), April 2021

From the same data we can see that

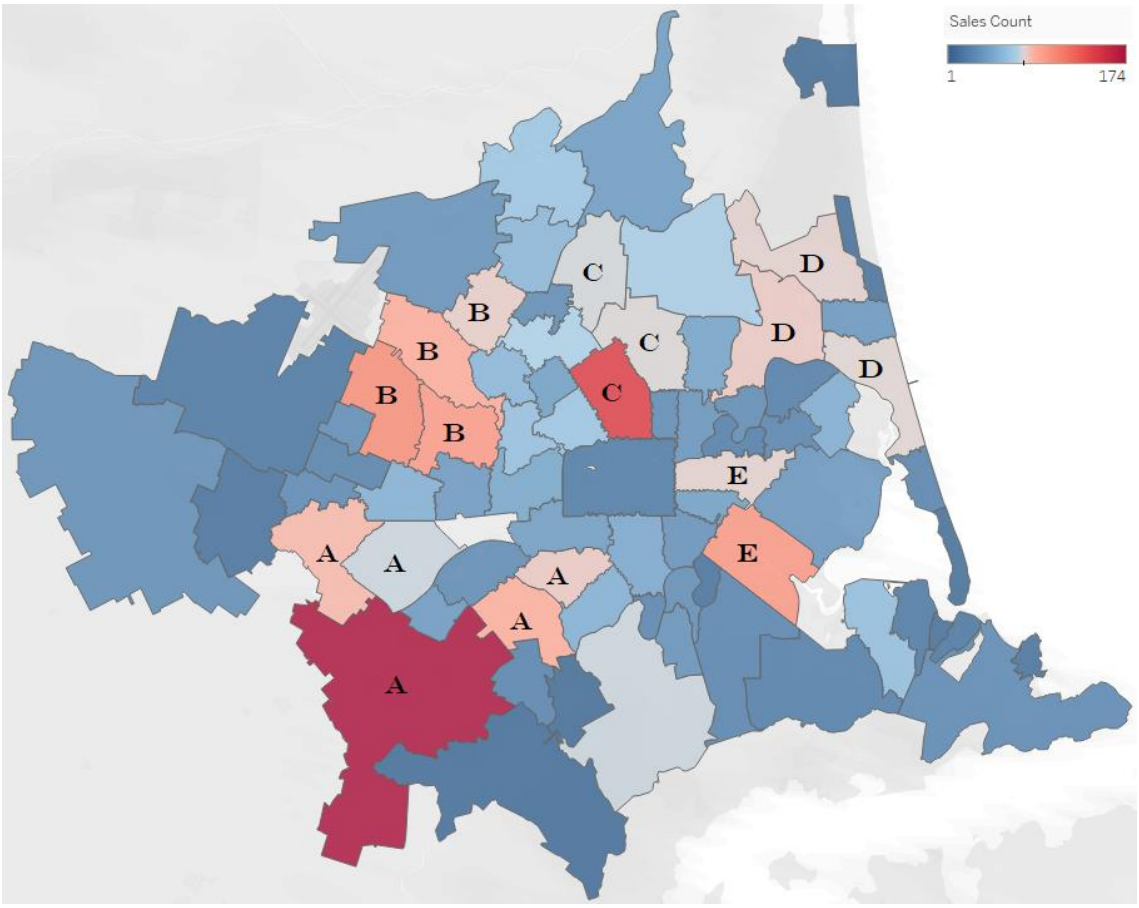
- 57% of sales were for stand-alone houses (Residences), 18% for Apartments, 18% for Townhouses and 7% for Units
- 40% of sales were for three-bedroom dwellings, 29% for two-bedroom dwellings and 23% for four-bedroom dwellings
- 62% of sales were for two-bathroom dwellings, 27% were for one-bathroom dwellings
- 37% of sales were for dwellings that had a floor area of between 100-199 metres squared, 27% between 50-99 metres squared and 19% between 200 -299 metres squared
- 30% of sales took eight or more weeks to sell. 26% took two or less weeks, 23% took two to four weeks and 21% took four to eight weeks to sell.

All Dwellings - What typologies are selling and where? What values are different types of homes achieving?

Residences

When it comes to looking at all dwellings, whether they be new builds or not, the clear predominance in Christchurch, as it is in most other parts of New Zealand, are stand-alone houses – what REINZ refer to as Residences. Figure 3 below shows where the most sales of these houses have been taking place in the six months ending February 2021.

Figure 3 – Sales of All Dwellings for Six Months Ending February 2021



Prepared by Real Estate Institute of New Zealand (REINZ), April 2021

There appear to be a few different clusters that have been notated with the letters A through E.

Cluster A is led by Halswell and joined by the adjacent suburbs of Hornby, Wigram, and Hoon Hay. I have also included Spreydon in this cluster as it is adjacent to Hoon Hay. Halswell had over twice as many sales as the next most active suburb in this cluster. Cluster A accounted for 14% of all Christchurch Residence sales in this period. 57% of Residences in this cluster were 3-bedroom dwellings and had a median price of $527,000. 30% were for 4-bedroom dwellings and had a median price of $670,000. 10% were for 2-bedroom dwellings and had a median price of $435,500.

Cluster B was led by Avonhead and had the adjacent suburbs of Ilam and Burnside in it, along with Bishopdale which is adjacent to Burnside. Cluster B accounted for 11% of Residence sales in Christchurch in this period. 44% of Residences in this cluster were 3-bedroom dwellings and had a median price of $588,000. 39% were for 4-bedroom dwellings and had a median price of $770,500. 8% were for 2-bedroom dwellings and had a median price of $495,500.

Cluster C was led by St Albans and joined by Mairehau and Redwood. St Albans had almost twice as many sales as the next most active suburb in this cluster. Cluster C accounted for 8% of all Christchurch Residence sales in this period. 53% of Residences in this cluster were 3-bedroom dwellings and had a median price of $550,000. 32% were for 4-bedroom dwellings and had a median price of $677,500. 7% were for 2-bedroom dwellings and had a median price of $460,000.

Cluster D was led by Burwood and joined by Parklands and New Brighton. Cluster D accounted for 7% of all Christchurch Residence sales in this period. 47% of Residences in this cluster were 3-bedroom dwellings and had a median price of $490,000. 34% were for 4-bedroom dwellings and had a median price of $612,000. 15% were for 2-bedroom dwellings and had a median price of $380,000.

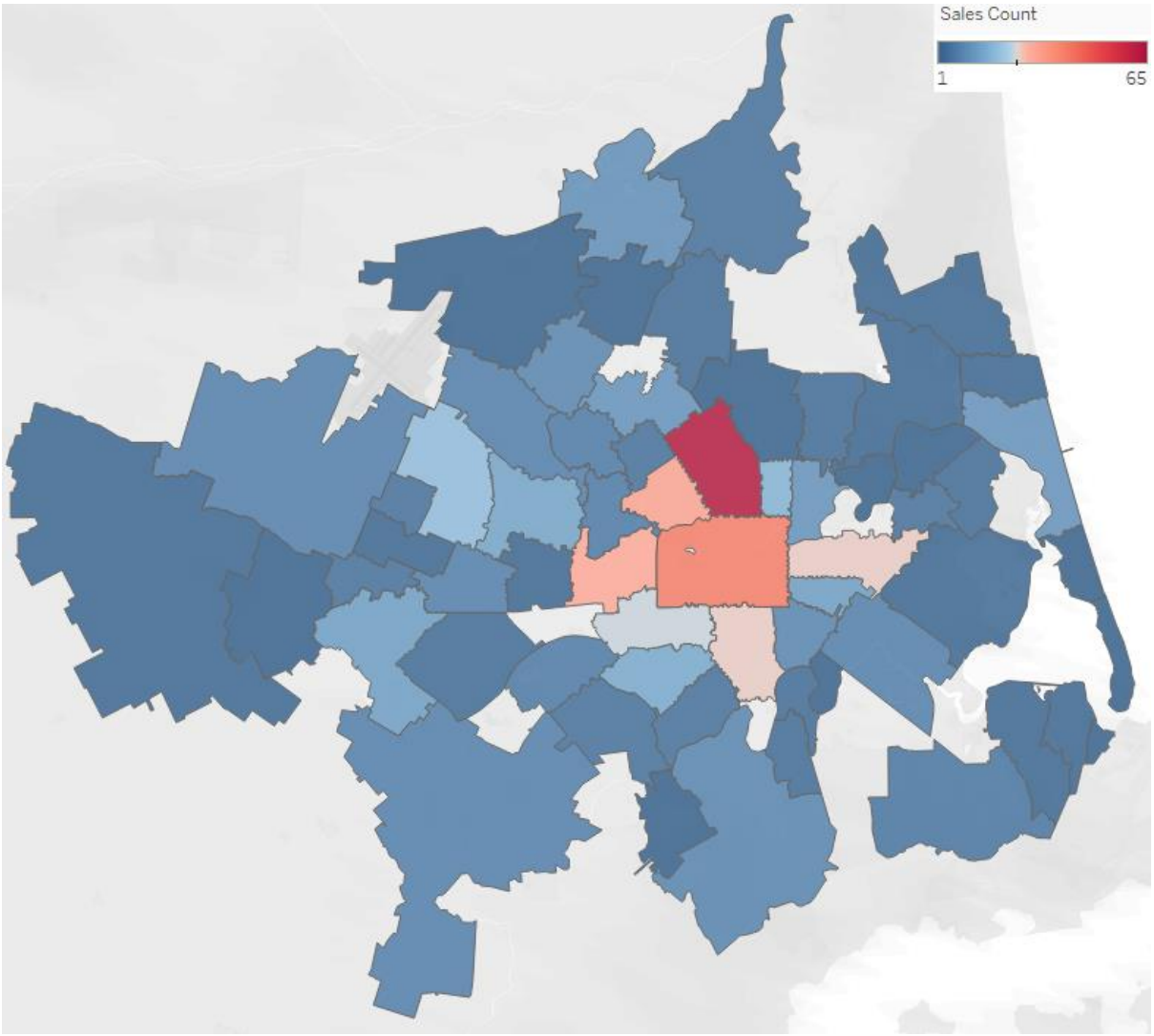
Cluster E was led by Woolston and joined by Linwood. Cluster E accounted for 5% of all Christchurch Residence sales in this period. 55% of Residences in this cluster were 3-bedroom dwellings and had a median price of $425,000. 17% were for 4-bedroom dwellings and had a median price of $443,000. 22% were for 2-bedroom dwellings and had a median price of $356,250.

There are a total of 16 suburbs in these clusters which accounts for 16% of the number of suburbs that had sales in Christchurch over this period but was responsible for 45% of all Residence sales.

Townhouses

Figure 4 shows the prevalence of Townhouse sales in Christchurch for the six months ending February 2021.

Figure 4 – Sales of Townhouses for Six Months Ending February 2021



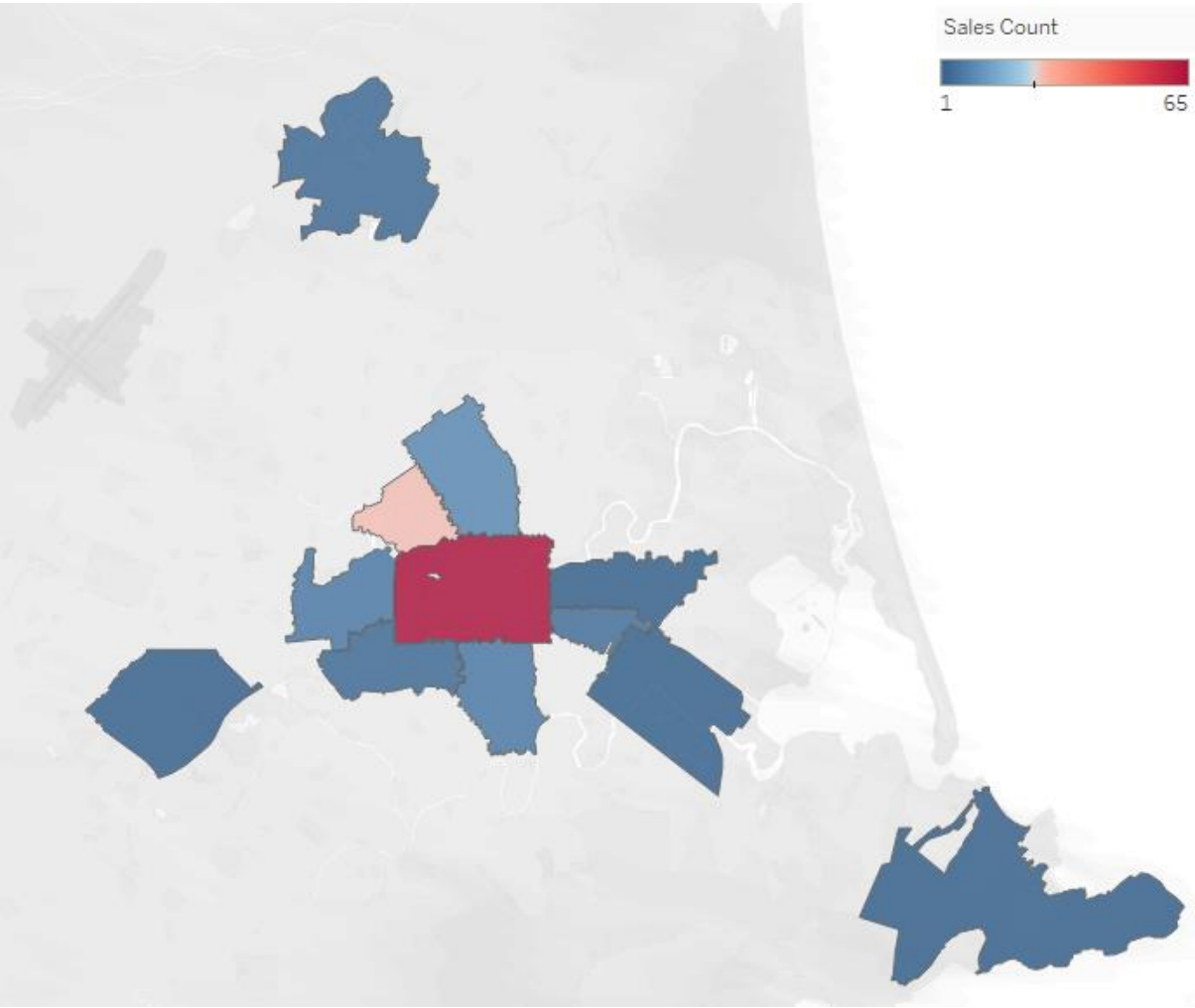
It is very clear to see that Townhouse sales are most prevalent in Christchurch Central and the adjacent suburbs with St Albans having the most Townhouse sales of all suburbs over this period.

The seven suburbs (Christchurch Central, St Albans, Linwood, Sydenham, Addington, Riccarton, and Merivale) in this dominant cluster accounted for 45% of all Townhouse sales in Christchurch over this period. 52% of the Townhouses sold in this cluster were for 3-bedroom dwellings and had a median sale price of $588,000. 39% of sales were for 2-bedroom dwellings and had a median sale price of $490,000. Only 5% of sales were for 4-bedroom Townhouses and they had a median sale price of $732,500.

Apartments

Figure 5 shows the prevalence of Apartment sales in Christchurch for the six months ending February 2021.

Figure 5 – Sales of Units for Six Months Ending February 2021



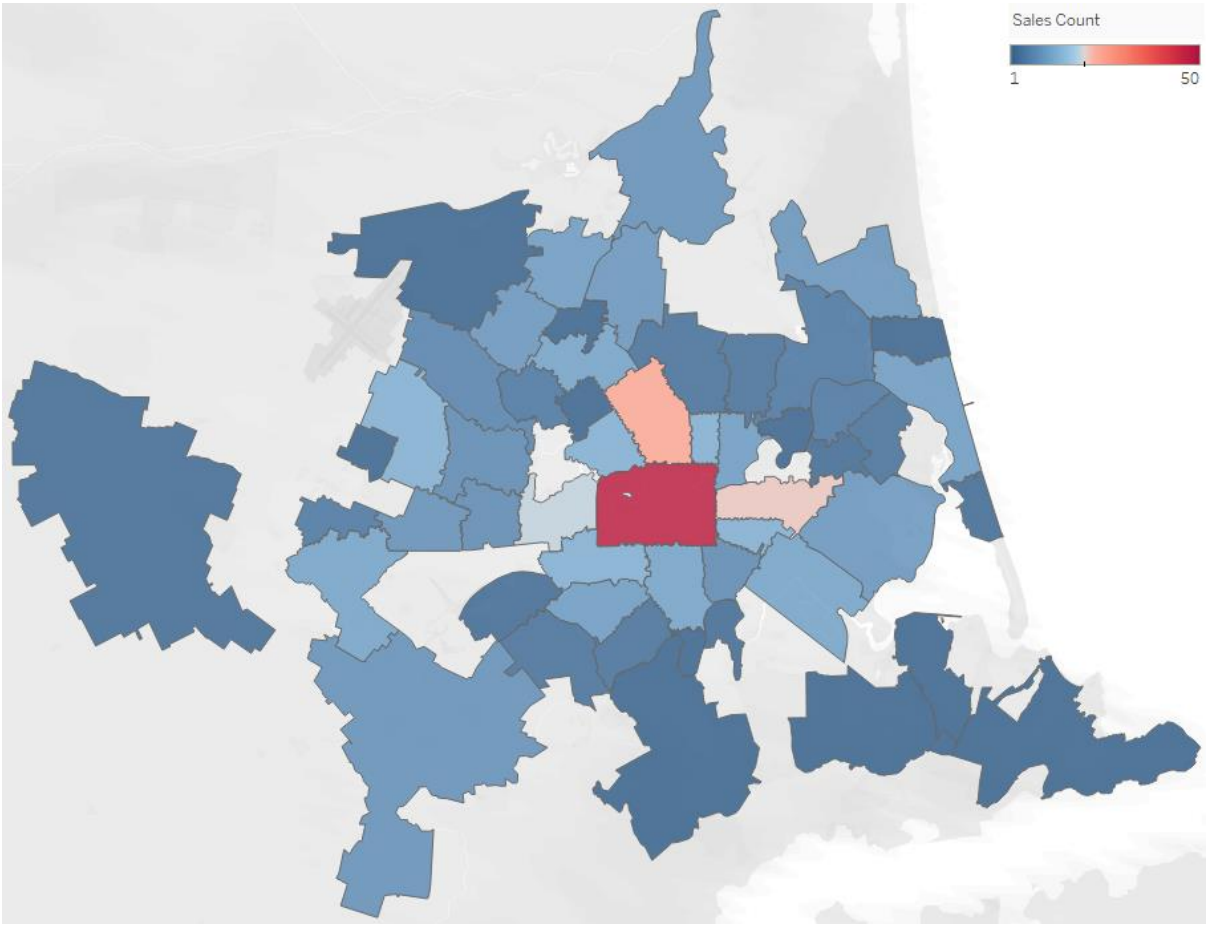
It is clear to see that beyond Christchurch Central and Merivale there are not many Apartment sales in Christchurch with no other suburb exceeding 10 Apartment sales during this period. 69% of Apartment sales took place in those two suburbs alone.

Within those two suburbs, 67% of Apartment sales were for 2-bedroom dwellings and had a median sale price of $556,500. 23% of Apartment sales were for 1-bedroom dwellings and had a median sale price of $406,000.

Units

Units are semi-attached dwellings, usually with one shared wall to another unit. They are sometimes referred to as ‘flats’. Figure 6 shows the prevalence of Unit sales in Christchurch for the six months ending February 2021.

Figure 6 – Sales of Units for Six Months Ending February 2021



Whilst there is a concentration of Unit sales in the Christchurch Central suburb and a few adjacent suburbs, Unit sales tend to be spread around Christchurch with no other clear suburbs.

If we look at Christchurch City, St Albans, Linwood, and Riccarton as being an 'upside down T shaped' cluster, we note this cluster accounts for 27% of all Unit sales in Christchurch. 73% of Unit sales were for 2-bedroom dwellings and had a median sale price of $382,000. 16% of Unit sales were for 1-bedroom dwellings and had a median sale price of $344,000.

What is the speed of sales?

At REINZ we measure the speed of sales by looking at median Days to Sell. Days to Sell is the difference between the List Date and the Agreement (Conditional Sale) Date. Table 1 shows the median Days to Sell in Christchurch for various Categories over the 6 months ending February.

Table 1 – Days to Sell by Category

Category	6ME Feb 2020	6ME Feb 2021
Apartment	47	49
Residence	31	27
Townhouse	35	28
Unit	34	25

Looking at this table we notice several things. Firstly, property in Christchurch is showing signs of excessive demand over supply with median Days to Sell dropping by 4 days for Residences, 7 days for Townhouses and 9 days for Units. Only Apartments have had an increase in the Days to Sell over the past year. Furthermore, a Days to Sell of under 30 days is typically associated with a very strong market and we have 3 of the 4 major property types with median Days to Sell under 30 days.

To dig a little deeper where there is more data, we will now look at the Residence Clusters identified above and see if the speed of sales of Residences is consistent across clusters and bedroom sizes. Table 2 presents this information for the 6 months ending February 2021.

