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|  | <p>Resource Management Act 1991</p> <p>Christchurch District Plan</p> <p>Plan Change 14</p> <p>Section 32 Evaluation</p> | <p>14</p> |
| <p style="text-align: center;">PLAN CHANGE 14</p> <p style="text-align: center;">REVISED PROVISIONS FOR <i>CHAPTER 7 – TRANSPORT CHAPTER</i></p> <p>Overview</p> <p>The following report has been prepared to support Plan Change 14 to the Christchurch District Plan. The proposed plan change updates the Transport Chapter provisions to ensure that they are appropriate for new residential development enabled under the National Policy Statement for Urban Development and the Medium Density Residential Standards under the Resource Management Act. Specifically, the proposed changes to the Transport Chapter seek:</p> <ul style="list-style-type: none">• To provide certainty around the design of pedestrian access to residential developments;• To reduce greenhouse gas emissions from High Trip Generating Activities;• To manage the potential pedestrian safety and streetscape impacts from additional vehicle crossings onto a site;• To provide for the increased uptake in cycling as a transport mode; and• To ensure residential units provided for by the MDRS have appropriate access, even if no subdivision is proposed. <p>The proposed changes to the Transport Chapter do not propose any changes to the objectives of the Christchurch District Plan.</p> | | |

Table of contents

- 1. Introduction 3
 - 1.1. Purpose of this report 3
- 2. Resource management issues..... 3
 - 2.1. Council’s legal obligations and strategic planning documents 3
 - 2.2. Problem definition - the issues being addressed..... 14
- 3. Development of the plan change 14
 - 3.1. Background 14
 - 3.2. Current Christchurch District Plan provisions..... 14
 - 3.3. Description and scope of the changes proposed..... 16
 - 3.4. Community/Stakeholder engagement..... 17
 - 3.5. Consultation with iwi authorities..... 18
- 4. Scale and significance evaluation 18
- 5. Evaluation of the proposal 21
 - 5.1. Statutory evaluation..... 21
 - 5.2. Evaluation of the purpose of the plan change..... 21
 - 5.3. Reasonably practicable options for provisions 25
 - 5.4. Evaluation of options for provisions 26
- 6. Evaluation of the preferred option for provisions 31
 - 6.2. Assessment of costs and benefits of the proposed policies and rules..... 32
 - 6.3. The most appropriate option 37
- 7. Conclusions 37

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. 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.
- 1.1.3. Section 32 requires that the Council provides an evaluation of the changes proposed in Plan Change 14 (Transport 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 those parts of proposed Plan Change 14 that relate to consequential changes to the Transport Chapter. In addition, the report examines any relevant directions from the statutory context including higher order documents. This report should be read in conjunction with the other parts of the section 32 for Plan Change 14.

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. 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:
 - a. **Part 2 of the RMA**
- 2.1.3. Under the **Section 5** the purpose of the Act 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 the promotion of sustainable transport options to support community wellbeing.

- 2.1.4. **Section 6** sets out the matters of national importance that need to be recognised and provided for. None of the section 6 matters of national importance are relevant to this topic.
- 2.1.5. In achieving this purpose, all persons exercising functions and powers under the RMA also need to have particular regard to the range of other matters referred to in **section 7**.
- 2.1.6. The s7 matters that are relevant to this topic include s7(b) the efficient use and development of physical resources (*integration of land use and transport*), s7(c) the maintenance and enhancement of amenity values (*effects of transport related activities on amenity values*), s7(f) the maintenance and enhancement of the quality of the environment (*effects of transport related activities on the quality of the environment*) and s7(i) the effects of climate change (*effects of climate change on transport infrastructure and effects of greenhouse gas emissions from transport*).
- 2.1.7. 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.

b. National Policy Statements

- 2.1.8. The **National Policy Statement on Urban Development (NPS-UD)** took effect on 20 August 2020 and replaced the National Policy Statement on Urban Development Capacity 2016.
- 2.1.9. The NPS-UD recognises the national significance of having well-functioning urban environments and of providing sufficient capacity to meet the different needs of people and communities. It requires Councils to provide development capacity with sufficient infrastructure, and to consider the benefits of urban development. District Plans must make room for growth both ‘up’ and ‘out’ and rules should not unnecessarily constrain growth.
- 2.1.10. Under the NPS-UD 2020 Christchurch has been classified as a Tier 1 urban environment. The following objectives and policies are therefore considered to be of relevance to this plan change:

| NPS on Urban Development 2020 | |
|---|--|
| <p>Objective 1 New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.</p> | <ul style="list-style-type: none"> • Recognise and provide for health and safety through appropriate transport provisions • Facilitate changing needs in relation to transport • Provide a responsive and flexible transport framework • Encourage and provide for alternative forms and a variety of modes of transport |
| <p>Objective 4 New Zealand’s urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.</p> | |
| <p>Objective 6 Local authority decisions on urban development that affect urban environments are: a. integrated with infrastructure planning and funding decisions; and</p> | |

| NPS on Urban Development 2020 | |
|--|--|
| <ul style="list-style-type: none"> b. strategic over the medium term and long term; and c. responsive, particularly in relation to proposals that would supply significant development capacity. | |
| <p>Objective 8 New Zealand’s urban environments:</p> <ul style="list-style-type: none"> a. support reductions in greenhouse gas emissions; and b. are resilient to the current and future effects of climate change. | |
| <p>Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:</p> <p>...</p> <ul style="list-style-type: none"> c. have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and <p>...</p> <ul style="list-style-type: none"> e. support reductions in greenhouse gas emissions; and <p>...</p> | |
| <p>Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:</p> <ul style="list-style-type: none"> a. the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement b. that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes: <ul style="list-style-type: none"> i. may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and ii. are not, of themselves, an adverse effect c. the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1) d. any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity | |

| NPS on Urban Development 2020 | |
|--|--|
| e. the likely current and future effects of climate change. | |
| <p>Policy 11: In relation to car parking:</p> <p>a. the district plans of tier 1, 2, and 3 territorial authorities do not set minimum car parking rate requirements, other than for accessible car parks; and</p> <p>b. tier 1, 2, and 3 local authorities are strongly encouraged to manage effects associated with the supply and demand of car parking through comprehensive parking management plans.</p> | |

2.1.11. No other National Policy Statements are considered to be of relevance to this topic.

c. National Environmental Standards

2.1.12. None of the current National Environmental Standards are of direct relevance to this topic

d. Canterbury Regional Policy Statement

2.1.13. The Canterbury Regional Policy Statement ('CRPS') became operative on 15th January 2013. It sets out the regional approach for managing the environment and providing for growth and associated effects. The RPS identifies the significant resource management issues for the region and outlines the policies and methods required to achieve the integrated sustainable management of the region's natural and physical resources.

2.1.14. The table below identifies the relevant provisions and resource management topics for transport contained in the CRPS as they relate to the purpose of this plan change.

| Canterbury Regional Policy Statement | |
|--|--|
| Chapter 5 – Land-Use and Infrastructure | <ul style="list-style-type: none"> • Ensure that a range of safe and efficient transport modes are provided to support consolidated sustainable growth. • Support and maintain a transport system that recognises different access and movement functions for a range of transportation modes. • Provide an acceptable level of accessibility to support the growth of consolidated urban areas and supporting a 'one network approach' to the transport system. • Insert provisions that address pedestrian access safety and |
| <p>Objective 5.2.1 Location, Design and Function of Development (Entire Region)</p> <p>Development is located and designed so that it functions in a way that:</p> <ol style="list-style-type: none"> 1. achieves consolidated, well designed and sustainable growth in and around existing urban areas as the primary focus for accommodating the region's growth; and 2. enables people and communities, including future generations, to provide for their social, economic and cultural well-being and health and safety; and which: <ol style="list-style-type: none"> a. maintains, and where appropriate, enhances the overall quality of the natural environment of | |

