

**BEFORE THE HEARINGS PANEL
CHRISTCHURCH DISTRICT PROPOSED PLAN CHANGE 4**

IN THE MATTER of the Resource Management
Act 1991

AND

IN THE MATTER of Proposed Plan Change 4 to
the Christchurch District Plan:
Short-Term Accommodation

**MEMORANDUM OF COUNSEL FOR CHRISTCHURCH CITY COUNCIL REGARDING
AMENDED OFFICERS' REPORT AND ECONOMIC EVIDENCE**

27 AUGUST 2021

MAY IT PLEASE THE HEARING PANEL:

1. This is a memorandum of counsel for the Christchurch City Council (Council) as proponent of Plan Change 4 (PC4).
2. The purpose of this memorandum is to seek an extension of time for the Council to serve Mr Bayliss' planning assessment to 4pm on Wednesday 1st September 2021.
3. The Panel's direction on 8th August was:

The Council shall provide a copy of an economic assessment of Plan Change 4 for the purposes of section 32, together with an updated Section 42A report and section 32AA evaluation to take account of the economic assessment, to every person who made a submission and stated a wish to be heard, no later than 4 pm on Friday 27 August.

4. Council will be providing that economic assessment to the submitters by 4pm today.
5. Unfortunately, lockdown-related hurdles mean that the Council is unable to meet that timetable for Mr Bayliss' evidence. Those hurdles faced by Mr Bayliss are a combination of: delays in receipt of the economic report; personal working-from-home circumstances; internet connection issues; and resource issues in his firm. As a result, the Council will not be in a position to serve his updated Section 42A report and section 32AA evaluation until 4pm on Wednesday 1st September.
6. Counsel has asked Mr Bayliss to summarise the key conclusions of the evidence that he is preparing. He advises that PC4 is, in the main, an appropriate response to the issues raised by short term accommodation and its direct and cumulative effects on the character of the environment in which it takes place, particularly residential coherence and a range of contributors to the quality of the environment. Having regard to the economic evidence and the practical difficulties of addressing cumulative effects of short-term accommodation, he is of the opinion that some of the changes proposed are not the most appropriate. He will be recommending the following changes:

- 6.1 Refine Objective 14.2.9 to focus on maintaining residential character and a predominance of residential activity within sites, minimising disturbance to neighbours, protecting strategic infrastructure from reverse sensitivity effects and focussing visitor accommodation in defined areas;
 - 6.2 Make consequential changes to the associated policies and remove the test in policy 14.1.9.1 that the activity be avoided where, having regard to cumulative effects, it is inconsistent with the centre-based framework for commercial activities;
 - 6.3 Change the status of unhosted visitor accommodation in a residential unit for more than 180 nights a year from a non-complying to a discretionary activity;
 - 6.4 Remove the proposed constraint on guests holding functions where the number of additional attendees exceed the number of paying guests staying overnight;
 - 6.5 Remove the controls on the maintenance of the exterior of the property; and
 - 6.6 Add a further permitted activity standard in rural zones.
7. Counsel respectfully requests that the Panel amend the timetable for the Council to serve Mr Bayliss' updated Section 42A report and section 32AA evaluation to take account of the economic assessment to 4pm on Wednesday 1st September 2021.
 8. As the Council will be serving the economic report today, has provided the above summary of Mr Bayliss' key conclusions, and will forward a copy of this memorandum today to all submitters who wish to be heard, it is submitted that there is no substantive prejudice arising for any other party and that no other change to the current timetable is warranted.

27 August 2021

A handwritten signature in blue ink, consisting of several fluid, connected strokes.

BK Pizzey

Counsel for the Christchurch City Council