Table 2 – Days to Sell by Bedroom by Cluster

Bedrooms	Cluster A	Cluster B	Cluster C	Cluster D	Cluster E
Two	24	24	22	23	30
Three	22	25	25	22	27
Four	22	28	23	27	30

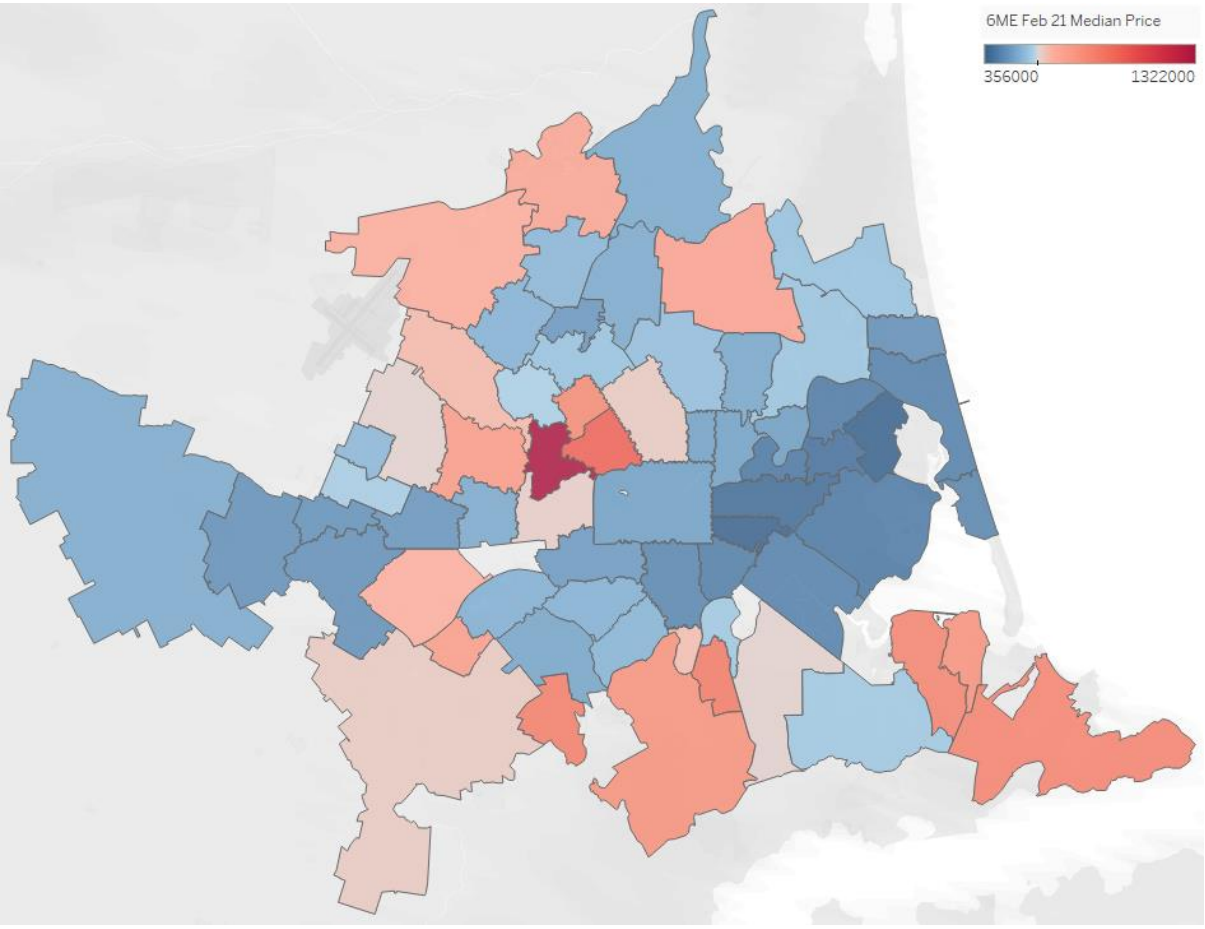
With the overall Residence median Days to Sell being 27 days we note that most of these combinations produce a median Days to Sell less than that which reinforces their popularity as areas. The exception here is Cluster E (Linwood and Woolston) where the median Days to Sell is at or above the overall median.

Medium-Large Residences in the southwest cluster A seem the highest in demand compared to supply along with smaller residences in the central north cluster C and medium sized residences in the northeast cluster D. These all achieved an extremely quick median Days to Sell of 22 days.

How have sale prices changed over 5 years in Christchurch?

Before looking at how parts of Christchurch have changed in price over the past 5 years, it is worth taking an overall snapshot of what the price landscape looks like right now. Figure 7 looks at median price of dwelling by suburb for the 6 months ending February 2021. Only suburbs with 10 or more sales in this period are represented.

Figure 7 – Median Price of Dwellings by Suburb for Six Months Ended February 2021



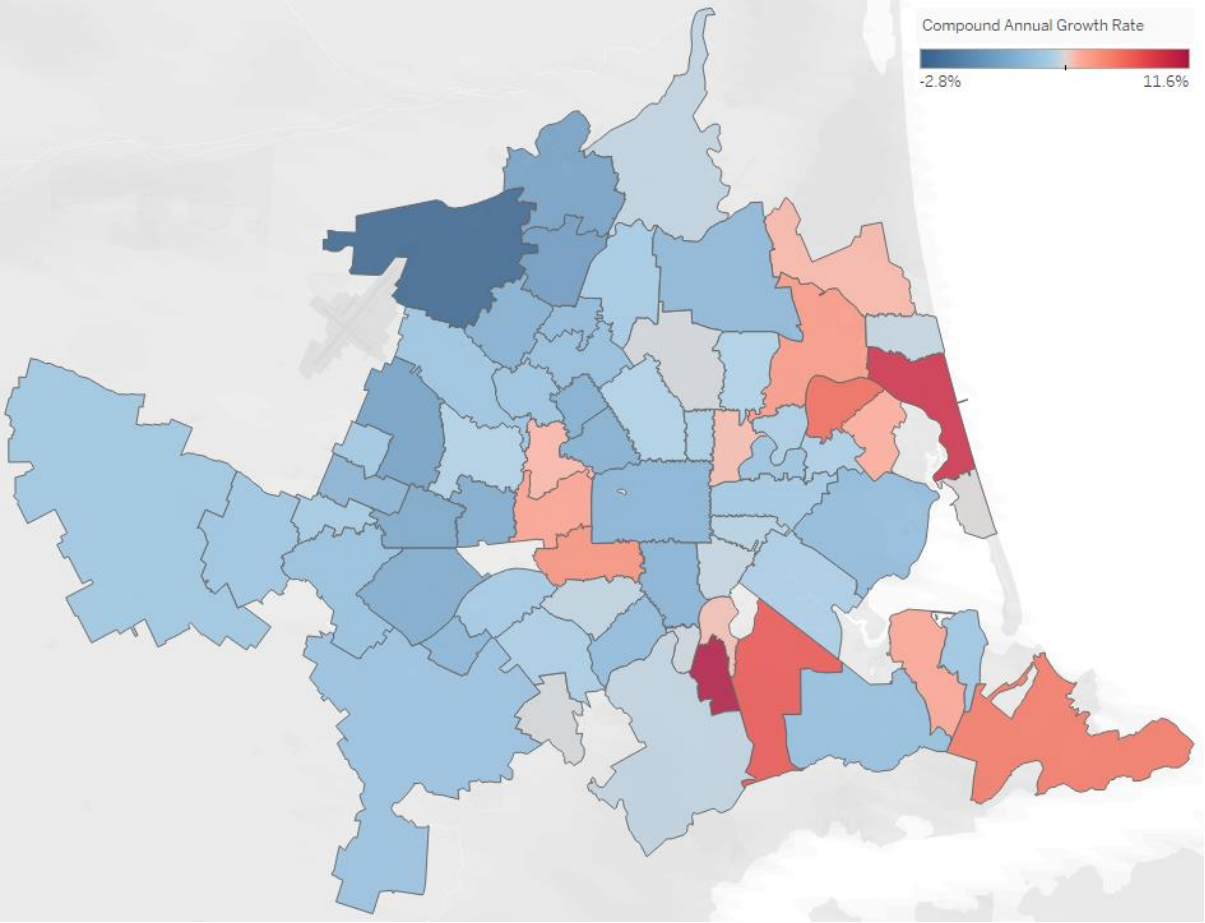
Immediately we can see the clusters of more expensive suburbs and the clusters of less expensive suburbs. Locals may instinctively know these patterns, but it is worth covering for the sake of completeness. Fendalton had the top median sale price of $1.32 million with the neighbouring suburb of Merivale a distant second at $969,000. There are a group of suburbs heading northwest that also have quite high median sales prices. We also see clusters of suburbs with medians over $600,000 in the (as identified above) popular suburb cluster of Halswell and adjacent suburbs. Directly south of the city we have Cashmere and Huntsbury turning out reasonably high median prices and Sumner, Mount Pleasant and Redcliffs to the southeast of the city.

At the other end of the scale, the most affordable suburbs seem to be to the East of the city with many of those suburbs showing a median price less than $400,000. There are also a group of suburbs directly west of the city showing median prices around the $460,000 mark. Finally, a group of suburbs immediately south-southwest of the city are showing median prices around the $500,000 mark.

Knowing the current market, we turn our attention to how prices have changed over the past 5 years. One way to measure change in to look at a measure called the Compound Annual Growth Rate, or CAGR. This answers the question, what percentage would the price have to grow by each period to get from the start period to the end period. In our case we are looking at years so we are looking to understand what the percentage change in price would have to be each year to get from the 6 months ending February 2016 price to the 6 months ending February 2021. CAGR is useful for smoothing growth over time rather than looking at each trough and peak along the way. When

looking at the Christchurch CAGR data it helps frame that data by observing that the CAGR for New Zealand over the same period was 10.1%. Figure 8 shows the CAGR for suburbs in Christchurch over the past 5 years.

Figure 8 – Compound Annual Growth Rate by Suburb Over Five Years



The first thing worth noting is that there were only two suburbs that had a CAGR more than the NZ median: Huntsbury at 11.6% and New Brighton at 10.4%. By Christchurch standards these two suburbs were the rock stars when it came to price movement over the past 5 years whereas by national standards they were only slightly above the midpoint.

In contrast, the suburb of Harewood was the only suburb to show a median price decrease over the past 5 years. As we have seen from Figure 7 though, Harewood still remains an expensive suburb compared to other Christchurch suburbs.

The area of New Brighton and adjacent suburbs catches the eye because we have noted the area before. It was one of the identified clusters where there was an increased number of sales. Figure 7 tells us that these suburbs are affordable compared to other parts of Christchurch whereas Figure 8 tells us that this is an area where prices have increased over the past 5 years more so than many other areas of Christchurch. The low days to sell completes a picture suggesting this is a very popular area for people to purchase property, particularly compared to 5 years ago.

The western adjacent suburbs to the city, Fendalton, Riccarton and Addington are another cluster of suburbs where price growth has been strong compared to many other parts of Christchurch. This

cluster is a unique mix of an expensive suburb, a moderately priced suburb and a more affordable suburb. Regardless of that mix, these central western suburbs have shown good price growth.

Two other clusters worth noting are Huntsbury/Hillborough/St Martins and Sumner/Mt Pleasant. These two clusters are ones where price growth has been strong, and this has contributed to these suburbs being quite expensive compared to the current Christchurch market. Neither of these groups of suburbs have shown amazing activity over the past 6 months in terms of number of sales so it is possible there has been a lack of listings which has pushed prices up.

On the flipside it is interesting to note that the popular area around Halswell identified earlier for its strong sales activity has not shown great price increases over the past 5 years yet are reasonably expensive areas. This may indicate that the supply of listings is OK for now, but also that prices might increase quickly should the supply side become an issue.

Are there are any trends for particular buyers in particular locations?

The primary source for answering this question are some very limited reports from realestate.co.nz that look at search activity on their website for a given location in each month. These reports cannot run any month except the prior month nor produce any information other than that which is given. The insights within are still very interesting and, for what it is worth, we have encouraged them to keep building the capability of this report for future work. Unfortunately, no improvements were able to be made prior to this report being written.

Since we began talking about the possibility of doing this report, we were able to obtain the November 2020 report, the January 2021 report, and the March 2021 report. This at least allows us to get a feel for if data changes much over the course of several months. This a summary of what these reports show.

Demographics of Searchers

Looking first at the gender of searchers, the three reports show that more females are searching for property in Christchurch than males. In chronological order the percentage representation of female searchers was 57%, 66%, and 66%.

Next, the age of searchers. This data is presented as a basic chart and I have combined the three basic charts (November on the left, March on the right) into one picture as follows.

Figure 9 – Age Brackets of People Searching for Property in Christchurch

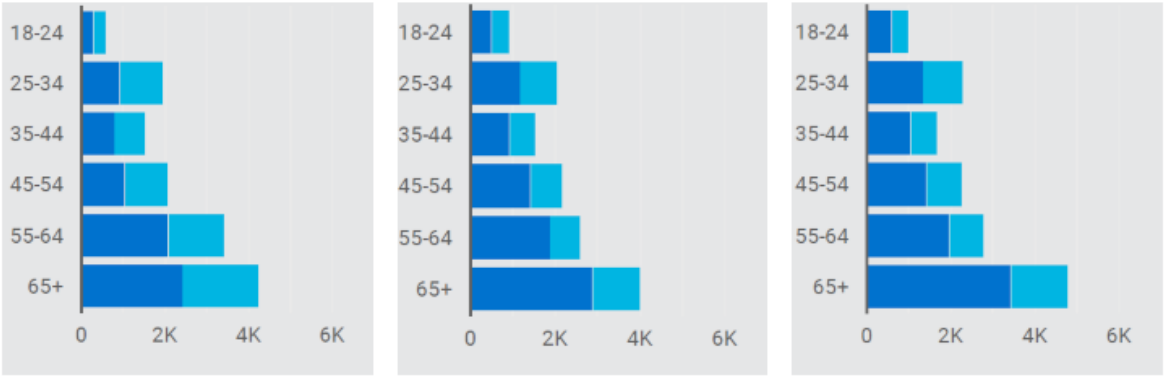


Figure 9 shows that the most active searchers for property in Christchurch are the retirement age 65+ age group. This is followed (closely in November, not too closely in January and March) by the age group below it, the 55–64-year-olds. For the most part, the 25–34-year-olds and the 45-54 years olds are roughly as active as each other. Then you have the 35–44-year-olds and finally, a distant last, the 18–24-year-olds.

Given the predominant nature of older searchers, does this indicate that there is a demand for more 'retirement age appropriate' dwellings? Or are these investors looking for the next property to add to their portfolio. This report does not answer these questions, but they are worth keeping in mind.

Where are people looking for property in Christchurch located? I have been able to source data on the top 10 locations of searchers in the three months already mentioned. Table 3 shows this data

Table 3 – Top Locations of People Searching for Property in Christchurch

Region	Nov-20	Jan-21	Mar-21
Canterbury	23,027	24,087	23,784
Auckland	5,947	6,390	6,449
Wellington	2,358	2,410	2,484
Otago	1,564	1,735	1,493
England	1,107	2,016	1,333
New South Wales	982	1,223	1,333
Queensland	793	1,147	1,216
Victoria	775	818	920
Bay of Plenty	616	665	696
Waikato	601	618	705

It will be no surprise that people in Canterbury are the leading searchers of property in Christchurch by a long way. Potentially more interesting insights are further down the table where England comes in as the 5th most searched from location in November 2020 and March 2021, and fourth in January 2021. We then have Australia strongly represented from it's three most populous states – if combined then Australia would sit comfortably third in January and March, fourth in November. Searchers in Bay of Plenty and Waikato round out the top 10. We note that if the number of searches compared to the underlying population were calculated for each of these regions, Bay of Plenty and Waikato would be well up the list.

Prepared by Real Estate Institute of New Zealand (REINZ), April 2021

Nonetheless, this Top 10 list shows there is an awareness of Christchurch overseas and an interest from these people to own property there. It also indicates a strong interest from the North Island in property located in Christchurch.

What are people searching for?

Next, we turn our attention to the part of the report which looks at what people are searching for. It is a very high-level look at this important question, but it does offer some valuable insight.

Table 4 looks at rank of the top 10 Christchurch suburbs searched for on the RealEstate.co.nz property portal and Table 5 looks at the actual number of searches.

Table 4 - Top Suburb Searched by People Searching for Property in Christchurch - Rank

Region	Nov-20	Jan-21	Mar-21
Christchurch Central	1	1	1
Fendalton	2	5	7
Cashmere	3	4	6
Halswell	4	3	4
Merivale	5	6	5
Sumner	6	2	2
Saint Albans	7	8	8
Avonhead	8	9	9
Ilam	9	-	-
Christchurch Surrounds	10	7	3
New Brighton	-	10	10

Table 5 - Top Suburb Searched by People Searching for Property in Christchurch - Count

Region	Nov-20	Jan-21	Mar-21
Christchurch Central	2,492	2,718	2,468
Fendalton	1,861	1,716	1,437
Cashmere	1,840	1,797	1,468
Halswell	1,796	1,824	1,734
Merivale	1,755	1,716	1,475
Sumner	1,711	1,950	2,155
Saint Albans	1,233	1,276	1,192
Avonhead	1,082	1,025	815
Ilam	977		
Christchurch Surrounds	955	1,325	1,857
New Brighton		902	795

Table 4 allows us to quickly track the popularity and the changes in popularity of the searched suburbs over the 3 months observed. Table 5 gives us a sense of how close the searches are for each

suburb, something accentuated by the colour coding where a deeper green is for the higher numbers and the paler numbers are at the lower end of the number of searches within the top 10 suburbs.

Christchurch Central is the most popular suburb for people to search for property in, with a notable distance between that and the second placed search result. This is strong indication again that being close to the city is high on the list of factors that are important to people looking to buy in property. Sumner catches the eye as one that was middle of the table in November but rose to second place in the following months, increasing in the amount of searches each month as well. We noted strong price growth in Sumner above, so this supports the theory that this is a popular area for purchasers.

Cashmere and Halswell also feature highly in these tables and Halswell in particular has featured in the above analysis quite strongly. The other search that stands out is Christchurch Surrounds – the number of searches for this suburb has almost doubled from November through to March to be sitting as the third most popular search in March 2021. This shows a recent trend towards the outer areas of Christchurch, perhaps in search of affordable property. Conversely, search volume for the relatively expensive properties of Fendalton and Merivale has dropped away somewhat, albeit they are still firmly ensconced in the top 10 list of most searched suburbs in Christchurch.

With regards to the price bands that people search for, most searches are done without a price band selected. When a price band is selected however, roughly 35% of searches are for properties less than $500,000, roughly 27% search for properties with a price less than $600,000, roughly 23% search for properties with a price less than $400,000 and the remaining 15% search for properties with a price less than $700,000.

The final part of these reports covers the top 5 keywords used when searching for property in Christchurch. This is where we get a little insight into what specific terms people have in mind when searching on the property portal.

Table 6 - Top Keywords Searched by People Searching for Property in Christchurch - Rank

Keywords	Nov-20	Jan-21	Mar-21
pool	1	1	2
garage	2	4	5
beach	3	2	-
double garage	4	-	-
view	5	5	-
sheldon	-	3	3
christchurch	-	-	1
canterbury	-	-	4

Table 7 - Top Keywords Searched by People Searching for Property in Christchurch - Count

Keywords	Nov-20	Jan-21	Mar-21
pool	2,228	1,577	1,012
garage	621	502	619
beach	472	811	
double garage	371		
view	265	388	
sheldon		605	859
christchurch			1,437
canterbury			804

Using the same approach as in Tables 4 and 5, Tables 6 and 7 allow us to quickly get a sense of what people are looking for when they look to buy Christchurch property and how that has trended over the four-month period we are observing. The most searched for term at this time is 'pool' which presumably refers to a swimming pool and, if it were ever going to trend, would do so as the weather got hotter. As the summer passes into autumn, we see the number of searches for this term fall, but still stay dominant. Unfortunately, we do not have data from June/July to confirm whether this is a seasonal search term or not.

People want space to put their car. They are specifically searching for property with garage space so we would expect listings that mention this to do very well. Also, of interest to searchers, particularly moving into summer, were properties near the beach. Again, this may be a seasonal term, but we do not have enough data to say so conclusively. There is interest in having a view as well, but we would suggest this is not a desire specific to Christchurch and so not particularly surprising.

Possibly the most interesting term to make it into the top 5 in both January and March was 'sheldon', presumably relating to Sheldon Park in Belfast. This is a short-term trending keyword which potentially coincides with the increased interest in Christchurch Surrounds over the same period. Potentially, people are looking at property further away from the city and hoping for cheaper prices, and in Sheldon Park they found a nice place to live nearby.

What do the local experts say?

Given the importance of this overarching question and the two that follow to the overall report, we reached out to some contacts in the real estate industry and were able to obtain some feedback from senior professionals at Harcourts Grenadier, Mike Pero and RayWhite.

When we asked them if there were any trends for particular buyers in particular locations it was observed that all locations in and around Christchurch have seen very strong interest over the last few months. Particularly strong competition amongst first home buyers has been noticed with a lift in those prices around 500k; the higher end has not seen drastic price changes, however.