| Canterbury Regional Policy Statement | |
|--|--|
| <p>the Canterbury region, including its coastal environment, outstanding natural features and landscapes, and natural values;</p> <ol style="list-style-type: none"> b. provides sufficient housing choice to meet the region’s housing needs; c. encourages sustainable economic development by enabling business activities in appropriate locations; d. minimises energy use and/or improves energy efficiency; e. enables rural activities that support the rural environment including primary production; f. is compatible with, and will result in the continued safe, efficient and effective use of regionally significant infrastructure; g. avoids adverse effects on significant natural and physical resources including regionally significant infrastructure, and where avoidance is impracticable, remedies or mitigates those effects on those resources and infrastructure; h. facilitates the establishment of papakāinga and marae; and i. avoids conflicts between incompatible activities. | <p>standards to address the integration of different transport modes to manage conflict and support appropriate access to consolidated urban growth within existing urban areas.</p> |
| <p>Chapter 6 – Recovery and Rebuilding of Greater Christchurch</p> | <ul style="list-style-type: none"> • Ensure that a range of safe and efficient transport modes are provided to support consolidated sustainable growth and to ensure that the roading infrastructure is aligned with land development. • Support and maintain a transport system that promotes the use of active and public transport modes, as well as reducing emissions. • Ensure that the transport system responds to development by providing transport choice and enabling maintenance and upgrading of the system when necessary. |
| <p>Objective 6.2.1 Recovery Framework Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:</p> <ol style="list-style-type: none"> 1. .. 2. .. 3. .. 4. .. 5. .. 6. .. 7. .. 8. .. 9. Integrates strategic and other infrastructure and services with land use development. 10. Achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs. | <ul style="list-style-type: none"> • Ensure that a range of safe and efficient transport modes are provided to support consolidated sustainable growth and to ensure that the roading infrastructure is aligned with land development. • Support and maintain a transport system that promotes the use of active and public transport modes, as well as reducing emissions. • Ensure that the transport system responds to development by providing transport choice and enabling maintenance and upgrading of the system when necessary. |

| Canterbury Regional Policy Statement | |
|---|--|
| <p>11. Optimises use of existing infrastructure. 12. ..</p> | |
| <p>Objective 6.2.4 Integration of transport infrastructure and land use Prioritise the planning of transport infrastructure so that it maximises integration with the priority areas and new settlement patterns and facilitates the movement of people and goods and provision of services in Greater Christchurch, while:</p> <ol style="list-style-type: none"> 1. managing network congestion; 2. reducing dependency on private motor vehicles; 3. reducing emission of contaminants to air and energy use; 4. promoting the use of active and public transport modes; 5. optimising use of existing capacity within the network; and 6. enhancing transport safety. | |
| <p>Policy 6.3.4 Transport Effectiveness Ensure that an efficient and effective transport network that supports business and residential recovery is restored, protected and enhanced so that it maintains and improves movement of people and goods around Greater Christchurch by:</p> <ol style="list-style-type: none"> 1. avoiding development that will overload strategic freight routes; 2. providing patterns of development that optimise use of existing network capacity and ensuring that, where possible, new building projects support increased uptake of active and public transport, and provide opportunities for modal choice; 3. providing opportunities for travel demand management; 4. requiring integrated transport assessment for substantial developments; and 5. improving road user safety. | |

e. Recovery Plans

2.1.15. The Land Use Recovery Plan ('LURP') and the Christchurch Central Recovery Plan ('CCRP') were prepared under the Greater Christchurch Regeneration Act 2016 ('GCRA').

2.1.16. The table below identifies the relevant provisions and resource management topics for transport contained in the LURP and CCRP as they relate to the purpose of this plan change.

| Recovery Plans | |
|--|--|
| Land Use Recovery Plan (LURP) | <ul style="list-style-type: none"> • Ensure that a range of safe and efficient transport modes are provided to support consolidated sustainable urban form. • Support and maintain a transport system that recognises different access and movement functions for a range of transportation modes. • Provide an acceptable level of accessibility to support the growth of consolidated urban areas and supporting a ‘one network approach’ to the transport system. • Insert provisions that address pedestrian access safety and standards to address the integration of different transport modes to manage conflict and support appropriate access to consolidated urban growth within existing urban areas. |
| <p>Outcomes</p> <p>Transport</p> <p>12. Congestion arising from road works and from changes in travel due to development, including business and household relocations, is minimised.</p> <p>13. An attractive and financially viable public transport network supports significantly increased use.</p> <p>14. More people walk and cycle in and between centres of activity and for local trips.</p> <p>15. An efficient freight network provides for the needs of freight transport, particularly in relation to access to the port and the airport.</p> | |
| <p>Actions</p> <p>4.4 Delivering infrastructure and services - Ngā tikanga whakahaere me ngā ratonga</p> <p>Integrate land use and infrastructure</p> <p>Action 36 Christchurch City Council district plan review Christchurch City Council to enable in the next review of its district plans, to provide for land use and transport network integration, including:</p> <p>i. measures to support the implementation of the Greater Christchurch Transport Statement, Christchurch Transport Strategic Plan and the Christchurch Central Recovery Plan</p> <p>ii. support for transport choice, including walking, cycling and public transport</p> <p>iii. management of conflicts between property access, streetscape and transport efficiency.</p> | |
| Central City Recovery Plan (CCRP) | |
| <p>Accessible City</p> <p>Access for all</p> <p>The redevelopment of central Christchurch provides a significant opportunity to address accessibility. The buildings, open spaces and facilities that people visit and work or live in need to be safe, accessible and people-friendly</p> | |
| <p>Transport network</p> <p>The Christchurch road network is predominantly radial and there are connections through the central city to</p> | |

| Recovery Plans | |
|---|--|
| <p>the wider network. Changes to the layout of the central city need to be carefully considered in terms of their impact on traffic flow within the central city itself, and on passenger and freight movements across the wider transport network.</p> | |
| <p>Streets for cycling As central Christchurch is redeveloped there will be opportunities to develop better infrastructure for cycling. These facilities could prompt the largest single change in how people travel around central Christchurch. The east and south parts of the Frame will provide links for walking and cycling across the entire Core.</p> | |
| <p>Parking and Service Vehicles The existence of well-located car parking that is easily accessible and convenient, but does not dominate city streets, is essential to achieve high-quality urban design and an accessible central city.</p> | |

f. Canterbury Regional Land Transport Plan 2021 - 31

- 2.1.17. The Canterbury Regional Land Transport Plan (RLTP) guides land transport planning and investment within the region. It sets out the current state of the region’s transport network, the priorities for investment and a 10-year programme.
- 2.1.18. The table below identifies the relevant provisions and resource management topics for transport contained in the RLTP as they relate to the purpose of this plan change.

| Canterbury Regional Land Transport Plan 2021 - 31 | |
|---|---|
| <p>Objective - Shared Prosperity (environmental, social, economic and cultural) Policies</p> <ul style="list-style-type: none"> • Ensure future transport investment supports intergenerational prosperity • Improve uptake of active and public transport to support improved public health • Transition to a low carbon transport system by moving people and goods efficiently | <ul style="list-style-type: none"> • Ensure that a range of safe and efficient transport modes are provided to support consolidated sustainable urban form. • Support and maintain a transport system that recognises different access and movement functions for a range of transportation modes. • Provide an acceptable level of accessibility to support the growth of consolidated urban areas and supporting a ‘one network approach’ to the transport system. |
| <p>Objective – Reduced Harm Policies</p> <ul style="list-style-type: none"> • Prioritise investment to align with the Road to Zero strategy | |

| Canterbury Regional Land Transport Plan 2021 - 31 | |
|--|---|
| <ul style="list-style-type: none"> • Prioritise the safety of vulnerable transport users, in particular cyclists and pedestrians • Provide a safe transport network by prioritising maintenance and renewals | <ul style="list-style-type: none"> • Insert provisions that address pedestrian access safety and standards to address the integration of different transport modes to manage conflict and support appropriate access to consolidated urban growth within existing urban areas. |
| <p>Objective – Mode Shift</p> <p>Policies</p> <ul style="list-style-type: none"> • Improve the attractiveness of sustainable transport options through integrating land use and transport planning and investment • Improve access to sustainable transport modes • Deliver travel demand management to encourage sustainable transport choices and optimise the network | |

g. Iwi Management Plans

- 2.1.19. 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 limited relevance to plan change 14 for the Transport Chapter. The Mahaanui IMP contains a policy seeking early, appropriate and effective involvement of Papatipu Rūnanga in the development of district plan changes relating to urban and township planning (P3.2).
- 2.1.20. The Mahaanui Iwi Management Plan contains the following relevant Transport policies relating to the purpose of this plan change:

| Mahaanui Iwi Management Plan (IMP) | |
|---|---|
| <p>Protection of tāngata whenua values</p> <p>P16.7 To support improved transport network infrastructure and services to support the development aspirations of Ngāi Tahu communities, such as those at Tuahiwi and Rāpaki.</p> <p>P16.8 To support sustainable transport measures in urban design and development, including public transport, pedestrian walkways, and cycle ways.</p> | <ul style="list-style-type: none"> • Ensure that a range of safe and efficient transport modes are provided to support consolidated sustainable growth and good urban design. • Support and maintain a transport system that recognises different access and movement functions for a range of transportation modes. • Insert provisions that address pedestrian access safety and standards to address the integration of different transport modes to manage conflict and support appropriate access to consolidated urban growth within existing urban areas. |

h. Future Development Strategy

- 2.1.21. 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).
- 2.1.22. The table below identifies the relevant provisions and resource management topics for transport contained in the FDS related to the purpose of this plan change.