Another expert observed that it has been more budget than area preference that has determined where purchasers are looking. School zones are usually another factor that dictates where family purchasers look. They have not noticed any major drivers for people wanting to get into the CBD. Some buyers are preferring new builds and are happy to compromise on areas for this, for example moving out to Rolleston. This aligns with another commentator who said that people moving to

Christchurch are showing more interest in post-quake builds in areas like Rolleston (Selwyn) and Rangiora and Kaiapoi (North Canterbury).

Are there any preferences for property types and particular locations that are not currently being met?

For this question I again turned to our local market experts. One noted that there are many developers looking to get their hands on RMD or transitional zoned land as these can be developed for multiple townhouses which have been very profitable for the companies doing so.

Another noted that smaller sections are becoming very appealing as are newer homes as well. There is a lot of appeal for property located near amenities such as parks, schools, and shops – especially where sections are smaller access to parks is high on the list of wants.

Good schools, like Burnside and Christchurch Boys and Girls in the north, are attracting people to the area like Burnside, Ilam and Strown. Similar in the south with Somerfield Primary and Cashmere High, for example, attracting people to Cashmere and surrounding areas. They also felt re-zoning could free up opportunities in Waltham, Sydenham, Beckenham, Woolston and Addington.

Finally, it was suggested that it all comes down to budget v location v want to haves v would like to haves. They thought single level three-bedroom double garage properties would be very popular whereas they think two- bedroom with a carpark only is in good supply. There are many people nearing retirement age that are looking to downsize, but they are very particular on what they will compromise and prefer to stay in their own communities.

Are there any clear short, medium or long-term trends?

We have seen over the course of this report that the medium to long term trend of the Christchurch market has been price growth well under that of NZ overall, but in the short term there have been price increases and other metrics suggesting that the market sentiment has changed and there has been a definite swing from buyer market to seller market.

The availability of land may be a driving force behind these trends. One of our commentators said that buyers want land but for the first time since the earthquakes it is very difficult to find a section anywhere, and another suggested land is ‘so expensive’. It is reasonable to think that the availability of land post-earthquake has been greater in Christchurch than in other parts of NZ generally, which aligns with price growth trends over the medium-longer term.

Although Christchurch is not experiencing a property crisis (one commentator noted that there is plenty of property and they are having open homes with less than 5 through) it would be prudent to think about the future and whether price rises akin to the rest of the country is what the council wants for its city. Given that activity around land availability takes time to potentially have any effect on dwelling prices, strategy around development is a very timely subject.

As mentioned above, re-zoning is a suggestion put forward by one of our local real estate experts and reducing the restrictions around building on the back of sections would be helpful for building the city up rather than out. Another suggested a more ‘outside the box’ kind of idea which may be worth assessing. They suggested re-developing Christchurch’s RedZone land. They felt that areas like

Avonside for example are prime spots for redevelopment, noting that if it is possible to build skyscrapers in Dubai on sand, the right people could remediate the red zone land.

In the meantime, whilst the CBD remains popular there does seem to be a short-term push to areas that are further out from the city. This is likely budget driven, with areas such as Halswell benefiting from these changing market conditions. When looking at what to build, stand alone homes are still what are being predominantly sought out with good garaging options high on the list of required features. The challenge will be to provide these properties at a price point that is considered affordable. One of our local experts noted that three-bedroom, double garage with a bit of a section would fly out the door in the $580,000-$650,000 range but she suspected the profits on that would not justify the developers building homes of that size.

In closing

This concludes the requested report into the Christchurch real estate market. The questions put to us within Section 3 of the Housing Demand in Christchurch Consultant Brief have been addressed directly with answers being based on either quantitative or qualitative research. We hope this information proves useful when it comes time for the Council to make decisions in this area.

Disclaimer:
This report is intended for general information purposes only. This report and the information contained herein is under no circumstances intended to be used or considered as legal, financial or investment advice. The material in this report is obtained from various sources and REINZ does not warrant the accuracy, reliability or completeness of the information provided in this report and does not accept liability for any omissions, inaccuracies or losses incurred, either directly or indirectly, by any person arising from or in connection with the supply, use or misuse of the whole or any part of this report.

Boffa Miskell

Commercial Centres NPS-UD

Urban Design and Built Form Descriptors
Prepared for Christchurch City Council

28 July 2022

Boffa Miskell is proudly a
Toitū carbonzero® consultancy

Document Quality Assurance

Bibliographic reference for citation: Boffa Miskell Limited 2022. *Commercial Centres NPS-UD: Urban Design and Built Form Descriptors*. Report prepared by Boffa Miskell Limited for Christchurch City Council.		
Prepared by:	Olivia Johnstone Urban Designer Boffa Miskell Limited	
	Jane Rennie Urban Designer / Associate Partner Boffa Miskell Limited	
Reviewed by:	Jane Rennie Urban Designer / Associate Partner Boffa Miskell Limited	
Status: [Final	Revision / version: [2]	Issue date: 28 July 2022

Use and Reliance
This report has been prepared by Boffa Miskell Limited on the specific instructions of our Client. It is solely for our Client's use for the purpose for which it is intended in accordance with the agreed scope of work. Boffa Miskell does not accept any liability or responsibility in relation to the use of this report contrary to the above, or to any person other than the Client. Any use or reliance by a third party is at that party's own risk. Where information has been supplied by the Client or obtained from other external sources, it has been assumed that it is accurate, without independent verification, unless otherwise indicated. No liability or responsibility is accepted by Boffa Miskell Limited for any errors or omissions to the extent that they arise from inaccurate information provided by the Client or any external source.

Template revision: 20210624 0000 / File ref: BM220186_001e_Centres_Framework_UD_Built_Form_Study_20220720.docx

Cover photograph: Google Street View Riccarton Road

CONTENTS

1.0 Introduction and Scope

In line with the National Policy Statement – Urban Development (NPS-UD), Christchurch City Council (the Council) are reviewing the existing Commercial Centres Hierarchy set out in the District Plan including to align with the National Planning Standards (NPS) Zones Framework.

As part of this, the Council are exploring a range of metrics associated with the existing commercial centres, including their geographic size and activity types, catchment and economic factors and accessibility to inform the proposed framework.

Also of relevance are the urban design and urban/built form of each of the key centre 'types'. As such, this report has been prepared on behalf of the Council to provide urban and built form inputs into the review. This includes developing 'descriptors' for each of the centre 'types' within the new Centres Framework. These descriptors will articulate the scale and nature of development intended within the centres, and the expectations around the qualities and features of each centre, including activities, amenity and open space. This will include Ōtautahi Christchurch context, scale, identity and character considerations, and how these relate to the theoretical framework that has been established for centres across a range of scales in Aotearoa New Zealand within the NPS-UD.

The 'descriptors' will provide a robust and clear intent articulated in a written format (with a supporting diagram) for incorporation within the District Plan. The descriptors will accompany associated objectives and policies, such that they effectively inform developers and their agents, policy and resource consent planners and urban designers amongst others of the urban design and built form expectations for each of the centre 'types'.

As such, this report includes:

- Relevant background on the legislative context and the existing Centres Hierarchy included in the District Plan.
- A theoretical description of the Centres Framework under the NPS-UD from an urban design and urban/built form perspective.
- Key 'descriptors' for each of the Centre 'Types' for Ōtautahi Christchurch from an urban design and urban / built form perspective and with a future focus derived from an analysis of the key attributes for each Centre 'Type'.

2.0 Background

2.1 Legislative Context

The NPS-UD is a key initiative of the Government's Urban Growth Agenda. It is designed to improve the responsiveness and competitiveness of land and development markets to better meet the different housing needs and preferences of New Zealanders. The NPS-UD requires Tier 1 authorities (Christchurch, Wellington, Auckland) to enable greater urban density in metropolitan and city centre zones, and a minimum building height of 6 storeys in areas within a walkable catchment of existing and planned rapid transit stops, the edge of city centre zones and the edge of metropolitan centre zones.

The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (enacted in December 2021) amended aspects of the NPS-UD. One key amendment was

to Policy 3(d). The previous policy directed councils to focus intensification in 'all other areas' with high levels of accessibility and demand. The new wording of Policy 3d is more specific in that it directs the Council to intensify areas within and adjacent to particular types of centres, namely town, neighbourhood and local centres and to a degree that is commensurate with the level of commercial activity and community facilities within them[1]. As such, the commercial centres framework within Christchurch's District Plan needs to align to those identified in the NPS-UD and the NPS.

The NPS-UD identifies the following framework of centres – City Centre, Metropolitan Centre, Town Centre, Local Centre and Neighbourhood Centre. This is based on the zone framework set out in the NPS. The Framework provides a list of zones with descriptions of their typical land use, urban form, density and mix of activities. It is therefore necessary to determine how the various centres should be classified. It is noted that there may be sub-categories within the framework to recognise a finer level of nuance than that provided by the NPS, notated as 'Tiers' and based predominantly on size and reach.

2.2 District Plan Centre's Hierarchy

Chapter 15 of the District Plan currently includes objectives and policies for commercial activity focussed within a network of centres to meet the wider community's and businesses' needs in a way that (amongst other matters) gives primacy to the Central City followed by District and Neighbourhood Centres identified as Key Activity Centres (15.2.2(4)).

As such, District Centres are the 'second tier' centre under the Central City. This hierarchy is also identified within the Canterbury Regional Policy Statement where Objective 6.2.5 notes the need to maintain the existing network of centres as focal points for commercial, community and service activities. These are identified as the Central City, Key Activity Centres (i.e., all District Centres) and Neighbourhood Centres.

The hierarchy of centres currently includes more than 150 existing commercial centres all of which are required to be realigned with the NPS Commercial Centres Zone Framework. Policy 15.2.2.1 and associated Table 15.1 sets out the role of the centres (see ***Appendix 1***).

This policy framework and associated built form standards of the District Plan anticipates a certain '**urban form**' for the City. Urban form generally refers to the three-dimensional shape of the city resulting from a range of physical characteristics such as the size, shape, and configuration of the built environment. Associated with the configuration of the urban /built form is the level of urban amenity expected within the Centres, through the relationship between the

[1] *Policy 3: In relation to tier 1 urban environments, regional policy statements and district plans enable:*

(a) In city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; and
(b) In metropolitan centre zones, building heights and density of urban form to reflect demand for housing and business use in those locations, and in all cases building heights of at least 6 storeys; and
(c) Building heights of at least 6 storeys within at least a walkable catchment of the following:
(i) Existing and planned rapid transit stops:
(ii) The edge of city centre zones:
(iii) The edge of metropolitan centre zones; and
(d) Within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent), building heights and density of urban form commensurate with the level of commercial activities and community services.

buildings and streets and public spaces, with a greater focus on ground floor activation and the visual appearance and interest of the buildings in the higher order centres.

The Centres-based framework also talks about the vitality of centres. Vitality, although being an economic concept is also a relevant urban planning term. In the Centres context, 'urban vitality' relates to a range of requirements that together create a vibrant urban area, including a mixed pattern of land use, small blocks, high enough density that it sufficiently attracts people, buildings of diverse ages and ease of accessibility to public facilities.[2] These requirements are closely connected to walkable environments because the vitality theory is focused on fostering human scaled environments that relate to the number of people being active in an area[3] and is also closely aligned with urban amenity considerations.

Appendix 2 sets out an overview of the urban form and associated urban amenity outcomes broadly anticipated from the Centres based policy framework.[4]

3.0 Methodology and Assumptions

3.1 Methodology

The methodology for this assessment comprises the following key steps:

- **Step 1** – **NPS-UD Built Form Framework**
  - Describe the overall urban form outcomes anticipated from the NPS centres hierarchy on a theoretical rather than actual (i.e., identified places) basis.
- **Step 2** – **Apply the Centre's Built Form Framework to Ōtautahi Christchurch**
  - Identify each Centre 'Type' on a scale spectrum with a future focus.
  - Identify the built form, movement and activity attributes associated with each Centre 'type' (see example table below).
  - Based on these attributes and future potential prepare detailed 'descriptors' for each Centre Type.

Example Formal of Table: Urban Form Attributes across Centre 'Types'

Attribute Category			Attributes	Centre 'Type'				
Built Form	Movement	Activities	Attributes	City Centre	Metro Centres	Town Centre	Local Centre	Neighbourhood Centre

- **Step 3 – Prepare Short Report**
  - Prepare a short report setting out the above.

[2] *Urban vitality in this context relates to a range of requirements that together create a vibrant urban area, including a mixed pattern of land use, small blocks, high enough density that it sufficiently attracts people, buildings of diverse ages and ease of accessibility to public facilities. These requirements are closely connected to walkable environments because the vitality theory is focused on fostering human scaled environments that relates to the number of people being active in an area. Jacobs, J. The Death and Life of Great American Cities; Vintage Books: New York, NY, USA, 1961 / Kim, S. Urban Vitality, Urban Form and Land Use: Their Relations within a Geographical Boundary for Walkers, 2020*

[3] *Jacobs, J. The Death and Life of Great American Cities; Vintage Books: New York, NY, USA, 1961*
Kim, S. Urban Vitality, Urban Form and Land Use: Their Relations within a Geographical Boundary for Walkers, 2020

[4] *Sourced from evidence of Jane Rennie in relation to Plan Change 6 (Homebase), dated 25 June 2021*

3.2 Assumptions

The following assumptions were noted:

- The work was undertaken in very tight timescales and has required the methodology to be modified to suit.
- The report was desk based only and does not assess the Centres in their existing format, (methodology based not place based), their current performance or consider each of the centres individually.
- Additional work streams considered the potential intensification around the centres.
- The Greater Christchurch Spatial Plan will determine future sub regional growth strategies and urban form, and the Ōtautahi Christchurch District Plan the city urban form.
- The roll of 'Local Centres' is being assessed in a separate plan change. This study will define the Local Centre and a baseline level of intensification which will be further established through the plan change.
- The Property Group report[5] was based on CCC GIS data, and it is noted there are some inconstancies.
- For the purposes of this report, density descriptions within the context of Ōtautahi Christchurch broadly align with around 3-5 storeys for medium density and 6 plus storeys for high density.

4.0 NPS-UD / NPS Centres Built Form Framework

The following sets out our interpretation of what the NPS-UD is seeking to achieve for each of the proposed commercial centre zones established through the National Planning Standards from an urban design and built form perspective.

4.1 City Centre Zone (CCZ)

The CCZ comprises areas used predominantly for a broad range of commercial, community, recreational and residential activities. The zone is the main centre for the district or region.[6]

Policy 3 in relation to Tier 1 urban environments, regional policy statements and district plans enable:

a. *"in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification.*[7]
b. *building heights of least 6 storeys within at least a walkable catchment of the following:*

   i. the edge of city centre zone."

Development capacity and intensification are achieved through enabling buildings that are taller and denser than within other centres – giving more businesses and residents the option to

[5] *The Property Group, Centres Review Data Collection Summary Report, January 2022*

[6] *National Policy Standards, Ministry for the Environment: https://environment.govt.nz/publications/national-planning-standards/*

[7] *Understanding and Implementing intensification provisions for the NPS on Urban Development, Ministry for the Environment, 2020: https://environment.govt.nz/assets/Publications/Files/Understanding-and-implementing-intensification-provisions-for-NPS-UD.pdf*

locate within the productive centre. The form of the city centre and typologies for housing should provide access for all to opportunities, culture and amenity to support health and wellbeing.

Intensification brings with it many positive outcomes – such as transport choice, increased accessibility, and a reduction of greenhouse gas emissions - all centres should be planned to deliver 'well-functioning' urban environments[8]. When considering the amount of density to be enabled, consideration should be given to whether or not the intensification is sufficient to support the outcomes mentioned above. Density around the city centre will gradually decrease in scale, with the walkable catchment from the edge of the city centre providing building heights of at least 6 storeys.

4.2 Metropolitan Centre Zone (MCZ)

The MCZ is used predominantly for a broad range of commercial, community, recreational and residential activities. The zone is a focal point for sub-regional urban catchments.[9]

Policy 3 in relation to Tier 1 urban environments, regional policy statements and district plans enable:

a. *"in metropolitan centre zones, building heights and density of urban form to reflect demand for housing and business use in those locations, and in all cases building heights of at least 6 storeys; and*[10]
b. *building heights of least 6 storeys within at least a walkable catchment of the following:*

    i. existing and planned rapid transit stops
    iii. the edge of metropolitan centre zones."

Intensification is enabled in metropolitan centres to provide the opportunity for more people to live and work in areas of high demand and good access, serviced by public transport, both existing and/or planned. It is anticipated that metropolitan centre zones will exhibit all or at least most, of these attributes.[11]

4.3 Town Centre Zone (TCZ), Local Centre Zone (LCZ) and Neighbourhood Centre Zone (NCZ)

Determining where a centre falls within the NPS-UD framework of town, local or neighbourhood centre depends on the built and urban form associated with the range of commercial activities and community services, and accessibility[12] of the centre.

---

[8] *National Policy Statement on Urban Development 2020: https://environment.govt.nz/publications/national-policy-statement-on-urban-development-2020/*

[9] *National Policy Standards: https://environment.govt.nz/publications/national-planning-standards/*

[10] *Understanding and Implementing intensification provisions for the NPS on Urban Development: https://environment.govt.nz/assets/Publications/Files/Understanding-and-implementing-intensification-provisions-for-NPS-UD.pdf*

[11] *Understanding and Implementing intensification provisions for the NPS on Urban Development, Ministry for the Environment, 2020: https://environment.govt.nz/assets/Publications/Files/Understanding-and-implementing-intensification-provisions-for-NPS-UD.pdf*

[12] *In the NPS-UD 'Understanding and Implementing Intensification Provisions for the NPS on Urban Development, MfE, accessibility references 'the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services (para 5.1 page 12). Under para 5.4 it states that Accessibility refers to the 'level of service' as a whole and defines people's overall ability to reach desired services and activities (together called opportunities). Assessment typically examines the time, cost and amenity of accessing services and activities via different modes. Under 5.4.3 it states that 'To measure accessibility or assess changes due to land-use or transport*

Commercial activities are those services that serve the community and provide jobs, such as supermarkets, banks, retail stores or local restaurants. Community facilities are community centres, recreational facilities like council gyms or pools and libraries and are present predominantly in Town or Local centres. Consideration should be given to the "*..level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or (ii) relative demand for housing and business use in that location."*

The categorisation of a centre will influence the level of intensification of and around the centre. ***Figure 1***, sourced from *'Understanding and implementing intensification provisions for the NPS on Urban Development'* shows how the accessibility and densities for Town, Local and Neighbourhood Centres should be determined for Tier 1 cities based on demand and accessibility. The locations that provide a range of activities and services are likely to be places that are easily accessible to a wide range of people. These locations will often be commercial centres within urban areas, ranging in size from smaller local or town centres through to larger metropolitan centres or even city centres. Across the city the centres should gradually decrease in height and density to reflect the level of accessibility by active and public transport from Town to Neighbourhood category.

Applying this gradual decrease in the scale of urban form enables a legible urban form across these centre types, with the greatest scale aligning with the highest level of commercial activity, commercial facilities and accessibility and associated change in patterns of development – a finer grain street and block pattern with higher density of development (See ***Figure 1***).

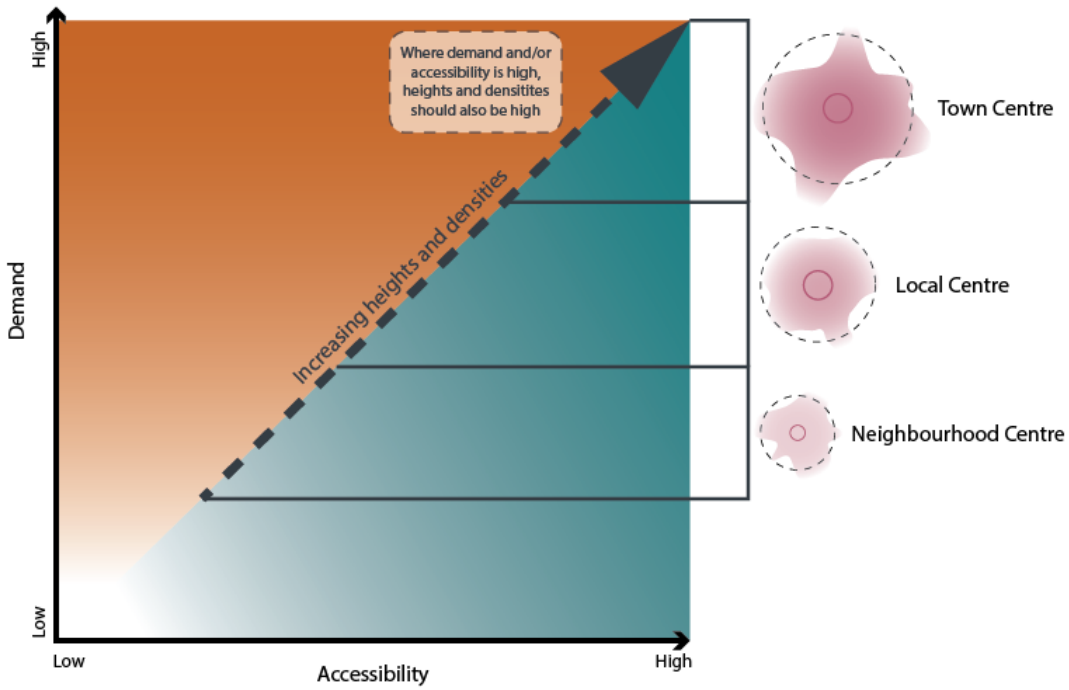


Figure 1: *Example framework for determining heights and densities of centre 'types' based on the level of demand and accessibility (Graphic edited by Boffa Miskell, original sourced: Understanding and implementing intensification provisions for the NPS on urban Development)*

interventions, you will require data on where people live, the location of destinations, and the cost, time and ease of travelling between these destinations for users of each mode and for each component of the journey'.

5.0 Applying the NPS-UD Centre's Built Form Framework to Ōtautahi Christchurch

5.1 Overview

This section sets out the key 'descriptors' for each of the Centre 'Types' for Ōtautahi Christchurch from an urban design and urban / built form perspective and with a future focus. A future focus includes consideration of the intent of the NPS-UD in the context of Ōtautahi Christchurch and the City's overall aspirations and values considered important in achieving well-functioning environments.

It is important to acknowledge the relevance of the urban form of the city and the contribution a legible and diverse network of centres has in informing the foundation for how residents live within the city and are able to access the services and facilities they need.

The built environment of our Centres is complex and continues to change. There will be a greater focus in the future on a number of the centres transitioning from being standalone retail developments to comprising mixed use centres in meeting local demands and providing access for a greater range of opportunities, culture and amenity to support health and wellbeing.

There are a range of urban design and urban /built form attributes that make up the centres and are critical to their success and overall vibrancy. ***Appendix 3*** sets out a range of attributes under three key themes: built form; movement; and activities. It is noted that within the Centre Type's there will be variability both in terms of the range of sizes of centres but also the number of attributes that are present.

Urban form refers to the pattern of development, in combination with the overall scale, or three-dimensional aspects resulting from a range of physical characteristics such as the size, shape, and configuration of the built environment. The built form of our Centres refers to the function, shape and configuration of buildings as well as the relationship to streets and open spaces. Defining a built form framework across the Centre Types helps to establish an overall structure or hierarchy of future built quality and character as shaped by the use, design, massing, scale and type of buildings. This will guide the scale and intensity and built form that is appropriate to the Centre Type and ensure new development reinforces this spatial differentiation.

A strong and thriving network of Centres across Ōtautahi Christchurch supports social cohesion, walkable neighbourhoods, aging in place and better access to employment, social infrastructure, the natural environment and local facilities. This includes access to both large scale businesses through to small local eateries and a diversity of cultural and creative experiences. Targeting growth to these areas of high amenity will also promote the use of active and public transport modes with investment in transport infrastructure not only having a significant impact on the urban form of the city, but allowing for connections between the Centres, supporting improved accessibility.

Figure 7 in ***Section 5.7*** provides a graphic summary of the scale and form of the NPS-UD Centres Framework for Ōtautahi Christchurch.

5.2 City Centre Description

The City Centre of Ōtautahi Christchurch is the pre-eminent Centre within the Canterbury Region representing the heart for business, tourism, cultural, civic, residential and education

functions. Given its primacy the City Centre has the greatest level of investment compared to other Centres, with a national (and international) focus. It comprises of built form of architectural quality and detail and public realm identity and is the most accessible and vibrant of the Centres.

The Central City is where there is significant capacity for business of varying scale form large government offices through to small, shared studios or corner cafes. City Centre innovation is encouraged through technology, buildings and the urban realm. High-density residential growth without height restriction provides the opportunity for many to live where they work and play. Development of new civic and cultural destinations attract visitors to the Centre and provide day and night activation. It has the highest density of both commercial, residential and guest accommodation development of all the Centres that support a diversity of experiences.

The urban form of the Centre is that of the largest centre located centrally within Ōtautahi Christchurch and clearly identifiable when seen from elsewhere within the city and beyond. It is compact in extent and includes the tallest buildings with no height restriction, which contribute to an enduring and interesting skyline. All buildings and landscapes are of an architectural or design quality expected within a City Centre environment. The scale and form of the city centre will respond to growth opportunities with the greatest scale of development focused where there is highest accessibility, with the scale of development reducing as you move to the edge of the walkable catchments of future transport nodes. The enablement of density within the city centre supports the recovery of the Centre as it sustained significant damage and population loss from their catchment post-earthquake.

Figure 2: *The City Centre has the tallest buildings of the Centres*

The Centre comprises the largest urban blocks which are clearly defined by a street grid, and refinement through activated laneways, pedestrian only spaces woven together by the high amenity Otākaro Avon River, Cathedral Square and a multitude of quality public spaces show casing the natural environment. Streets are treated as public realm, providing space for public art, amenity and play with slow speeds and space defined for a range of users. The built character reinforces human scaled elements, architectural quality and form as defined by the walkable streets and blocks. Buildings provide a continuous edge and sense of enclosure to the tree lined streets, opening to public plazas, the river corridor, and laneways. The buildings are easily understood as having an engaging street level, a mid-level and a top level, contributing to

the scale and character of the City Centre. Mixed use buildings are promoted and the lower levels of buildings at the street front are reserved for commercial, hospitality and retail use that activate and provide vibrancy to the streets, with upper levels for office and residential uses. Civic buildings, often of interesting or landmark forms, anchor and provide legibility to the Centre, promoting movement between activities and the commercial heart of the city. The Centre has the highest urban amenity and largest range of activities with landmark buildings that are highly articulated and visually appealing, with a focus on contributing to a high-quality pedestrian environment.

The Centre incorporates a significant open space component which adds to its identity and quality, and environmental qualities. Servicing and parking are located internally within the blocks, with surface carparking minimised to improve the pedestrian experience.

The Centre has a focus on both local and regional transport services. It is highly connected with provision of the City Centre public transport interchange with future rapid transit anticipated to further enhance the connections within the City and the District. Transit facilities are fully integrated with other land uses and active modes through quality walking and cycling connections, to create a comfortable user experience .

The City Centre is surrounded by green space and the city fringe of residential and mixed use activity, within walking distance. These areas provide complementary living, opportunities for alternative and comprehensive housing development, service industries, business and entertainment activities, and opportunities to connect with nature.

5.3 Metropolitan Centre Description

Metropolitan Centres are located to serve sub-regional catchments of Greater Christchurch and are second only to the City Centre in overall scale and intensity. They are focal points or destinations providing retail, commercial, community, recreational and residential activities and amenities. These include department stores, supermarkets, food and beverage locations, entertainment, and guest accommodation. The centres are typically located in association with a main street, with good connectivity, a range of retail opportunities both large and small and supported by a wide array of service and community activities. Metropolitan Centres provide for a range of residential living options. A wide range of services and activities reflect the needs of the wider community and includes unique offerings from those offered in other Centres, The Centres offer high density living in the form of mixed-use towers and apartment buildings

The Metropolitan Centres have significant capacity for intensification providing the opportunity for more people to live and work in areas of high demand and good access, serviced by public transport, both existing and/or planned. Growth and intensification are supported by a comprehensive range of activities present, from larger corporate businesses to local eateries, , theatre, galleries and retail. Public transit stops and corridors provide a well-integrated public transport hub for users.

The urban form of the Metropolitan Centre’s is compact in extent and focused on public transport infrastructure. Building heights and densities of urban form that reflects demand for housing and business use in those locations, and in all cases building heights of at least 6 storeys are enabled. Mixed-use buildings are encouraged to support the vitality of the Centre. Buildings are anticipated to reduce in scale as accessibility decreases, with taller buildings located more centrally within the Centre aligning with the frequent transit network. Shopping malls and anchor stores are integrated within the urban fabric with a range of building typologies

to reflect the range of land uses within the Centre. Transit facilities are integrated with active modes through quality walking and cycling connections.

Figure 3: *A Metropolitan Centre building heights are at least 6 storeys and reflect demand for business and housing*

The Centre has a high urban amenity with buildings that are well articulated and with a focus on contributing to a high-quality pedestrian environment. The built character reinforces human scaled elements, architectural quality and form as defined by the walkable streets and blocks. The Centre incorporates open space and recreation which adds to its identity and serves the wellbeing of residents and visitors. High amenity street networks of slow speeds support active modes of transport, create lively streets and improve pedestrian safety. Servicing and parking are located internally within the blocks ensuring a pedestrian friendly environment.

5.4 Town Centre Description

Town Centres are focal points or nodes, providing a wide range of retail, commercial and community activities and amenities in the form of department stores, supermarkets, food and beverage locations, entertainment, and guest accommodation, distributed broadly across the wider city. The Centres are typically located in association with a main street, with good connectivity, a range of retail opportunities from large to small supported by a wide array of service activities and a range of residential living options. Services and activities reflect the local character and culture of the local community, responding directly to their needs. This creates a network of Town Centres that have variety and a unique offering between the centres, catering to certain needs or cultures. There are a range of scales of Town Centres depending on their historical context and location within the City and extent of retail, commercial and community services and facilities.

Town Centres offer high density living in the form of mixed-use and apartment buildings within a consolidated centre supported by frequent public transit services and associated infrastructure. High amenity street networks of slow speeds support active modes of transport, create lively streets and improve pedestrian safety. Residential and business growth presents opportunities for increased accessibility to employment, social infrastructure and local services, enabling people to work and live in their local Town Centre, reducing the need to travel by car. The Town

Centre incorporates a significant open space component as well as other public assets, to support the social and cultural wellbeing of residents and visitors.

The Centres are compact in their urban form, with higher density building in the centre and/ or along the major transit routes, in the most accessible locations, reducing in scale as accessibility decreases to meet the surrounding urban fabric. Building heights are likely to vary but would be around 2-6 storeys in height depending on the context and the nature and extent of the Centre with buildings greater than 6 storeys if within walking distance of a rapid transit stop.

Figure 4: *Town Centres are anticipated to include buildings of between 2 and 6 storeys depending on the context and depending on if there is a rapid transit stop*

The built character reinforces a finer grain and human scaled form as defined by pleasant, walkable streets and blocks, with an active built edge to the street. Shopping malls and anchor stores are integrated within the urban fabric with a range of building typologies to reflect the range of land uses within the Centre.

Streets within the Centre are safe, comfortable and attractive prioritising pedestrians through definition of space, speed reduction, street trees and public space. They are places of welcome, of activity and movement, and support the mix of uses located adjacent to the street, and residential use and offices above. This may include larger commercial floorplates. Streets and public spaces combine to comprise a vibrant centre that people visit for different purposes at different times in the day. Servicing and car parking are located internally and consolidated within the blocks, promoting active street edges, in key locations to service a wide range of activities.

The urban amenity of the centres provides for comfortable, vibrant and appealing places with buildings that are highly articulated and contributing to a quality pedestrian environment and liveable place.

5.5 Local Centre Description

Local Centres are a hub for their community, providing a range of commercial, community and recreational/ open space activities serving their local catchment. They have a more integrated

rather than accentuated built form (the height and scale of buildings is less prominent and more consistent with the scale of the residential catchment around it). Local Centres are influenced by their local community or natural environment which gives a defined character to these Centres across the city. There are a range of scales of Local Centres depending on their historical context and location within the City and extent of retail, commercial and community services and facilities.

Commercial buildings, community facilities and anchor stores are located on the Main Streets with the most foot traffic, and where they are served by active and public transport modes and incorporated within the fine grain fabric of buildings and activity that provides the pedestrian quality and human scale to the street.

The Local Centres are serviced by local transport routes and bus stops, integrated within a wider active transport network. Future growth at Local Centres supports accessibility to goods and services needed daily, and active and public transport services.

The urban form of Local Centres is compact with medium density mixed use apartments and townhouses at the centre decreasing to medium-low density typology buildings where the level of accessibility reduces. The scale and form of the local centre is centralised around the greatest intensity of activity that is most easily accessed by public and active transport. Building heights and densities should decrease from the centre, where accessibility is highest, to meet the residential surrounds, where walking to the centre becomes less convenient.

Figure 5: *Local Centres are anticipated to include building heights of a graduating scale, with buildings located in proximity to the context being of a similar height.*

The built character of the Local Centre reinforces the street level, with infrastructure and landscape elements reinforcing this scale. Walkable, human scaled streets with an active edge are created through the placement of medium to low height buildings at the edge of or close to the footpath. Carparking is minimised and integrated into the streetscape and at the rear of buildings, minimising severance resulting from large areas of carparking.

Local Centres incorporate small scale open spaces that provide for community activity, art and expression, and places of repose, and integrate with existing or planned community facilities, such as schools, community centres and/or libraries as well as other public related uses. This public amenity supports the level of intensification and social and cultural wellbeing.

Main Streets and Activity Streets within the Local Centre provide low key, amenable places, which support street life, commercial activity, and community interaction.

5.6 Neighbourhood Centre Description

The range of low key, small scale services and uses, including residential, small scale office, entertainment and commercial, contributes to a vibrant Neighbourhood Centre that people visit for different purposes at different times of the day. Limited mixed use opportunities provide for some activation, supporting others' daily needs, and allows people to live where they work or where they can easily commute to other Centres. Small offices also allow for local business hubs and working, however the main driver for employment at Neighbourhood Centres are the small scale, localised commercial activities.

Neighbourhood Centres provide daily convenience shopping supporting smaller neighbourhood catchments, serviced by local transport routes and bus stops, and integrated within the wider active transportation network. They range in size from a small group of convenience shops to a stand-alone supermarket with other local services, supported by a nearby community facility, to a more diverse retail and service offer, still focused on meeting the needs of local residents.

Neighbourhood Centres are compact in their form and limited in height, located on a street corner, or within a block. Buildings should integrate in scale and form with the adjacent residential areas with the height of buildings being similar to the context. Accessible on street parking is provided for those people who cannot easily walk or cycle. Residential medium densities surrounding the Centre are dependent on the scale of the Centre and level of accessibility, offering housing choice within a walkable distance.

Figure 6: *Neighbourhood Centres are anticipated to include buildings of a similar scale and form as the surrounding context*

The built character reinforces the street level with infrastructure and landscape elements reinforcing this scale and supporting a series of independent neighbourhood stores. Smaller forms or standalone anchor stores may exist but are accompanied by smaller scaled and independent local stores. Slow, safe, walkable streets with active mode facilities interface with shops, with sufficient space provided to enable neighbourhood retailers to make use of the

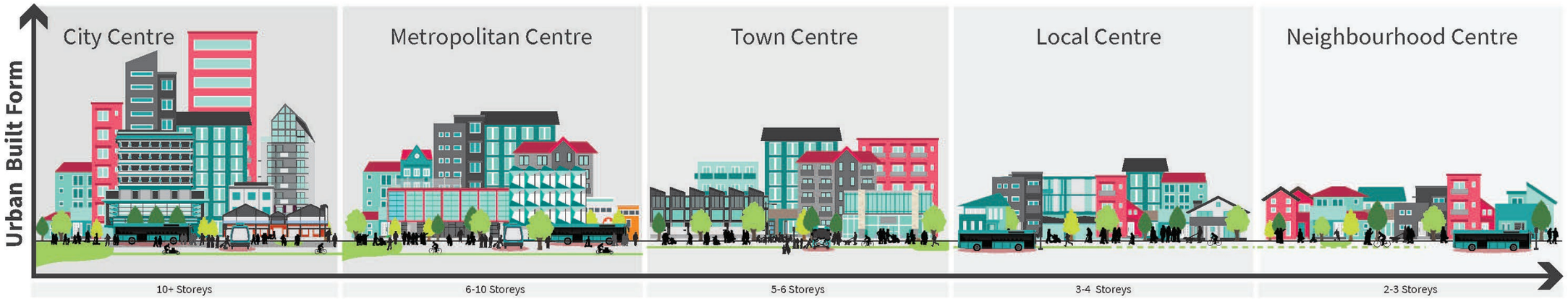
public realm and activate the edge. Carparking is minimised and integrated into the streetscape and at the rear of buildings.

Neighbourhood Centres incorporate small scale open spaces that provide for community activity, art and expression and places to pause, and integrate existing or planned community facilities, such as schools, community centres and/or libraries. Main Streets and Activity Streets within the Neighbourhood Centre provide low key, amenable places, which support street life, commercial activity, and community interaction.

The range of low key, small scale services and uses, including residential, small scale office, entertainment and commercial, contributes to a vibrant Neighbourhood Centre that people visit for different purposes at different times of the day. Limited mixed use opportunities provide for some activation, supporting others' daily needs, and allow people to live where they work or where they can easily commute to other Centres.

5.7 Graphic Summary of the Scale and Built Form of the NPS-UD Centres Framework for Ōtautahi Christchurch

Figure 7 communicates the Centre 'descriptors' and the desired hierarchy of Centre's demonstrating the decrease in scale and form from the City Centre, down to the smallest, Neighbourhood Centre. As noted earlier, Centres are required to provide a range of services at each scale with the catchment they service decreasing from an inter-regional catchment at the City Centre level to a local community within a Neighbourhood Centre.



Activity	City Centre	Metropolitan Centre	Town Centre	Local Centre	Neighbourhood Centre
Residential, Retail And Commercial Mix	• Inter-regional catchment • Highest density and mixed-use • Has the broadest range activities • Primary business and tourism destination • High quality public realm • Large scale, high quality government and head offices • Entertainment and night-time economy • Focus of arts and culture • General hospital	• Sub-regional catchment • High density and mixed-use • Broad range activities • Seconday business and tourism destination • High quality public realm • Large scale retail offer • Entertainment and night-time economy • Specialist hospital services	• Sub-city catchment • High to medium densities and mixed-use • Range of activities • Local business and visitor node • High quality public realm • Anchor stores and business hub • Specialist medical hub	• Suburban catchment • Medium densities and mixed-use • Activities that serve the suburban catchment • Small scale business and office activity • Supermarkets generally form anchor for retail activities • Quality public realm • Corner hospitality and entertainment • Small business hub • Health centre	• Local catchment • Medium to low densities and mixed-use • Activities that serve the local, walkable catchment • Local businesses • Quality public realm • Health services • Small scale health services and offices
Civic/Community	City Library, Town Hall, Metro Sports and Arena, Civic Park and Square, Convention Centre	Library, Community Centre and Civic Plaza, Tertiary Education, Large Recreation Facilities	Library and Community Facilities	Local Library and Community Facilities*	
Movement					
	Rapid Transit, Station, MCR*, W1*	Rapid Transit,Station, MCR*, W1*	Rapid or frequent transit, Bus Priority, Transport Interchange, MCR*, W1*	Frequent, Local Stop, Secondary Cycleway, W2*	Secondary Cycleway, W2*

*MCR: Major Cycle Route
*W1 Pedestrian Priority

* August include facilities such as a pool, hall, volunteer library

Appendix 1 – District Plan Policy 15.2.2.1 - Role of Centres / Table 15.1 Centre's Role

Policy 15.2.2.1

a. *Maintain and strengthen the Central City and commercial centres as the focal points for the community and business through intensification within centres that reflects their functions and catchment sizes, and in accordance with a framework that:*
   1. *gives primacy to, and supports, the recovery of the Central City;*
   2. *supports and enhances the role of District Centres; and*
   3. *maintains the role of Neighbourhood Centres, Local Centres and Large Format Centres as set out in Policy 15.2.2.1, Table 15.1 - Centre's role.*

Table 15.1 - Centre's role

	Role	Centre and size (where relevant)
A.	Central Business District Principal employment and business centre for the City and wider region and to become the primary destination for a wide range and scale of activities including comparison shopping, dining and night life, entertainment activities, guest accommodation, events, cultural activities and tourism activities. Provides for high density residential activity, recreation activities and community activities and community facilities (including health and social services) as well as civic and cultural venues/ facilities (including museums, art galleries). Serves the district's population and visitors. The focus for the district, sub-regional and wider transport services with a central public transport interchange, providing access to large areas of the district and the surrounding districts of Selwyn and Waimakariri. (Proposed Plan Change 4)	Centre: Central City
B.	District Centre - Key Activity Centre Major retail destination for comparison and convenience shopping and a focal point for employment (including offices), community activities and community facilities (including libraries, meeting places), entertainment (including movie theatres, restaurants, bars), and guest accommodation. Medium density housing is contemplated in and around the centre. Anchored by large retailers including department store(s) and supermarket(s). Accessible by a range of modes of transport, including multiple bus routes. Public transport facilities, including an interchange, may be incorporated. The extent of the centre: 1. is the Commercial Core Zone and Commercial Retail Park Zone at Hornby, Belfast/ Northwood and Papanui/Northlands; and 2. is the Commercial Core Zone in all other District centres; and 3. includes community facilities within walking distance (400 metres) of the commercial zone. (Proposed Plan Change 4)	Centres: Riccarton, Hornby, Papanui/Northlands, Shirley/Palms, Eastgate/Linwood, Belfast/ Northwood, North Halswell (emerging) (All Key Activity Centres) Size: Greater than 30,000m^2
C.	Neighbourhood Centre A destination for weekly and daily shopping needs as well as for community facilities. In some cases, Neighbourhood Centres offer a broader range of activities including comparison shopping, entertainment (cafes, restaurants and bars), residential activities, small scale offices and other commercial activities. Anchored principally by a supermarket(s) and in some cases, has a second or different anchor store. Serves the immediately surrounding suburbs and in some cases, residents and visitors from a wider area. Medium density housing is contemplated in and around the centre. Accessible by a range of modes of transport, including one or more bus services. The extent of the centre:	Centres: Spreydon/ Barrington (Key Activity Centre), New Brighton (Key Activity Centre), Bush Inn/Church Corner, Merivale, Bishopdale, Prestons (emerging), Ferrymead, Sydenham (Colombo Street between Brougham Street and Moorhouse Avenue); Addington, Avonhead, Sumner, Akaroa, Colombo/Beaumont (Colombo Street between Devon Street and Angus Street), Cranford, Edgeware, Fendalton, Beckenham, Halswell, Lyttelton, Ilam/Clyde, Parklands, Redcliffs, Richmond, St Martins, Stanmore/Worcester, Sydenham South (Colombo Street between Brougham Street and Southampton Street),

	Role	Centre and size (where relevant)
	1. is the Commercial Core Zone in the identified centres, Commercial Local Zone at Wigram and Beckenham and Commercial Banks Peninsula Zone at Lyttelton and Akaroa; and 2. Community facilities within walking distance (400 metres) of the centre.	Wairakei/Greers Road, Wigram (emerging), Woolston, Yaldhurst (emerging), West Spreydon (Lincoln Road), Aranui, North West Belfast. Size: 3,000 to 30,000m^2.
E.	Local centre A small group of primarily convenience shops and, in some instances, community facilities. Accessible by walking, cycling from the area served and on a bus route in some instances. Also includes standalone supermarkets serving the surrounding residential community. The extent of the centre is the Commercial Local Zone, except Wainoni and Peer Street where the Commercial Core Zone applies.	Centres: Wainoni (174 Wainoni Road), Upper Riccarton (57 Peer Street), both zoned Commercial Core, All other commercial centres zoned Commercial Local. Size: Up to 3,000m^2 (Excluding Wainoni and Upper Riccarton)

Appendix 2 – Urban Form and Amenity Outcomes of the Existing District Plan Centres Hierarchy

The following urban form and associated urban amenity outcomes are broadly anticipated for the Centres based on the District Plan Chapter 15 policy framework and associated Table 15.1. This is relevant to the differentiation between the Centres in the hierarchy from an urban form perspective.