| Our Space 2018-2048 (Future Development Strategy) | |
|---|--|
| Integrating land use and transport planning to ensure future urban growth is effectively and efficiently supported by the transport network, including delivering a significantly enhanced public transport system. | <ul style="list-style-type: none"> • Ensure that a range of safe and efficient transport modes are provided to support sustainable growth that efficient and effective. • Support and maintain a transport system that integrates land use and transport planning while recognising different access and movement functions for a range of transportation modes. • Provide an acceptable level of accessibility to support the growth of consolidated urban areas and address pedestrian access safety • Introduce standards to address the integration of different transport modes to manage conflict and support appropriate access to consolidated urban growth within existing urban areas. |
| Integrating land use and transport planning to shape desired urban form | |
| Ensure that transport is integrated with land use but also that all the components of the network are joined in a way that makes it easier to make choices on how to travel. | |
| Promotes a compact urban form, which provides for efficient transport and locates development in a manner that takes into account climate change and sea level rise. | |
| Greater Christchurch Urban Development Strategy (2016) | |
| By the year 2041, Greater Christchurch has a vibrant inner city and suburban centres surrounded by thriving rural communities and towns, connected by efficient and sustainable infrastructure. | <ul style="list-style-type: none"> • Ensure that a range of safe and efficient transport modes are provided to support consolidated sustainable urban form and integrated development. • Support and maintain a resilient transport system that recognises different access and movement functions for a range of transportation modes. • Provide an acceptable level of accessibility to support the growth of consolidated urban areas and |
| Integrating environmental, land use, infrastructure, social, cultural, economic and governance goals, working with the environment, and using the best available information and evidence in decision making, policies, plans and activities. | |
| An efficient, reliable, safe and resilient transport system for people and businesses reduces dependency on private motor vehicles, promotes active and public transport, and improves accessibility for all people. | |

| Our Space 2018-2048 (Future Development Strategy) | |
|--|---|
| Key public transport corridors and routes are identified and protected. The transport network can readily adapt to new technology and modes. | <p>supporting a ‘one network approach’ to the transport system.</p> <ul style="list-style-type: none"> • Insert provisions that address pedestrian access safety and standards to address the integration of different transport modes to manage conflict and support appropriate access to consolidated urban growth within existing urban areas. |
| Infrastructure, including transport, is resilient, timely and affordable, and comprehensively integrated with land use planning. | |
| A network of vibrant and diverse key activity and neighbourhood centres supports the Christchurch central city, incorporates mixed-use and transport-orientated development, supports increased density and diversity of housing, and provides access to community facilities. | |
| Well-designed, walkable neighbourhoods to encourage and enable more people to use active and public transport more often. | |
| Changes in land use and new development, particularly since the earthquakes, require integrated planning and investment in infrastructure. An especially important focus is a transport system that moves people and freight efficiently. | |
| Housing, health, transport and other services will need to adapt to meet the needs of a population that is ageing and becoming more culturally diverse. | |

i. Christchurch Transport Strategic Plan 2012–2042

2.1.23. In 2012 Council adopted a 30-year vision for transport within the City.

| Christchurch Transport Strategic Plan 2012–2042 | |
|---|---|
| <p>Goal 1 Improve access and choice</p> <p>Objective 1.1 Balancing the network</p> <p>Objective 1.2 Use the existing road network more efficiently</p> <p>Objective 1.3 Encouraging people to use a wider range of travel options</p> | <ul style="list-style-type: none"> • Ensure that a range of safe and efficient transport modes are provided to support consolidated sustainable urban form. • Provide for a balanced and efficient transport network that supports a range of travel options. • Support and maintain a transport system that recognises different access and movement functions for a range of transportation modes. |
| <p>Goal 4. Create opportunities for environmental enhancement</p> <p>Objective 4.1: Reduce emissions and invest in green infrastructure and environmental enhancement</p> | |

2.2. Problem definition - the issues being addressed

2.2.1. **ISSUE 1** – The RMA and the NPS-UD require Tier 1 Councils to introduce Medium Density Residential Standards and give effect to Policy 3 of the NPS-UD, i.e. provide for increased development capacity in residential and commercial areas. At the same time the NPS-UD requires Councils to remove any minimum car-parking requirements from their District Plans. The additional development capacity and density enabled by PC14 will have consequential effects the safety and capacity of the transport network that need to be addressed.

2.2.2. The proposed changes to the Transport Chapter are consequential and address the transport related effects of increased density, particularly relating to:

- Increased reliance on pedestrian access to residential units;
- Increased number of vehicle crossings;
- Additional cycle-parking requirements;
- Additional loading requirements; and
- The reduction of greenhouse gas emissions.

3. Development of the plan change

3.1. Background

3.1.1. Under recent legislative changes Council is required to introduce increased density provisions to the District Plan and enable additional development. The identified resource management issue relating to transport is consequential to those changes. The current transport provisions of the ODP were drafted in the context of less permissive development frameworks and require updating to better reflect and respond to the increased development and density enabled by the prescribed changes.

3.2. Current Christchurch District Plan provisions

3.2.1. The current Plan’s Strategic Directions objectives, chapter objectives and provisions relevant to this plan change include:

3.2.2. Chapter 3 of the Operative District Plan includes the Strategic Directions. Objective 3.3.7 – Urban growth, form and design is the most relevant for this topic:

3.3.7 Objective - Urban growth, form and design

- a. *A well-integrated pattern of development and infrastructure, a consolidated urban form, and a high quality urban environment that:*
 - i. *Is attractive to residents, business and visitors; and*
 - ii. *Has its areas of special character and amenity value identified and their specifically recognised values appropriately managed; and*
 - iii. *Provides for urban activities only:*

- A. *within the existing urban areas unless they are otherwise expressly provided for in the CRPS; and*
- B. *on greenfield land on the periphery of Christchurch's urban area identified in accordance with the Greenfield Priority Areas in the Canterbury Regional Policy Statement Chapter 6, Map A; and*
- iv. *Increases the housing development opportunities in the urban area to meet the intensification targets specified in the Canterbury Regional Policy Statement, Chapter 6, Objective 6.2.2 (1); particularly:*
 - A. *in and around the Central City, Key Activity Centres (as identified in the Canterbury Regional Policy Statement), larger neighbourhood centres, and nodes of core public transport routes; and*
 - B. *in those parts of Residential Greenfield Priority Areas identified in Canterbury Regional Policy Statement Chapter 6, Map A; and*
 - C. *in suitable brownfield areas; and*
- v. *Maintains and enhances the Central City, Key Activity Centres and Neighbourhood Centres as community focal points; and*
- vi. *Identifies opportunities for, and supports, the redevelopment of brownfield sites for residential, business or mixed use activities; and*
- vii. *Promotes the re-use and re-development of buildings and land; and*
- viii. *Improves overall accessibility and connectivity for people, transport (including opportunities for walking, cycling and public transport) and services; and*
- ix. *Promotes the safe, efficient and effective provision and use of infrastructure, including the optimisation of the use of existing infrastructure; and*
- x. *Co-ordinates the nature, timing and sequencing of new development with the funding, implementation and operation of necessary transport and other infrastructure.*

3.2.3. The operative Transport Chapter has one Objective:

7.2.1 Objective - Integrated transport system for Christchurch District

- a. *An integrated transport system for Christchurch District:*
 - 1. *that is safe and efficient for all transport modes;*
 - 2. *that is responsive to the current recovery needs, future needs, and enables economic development, in particular an accessible Central City able to accommodate projected population growth;*
 - 3. *that supports safe, healthy and liveable communities by maximising integration with land use;*
 - 4. *that reduces dependency on private motor vehicles and promotes the use of public and active transport;*
 - 5. *that is managed using the one network approach.*

3.2.4. The Objective provides an overall direction for matters related to transport and is still relevant in the context of the amendments proposed by Plan Change 14. The policies, rules and standards of the transport chapter have been reviewed and are proposed to be amended as described below.

3.3. Description and scope of the changes proposed

3.3.1. The purpose of the plan change is to update the Transport Chapter of the Christchurch District Plan to give effect to the Medium Density Residential Standards (MDRS) as set out in Schedule 3A of the Resource Management Act and the National Policy Statement for Urban Development 2020. Specifically, the proposed changes to the Transport Chapter seek:

- To provide certainty around the design of pedestrian access to residential developments;
- To reduce greenhouse gas emissions from High Trip Generating Activities;
- To manage the potential pedestrian safety and streetscape impacts from additional vehicle crossings onto a site;
- To provide for the increased uptake in cycling as a transport mode; and
- To ensure residential units provided for by the MDRS have appropriate access, even if no subdivision is proposed.
- To provide for the additional demand associated with service vehicles/ loading

3.3.2. The proposed changes to the Transport Chapter do not propose any changes to the objectives of the Christchurch District Plan.