Central City – The Central City has primacy in the City and the Region. It provides for high density residential, and a comprehensive range of land uses to align with its role as the primary centre. It is highly connected with provision of the central public transport interchange. The built form standards enable buildings up to a height of 30 metres and a requirement for buildings to be highly articulated and of a high quality and with ground floor activation.

As a result, the urban form of the centre is that of the largest centre located centrally within Christchurch and clearly identifiable from a 3D perspective. It has the tallest buildings, comprises the largest urban blocks which are clearly defined by a street grid and buildings built up to the street edge (largely perimeter block forms), and given this, is highly identifiable. The Centre has the highest density of both commercial and residential development of all the Centres and is the most accessible by PT. The City Centre has the highest urban amenity with buildings that are highly articulated with a focus on buildings contributing to a high-quality pedestrian environment associated and high levels of accessibility.

District Centres – The Key Activity Centres comprise of focal points or destinations for major retail (comparison and convenience), commercial and community activities distributed broadly across the wider City. Medium density residential is contemplated in and around the Centres and they are accessible by a range of modes. The built form standards enable buildings to a height of up to 20 metres, buildings to address the public realm positively to achieve a high level of activation and their size is to be greater than 30,000sqm in area.

As a result, the urban form of the centres is secondary to the Central City, medium rise in height and density of development, with buildings fronting key streets, integration of shopping malls within the urban fabric in most cases and comprising a greater range of building typologies to reflect the range of land uses. They are clearly identifiable given height limits and a more intensive built form and activity. The centres have good access to PT with a range of services, with some transfer opportunities between bus routes. The urban amenity of the centres although not as high as the central city, is still important, with buildings that are highly articulated and a focus on contributing to a quality pedestrian environment to support pedestrian accessibility.

Neighbourhood Centres – These Centres, with a focus on day to day needs and generally a supermarket, are located within the various suburbs of the City. They include some local community facilities and medium density is contemplated in and around the centres. They are accessible by one or more buses. The built form standards enable buildings to a height of 12 metres, for buildings to address the public realm and their size is between 3,000 and 30,000m^2.

As a result, the urban form is more local in focus and scale, with low to medium density of height and development, although the centres are still legible in the context of the surrounding suburb, given the likely building typologies. Buildings either front key streets and/or are orientated around carparking areas (particularly where there is a supermarket or large anchor store). They have access to several bus routes. The urban amenity of these centres is less of a focus; however, it is still important for building to activate the public realm, be visually attractive, and respond positively to the local character and context.

Large Format Centres[13] – These are standalone retail centres with a focus on large building footprints which provide a range of yard and trade-based suppliers and serving a larger geographical area. The built form standards enable buildings to a height of 15 metres and no specified size limit.

As a result, the urban form is dominated by large footprint buildings orientated around carparking and primarily accessed by car, with limited PT provision or focus on active modes. The Centres are generally aligned with other commercial or industrial areas of the City given larger format units can be more difficult to integrate into a commercial centre that is located in a residential context. The urban amenity of the centres is the lowest of the centres given the car-based strategy and that buildings are not expected to activate the public realm in the same way as the higher order centres.

Local Centres – These are primarily small groups of shops within residential areas and limited in size of up to 3,000sqm. The built form standards enable buildings to a height of 8 metres, with no specified size limit.

As a result, the size of the centres is limited, and the urban form is generally small scale in height, integrated into the neighbourhood, resulting in a limited demarcation between the centre and the residential context in which they are located. An urban amenity that responds positively to the local character and context is the focus.

[13] *Large Format Centres are excluded from this study.*

Appendix 3 – Urban and Built Form Attributes Across Centre Types

Urban and Built Form Attributes			NPS-UD Centres 'Type'				
Attribute category		Attributes* *Scale of attributes may vary depending on the Centre 'Type' context	City Centre	Metropolitan Centre	Town Centre	Local Centre	Neighbourhood Centre
Built form		High density residential typologies (greater than 6 storeys)					
		High density commercial typologies (greater than 6 storeys)					
		Maximised building heights					
		Large scaled civic buildings					
		Vertical mixed use					
		Quality façade materials and architectural detailing					
		Larger format store integrated into mix-used buildings					
		Highest built forms within wider urban context					
		Large blocks with through block pedestrian links					
		Activated building edges to enhance public realm					
		Uniqueness of architectural character and landscape elements					
		Medium scaled commercial building at the centre (up to 6 storeys)					
		Human scaled architectural elements					
		High to medium density residential typologies (4 to 6+ storeys)					
		Neighbourhood scaled civic buildings					
		Fine grained walkable blocks					
		Larger format store integrated within main street					
		Range of housing typologies decreasing in scale as moves away from services at the centre					
		Local shops of a fine grain					
		Medium density residential typologies (2-4 storeys)					
		Small pocket of commercial shops					
Movement		Public transport interchange					
		Active transport infrastructure					
		Rapid transit					
		Transport priority streets					
		Public transport super stops and frequent services (existing and planned)					
		Local public transport stops and services (existing and planned)					
		Built interface engaging with the street environment					
		High quality streetscape that builds place value					
		High quality streetscape elements					
		Carparking visibility minimised					
		Street parking integrated into streetscape					
		Pedestrian priority/ shared streets and laneways					
		Local and Activity Streets[14]					
		Urban Connector Streets[13]					
		Main Streets[13]					
		City Hubs + Civic Spaces[13]					
Activities	Civic/ Community	Civic facilities*					
		Cultural facilities					
		Education facilities					
		Public facilities - libraries, recreation (gyms, courts, sports clubs and /or pools), community centres					
		Parks and public spaces					
		Community activity hub					
		Healthcare					
	Commercial	Employment core/ epicentre					
		Night life – night-time entertainment/ hospitality					
		Anchor stores					
		High employment hub					

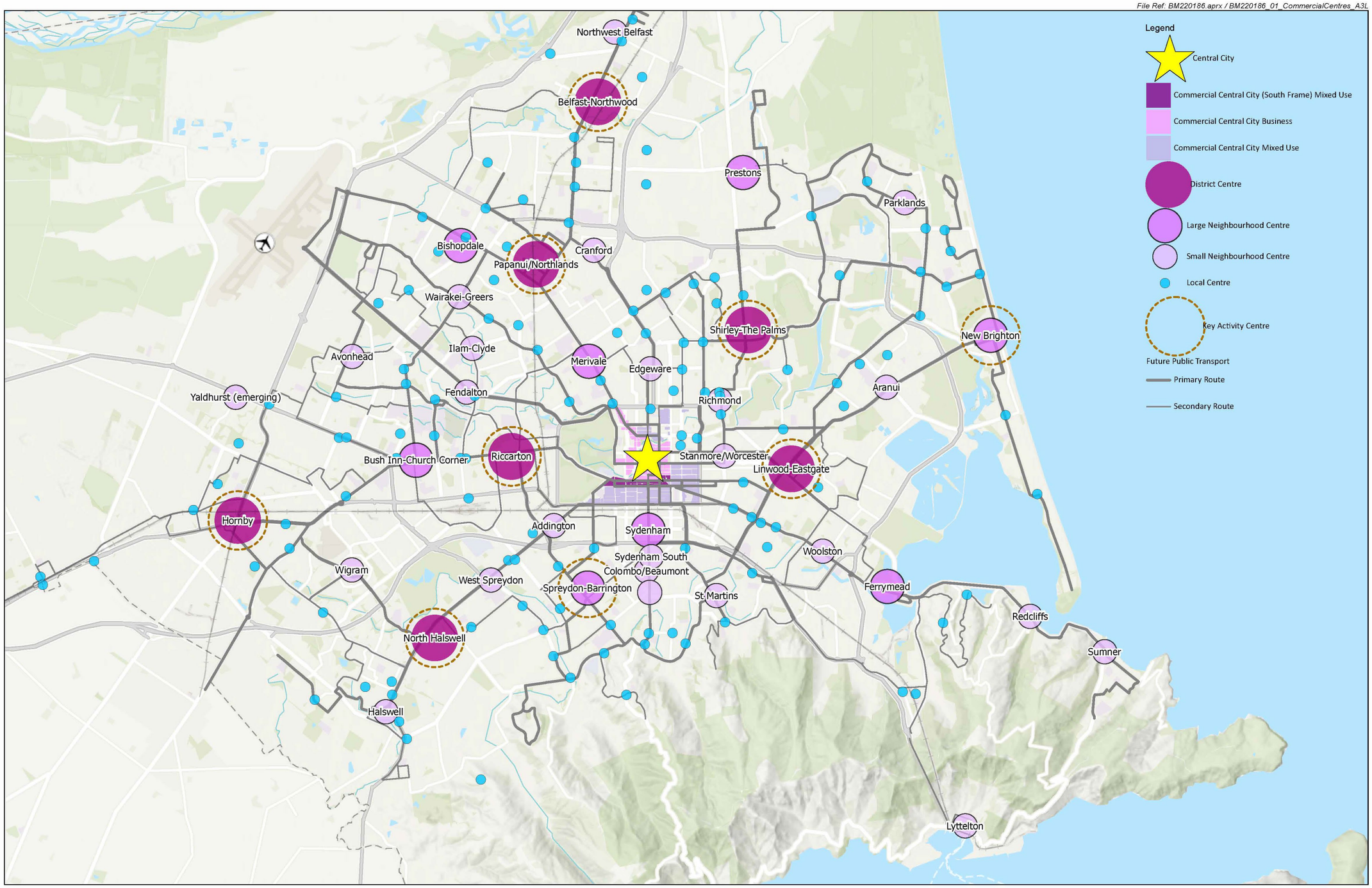
Scale and Design Complexity: City Centre → Neighbourhood

[14] *One Network Framework Street categories*

		Daily shopping needs					
		Weekly shopping needs including standalone supermarket					
		Local speciality / destination					
		Small scale offices					
		Range of services – regional catchment					
		Range of services – local catchment					
	Residential	High density residential (greater than 6 storeys)					
		High - medium density residential (4 to 6+ storeys)					
		Medium density residential (2-4 storeys)					
		Range of housing typologies decreasing in scale as moves away from services at the centre					

Appendix 4 – Centres Framework Maps

File Ref: BM220186.aprx / BM220186_01_CommercialCentres_A3L



Boffa Miskell

www.boffamiskell.co.nz

This plan has been prepared by Boffa Miskell Limited on the specific instructions of our Client. It is solely for our Client's use in accordance with the agreed scope of work. Any use or reliance by a third party is at that party's own risk. Where information has been supplied by the Client or obtained from other external sources, it has been assumed that it is accurate. No liability or responsibility is accepted by Boffa Miskell Limited for any errors or omissions to the extent that they arise from inaccurate information provided by the Client or any external source.

0 2 km

1:75,000 @ A3

Data Sources: Eagle Technology, LINZ, StatsNZ, NIWA, Natural Earth, © OpenStreetMap contributors., Eagle Technology, Land Information New Zealand

Projection: NZGD 2000 New Zealand Transverse Mercator

COMMERCIAL CENTRES FRAMEWORK

District Plan Centre Type

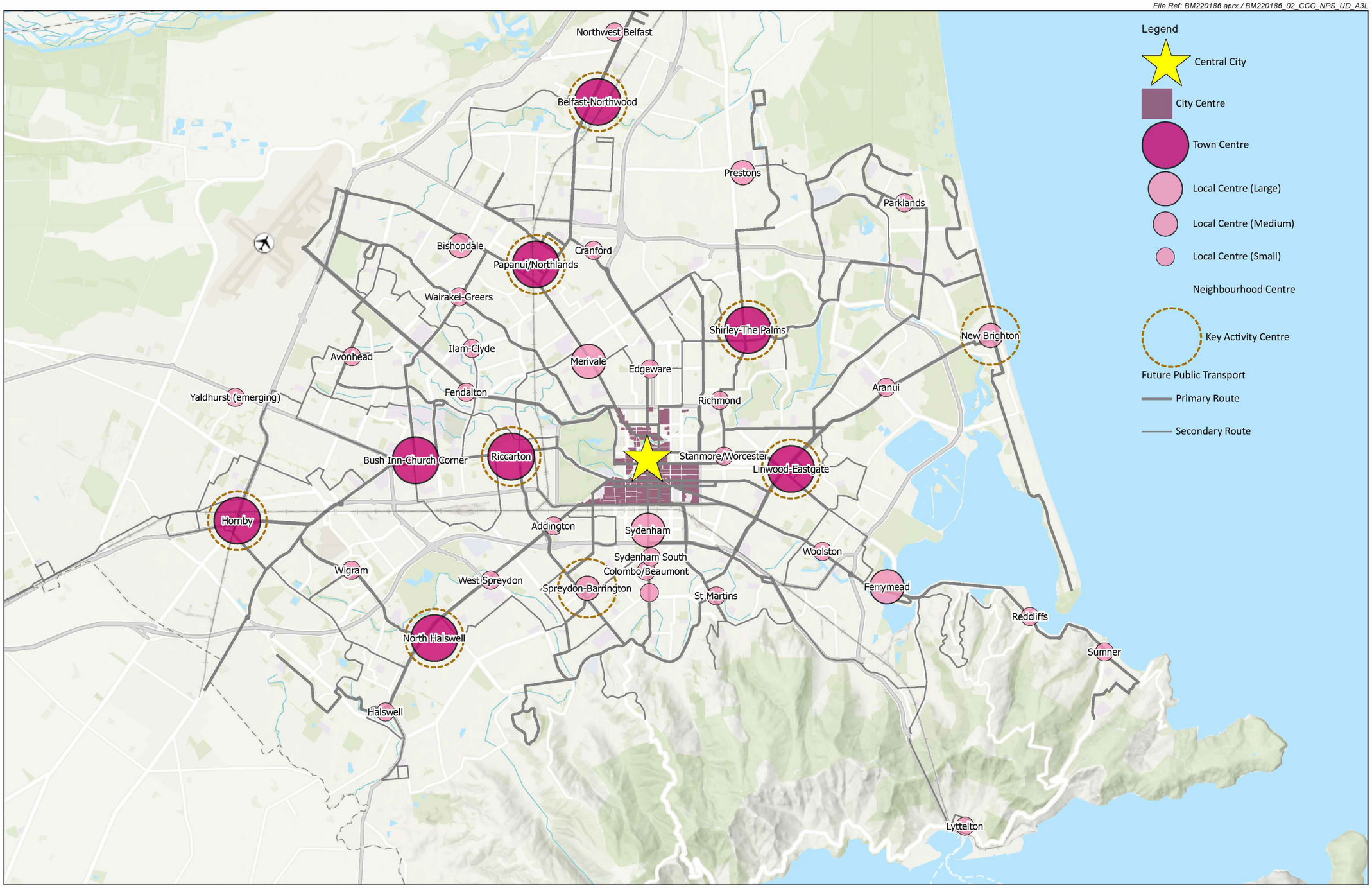
Date: 04 April 2022 | Revision: 0

Plan prepared for CCC by Boffa Miskell Limited

Project Manager: jane.rennie@boffamiskell.co.nz | Drawn: BMc | Checked: OJo

Map 1

File Ref: BM220186.aprx / BM220186_02_CCC_NPS_UD_A3L



Boffa Miskell

www.boffamiskell.co.nz

This plan has been prepared by Boffa Miskell Limited on the specific instructions of our Client. It is solely for our Client's use in accordance with the agreed scope of work. Any use or reliance by a third party is at that party's own risk. Where information has been supplied by the Client or obtained from other external sources, it has been assumed that it is accurate. No liability or responsibility is accepted by Boffa Miskell Limited for any errors or omissions to the extent that they arise from inaccurate information provided by the Client or any external source.

0 2 km

1:75,000 @ A3

Data Sources: Eagle Technology, LINZ, StatsNZ, NIWA, Natural Earth, © OpenStreetMap contributors., Eagle Technology, Land Information New Zealand

Projection: NZGD 2000 New Zealand Transverse Mercator

COMMERCIAL CENTRES FRAMEWORK

CCC NPS-UD Recategorisation

Date: 04 April 2022 | Revision: 0

Plan prepared for CCC by Boffa Miskell Limited

Project Manager: jane.rennie@boffamiskell.co.nz | Drawn: BMc | Checked: OJo

Map 2

Appendix 5 – Definitions

Access

The ability to reach desired goods, services, activities, and destinations – and in the case of movement, reach a given destination (trip end), and the ability to make short trips within a location – as opposed to journeys passing through a location.

Access considers how people move within a place, including local walking and cycling, as well as how they get to and from the place. It also includes considering the provision of end-of-trip facilities like cycle racks, parking, and public transport routes and stops.

Accessibility

The ability for everyone, regardless of disability, personal circumstances, or where they live, to use and benefit from the transport network. This is achieved by designing for people with mobility impairment or vulnerability.

Adaptable

A building, place, or space that is able to adjust to new conditions, or to be modified for a new purpose.

Amenity

The ‘liveability’ of a place. A place’s amenity is affected by its access to sunlight and views, access to facilities and services, and other design aspects. Amenity includes clean and fresh air, natural ventilation, and protection from noise. Expectations of amenity and comfort change over time.

Attractive

A building, place, or space that is aesthetically pleasing, or appealing.

Biodiversity

The variety of life on Earth and the natural patterns it forms. Current biodiversity is the fruit of billions of years of evolution, shaped by natural processes and, increasingly, by the influence of humans. It forms the web of life of which we are an integral part and upon which we fully depend.

Built environment

The constructed environment, as distinct from the natural environment. Encompasses all aspects of our surroundings made by people, and includes cities and towns, neighbourhoods, parks, roads, buildings, infrastructure, and utilities like water and electricity.

Built form

The regulatory and statutory frameworks that describe the three-dimensional articulation of building type, function, and use. These frameworks provide the limits within which architectural design operates. The limits are related to envelope, solar planes, setbacks, height, mass, and interface.

Connectivity

The number of connecting routes within a particular area, often measured by counting the number of intersection equivalents per unit of area. An area may be measured for its 'connectivity' for different travel modes – vehicle, cyclist, or pedestrian. An area with high

connectivity has an open street network that provides multiple routes to and from destinations. (Urban Design Guidelines for Victoria, Glossary)

Context

The physical, social, cultural, economic, environmental, and geographic circumstances that form the setting for a place or building.

Design

Design is a verb and a noun, both a problem-defining and problem-solving activity that brings together many different pieces of information in order to identify and develop new opportunities. Design should be understood as both a process put in place to do something, and an outcome of creating something.

Design process

A series of actions or steps taken to achieve a particular end. Design processes are not linear; they are iterative, collaborative, and circular, where feedback and ideas are intertwined and continual. Design processes help provide solutions to complex problems where many inputs and concerns are needing to be resolved.

Design

The tactile, physical attributes related to the material finishes and fixtures of the built environment. Design quality also relates to less tangible attributes regarding sense of place and belonging, and Aboriginal culture. Design quality needs to be valued and maintained over time.

Diverse

A building, place, or space that embraces a range of uses and users, to satisfy a broad demography and their multiple needs.

Equitable

A built environment that is fair and able to be accessed in a safe and dignified way by all citizens.