3.3.3. The Plan Change proposes to include a definition for Pedestrian Access. This definition would be - **Pedestrian Access** - A formed pathway that provides access for pedestrians from the street to a residential unit and to any parking area for that residential unit.

3.3.4. The purpose of this definition is to provide clarity around the proposed pedestrian access rules.

3.3.5. The Plan Change proposes changes to the following policies:

- 7.2.1.2 Policy – High Trip Generating Activities; and
- 7.2.1.9 Policy – Pedestrian Access (New policy).

3.3.6. The Plan Change also proposes a number of changes to the rules to address the issue identified and ensure that the relevant Plan objectives are achieved. These changes include:

- Setting new permitted activity standards and escalations to Restricted Discretionary Activity status for the following:
 - Minimum pedestrian access widths and formation for developments involving 3 or more residential units (Rules 7.4.3.7(b), 7.4.4.27, 7.5.7 (c), and (d)); and
 - Co-location of vehicle crossings (Rules 7.4.3.8 (h), 7.4.3.13, 7.4.4.28, 7.5.11.4);

- Amend the legal and formed widths in Table 7.5. 7.1. This is to ensure that vehicular access onto the site is a sufficient width to provide for low speed traffic and pedestrian safety. The existing widths were slightly too narrow to achieve this outcome.
- Update Table 7.5.2.1 so that a loading bay for a 99th percentile vehicle is provided when a development involves 20 or more residential units.
- Amend the Rules 7.4.3.7 (d) and 7.4.4.21 (ii) so that they also apply to access affecting a Key Pedestrian Frontage or Major Cycle Route;
- Changed the cycle parking requirements under Table 7.5.2.1 to the following:
 - For residential units with one or two bedrooms- 1 residents' space/ dwelling without a garage;
 - For residential units with three or more bedrooms- 2 residents' space/ dwelling without a garage
- Adding a new matter of discretion in relation to the consideration of greenhouse gas emissions from high vehicular trip generating activities (7.4.4.18 ((vii));
- Adding a landscaping consideration to the Residential Design Principles in Chapter 14 relating to the softening of hard surfaces associated with vehicular access and loading bays; and
- Making any other consequential changes to the District Plan as required to give effect to the proposed approach and the MDRS.

3.4. Community/Stakeholder engagement

- 3.4.1. Pre-notification engagement and consultation on proposed Plan Change 14 was open from 11 April 2022 to 13 May 2022 (i.e. five weeks). Various methods were used to encourage public feedback including:
 - Letters to the owners of affected properties
 - Public advertising placed in The Press and Star and community newspapers, along with Newline articles, and social media posts,
 - Hard copies of the consultation flyer provided to all Christchurch City Council libraries and service centres;
 - Have your Say online consultation webpage.
 - Staff engagement directly with the public via webinars and attending specific organisation or association meetings.
- 3.4.2. 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).
- 3.4.3. We heard from a wide range of organisations, including:
 - Crown and Council entities,
 - Residents Associations and Community Groups,
 - Professional associations/organisations, and Commercial entities.

- 3.4.4. 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)*
- 3.4.5. 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>). The draft consultation documents included a summary of the proposed changes proposed for subdivision in the Medium Density Residential zone, High Density Residential zone and commercial zones.
- 3.4.6. There have been no changes made in light of feedback, noting that changes to the Transport chapter were not included in the consultation material.

3.5. Consultation with iwi authorities

- 3.5.1. Plan Change 14 has been developed alongside Mahaanui Kurataiao Limited (MKT). Discussions began in late 2021 to help frame overall thinking for the development of Plan Change 14 and involved discussing:
- Strategic Directions development (Chapter 3);
 - Scope of relevant residential zones;
 - Scope of considerations for papakāinga / kāinga nohoanga development as part of MDRS;
 - Types of cultural significance features that should be considered as qualifying matters; and
 - Broader strategic outcomes of Plan Change 14.
- 3.5.2. Following the release of the full draft proposal in April 2022, Council met with representatives from MKT to further discuss the above. Support was expressed for the approach undertaken thus far, and reiterated the importance of adequate qualifying matters to be captured in the proposal.
- 3.5.3. 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 transport provisions.

4. Scale and significance evaluation

- 4.1.1. Section 32(1)(c) of the RMA requires that this report contain a level of detail that corresponds with the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of the proposal.
- 4.1.2. The level of detail undertaken for this evaluation has been determined by assessing the scale and significance of the environmental, economic, social and cultural effects anticipated through

introducing and implementing the proposed provisions (i.e. objectives, policies and rules) relative to a series of key criteria.

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

| <i>Criteria</i> | <i>Scale/Significance</i> | | | <i>Comment</i> |
|---|---------------------------|---------------|-------------|---|
| | <i>Low</i> | <i>Medium</i> | <i>High</i> | |
| Basis for change | x | | | <ul style="list-style-type: none"> Part of a wider plan change to give effect to the MDRS and National Policy Statement for Urban Development 2020 requirements. Amending a limited number of provisions in the transport chapter to ensure that the vehicular and pedestrian safety outcomes from the development enabled under the MDRS and the NPS-UDS are provided for. |
| Addresses a resource management issue | | x | | <ul style="list-style-type: none"> Addresses the issue of increased effects on safety and functioning of the transport network associated with the additional development capacity and density enabled by PC14. . Assists with ensuring a well-functioning urban environment through the provision of safe vehicle and pedestrian movements. Assists with reducing greenhouse gas emissions from high trip generating activities, supporting access for cyclists and making existing and proposed major cycleways safer. |
| Degree of shift from the status quo | x | | | <ul style="list-style-type: none"> The proposed changes are modest and are not a significant departure from the existing transport provisions. |
| Who and how many will be affected / geographical scale of effects | | x | | <ul style="list-style-type: none"> As the Transport Chapter is a city-wide chapter, the number of properties impacted by the proposed changes is very large. The degree of impact of the proposed changes are considered to |

| Criteria | Scale/Significance | | | Comment |
|---|--------------------|--------|------|---|
| | Low | Medium | High | |
| | | | | be medium as the amended provisions have the potential to introduce some additional costs for High Trip Generating activities through more detailed Integrated Traffic Assessments that cover greenhouse gas emissions and the implementation of mitigation measures. |
| Degree of impact on or interest from iwi/ Māori | x | | | <ul style="list-style-type: none"> The proposed provisions will not have a significant impact on the interests of iwi or Māori. This is because the proposed changes will not limit the development potential of Māori land, nor will they result in additional impacts on sites that are of cultural significance. |
| Timing and duration of effects | | x | | <ul style="list-style-type: none"> Effects will be ongoing. |
| Type of effects | x | | | <ul style="list-style-type: none"> The main effect associated with the proposed changes will be improved traffic and pedestrian safety. The new provisions will assist with providing for the reduction An additional effect will be improved urban design outcomes with the landscaping changes proposed for the Residential Design Principles. It is recognised that the proposed provisions will have some increased costs associated with the installation of pedestrian pathways and additional cycle parks, as well as implementing mitigation measures for High Trip Generating Activities. |
| Degree of risk and uncertainty | x | | | <ul style="list-style-type: none"> The proposed changes have a low risk and low uncertainty. The proposed changes are consistent with the existing format of the plan, and largely amends and builds on the existing approach within the District |

| Criteria | Scale/Significance | | | Comment |
|-----------------|---------------------------|---------------|-------------|--|
| | <i>Low</i> | <i>Medium</i> | <i>High</i> | |
| | | | | Plan to manage transport related effects arising from development. |

4.1.4. Overall, the scale and significance of the proposed provisions are considered to be low.

4.1.5. Consequently, a high-level evaluation of these provisions has been identified as appropriate for the purposes of this report.

5. Evaluation of the proposal

5.1. Statutory evaluation

5.1.1. A change to a district plan should be designed to accord with sections 74 and 75 of the Act to assist the territorial authority to carry out its functions, as described in s31, so as to achieve the purpose of the Act. The aim of the analysis in this section of the report is to evaluate whether and/or to what extent the proposed plan change meets the applicable statutory requirements, including the District Plan objectives. The relevant higher order documents and their directions are outlined in section 2.1 of this report. The proposed plan change has been prepared to address the transport associated impacts arising from the implementation of the MDRS and the National Policy Statement for Urban Development.

5.2. Evaluation of the purpose of the plan change

5.2.1. Section 32 requires an evaluation of the extent to which the objectives¹ of the proposal are the most appropriate way to achieve the purpose of the Act (s 32(1)(a))

5.2.2. The existing objectives of the operative Christchurch District Plan are not proposed to be altered or added to by the proposed changes to the Transport Chapter. This report, therefore, evaluates the extent to which the purpose of the Plan Change (s32(6)(b)) is the most appropriate to achieve the purpose of the Act.

5.2.3. The evaluation, therefore, examines whether:

- the purpose of the plan change (s32(6)(b)) is the most appropriate way to achieve the purpose of the Act (s32(1)(a));
- the provisions in the proposal are the most appropriate way to achieve the purpose of the plan change; and
- the provisions in the proposal implement the unaltered objectives of the District Plan.

¹ 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.

5.2.4. The following table provides an evaluation of the purpose of the proposed Plan Change as well as alternative approach (being to retain the status quo) to establish which is the most appropriate way to achieve the purpose of the Act (s32(1)(a) and s32(6)(b)).

| Purpose of the proposal | Summary of Evaluation |
|--|---|
| <p>The purpose of the amendments to the transport chapter is to address the transport related impacts arising from the Schedule 3A of the Resource Management Act - Medium Density Residential Development Standards as well as to give effect to the National Policy Statement for Urban Development.</p> | <ul style="list-style-type: none"> • The proposed changes assist with achieving Objective 1 of the National Policy Statement for Urban Development for the provision of well-functioning urban environments. • The proposed changes respond to Objective 8 and Policy 6(e) of the National Policy Statement for Urban Development, in that they are providing a framework to considered vehicular emissions associated with high trip generating activities. • The proposed changes support the outcomes sought under the Strategic Objectives 3.3.7 (a) and (b) through addressing the traffic and pedestrian safety effects as a result of the MDRS provisions as well as seeking to reduce vehicular generated greenhouse gas emissions associated with high trip generating activities. • The implementation of the proposed changes will ensure that appropriate and safe pedestrian accesses are provided to future residential developments. • The implementation of the proposed changes will enable greenhouse gas emissions from high trip generators to be considered. • The proposed changes require additional bicycle facilities to be provided on sites in recognition that there is expected to be a greater uptake of this activity and the need to support activities within the District Plan that reduce greenhouse gas generation. • The proposed changes will ensure appropriate urban design outcomes associated with vehicular and pedestrian access are achieved. • The proposed changes seek to partially respond to the following resource management issues identified in PC14: <ul style="list-style-type: none"> ○ Well-functioning urban environments that enable people to provide for their wellbeing (Issue 1); and ○ The integration of increased development with the provision of infrastructure and the efficient provision of infrastructure (Issue 6). <p>The proposed changes would (in the context of Part 2 matters):</p> |

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| | <ul style="list-style-type: none"> • Ensure that the Transport provisions of the Christchurch City District Plan are consistent with higher order direction (NPS-UD) and the Strategic Objectives of the District Plan; • Give effect to Section 5(2) of the Act through the sustainable development of urban land while also ensuring the health and safety of occupants of future residential development are provided for by having appropriate and safe vehicular and pedestrian access; • Give effect to Sections 7(b), (c) and (f) of the Act by ensuring that the resulting traffic related impacts arising from Medium Density and High Density Housing are addressed. Additionally that vehicular and pedestrian access provides for the needs of future residents and achieves an appropriate amenity outcome, while still allowing for the development of residentially zoned sites. • Support Council to give effect Section 7 (i) by: <ul style="list-style-type: none"> ○ addressing the effects of climate change by seeking to reduce vehicular emissions associated with high trip generating activities; and ○ requiring additional bicycle facilities to be provided on sites in recognition that there is expected to be a greater uptake of this activity and the need to support activities within the District Plan that reduce greenhouse gas generation. • Result in a marginal increase in costs associated with developments through implementation of the new pedestrian access requirements and the increased amount of dedicated bicycle spaces to be provided; and • May result in small costs for high trip generators through the need to consider measures associated with reducing greenhouse gas emissions from transport. However, these increased costs are not considered to be significant and may not be realised by all developments. |
| <p><i>Alternative purpose – Retain status quo with no changes to the existing provisions</i></p> <p>The Christchurch City District Plan has a number of existing transport provisions. These provisions have been written in the context of the existing District Plan framework. While these provisions provide a</p> | <p>Policy 7.2.1.2 and Rules 7.4.3.10 and 7.4.4.18 does not provide for a consideration of the reduction of greenhouse gas emissions associated with vehicular transport. This means that the District Plan is not giving full effect to Objective 8 and Policy 6 (e) of the NPS-UD.</p> <p>The existing District Plan framework does not prescribe pedestrian access requirements for developments involving less than 9 residential units (Rule 7.4.3.7 and Appendix 7.5.7 (c)), other than as able to be considered through the residential design principles in Chapter 14. This means that developments involving less than 9 residential units can have pedestrian access created which is either not</p> |

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| <p>framework to manage and address a number of transport related effects associated with development, they do not fully address the resulting impacts arising from the level of development enabled under the NPS-UD 2020 and the MDRS.</p> | <p>practicable, unsafe, or undesirable to use. This has some potential conflict with Objective 7.2.1 which seeks the following outcomes that is safe and efficient for all transport modes and that reduces dependency on private motor vehicles and promotes the use of public and active transport.</p> <p>The existing rule framework does not effectively address the resulting pedestrian and streetscape impacts from additional vehicular accesses associated with development enabled by the MDRS and NPS-UD. As such there is the ability for there to be multiple vehicular accesses on adjacent sites that can detract from the streetscape values and pedestrian safety.</p> <p>Retaining the status quo would (in the context of Part 2 matters):</p> <ul style="list-style-type: none"> • Result in a policy and framework that does not fully meet Section 5 of the Act as it would not be giving effect to the requirements of the NPS-UD in respect of Objective 1, Objective 8, and Policy 6(e); and • Has the potential to result in effects on the transport network, the safe and efficient operations of sites and the surrounding environment. <p>These effects include:</p> <ul style="list-style-type: none"> • The provision of pedestrian access that is unsafe or is not appropriately designed to allow for safe and efficient pedestrian movements on a site; • Impacts on established major cycle routes by larger multi-unit developments, with vehicular access onto these routes; and • Impacts on pedestrian safety on footpaths from an increase of vehicle accesses on sites from increased development. |
|---|--|

5.2.5. Having assessed the proposed provisions and the status quo, it is considered that the proposed approach is the most appropriate option. The proposed provisions allow for the Council to address the traffic and pedestrian effects arising from the MDRS and the enabled development under the NPS-UD. The proposed approach also addresses the climate change considerations under the Act and NPS-UD. The status quo would not respond as effectively to these matters and is therefore not the most appropriate way to give effect to the purposes of the Act.

5.2.6. It is, therefore, considered that the purpose of the Plan Change is the most appropriate way to achieve the purpose of the Act.

5.3. Reasonably practicable options for provisions

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

5.3.2. **Option 1** – Status quo. The status quo contains a number of policies and rules that relate to managing the transportation effects arising from land development. These rules have been developed in the context of the existing District Plan provisions. While they effectively address a number of transportation effects associated with land development, they do not necessarily address the resulting impacts from the implementation of the MDRS. Specifically, they do not:

- Have a minimum pedestrian access width for developments involving less than 9 residential units (as per Appendix 7.5.7 (c));
- Do not require a consideration of greenhouse gas emissions from high vehicular trip generating activities;
- Do not consider the impacts from vehicular access onto Key Pedestrian Frontages or Major Cycle Routes;
- Have a minimum bicycle storage requirement that is appropriate for the increase in the demand of this transport mode into the future;
- Does provide for loading requirements for larger residential developments and the potential impacts that can arise from the lack of an on-site loading facility;
- Do not effectively address the potential impacts from a number of vehicle accesses being located in close proximity to one another; and
- Allow for large expanses of hard surfacing within a site associated with vehicle access and manoeuvring areas.

5.3.3. **Option 2** – More Restrictive Approach – Require resource consent for all new vehicular and pedestrian accesses as a Restricted Discretionary Activity, so a site-specific assessment of the traffic and pedestrian impacts can be undertaken as well as the consideration of options to reduce greenhouse gas emissions from vehicles. This would include a more restrictive and prescriptive policy framework for the range of transport effects that can be generated by an activity, so that Council is enabled to decline applications, when these outcomes cannot be met.