Fit for Purpose

1. A building, place, or space that works according to its intended use

2. In relation to any land selected, acquired or proposed to be dedicated as public space,

‘fit for purpose’ specifically refers to the proposed public space having qualities (such as grade, width, visibility) that make it capable of supporting the required uses including performative attributes such as being free from hazards and constraints that would encumber safe use.

Green Infrastructure

Green infrastructure is the network of green spaces, natural systems, and semi- natural systems that support sustainable communities and includes waterways, bushland, tree canopy, green ground cover, parks and open spaces that are strategically planned, designed, and managed to support a good quality of life in an urban environment.

Healthy

A building, place, or space that promotes positive social, emotional, mental, and physical health for its people.

Inclusivity

Recognition that every person has the right to participate in shaping the built environment and to benefit from urban development. It places particular focus on the most marginalised and vulnerable groups of society by promoting participation in planning processes and also diversity in representation. Inclusive cities enable everyone access to services, jobs, and opportunities and to be part of city civic and political life. (HABITAT III Glossary)

Integrated

A built environment that links communities and functions and activities within a cohesive place.

Interface

A point where two systems, subjects, elements, or organisations meet and interact.

Intersection

Intersections between streets, walking, and cycling paths, including through-site links.

Liveable

A built environment which supports and responds to people's patterns of living, and is suitable and appropriate for habitation, promoting enjoyment, health, wellbeing, safety, and prosperity.

Local character

The distinctive features or attributes specific to a neighbourhood, providing a sense of place and identity.

Mobility

Movement of people and goods from place to place – used to refer to connectivity to destinations and activities (in lieu of 'accessibility'). This is usually determined by the main mode (or modes) of transport and their catchments – e.g. a measure of mobility from a suburb to a centre may be the frequency and reliability of a given bus service passing through the suburb and centre. Mobility is generally distinct from local access (e.g. walking and cycling around a place).

Mitigation (of climate change)

Human intervention to reduce the sources or enhance the sinks of greenhouse gases. Mitigation (of disaster risk and disaster) is the lessening of the potential adverse impacts of physical hazards (including those that are human-induced) through actions that reduce hazard, exposure, and vulnerability. (HABITAT III Glossary)

Net zero

Net zero emissions means emissions are balanced by carbon storage. The more emissions are reduced, the less sequestration is needed to achieve net zero.

Night-time economy

Night-time economy can be defined as social or business activities that take place between 6pm and 6am. This includes a myriad of business activities, events and services generally categorised into three core areas of entertainment, food and drink. Non-core activities, such as transport, accommodation, education and retail services also contribute to a vibrant and lively night-time economy.

Open space

Land that has no buildings or other built structures, including green space.

Permeability

Permeability or connectivity describes the extent to which urban forms permit (or restrict) movement of people or vehicles in different directions. Permeability is generally considered a positive attribute of urban design, as it permits ease of movement and avoids severing neighbourhoods. (Wikipedia)

Place

Place is the interdependent relationship of people and their environment. It is a relational concept. 'Place' can't be comprehensively defined, but individual places can be described or understood by people in different ways and at different scales. Places are multi-layered and diverse environments. They are a synthesis of layers and elements generally understood through:

- meaning – people's understanding and connection to places, which reinforces personal or collective identity and belonging
- physical form – the physical attributes of the surrounding environment including its material, spatial, and natural qualities
- activity – the things that people do and the things that are happening in a particular location or area.

Place-based

A holistic understanding of context and the people who populate places to support the long-term needs of the wider community. It acknowledges a place's local knowledge, its unique history, culture, environment, and economy.

Precinct

A large area defined by physical characteristics or boundary constraints.

Precinct Structure Plan

As defined in the relevant instrument – generally understood as a framework document showing how development will occur in a given place, and including building parameters like height, density, shadowing, and environmental concerns. It is a visual document that details a clear strategy or plan for the physical transformation of a place, supported by financial, economic, and social policy documents which outline delivery mechanisms and implementation (variously also a precinct strategy or master plan, depending on scale and level of detail).

Public space

Places publicly owned, or designated for public use, that are accessible and enjoyable by all, free of charge and without a profit motive, including:

- public open spaces: active and passive spaces including parks, gardens, playgrounds, public beaches, riverbanks and waterfronts, outdoor playing fields and sports courts, and publicly accessible bushland
- public facilities: public libraries, museums, galleries, civic and community centres, showgrounds and indoor public sports facilities
- streets: streets, avenues and boulevards, squares and plazas, pavements, passages and lanes, and bicycle paths.

Quality

The standard of something, measured comparatively against things of a similar kind. 'Quality' can also describe something that is high grade and of superior excellence.

Regenerative design

Regenerative design is design that ensures the built environment has a net positive impact on natural systems. To progress towards regenerative design and systems for our planet, we need to understand how to design for all species while respecting planetary boundaries and using science- targets.

Resilience

The capacity of a social or ecological system to cope with a hazardous event or disturbance, responding or reorganising in ways that maintain its essential function, identity, and structure, while also maintaining the capacity for adaptation, learning, and transformation.

Resilience is a complex and dynamic system-based concept used differently in a variety of disciplines, and also a simple concept referring to the ability of a system to return to a previous or improved set of dynamics following a shock. It also refers to the potential for individuals, communities, and ecosystems to prevent, absorb, accommodate and recover from a range of shocks and stresses. (HABITAT III Glossary)

Responsive

Buildings, places, and spaces that react positively to place and local character and context.

Site

A parcel of land with associated land title. Land title is the evidence of a person's rights to land.

Skyline

A shape or pattern made against the sky, especially by buildings

Sustainability

The endurance of systems, buildings, spaces, and processes – their ability to be maintained at a certain rate or. level, which contributes positively to environmental, economic, and social outcomes.

Value

A measure of what design is worth. Value is not merely related to economics, but includes an understanding of social, cultural and environmental factors as components contributing to the value of good design.

Walkability

The extent to which the built environment is friendly to the presence of people living, shopping, visiting, enjoying or spending time in an area without needing to use a vehicle. Factors affecting walkability include, but are not limited to, street connectivity, land-use mix, residential density, the presence of trees and vegetation, and the frequency and variety of buildings, entrances and other sensations and elements along street frontages.


TOGETHER SHAPING BETTER PLACES
50
1972 - 2022

Plan Change 14

Qualifying Matter: Lyttelton Commercial Centre - Lower Height Limit

Christchurch City Council

Technical Report

Date: 1 August 2022
Version: V03
Author: Josie Schröder
Peer reviewed: Ceciel DelaRue

DISCLAIMER:

Christchurch City Council has taken every care to ensure the correctness of all the information contained in this report. All information has been obtained by what are considered to be reliable sources, and Christchurch City Council has no reason to doubt its accuracy. It is however the responsibility of all parties acting on information contained in this report to make their own enquiries to verify correctness.

This document has been prepared for the use of Christchurch City Council only. Copyright © 2022 by Christchurch City Council.

1. Introduction

1.1 Summary

The Lyttelton town centre (see ***Appendix 1*** for extent) is proposed in the commercial centres hierarchy as a Local Centre (Medium) Zone, with an associated 14m height limit. However, the special characteristics of the Lyttelton town centre warrant a lower height limit than this, with retention of the current 12m height limit proposed as a Qualifying Matter through Plan Change 14.

There are less than 80 commercial sites located within the Commercial Banks Peninsula Zone in Lyttelton. Activities within this zone include, but are not limited to, retail, offices, hospitality and public uses such as the library and local government services. They are within two largely distinct areas - Norwich Quay, which more strongly relates to the port-side context, and London Street, which is the main retail street, and the area to which the height limit is most pertinent for the reasons discussed below.

The combination of the extent of heritage listed buildings and adjacent proposed Residential Heritage Area (and adjacent existing/proposed Character Area), distinct and recognised built character, and topography impacting on sunlight access, all contribute to the rationale for a lower height limit for the Lyttelton town centre.

1.2 Legal Requirements

The matter of whether lower height limits can be applied to particular locations within Ōtautahi Christchurch should be considered under section 77O of the Resource Management Act 1991 (RMA). This relates to 'Qualifying Matters in application of intensification policies to urban non-residential areas' and identifies that:

'a specified territorial authority may modify the requirements of policy 3 in an urban non-residential zone to be less enabling of development than provided in those policies only to the extent necessary to accommodate 1 or more of the following qualifying matters that are present:

(a) A matter of national importance that decision makers are required to recognise and provide for under section 6. Section 6(f) identifies and enables the protection of historic heritage from inappropriate subdivision, use and development. Almost the entirety of the Lyttelton township is identified as a Historic Area by Heritage New Zealand Pouhere Taonga. In addition, individual scheduled items are located within the commercial centre. A Residential Heritage Area is also proposed immediately to the north of the commercial centre, and covers most of the Lyttelton residential area, with connection to the harbour being a contributory matter.

(j) Any other matter that makes high-density development as provided for by policy 3, as the case requires, inappropriate in an area, but only if section 77R is satisfied. The town centre is recognised as having a distinct character and strong sense of place as a result of the built form (with noted associated heritage values), including scale. In addition, Lyttelton's location on the steep, southern slopes of the Port Hills, access to sunlight is a matter that has been identified as a matter of importance to (and by) the community.

Section 77P describes the evaluation – additional to that under section 32 of the RMA – required for qualifying matters. However, section 77Q specifies a different process for 'existing qualifying matters', which includes a qualifying matter referred to in section 77O(a) that is operative in the relevant district plan when this plan change. Lyttelton, including its town centre, contains numerous buildings and settings listed within the Schedule of Significant Historic Heritage and/or Schedule of

Heritage Areas, and as noted earlier, is identified for almost its entirety as a Historic Area (see ***Appendix 2***).

For section 77O(j) 'other matters', section 77R requires that the matter can only be considered as a qualifying matter if an evaluation report also identifies:

a) The specific characteristic that makes the level of urban development required in Policy 3 in appropriate;

b) Justifies why that characteristic makes that level of urban development inappropriate given the national significance of urban development and the objectives of the NPS UD; and

c) Includes site specific analysis.

This report meets the requirements in section 77R in respect to the distinct character of Lyttelton's town centre, and with reference to sunlight access provided.

As such, this evaluation highlights the rationale behind identifying 'a lower height limit on sites currently located in Lyttelton's Commercial Banks Peninsula Zone' as a qualifying matter in order that sections 77O(a) and (j), 77P, 77Q, and 77R are met.

2. Background

In respect to Plan Change 14, Lyttelton is proposed as a Local Centre (Medium) within the city's hierarchy of centres. The Lyttelton commercial centre serves not just Lyttelton but the entire Lyttelton Harbour basin area. As such it offers a range of services and retail activity to the local area, as well as accommodating a significant place of employment to the city via the Lyttelton Port Company.

For these reasons amongst others, Lyttelton has been included within the Ōtautahi Christchurch urban area. As such Medium Density Residential Standards (MDRS) will apply to most of the residential area of the township. However, most of this area is also proposed as Qualifying Matters for the reasons of heritage and character values. This includes areas surrounding the commercial centre, where height limits are proposed to be restricted to 7m, as existing[1].

Lyttelton has a character quite distinct from other urban areas within Ōtautahi Christchurch due to its steep, sloping topography, colonial and Ngāi Tahu cultural heritage, portside location, street and lot layout and eclectic mix of buildings, many of which are denoted as historic heritage.

Lyttelton is located on the southern slopes of the Port Hills. The sunny aspect is to the north, compromising the extent of access to sun, in particular during the winter months. Public space within the commercial town centre, and township more widely, is limited with the focus of much of the community activity in public space on London Street and Albion Square (located on the corner of London Street and Canterbury Street). As such ensuring a good level of comfort for the users of these spaces and access to sunlight for adjacent uses/buildings has and is considered to be of high importance to the community[2].

[1] See Plan Change 13 and 14 for detailed provisions - Lyttelton's Residential Heritage and Character Areas.
[2] Lyttelton Master Plan 2012 and recent submissions on RMA/2020/1555 and RMA/2019/1330

3. Issues in Respect to Height Limits

4. Lyttelton Heritage and Character

Heritage

Lyttelton is an excellent surviving example of a planned colonial settlement dating from 1849, with aesthetic, architectural, historical, social and archaeological significance. Heritage New Zealand Pouhere Taonga listed Lyttelton as a Historic Area (List Number 7784)[3] on 13 August 2009, effective from that date. The Lyttelton Township Historic Area includes almost all of the township of Lyttelton, including the town centre. This listing remains post-earthquakes.

Much of the Historic Area is also proposed as a Residential Heritage Area through Plan Change 13, and to a lesser extent is covered by an existing Character Area Overlay, which is proposed to be retained and extended through Plan Change 14. The Residential Heritage Area includes the properties immediately to the north of the Lyttelton town centre. These properties are in an elevated position above the commercial and mixed use buildings of the commercial centre framing London Street.

In addition to a range of heritage values, the significance of the area also lies in the contextual values. "The contextual value of the Heritage Area arises from the development pattern created by the relationship between the colonial grid pattern of the principal streets and the topography of the locale on the southern flank of the Port Hills. The steeply sloping terrain of the town creates a high level of visual connectivity between the properties within the town and to their port and harbour setting."

Pre-earthquakes, Lyttelton had a wide variety of buildings of different ages and styles which collectively created an eclectic, vibrant townscape much valued by the community. The Harbourlight Theatre, built in 1917 in a Moorish style, was the largest scale building on London Street at an approximate equivalent of 3 storeys (approximately 12 metres), excluding the two decorative tower features. However, most of the buildings along London Street were 1 to 2 storeys at street level.

Figure 1: Heritage items in and around the Lyttelton town centre scheduled in the Christchurch District Plan (excerpt).

[3] https://www.heritage.org.nz/the-list/details/7784

Post-earthquake eight scheduled buildings remain along London Street, with four of these located within the commercial area.

Character

Although diminished by the earthquakes, the variety in building types and styles remains. While a mix of old and new development, overall the combination of buildings and topography create a sense of place, unified by their similarity in height, scale, grain and relationship to public space.

The Lyttelton commercial centre design guidelines currently exist within the Christchurch District Plan (2017) in the form of *Appendix 15.15.6 Design guidelines – Lyttelton Commercial Banks Peninsula Zone*. They identify the physical framework and explain the building design principles to uphold and strengthen, rather than diminish, the enduring character and identity of the Lyttelton town centre. The design of all new developments and external alternations to existing buildings within that zone in the Lyttelton town centre is assessed through the Resource Consent process against these guidelines. In respect of the key matters discussed above, the design principles include:

- *Principle 1: Reflect the context*, which acknowledges and suggests means to reflect Lyttelton's special character.
- *Principle 2: Addressing the slope, views and existing building form*, which emphasises the need to keep in scale, so as not to dominate or diminish the streetscape as a whole.
- *Principle 5: Incorporate variety and pay attention to detail*, which advises against buildings being exactly the same height as their neighbours.
- *Principle 6: Promote sustainable building initiatives*, which encourages building design to achieve a high level of natural light penetration, thermal comfort and sunny spaces outdoors.

Figure 2: London Street, viewed east to west, with adjacent residential (heritage and character) areas to the west

Figure 3: London Street viewed east to west at eye level illustrating the built character

Figure 4: London Street viewed from the south east (cnr of London and Oxford Street, including heritage buildings

5. Lyttelton Master Plan

The Lyttelton Master Plan[4] was prepared in 2011 (and endorsed by Council in 2012) in collaboration with the local community and other stakeholders, to provide an agreed vision to guide severely earthquake-damaged Lyttelton's recovery and rebuild. Key aspects of the Master Plan actions focused on building height, recognising the importance of public space amenity to the community, including:

- *Action (B1) Rebuild and recovery-supportive amendments to the Proposed Banks Peninsula District Plan* (page 94) noted that:
    - The *"12m maximum height is appropriate and ensures new buildings keep within the height ranges of existing building around them. Consideration could be given to ways to encourage a set back third level to avoid overshadowing the main street."* It is noted that while a 12m height was instituted in the Christchurch District Plan, no provision was made for a third level setback. However, with a Restricted Discretionary activity

[4] Lyttelton Master Plan, Christchurch City Council (June 2012)

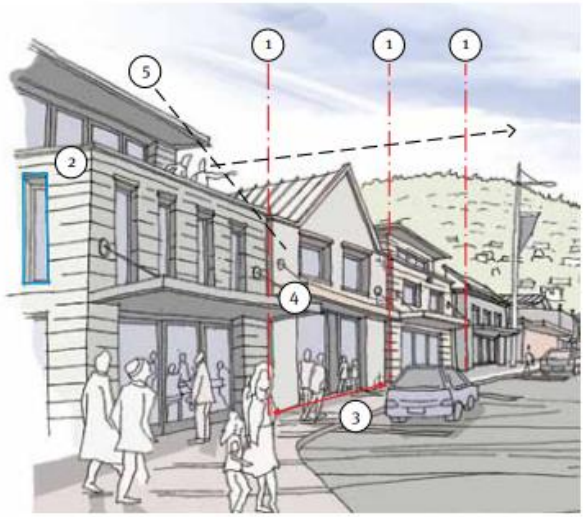
status for new buildings or alterations to existing buildings, this provides opportunity to manage any potential impacts.

- The aim is *"for a successful blend of old and new (not replication) where there is variety and interest but a similarity of scale."* This has largely been achieved through the use of statutory design guidance[5], which were made operative in 2017 as part of the District Plan Review.

- *Action (B2) Design and character guidance* (page 99) -an evaluation of the commercial buildings in Lyttelton's town centre , which have largely been incorporated into the consequent statutory design guidance that was subject to public consultation, that included:
  - Architectural character attributes: *"Double and single level buildings with high parapets."*
  - Core design principles*: "Maintain the generally low built form (one to three stories) based on the height, scale and form of buildings which are still standing and those which have been lost."*
  - An elevation illustrating some of the character elements and core design principles, including *"Buildings similar heights and proportions to their neighbours"* and *"Building set backs on the third level minimise shadows at street level while achieving views out to the harbour."*

There is strong support for retaining the 'vertical' building proportions and fine grain (a series of separate building facades and architectural expression) as per the pre-earthquake condition. This elevation illustrates some of these character elements and core design principles:

1. Buildings similar heights and proportions to their neighbours. Character is maintained by emphasising each individual building with architectural variety, colour and materials.
2. Secondary design elements such as windows and trimmings reinforce the street's vertical proportions.
3. Buildings are sited to define the edge of the street and are active at the ground floor level.
4. Verandas are included for weather protection and maintain a consistent line to their neighbours.
5. Building set backs on the third level minimise shadows at street level while achieving views out to the harbour.



▲ *Artist's impression only, demonstrating character and design elements along London Street.*

Figure 5: Capturing the scale and design elements anticipated through redevelopment of London Street commercial property. Lyttelton Master Plan pg. 100, Christchurch City Council

[5] Appendix 15.15.6 Design Guidelines – Lyttelton Commercial Banks Peninsula Zone, Christchurch District Plan

6. Height in Respect to Public Space

London Street is the focal point of Lyttelton town centre. The street runs 20^0 from north south, has an enclosed, intimate scale and includes eight listed heritage settings and/or items in in the two main blocks between Dublin and Oxford Streets. It is an important civic space, being the location of Albion Square (on which the Lyttelton War Memorial Cenotaph and numerous community events are located) and the weekly Lyttelton Farmers' Market (which supports local producers of food, drinks, plants, craft and entertainment and attracts hundreds of people to the centre).

Figure 6: Albion Square, in the context of London Street to the south

Elsewhere within Lyttelton there are limited spaces to sit, or to congregate, and the comfort of people utilising these spaces is an important element of this. Further, businesses provide outdoor dining and seating at both sides on London Street, and onto Albion Square, adding to the community activity and interest within these public spaces.

Human scale, a unique character and access to sunlight are important components of successful public space. The value (environmentally, socially and economically) of London Street will be compromised by a higher height of adjacent buildings, restricting sunlight access and compromising the character of the commercial town centre.

In addition to the 12m height limit, a recession plane angle applies to a street block bounded by London Street, Norwich Quay, Canterbury and Oxford Streets. As an NZTA-controlled state highway, Norwich Quay is a wider street accommodating a significant and growing volume of port-generated heavy traffic, single-sided for the majority of its length, with an open outlook to the port and beyond. While the lower ground level than that of London Street suggests taller buildings would be more appropriate within this block, the resulting loss of sunlight to both London Street and Norwich Street result in further compromised public space and less vibrant commercial activity as a result.

It's for these reasons – protecting heritage, character and access to sunlight - that building height was and is currently limited to 12m in the Lyttelton town centre.

Buildings within the commercial centre are predominantly 1 and 2 storey, with recently consented developments proposed up to 3 storeys in height (at the time of writing), with one development

proposal consented at 4 storeys plus roof top terrace, adjacent to London Street. Proposals to date, both pre–application (provided to Council in confidence) and those that have been lodged for resource consent, over two storeys have provided for mixed use, with the upper floor(s) for residential, rather than commercial, activity[6]. (see ***Appendix 3*** for detail)

Where of a higher height, the upper floor levels have been designed to limit visual dominance and overshadowing effects on public space, including by providing light weight or setback upper floors, or visual breaks in the streetscene to the north of London Street. This variety has allowed sunlight to penetrate from the north, and sightlines to the harbour to be retained from the residential (heritage) dwellings located above London Street.