5.3.4. **Option 3** – Proposed Plan Change

- Amends Policy 7.2.1.2 to ensure that it provides guidance on the reduction of vehicular greenhouse gases from high trip generating activities.
- Proposes a new policy (Policy 7.2.1.9) pertaining to pedestrian access,

- Setting new permitted activity standards and escalations to Restricted Discretionary Activity status for the following:
 - Minimum pedestrian access widths and formation for developments involving 3 or more residential units (Rules 7.4.3.7(b), 7.4.4.27, 7.5.7 (c), and (d)); and
 - Co-location of vehicle crossings (Rules 7.4.3.8 (h), 7.4.3.13, 7.4.4.28, 7.5.11.4);
- Amend the legal and formed widths in Table 7.5. 7.1. This is to ensure that vehicular access onto the site is a sufficient width to provide for low speed traffic and pedestrian safety. The existing widths were slightly too narrow to achieve this outcome.
- Update Table 7.5.2.1 so that a loading bay for a 99th percentile vehicle is provided when a development involves 20 or more residential units.
- Amend the Rules 7.4.3.7 (d) and 7.4.4.21 (ii) so that they also apply to access affecting a Key Pedestrian Frontage or Major Cycle Route;
- Changed the cycle parking requirements under Table 7.5.2.1 to the following:
 - For residential units with one or two bedrooms- 1 residents' space/ dwelling without a garage;
 - For residential units with three or more bedrooms- 2 residents' space/ dwelling without a garage
- Adding a new matter of discretion in relation to the consideration of greenhouse gas emissions from high vehicular trip generating activities (7.4.4.18 (vii));
- Adding a landscaping consideration to the Residential Design Principles in Chapter 14 relating to the softening of hard surfaces associated with vehicular access and loading bays; and
- Making any other consequential changes to the District Plan as required to give effect to the proposed approach and the MDRS.

5.4. Evaluation of options for provisions

- 5.4.1. The policies of the proposal must implement the objectives of the District Plan (s75(1)(b)), and the rules are to implement the policies of the District Plan (s75(1)(c)). The current District Plan objectives for the Transport Chapter (which are not proposed to be changed as part of this plan change) seek to ensure that the Christchurch Transport System is integrated and is safe and efficient for all transport modes. The objectives seek to reduce dependency on private motor use and integration with land use activities. The objectives also seek to manage the impacts of freight on the transport network.
- 5.4.2. Given these objectives, the proposed policies and rules need to ensure that development enabled under the MDRS and NPS-UD do not compromise these outcomes and that the resulting transport impacts are appropriately addressed.

- 5.4.3. In addition, each proposed policy or method (including each rule) needs to be examined as to whether it is the most appropriate way for achieving the purpose of the plan change (s32(1)(b)).
- 5.4.4. Before providing a detailed evaluation of the policies and rules in the plan change, the alternative options identified have been considered in terms of their potential costs and benefits and overall appropriateness in achieving the objectives of the Plan and the relevant directions of the higher order documents.
- 5.4.5. The tables below summarise the assessment of costs and benefits for each option based on their anticipated environmental, economic, social, and cultural effects.
- 5.4.6. The overall effectiveness and efficiency of each option has been evaluated, as well as the risks of acting or not acting.
- 5.4.7. **Option 1 - Status quo**

| Benefits | Appropriateness in achieving the objectives/ higher order document directions |
|--|--|
| <p><u>Environmental:</u> The environmental benefit associated with the status quo is that there would be more room on site for landscaping/ development, where dedicated pedestrian access is not provided.</p> | <p><u>Efficiency</u></p> <ul style="list-style-type: none"> • The status quo is not efficient as the resulting costs from maintaining the status quo are higher than the associated benefits. In particular, there are potential significant social costs arising from the construction of residential units with pedestrian access that may not be accessible to all users. • The status quo would also be inefficient as it would not allow for the outcomes sought under Objective 7.2.1 to be fully addressed because of the intensification under the Proposed Plan Change. In particular, the existing provisions would not efficiently achieve the following outcomes <ul style="list-style-type: none"> i. that is safe and efficient for all transport modes; ii. that supports safe, healthy and liveable communities by maximising integration with land use; iii. that reduces dependency on private motor vehicles and promotes the use of public and active transport. <p>This is due to the differing development forms that will arise from the intensification enabled under the plan</p> |
| <p><u>Economic:</u> There are economic benefits associated with the status quo. These include:</p> <ul style="list-style-type: none"> • Reduced construction costs for pedestrian access for residential developments involved less than 8 residential units. • No compliance costs for consideration of greenhouse gas emissions for HTG activities. • Reduced construction costs from not having to provide two on-site cycle parking spaces when three bedroom units (or larger) are proposed; and • Reduced construction costs from not having to provide a loading bay for developments involving more than 20 residential units. | |
| <p><u>Social:</u> The status quo has some social benefits in that it does promote alternative modes of transport for future development. However, there is the potential for the social benefits associated with</p> | |

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|---|---|
| <p>alternative transport to be enhanced over and above what the existing provisions provide for.</p> | <p>change and the likely increase in demand in active transport.</p> |
| <p>Costs</p> | <ul style="list-style-type: none"> The status quo would remain ineffective in providing for the future growth of bicycle parking. This is due to the number of bicycles that are required to be provided on-site as well as the interaction between vehicle accesses and major cycle routes. |
| <p><u>Environmental:</u> The status quo does not have a requirement to consider the impacts of high trip generating activities on greenhouse gas emissions. This represents a potential environmental cost in terms of climate change.</p> | <p><u>Effectiveness</u></p> |
| <p><u>Economic:</u> There is an economic cost associated with not providing a loading bay on site as it results in inefficiencies with providing delivery services to residential units and for trades people to attend developments without loading bays,</p> | <ul style="list-style-type: none"> The status quo would be ineffective as achieving the outcomes of the Strategic Objectives and the NPS-UD as there is no ability to consider the impacts of climate change from vehicle emissions. As such, this matter would remain unconsidered in applications involving high trip traffic generators. |
| <p><u>Social:</u> The status quo would allow for residential development to occur that could result in:</p> <ul style="list-style-type: none"> Unsafe pedestrian accessways; Pedestrian access that is impracticable or undesirable to use; Does not provide enough space to accommodate future cycle use growth; Potential for new vehicle crossings to have conflict with major cycle routes, thereby reducing the safety of these cycle routes; Does not provide for loading needs of future developments to be met; Poor urban design outcomes; and/or Increased greenhouse gas emissions. <p>These outcomes all have social costs as they impact the way that people interact with their surrounds and in some instances could result in outcomes that have undesirable health, safety and social outcomes.</p> | <ul style="list-style-type: none"> The status quo is considered to not be as effective at achieving the Objective 8, Policy 6(e) of the NPS-UD or Strategic Objectives 3.3.7 (a) and (b) of the Christchurch District Plan as the existing Transport Chapter is missing policies and rules to address the resulting effects from development arising under the MDRS and the climate change requirements of the NPS-UD. |
| <p>Risk of acting/not acting The risk of the status quo (i.e. not acting) is that there could be traffic and pedestrian outcomes that arise from the MDRS that are not desirable and could be unsafe; and The status quo would be inconsistent with higher order direction and the strategic directions of the District Plan. This would be because some of the transport provisions would remain silent on some aspects of development that are enabled by the MDRS (for example pedestrian access for developments involving 3 – 8 residential units) or on the impact of vehicle emissions on climate change.</p> | |

Recommendation: This option is not the most appropriate way to achieve the objectives, mostly because:

- They do not address all the arising pedestrian and traffic safety effects arising from the MDRS;
- They do not allow for the consideration of the greenhouse gas emissions from High Trip Traffic Generators;
- They do not fully support future growth in the use of bicycles as a transport mode;
- They do not give full effect to Objective 1 and 8, or Policy 6(e) of the NPS-UD;
- They do not meet the outcomes of the Strategic Objectives 3.3.7 (a) and (b) of the Christchurch District Plan; and
- The costs associated with the status quo are considered to exceed the resulting benefits.

5.4.8. **Option 2 - More Restrictive Approach**

| Benefits | Appropriateness in achieving the objectives/ higher order document directions |
|--|---|
| <p><u>Environmental:</u></p> <ul style="list-style-type: none"> • The alternative approach would allow for the consideration of greenhouse gas emissions from vehicles in all situations. This has the potential to have positive environment benefits, through reduced greenhouse gas emissions. | <p><u>Efficiency:</u></p> <ul style="list-style-type: none"> • This alternative approach is not efficient as it would result in a large number of developments having to obtain resource consent that could otherwise be addressed through standards in a District Plan. Inefficiencies will arise from resource consent being required, particularly where there are no resulting traffic or pedestrian safety issues, which would normally be addressed through permitted activity conditions within a District Plan. • This alternative approach is not efficient as it will result in costs that exceed the resulting benefits. |
| <p><u>Economic:</u></p> <ul style="list-style-type: none"> • There are no economic benefits with the more restrictive approach. | |
| <p><u>Social:</u></p> <ul style="list-style-type: none"> • There are potential social benefits in safer roading networks through having all new development with vehicular or pedestrian access having to be assessed through the resource consent process. This process would allow for the traffic impacts from all new development to be considered and where appropriate, to require mitigation measures to be installed to reduce these effects. | |
| <p>Costs</p> | <p><u>Effectiveness:</u></p> <ul style="list-style-type: none"> • This alternative approach would be effective, as all developments involving pedestrian or traffic access would be assessed. This would ensure that traffic or pedestrian safety issues associated with all developments could be considered and addressed. This would ensure that all the outcomes under Objective 7.2.1 would be achieved as the traffic impacts from all developments would be assessed through a resource consent process. |
| <p><u>Environmental:</u></p> <ul style="list-style-type: none"> • There are no environmental costs associated with the more restricted approach | |
| <p><u>Economic:</u></p> | |

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| <ul style="list-style-type: none"> • There would be additional costs associated with new development as all development would need resource consent to allow for the consideration of access arrangements. • The increased costs associated with land development would flow through into the cost for new housing, which would have financial implications for future owners. • There would be greater uncertainty associated with development as every application would be subject to the resource consent process and there would be no certainty that is provided through permitted activity conditions. As a result, Christchurch could become a less desirable place to undertake development when compared to neighbouring regions and there would be the resulting wider economic costs derived from displaced development. | <ul style="list-style-type: none"> • This alternative approach would also be effective in reducing greenhouse gases from vehicular activities as it would allow for a wider consideration of transport related activities and measures to how greenhouse gas reductions could be achieved. |
| <p><u>Social:</u></p> <ul style="list-style-type: none"> • There would be associated costs arising from increased housing as a result of having to obtain resource consent approval for all development that has pedestrian or traffic access. | |
| <p>Risk of acting/not acting</p> <p>This risk of acting with this alternative approach is that developments that do not generate traffic safety or pedestrian safety issues would be required to go through the resource consent process. This would result in an inefficient system and would generate additional costs and delays for developments, without any significant benefits.</p> <p>While this approach is considered to be effective at addressing pedestrian and traffic safety issues arising from residential development, the resulting inefficiencies and costs outweigh any resulting benefits associated with ever development having to go through the resource consent process.</p> | |
| <p>Recommendation:</p> <p>This option is not recommended as it is considered that the costs associated with this option outweigh the benefits and that this alternative approach is not an efficient way to achieve the outcomes of the Act or the plan change.</p> | |

5.4.9. Summing up, Options 1 – 2 are not considered efficient and effective (or as efficient and effective) in achieving the objectives of the Plan and the NPS-UD and MDRS (as the preferred option). It is considered that the costs associated with the alternative options significantly outweigh the benefits. The alternative options are considered to be more inefficient than the preferred option

and have greater risks from acting/not acting when compared to the preferred option. The detailed evaluation of **Option 3**, the preferred option, follows.

6. Evaluation of the preferred option for provisions

6.1.1. **Option 3** is the proposed plan change, which

- Providing a definition of pedestrian access - Pedestrian Access - A formed pathway that provides access for pedestrians from the street to their residential unit.
- Amending Policy 7.2.1.2 to ensure that it provides guidance on the reduction of vehicular greenhouse gases from high trip generating activities;
- Proposing a new policy (Policy 7.2.1.9) pertaining to pedestrian access, that supports the new permitted activity rule;
- Setting new permitted activity standards and escalations to Restricted Discretionary Activity status for the following:
 - Minimum pedestrian access widths and formation for developments involving 3 or more residential units (Rules 7.4.3.7(b), 7.4.4.27, 7.5.7 (c), and (d)); and
 - Co-location of vehicle crossings (Rules 7.4.3.8 (h), 7.4.3.13, 7.4.4.28, 7.5.11.4);
- Amend the legal and formed widths in Table 7.5. 7.1. This is to ensure that vehicular access onto the site is a sufficient width to provide for low speed traffic and pedestrian safety. The existing widths were slightly too narrow to achieve this outcome.
- Update Table 7.5.2.1 so that a loading bay for a 99th percentile vehicle is provided when a development involves 20 or more residential units.
- Amend the Rules 7.4.3.7 (d) and 7.4.4.21 (ii) so that they also apply to access affecting a Key Pedestrian Frontage or Major Cycle Route;
- Changed the cycle parking requirements under Table 7.5.2.1 to the following:
 - For residential units with one or two bedrooms- 1 residents' space/ dwelling without a garage;
 - For residential units with three or more bedrooms- 2 residents' space/ dwelling without a garage
- Adding a new matter of discretion in relation to the consideration of greenhouse gas emissions from high vehicular trip generating activities (7.4.4.18 ((vii));
- Adding a landscaping consideration to the Residential Design Principles in Chapter 14 relating to the softening of hard surfaces associated with vehicular access and loading bays; and
- Making any other consequential changes to the District Plan as required to give effect to the proposed approach and the MDRS.

6.2. Assessment of costs and benefits of the proposed policies and rules

6.2.1. This assessment considers the potential benefits and costs associated with the policies and rule changes proposed to the District Plan. For the benefit of this Section 32 report, this assessment will be grouped into the following categories:

- Policies and rules associated with pedestrian access;
- Policies and rules associated with vehicle emissions from high trip generating activities and the changes to the rules pertaining to bicycle storage requirements; and
- Rules associated with vehicular access design.

6.2.2. Pedestrian Access – New definition, Proposed Policy 7.2.1.9 and Rules 7.4.3.7 (b), Appendix 7.5.7 (c), and (d), 7.4.4.27, and Table 7.5.7.1.

| Benefits |
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| <p><u>Environmental:</u> The proposed provisions have the potential environmental benefit of supporting active transport by ensuring that private pedestrian access is provided to residential units.</p> |
| <p><u>Economic:</u> There are no direct economic benefits identified with the proposed provisions.</p> |
| <p><u>Social:</u> The proposed changes have the following social benefits:</p> <ul style="list-style-type: none"> • They ensure that pedestrian pathways provided to residential dwellings are able to be used by all members of society, including those with reduced mobility; and • Helps assist with safe illumination of pathways at night, thereby reducing the potential for unsafe environments. |

| Costs |
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| <p><u>Environmental:</u> There are no identified environmental costs with the proposed policies and rules associated with pedestrian access. There is an environmental cost associated with the lost opportunity to provide for landscaping on sites as a result of the need to provide pedestrian pathways.</p> |
| <p><u>Economic:</u> There are potential economic costs associated with the installation of pedestrian pathways. However, relative to the costs associated with undertaking land development, these costs are considered to be small. There are the potential economic costs associated with the resource consent process when residential developments do not comply with the pedestrian access requirements. There are potential lost development costs associated with the provision of pathways. However, given the small area accommodated by pathways, these lost opportunity costs are expected to be low.</p> |

Social:
 There are no identified social costs with the proposed policies and rules associated with pedestrian access and lighting.

Appropriateness in achieving the objectives/ higher order document directions

Efficiency:
 The proposed provisions are efficient as they use the existing District Plan structure of using permitted activity standards to set minimum prescribed widths and other requirements for pedestrian pathways. If these standards are met, then no resource consent is triggered. The elevation associated with the permitted activity standards not being met, is to a Restricted Discretionary Activity. This is consistent with the existing District Plan structure and therefore is an efficient elevation as it ensures that the effects considered are directly related to the standards that are not being met.
 The benefits arising from the proposed provisions are considered to outweigh the resulting costs and therefore the proposed approach is an efficient way to achieve the outcomes of the plan change in respect of pedestrian access.

Effectiveness:
 The proposed changes are effective as they assist with giving effect to Objective 1 of the NPS-UD and the Strategic Objectives 3.3.7 (a) and (b) as they assist with providing for a well-functioning environment that meets the future residential occupants’ social well-being and health and safety requirements.
 The proposed changes build on the existing District Plan framework and strike a balance between providing for pedestrian safety and amenity, while also ensuring the residential development potential of sites is still able to be met.
 The proposed changes ensure that pedestrian functionality and safety is provided to permitted residential development that is enabled by the MDRS and the NPS-UD.

Risk of acting/not acting
 The risk of acting is small. The main risk is that the marginal additional cost imposed by the proposed provisions may discourage residential development in some limited instances. One risk from not acting is that residential development enabled by the MDRS and NPS-UD may provide pedestrian pathways that do not meet the mobility needs of all potential future occupants or the functional needs of occupants.

6.2.3. Proposed Amendments to Policy 7.2.1.2 Amendment to Rules 7.4.3.7(d), 7.4.4.18, and 7.4.4.21 Amendment to Appendix 7.5.2 and Table 7.5.2.1.