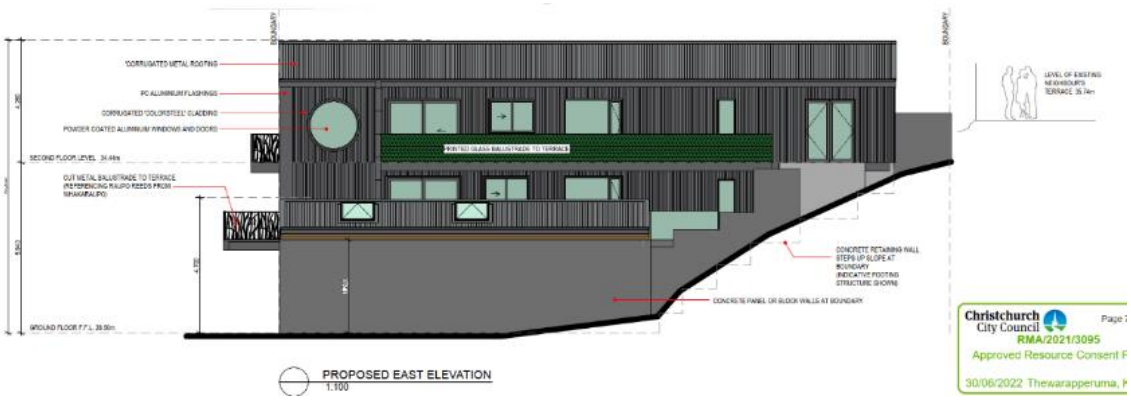


Figure 7: Side elevation (east elevation) RMA/2021/3095 illustrating the relationship of development to the north of London Street and the proposed Residential Heritage Area located above (right). The full height of the proposal is 10.6m from street level but both gable roofs and a 1.5 storey section provide for sunlight access from the north (hills) and sightlines from above to the south (harbour).

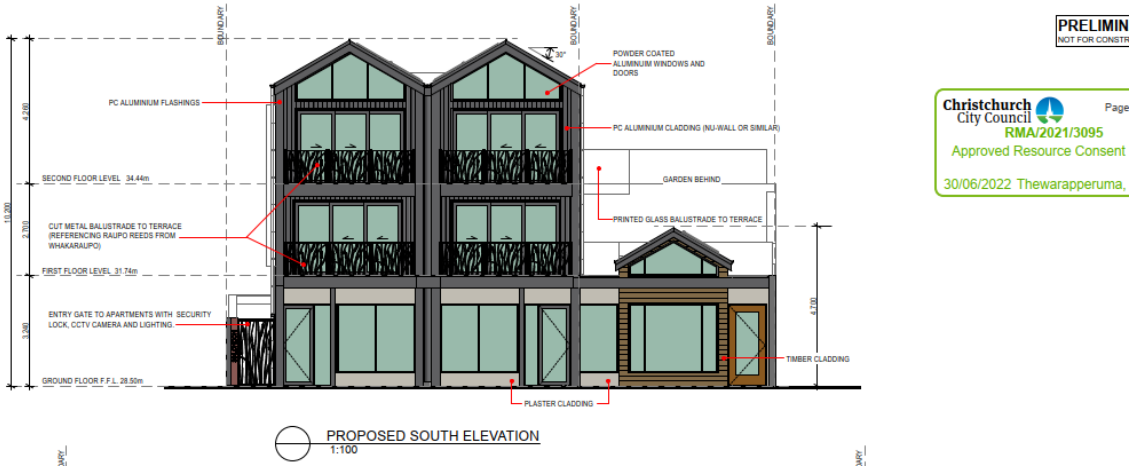


Figure 8: RMA/2021/3095 London Street elevation (south)

[6] The most significant in scale to date being "Colletts Corner", located on the corner of Oxford and London Streets, containing 4 storeys (one below street level) of mixed activities, predominantly to a height of 12m.

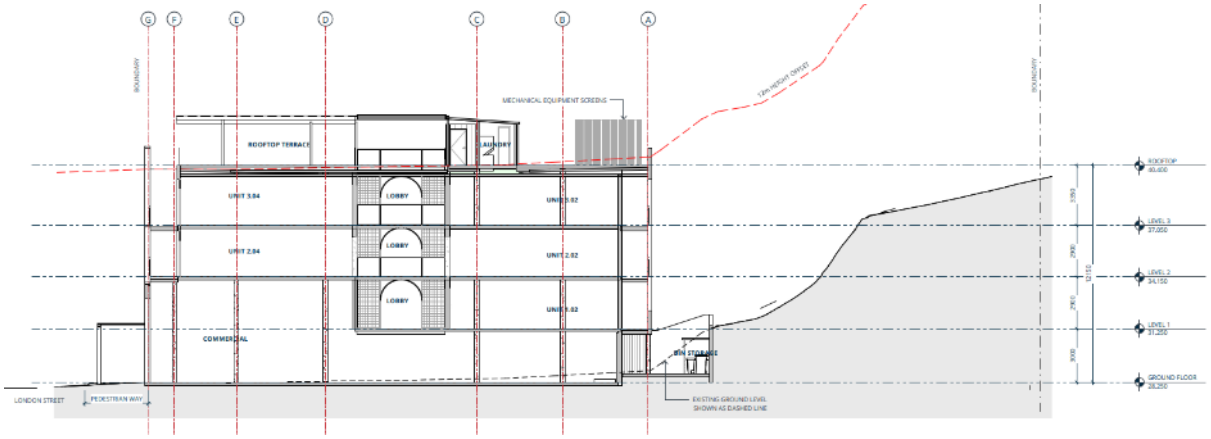


*Figure 9: RMA/2022/801 – Side elevation (east) - a consented 4 storey development with lightweight roof terrace. Equivalent in height to the former Harbourlight Theatre, located on the subject site at 24 London Street. (See **Appendix3** for more detail), with artists impression of the proposed building within the adjacent built context.*

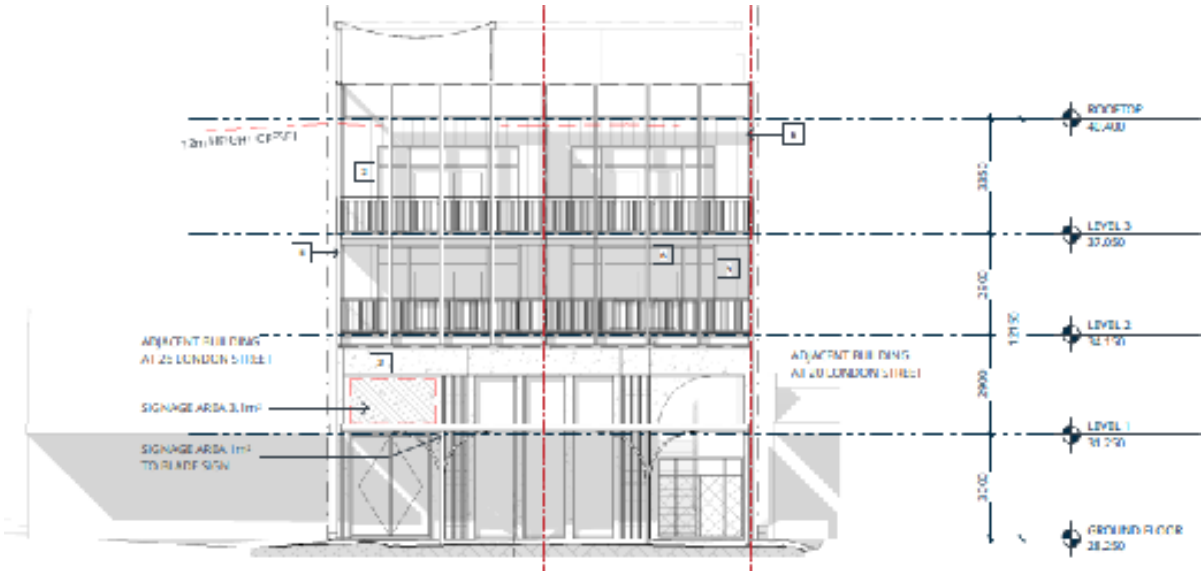


Figure 10: RMA/2022/801 - London Street elevation (south)

Figure 12: RMA/2022/801 – Proposal illustrated within the context

7. District Plan Provisions – Options

To inform Plan Change 14, the Council has therefore assessed what constitutes 'building heights and density of urban form commensurate with the level of commercial activities and community services' in the context of Lyttelton town centre.

Below is a short summary of the options considered, with the key difference being a height difference of 2m, with a maximum height scenario of 12m or 14m. To be at least consistent with the Local Centre (Medium) Zone across Ōtautahi Christchurch, a height limit above 14m has not been proposed as an option.

It is proposed to retain the status quo in respect to the Restricted Discretionary Activity status, in association with the statutory design guidance, to ensure ongoing management of the heritage and character values discussed. The evaluation of the options is discussed in more detail in ***Appendix 4***.

Impact of Lower Height Limit in the Lyttelton town centre on development capacity

Heights	**Total Developable Floor Area**
12m (4 storey)	86,400m2
14m (5 storey)	108,000m2
Difference	21,600m2
Note: 21,600m2 equates to 288 x 1 bed or 144 x 2 bed (including circulation and excluding outdoor living space, bike storage and service space).	

Assumptions:

- 36,000m^2 in Commercial Banks Peninsula Zone (75 sites total)
- 36,0000m^2 @ 60% (site coverage standard) = 21,600m2 ground level area available for development
- 2m height difference equates at most to one storey
- Likely upper floor use – residential
- 300m^2 - 4 x 1 bed or 2 x 2 bed
- Note – floor space could also be office, hotel space etc.
- No current impact from recession planes (no public space in block contained by Oxford, Canterbury, London Streets and Norwich Quay) and therefore not equated into the floor area.

The following options in respect to the management of height were considered:

Option 1: Status Quo

Retain the current maximum building height of 12m and associated provisions in Lyttelton's Commercial Banks Peninsula Zone.

Option 2: Increase maximum building height

Increase the maximum building height to 14m to align with the Local Centre (Medium) Zone.

Option 3: Use an alternative control to maximum building height

Increase the building height to 14m in line with the Local Centre (Medium) Zone in association with a recession plane to limit the impact of height on London Street and Albion Square.

8. Conclusion

It is noted that in itself 2m of apparent additional height does not appear of significance and may provide an increase in flexibility in respect to the floor to ceiling heights of a 4 storey building. However, all of the existing buildings, both pre and post-earthquake (including those consented at the time of writing), are less 12m or less (equivalent to 4 storey) with the majority of buildings being two storey or less.

The Restricted Discretionary Activity status, as is proposed to be retained, provides for the opportunity to evaluate any proposed increase in height in association with the management of character values. Given the special characteristics of Lyttelton and its town centre summarised above, the outcome of this process is that a 12m building height limit is to be proposed within Lyttelton's Local Centre (Medium) Zone.

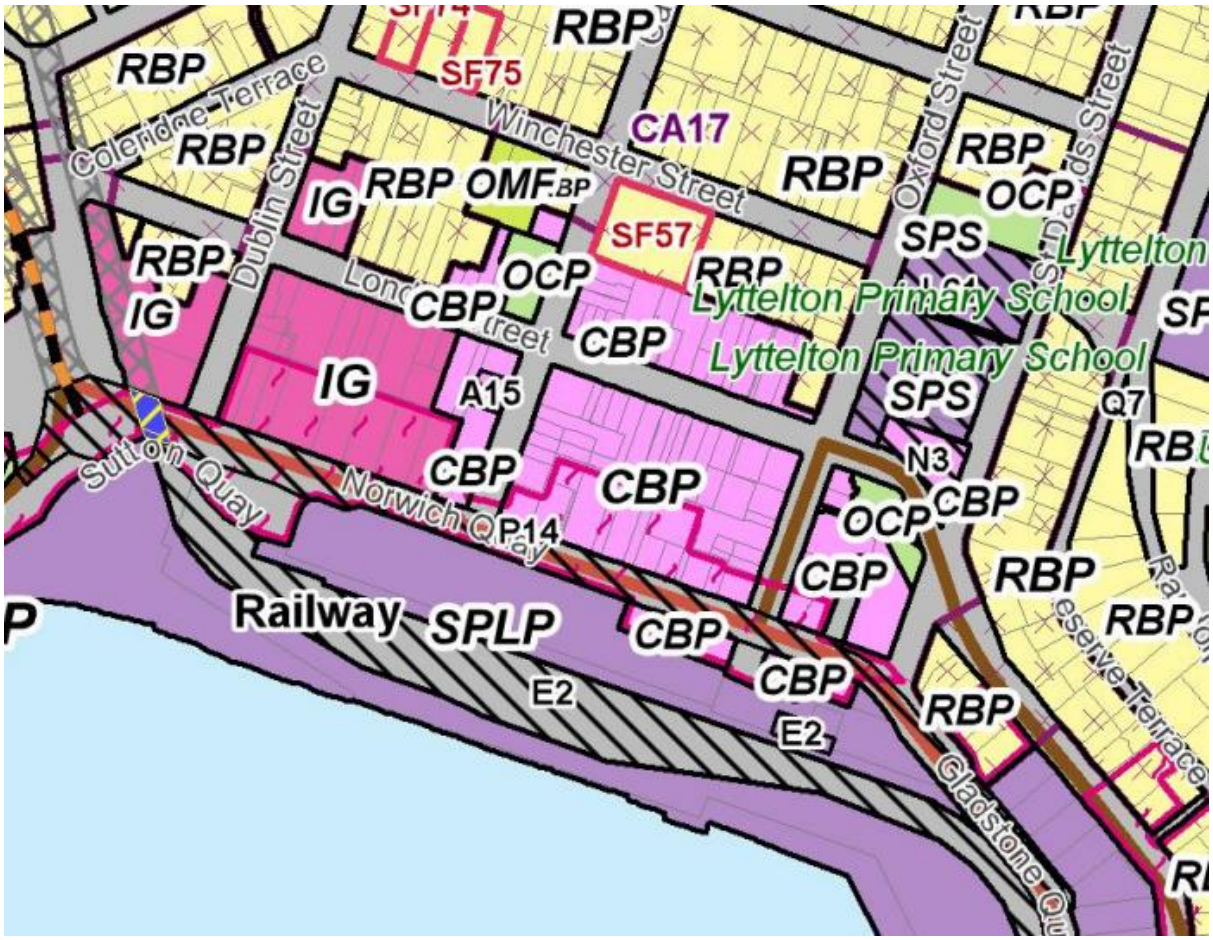
There are less than 80 commercial sites located within the Commercial Banks Peninsula Zone in Lyttelton. Activities within this zone include but are not limited to retail, office, hospitality and public uses. In effect the difference in height limit of 2m may equate to 1 storey in real terms i.e. from the ability to build 4 versus 5 storeys, subject to design control if retained. This is illustrated

A 14m height limit for development in the Local Centre (Medium Zone) is considered inappropriate for the Lyttelton town centre. Policy 3(d) of the NPS-UD requires that, within neighbourhood centre zones, District Plans should enable building heights and density of urban form commensurate with the level of commercial activities and community services (subject to providing for qualifying matters (Policy 4)).

As such, the existing provisions, Option 1 – Status Quo, including the 12m height limited and restricted discretionary activity assessment remains appropriate. This provides the option to assess any increase in height on its merits to provide for a scale of building that does not unduly result in visual dominance effects, and sightlines, in regard to the character and heritage, and manage levels of shading such that its role as an important community gathering and socialising space, and commercial heart, is not overly compromised.

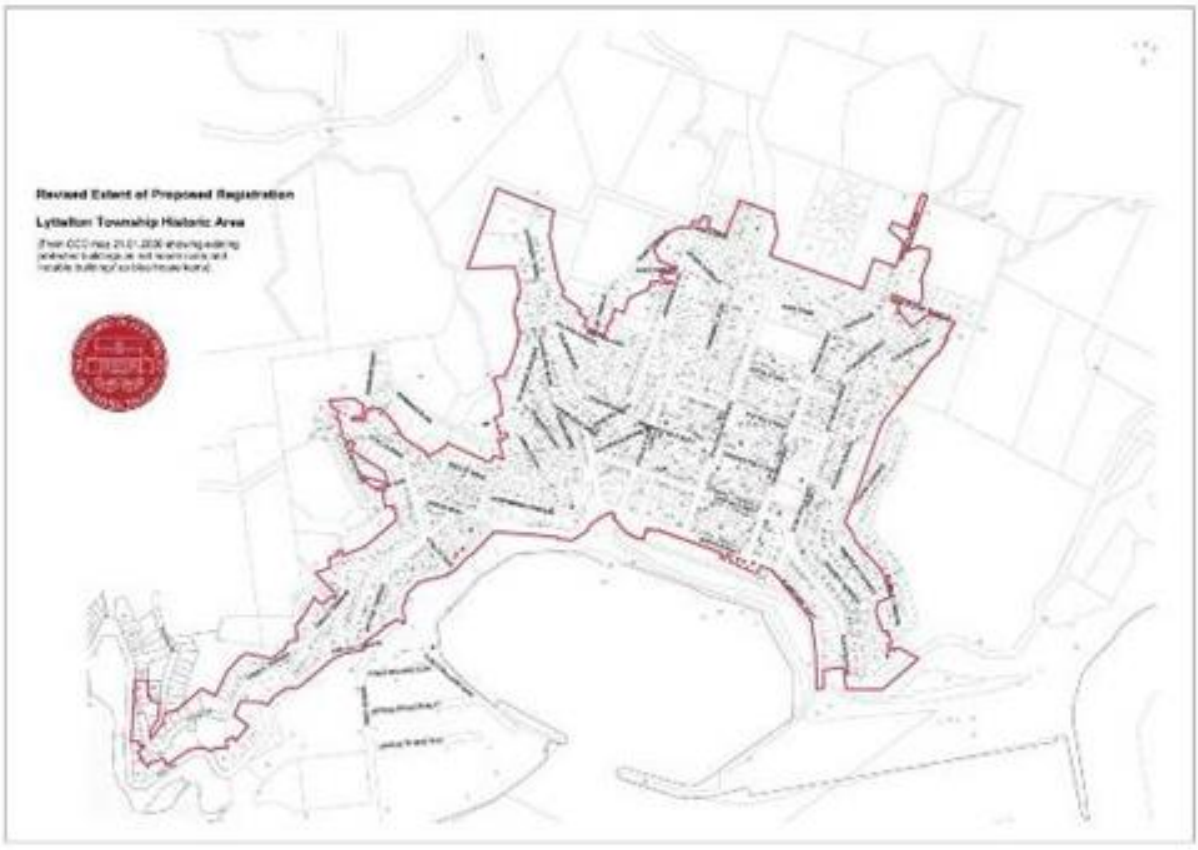
Appendix 1: Lyttelton Local Centre Zone Extent

The existing Commercial Banks Peninsula Zone (CBP) extent is proposed to be retained (identified in light pink below) and identified as a Local (Medium) Centre in the hierarchy of commercial centres. The Residential Banks Peninsula Zone (RBP) identified as yellow will be rezone Medium Density Residential (MRZ). However, proposed the Residential Heritage Area, and existing Character Areas proposed to be retained and expanded (denoted by CA17) would cover the entirety of the MRZ shown below.



Appendix 2: Lyttelton Township Historic Area

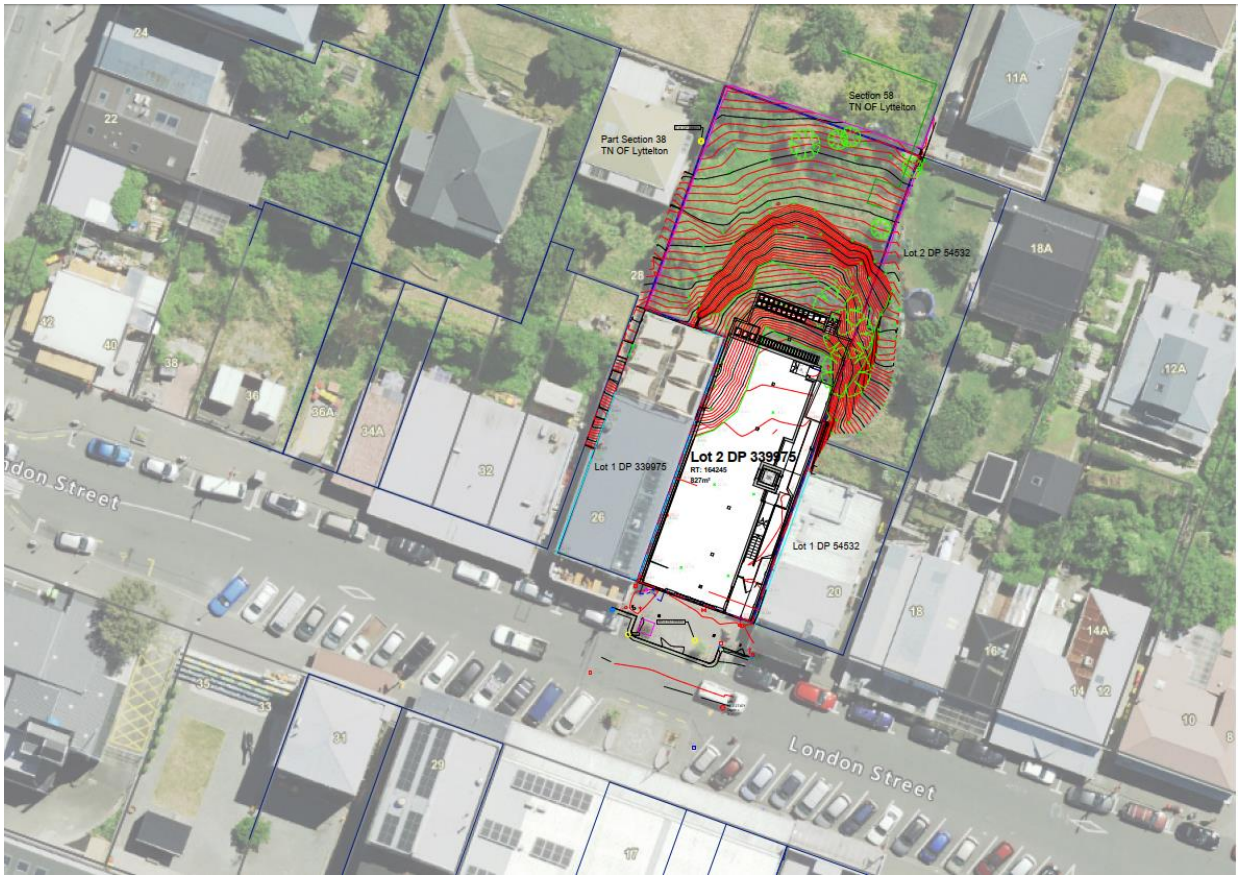
Reference: https://www.heritage.org.nz/the-list/details/7784



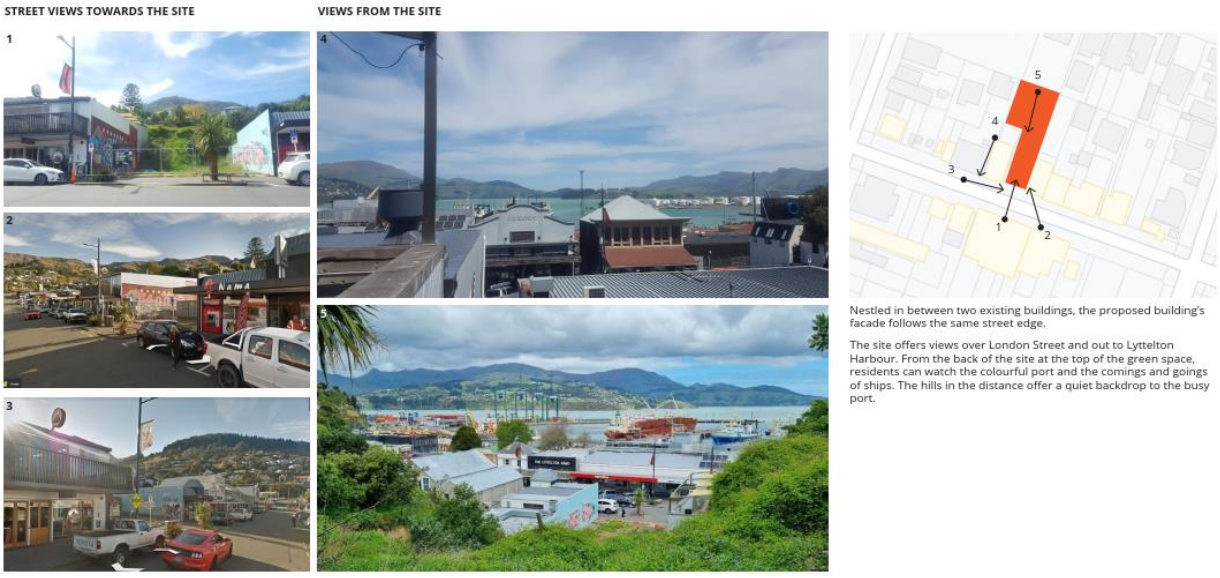
Lyttelton Township Historic Area. Extent of Registration map.
Copyright: NZ Historic Places Trust. Date: 1/08/2009.

Appendix 3: Example - Consented Proposal RMA/2022/801

Noting that all information following is drawn from the resource consent application for the development proposal.

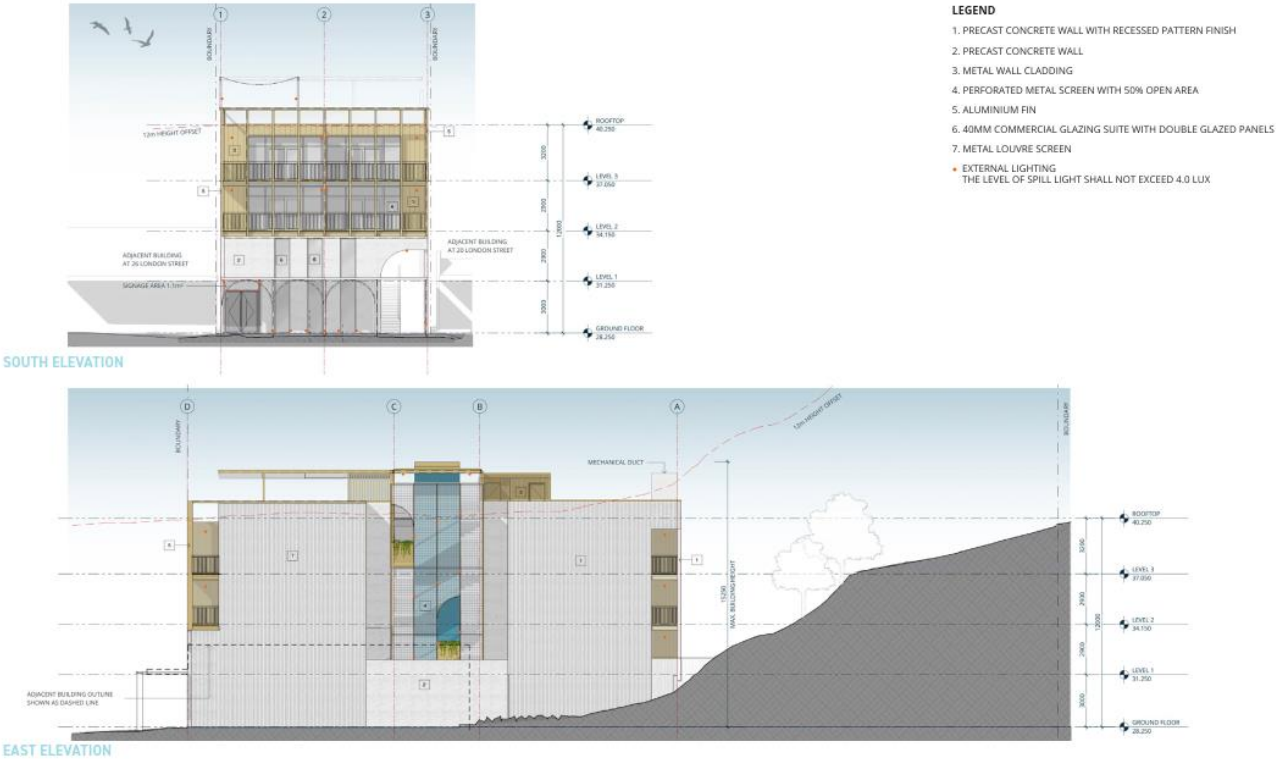


Site Context: Illustrating the fine grain of the subdivision pattern adjacent to London Street. Noting the subject site has a significant change in topography and extends such that it is adjacent to the proposed Residential Heritage Area.



Site context including London Street streetscene, and sightlines to the harbour from the upper part of the site, adjacent to the Proposed Residential Heritage Area.

Comparison with the former Harbourlight Theatre (demolished) and current 12m height limit, noting consideration of the architectural character, form and scale.



Street and side elevations of the proposed development including an illustration in the change in topography from south (left) to north (right) of the site.

Level & Use	Unit number	Number of bedrooms	Floor Area (NFA)	Terrace Area per unit	Outdoor area
Ground Floor (Commercial)	-	-	222m²	-	-
1 (Residential)	Unit 1.01	1 bedroom	51m²	8.0m²	-
	Unit 1.02	1 bedroom	45m²	8.0m²	-
2 (Residential)	Unit 2.01	1 bedroom	51m²	8.0m²	-
	Unit 2.02	1 bedroom	45m²	8.0m²	-
	Unit 2.03	1 bedroom	52m²	9.0m²	-
	Unit 2.04	1 bedroom	47m²	9.0m²	-
3 (Residential)	Unit 3.01	1 bedroom	51m²	8.0m²	-
	Unit 3.02	1 bedroom	45m²	8.0m²	-
	Unit 3.03	1 bedroom	52m²	9.0m²	-
	Unit 3.04	1 bedroom	47m²	9.0m²	-
Rooftop (Residential Communal Space)	-	-	-	-	128m²
Landscaped/undeveloped hillside					425m²

Artist's impression of the proposal within the context of London Street.

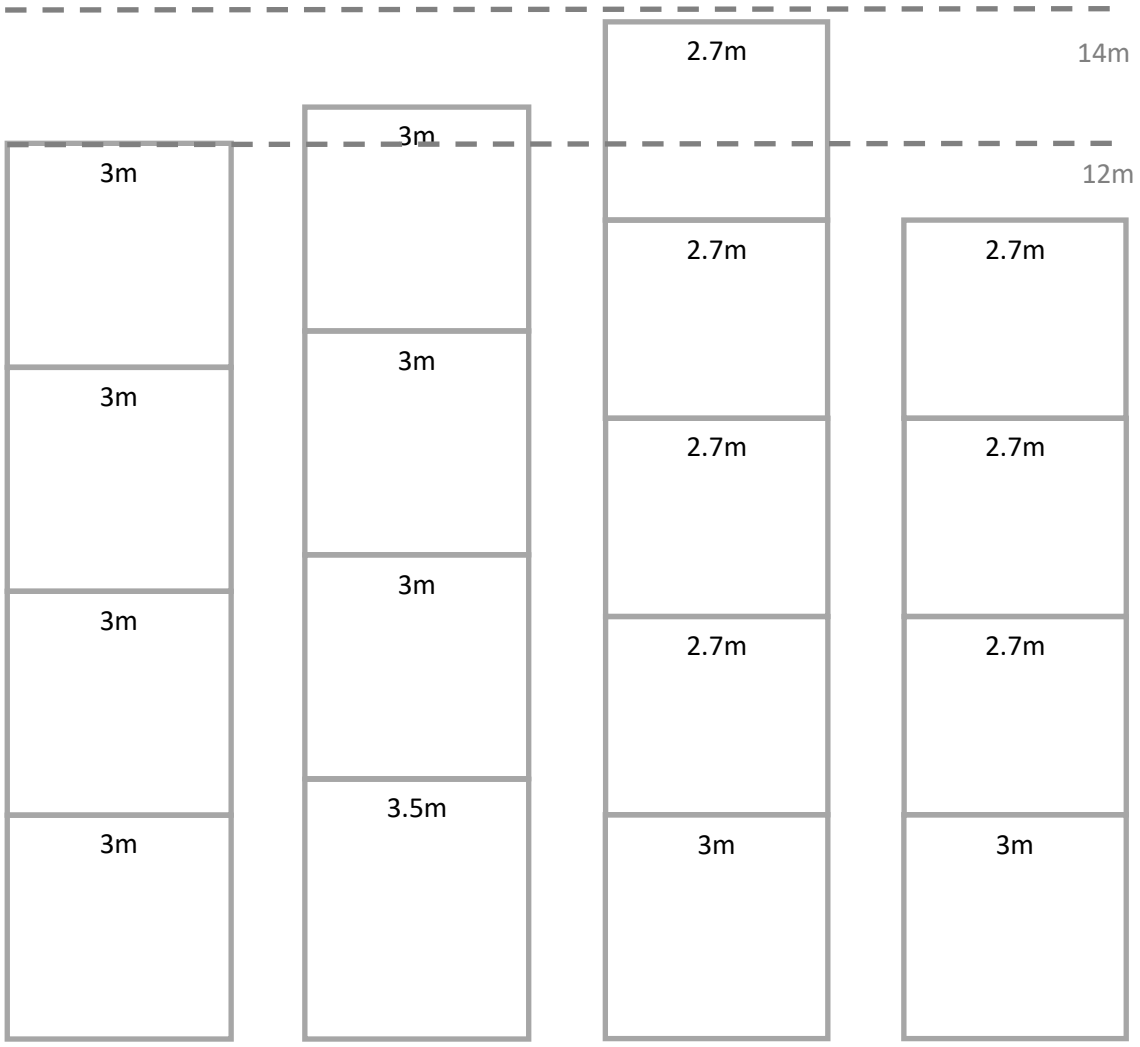
Appendix 4: Evaluation of Options

Options	Efficiency	Effectiveness
Option 1 – Apply Policy 3 of the NPS UD without a qualifying matter Retain the current maximum building height of 12m and associated provisions.	**Costs** • Development capacity is potentially reduced (dependent upon design approach and site limitations, and inconsistent with Local (Medium) Centre Zones elsewhere in the city (by 2m, or potentially 1 storey see ***Appendix 5***). • Reduction in potential development capacity potentially compromises economic benefits of additional floor area, likely associated residential population and vibrancy. • May have a limited effect on the wider economic growth of the city as a whole as a consequence. **Benefits** Environmental: The lower height limit better reflects the community's expectations for the area as expressed through the Lyttelton Master Plan and the District Plan Review of 2017, including in respect to: - Location on the steep, southern slopes of the Port Hills and will better provide access to sunlight to mitigate its effect on overshadowing; and - Unique and nationally recognised (by Heritage New Zealand Heritage Pouhere Taonga) character arising from its colonial and Ngāi Tahu cultural heritage, portside location, street and lot layout and eclectic mix of buildings. The lower height limit • Reflects the community's expectations for the area as expressed through the Lyttelton Master Plan and the District Plan Review of 2017. • Allows for better management of building height and scale via the Restricted Discretionary Activity pathway (which is already in play see ***Appendix 6***). • Provides for outlook to the harbour from sites for proposed Residential Heritage Areas above and to the north of London Street, for which one of the heritage attributes is connection with the harbour, and prominence of dwellings in respect to views from elsewhere. • The Restricted Discretionary Activity Status is enabling and allows for consideration of higher heights than those permitted in association with the retention of character and/or heritage values.	Finely balanced to provide opportunity for additional height where appropriate, but likely some economic cost of the potential for reduction in floor area. Effective to s6 matters and the retention of character values, but less so in meeting the NPS UD in provision of additional floor area. However, the Restricted Discretionary Activity status enables opportunity for additional height (as illustrated in Appendix 3). The option is not effective at meeting the direction of Policy 3d of the NPS UD in terms of providing, within and adjacent to local zones, building heights and density of urban form that are commensurate with the level of commercial activities and community services. It does however meet the direction of Policy 4 of the NPS UD (modification of building height and density requirements) in order to accommodate a qualifying matter (heritage impacts in this case).

	Risk of acting/not acting A site by site analysis has not been undertaken in respect to the character values given the public process undertaken as part of the District Plan Review including associated design guidance informed by a parallel public submissions process. There has been minimal change within the town centre since this time. Shading analysis has not been undertaken due to the significant variance in topography, requiring substantive modelling. At this stage it is considered that the benefits of undertaking this extensive work are not justifiable, when other considerations can be applied.	
Option 2: Increase maximum building height Increase the maximum building height to 14m to align with the Local Centre (Medium) Zone, while retaining (with some alteration) the Lyttelton Town Centre statutory design guidelines to manage character.	**Costs** • Impacts on use and enjoyment of public space (overshadowing, visual impact, impacts on heritage and character values), and to a degree private space. **Benefits** • Increased development capacity. • Additional floor area may assist development feasibility issues unique to Lyttelton, such as the incidence of long, narrow sites and requirement for archaeological surveys where necessary. **Risk of acting / not acting** As above	Implements the NPS UD in regard to consistency and commensurate height with other Local Centre (Medium) Zones and breadth of activities. Falls short in meeting the objective of a well-functioning urban environment.
Option 3: Use an alternative control to maximum building height Increase the building height to 14m in line with the Local Centre (Medium) Zone in association with a	**Costs** • Development capacity is potentially reduced (dependent upon design approach and site limitations, and inconsistent with Local (Medium) Centre Zones elsewhere in the city (by 2m, or potentially 1 storey see ***Appendix 5***). • Reduction in potential development capacity potentially compromises economic benefits of additional floor area, likely associated residential population and vibrancy. • May have a limited effect on the wider economic growth of the city as a whole as a consequence. • Controlling height via the recession plane is:	Implements the NPS UD in regard to consistency and commensurate height with other Local Centre (Medium) Zones and breadth of activities. Falls short in meeting the objective of a well-functioning urban environment.

recession plane to limit the impact of height on London Street and Albion Square, while retaining (with some alteration) the Lyttelton Town Centre statutory design guidelines to manage character.	○ Potentially more complex (and expensive) means (for both developers and Council's Resource Consents staff) of doing so. ○ Does not provide a height limit per se, other than the intersection of the upper ends of the recession planes, which could potentially be higher than both 12m or 14m depending on the size of the site (larger sites, including any resulting from the amalgamation of yet to be redeveloped sites on Norwich Quay, could potentially build higher than 12m or 14m). ○ Could result in development contrary to the core design principles identified with respect to the Lyttelton Master Plan and with an adverse effect on building form relative to that of existing development.	
	Benefits • Controlling height via the recession plane better reflects and is more appropriate to Lyttelton's: ○ Location on the steep, southern slopes of the Port Hills and will better provide access to sunlight to mitigate its effect on overshadowing. ○ Core design principle within the town centre regarding designing for the microclimate by using setbacks (i.e. on the third level to minimise shadows at street level while providing for outlook to the harbour from residential sites above and to the north of London Street).	
	Risk of acting/not acting As above	

Appendix 5: Height and Storey Scenarios



- 4 Storey
- Total Height: 12m
- Good floor to ceiling height (2.7m)
- Roof form within upper level or reduced floor level heights
- Additional opportunity via RDA

- 4 Storey
- Total Height: 12.5m
- Good floor to ceiling height (2.7m) including generous ground floor
- If 14m height limit - ample opportunity for roof form, or RDA with roof form within upper level, or height dispersed through levels

- 5 Storey
- Total Height: 13.8m
- Minimal floor to ceiling height (2.4m) for quality living space, or versatility for other uses
- Minimal roof form and limited opportunity to disperse through levels, likely request for additional height

- 4 Storey
- Total Height: 11.1m
- Minimal floor to ceiling height (2.4m) for quality living space or versatility for other uses
- Provision for roof form through levels

Appendix 6: Christchurch District Plan Provisions (2017)

In relation to character/design, height and sunlight.

Commercial Banks Peninsula Zone	Christchurch District Plan (2017)
Design rule	**15.6.1.3 Restricted discretionary activities:** RD3(a) Activities listed in Rule 15.6.1.1 P3 to P22 in Lyttelton or Akaroa which involve the erection of a building, relocatable building or relocation of a building, external additions or alterations to a building, which meet the activity specific standards in Rule 15.6.1.1 and built form standards in Rule 15.6.2. The Council's discretion shall be limited to (b) Lyttelton Design Guidelines (Appendix 15.15.6).
Reason for rule	**15.13.1 Urban design:** (a) The extent to which the development: (i) Recognises and reinforces the centre's role, context, and character, including any natural, heritage or cultural assets. (ii) Promotes active engagement with, and contributes to the vibrancy and attractiveness of, any adjacent streets, lanes or public spaces. (iii) Takes account of the nearest buildings in respect to the exterior design, architectural form, scale and detailing of the building. (iv) Provides a human scale and minimises building bulk while having regard to the functional requirements of the activity.
Height rule	**15.6.2.1 Maximum building height:** (a)(i) Maximum height of any building shall be 12m.
Reason for rule	**15.13.3.1 Maximum building height:** (a) The extent to which an increase in height of the development: (v) Contributes to variety I the scale of buildings in a centre, and creates landmarks on corner sites. (vii) Results in adverse on adjoining residential zones or on the character, quality and use of public open space. (viii) Contributes to the visual dominance of the building when viewed from the surrounding area, having regard to the anticipated scale and form of buildings in the surrounding environment.
Access to sunlight rule	**15.6.2.5 Sunlight and outlook at boundary with a residential zone or any public space:** (a) Where a site boundary adjoins a residential zone, or public space (other than a road) in the block between London Street, Norwich Quay, Oxford Street and Canterbury Street, no part of any building shall project beyond a building envelope contained by a 45 degree recession plane measured at any point 2 metres above the site boundary, unless specified below. (b) Where sites are located within a Flood Management Area, recession plane breaches created by the need to raise floor levels shall not be limited or publicly notified.
Reason for rule	**15.13.3.4 Sunlight and outlook at boundary with a residential zone:** (a) The extent to which building intrusion into a recession plane: (ii) Overshadows and impacts on the outdoor living spaces and main living areas of residential buildings, and/or activities undertaken within the space affected, while having regard to the time of year that over shadowing is expected to occur. (b) The extent to which shading by buildings impacts on the use and amenity values of London Street in Lyttelton or other public space.