Benefits

Environmental:
 There are environmental benefits associated with reduced greenhouse gas emissions from high trip generating activities. It is recognised that these benefits have to the potential to be small (depending on the nature of the high trip generating activity) and should be considered in the context of the proposed provisions being one approach out of many to reduce the impacts for greenhouse gases to give effect to Objective 8 of the NPS-UD. However, it considered from a vehicular emissions perspective, this proposed change is one of the most efficient ways to give

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| <p>effective to this objective, along with the existing District Plan provisions around active transport and the proposed changes to the cycle storage requirements.</p> <p>There are environmental benefits associated with increased bicycle use enabled through the provision of cycle parking and mitigation of impacts of access on Major Cycle Routes i.e. through reduced greenhouse gas emissions.</p> |
| <p><u>Economic:</u></p> <p>There is a potential economic benefit associated with increased bicycle use, facilitated by the provision of cycle parking and mitigation of impacts of access on Major Cycle Routes. It is generally recognised that an increase in cyclists has positive economic impacts on businesses that are located along cycleways.</p> |
| <p><u>Social:</u></p> <p>There are social benefits associated with reduced greenhouse gas emissions from high trip generating activities. These largely relate to improved health outcomes for people as a result of reduced vehicle emissions.</p> <p>There are social benefits from increased bicycle use facilitated by increased cycle parking and mitigation of impacts of access on Major Cycle Routes, including reduced greenhouse gas emissions, improved health, and well-being.</p> |
| <p><u>Cultural:</u></p> <p>The cultural benefit associated with this approach is that it allows for improved relationship between the iwi and the air, due to potentially improved air quality and reduced vehicular emissions.</p> |

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| <p>Costs</p> |
| <p><u>Environmental:</u></p> <p>No environmental costs have been identified with these proposed changes.</p> |
| <p><u>Economic:</u></p> <p>There is no significant increase in consenting costs as High Trip Generating Activities already require resource consent as a Restricted Discretionary Activity.</p> <p>There will be the increased costs of implementing the measures to reduce greenhouse gas emissions associated with High Trip Generating Activities.</p> <p>There will be increased costs associated with providing additional bike storage facilities.</p> <p>There is the potential for there to be loss opportunity costs associated with the provision of larger bicycle storage facilities. However, these costs are likely to be small, given the limited footprint of any bicycle storage facilities, relative to the size of a site.</p> |
| <p><u>Social:</u></p> <p>No social costs have been identified with these proposed changes.</p> |
| <p><u>Cultural:</u></p> <p>No cultural costs have been identified with these proposed changes.</p> |

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| <p>Appropriateness in achieving the objectives/ higher order document directions</p> |
| <p>Efficiency:</p> |

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| <p>The proposed amendments are efficient as they build on the existing rule framework that exists for High Trip Generating Activities. The proposed amendments add a matter of consideration to the existing Restricted Discretionary Activity framework for High Trip Generating Activities. As such, the proposed changes are not creating a new consenting requirement for these activities. The proposed changes to the bicycle parking requirements are efficient as they adjust the existing requirements and use the existing District Plan framework.</p> <p>The proposed changes to provisions for high trip generating activities target those activities that have the potential to generate a large amount of vehicle movements. Due to the scale of the potential development forms, there is more of an ability to implement measures that reduce vehicle demand associated with their respective activity, and therefore their associated greenhouse gas emissions. It is however recognised that as a percentage of traffic generation, High Trip Generators are a very small contribution to overall daily City traffic volumes.</p> |
| <p>Effectiveness:</p> <p>The proposed changes are effective as they assist with giving effect to Objective 8 and Policy 6(e) of the NPS-UD.</p> <p>The proposed changes give effect to strategic objective 3.3.7(b) as it assists with improving resilience to the current and future effects of climate change, by reducing vehicle emissions and further supporting cycling activities.</p> <p>The proposed changes target those activities that both generate the highest volumes of traffic, but also have the scale to implement measures to reduce traffic generation (and therefore greenhouse gas emissions associated with vehicle movements).</p> <p>The proposed changes to the bicycle parking requirements reflects the growing demand for this transport mode and will ensure that developments incorporate enough space to allow for the future growth in the number of people using bicycles.</p> |
| <p>Risk of acting/not acting:</p> <p>The risk of acting is that High Trip Generating Activities will have to implement additional measures into their activities to reduce their associated vehicular greenhouse gas emissions. This has the potential to generate extra costs for the activities and may act as a small deterrent to their establishment.</p> <p>The risk of not acting is that future developments may not provide enough bicycle parking to meet future demand of this transport mode.</p> <p>The risk of not acting is that the Christchurch District Plan would not be giving full effect to the NPS-UD and the Strategic Objectives.</p> |

6.2.4. Rules 7.4.3.8, 7.4.3.13, 7.4.4.28, Appendix 7.5.11.4. Table 7.5.3.1, and Add new matter to the Residential Design Principles regarding landscaping of accessways

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| <p>Benefits</p> |
| <p><u>Environmental:</u></p> <p>There are limited environmental benefits associated with proposed landscaping provisions. However, these environmental benefits are very limited due to the small scale and size of the landscaping likely to be involved.</p> <p>The ability to consider landscaping as part of multi-unit developments and reducing the dominance of hard surfaces has positive environmental benefits associated with greening of areas within a development.</p> |

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| <p><u>Economic:</u> There are no economic benefits associated with the proposed provisions.</p> |
| <p><u>Social:</u> The social benefits associated with the proposed provisions are: It encourages pedestrian safety by limiting the width of driveways that are co-located so that they are not too wide for pedestrians to cross safely; It assists with reducing the dominance of vehicle accesses and hard surfaces along the front boundaries of properties by limiting the extent of vehicle accesses. This has resulting streetscape and traffic safety benefits; The provision of a loading bay helps meets future residents needs, involving more than 20 residential units, through the provision of a space for courier vans and trades people; and The ability to consider landscaping as part of multi-unit developments and reducing the dominance of hard surfaces has positive social benefits associated with greening of areas within a development.</p> |
| <p><u>Cultural:</u> There are no cultural benefits associated with the proposed provisions.</p> |

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| <p>Costs</p> |
| <p><u>Environmental:</u> There are no environmental costs associated with the proposed provisions.</p> |
| <p><u>Economic:</u> There are potential economic costs associated with the installation of landscaping between vehicle access as part of any multi-unit development (this arises from the Residential Design Principle). However, relative to the costs associated with undertaking land development, these costs are considered to be small. There are the potential economic costs associated with the resource consent process when residential developments do not comply with the vehicle crossing separation distance requirements. There are potential costs associated with the installation of the loading bays.</p> |
| <p><u>Social:</u> There are no social costs associated with the proposed provisions.</p> |
| <p><u>Cultural:</u> There are no cultural costs associated with the proposed provisions.</p> |

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| <p>Appropriateness in achieving the objectives/ higher order document directions</p> |
| <p><u>Efficiency:</u> The proposed provisions are considered to be efficient as they use the existing District Plan structure of using permitted activity standards to set minimum vehicle separation distances. If these standards are met, then no resource consent is triggered. The elevation associated with the permitted activity standards not being met, is to Restricted Discretionary Activity. This is consistent with the existing District Plan structure and therefore is an efficient elevation as it ensures that the effects considered are directly related to the standards that are not being met.</p> |

The benefits arising from the proposed provisions are considered to outweigh the resulting costs and therefore the proposed approach is an efficient way to achieve the outcomes of the plan change in respect of ensuring the potential impacts from multiple vehicle accesses occurring on adjacent sites as a result of the MDRS provisions are addressed.

Effectiveness:

The proposed changes are effective as they assist with giving effect to Objective 1 of the NPS-UD and the Strategic Objectives 3.3.7 (a) and (b) as they assist with providing for a well-functioning environment, that meets the future residents social well-being and health and safety requirements.

The proposed changes build on the existing District Plan framework and strikes a balance between providing for future pedestrian safety and reducing the impacts of additional vehicle access, while also ensuring the residential development potential of sites is still able to be met. The proposed changes ensure that pedestrian functionality and safety on the local roading network is provided to permitted residential development that is enabled by the MDRS and the NPS-UD.

6.3. The most appropriate option

6.3.1. It is considered the preferred option is the most appropriate way to achieve the purpose of the Proposed Plan Change. The preferred options builds on the existing rule framework and provides a permitted activity framework for most activities. Where these permitted standards cannot be met, then the application escalates to a Restricted Discretionary Activity. The benefits from the proposed provisions are considered to outweigh the resulting costs and the proposed approach is considered to be both effective and efficient at achieving the purpose of the plan change.

7. Conclusions

7.1.1. The proposed plan change seeks to make changes to the Transport Chapter (Chapter 7) of the Christchurch District Plan to respond to the transport related effects arising from the MDRS and NPS-UD implementation.

7.1.2. The evaluation undertakes an assessment of the proposed provisions alongside realistic alternative approaches. The evaluation has been undertaken in accordance with s.32 of the RMA in order to identify the need, benefits and costs, in addition to the appropriateness of the proposal, having regard to its effectiveness and efficiency relative to other means in achieving the purpose of the RMA. The evaluation demonstrates that this proposal is the most appropriate option as it:

- Best gives effect to higher order documents, including the national planning standards;
- Is the most effective and efficient way to achieve the purpose of the Act and the Christchurch District Plan strategic objectives; and
- Addresses the identified issues.