

**SECTION 32
SPECIFIC PURPOSES CHAPTER 21**

**Chapter 21 Specific Purpose Zone
Section 32
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PART 1

1.0 INTRODUCTION

1. Scattered within Christchurch district, there are a number of activities which share common traits that make the collation of their respective planning provisions within one chapter of the Replacement District Plan sensible. They are all specific purpose activities, generally of a large scale, infrastructural nature, managed as one entity by one operator (whether public or private, site-specific or collectively) and which require tailor-made planning provisions.
2. This report has been prepared to fulfil the obligations of the Council under the Resource Management Act 1991 (the Act), being an evaluation of the 'policy approach' promoted in the Specific Purposes Chapter of the Replacement District Plan. Parts 1 and 3 contain information relevant to all of the specific purpose zones, while Part 2 contains the evaluation of objectives, policies, rules and other methods specific to each of the following zones:
 - a. Specific Purpose (Defence Wigram) Zone;
 - b. Specific Purpose (Cemetery) Zone;
 - c. Specific Purpose (Styx Mill Road Transfer Station) Zone;
 - d. Specific Purpose (Hospital) Zone;
 - e. Specific Purpose (School) Zone;
 - f. Specific Purpose (Tertiary Education) Zone;
 - g. Specific Purpose (Golf Resort) Zone.
3. The following two zones, which have been prepared, publically notified and considered separately as plan changes outside of the Replacement District Plan process, will be slotted into the Specific Purposes Chapter once made operative:
 - a. Specific Purpose (Airport) Zone; and
 - b. Specific Purpose (Ruapuna Motorsport Park) Zone.
4. Provisions for a Specific Purposes (Lyttelton Port) zone were prepared but will not now be notified, as the Port will be considered as part of the Lyttelton Port Recovery Plan process.
5. This report should be read together with the Specific Purposes Chapter.

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2.0 SCOPE OF THE SPECIFIC PURPOSES CHAPTER

2.1 Scope of the Specific Purpose (Defence Wigram) Zone

The land use zone includes the Wigram Airbase and Museum. The provisions of this zone were developed as a plan change and no changes are proposed to those provisions.

2.2 Scope of the Specific Purpose (Cemetery) Zone

The land use zone includes all operational and closed cemeteries owned and/or administered by the Council within the district, and only those crematoria having memorial gardens for the purpose of ash interment. There are 28 individual sites between Christchurch and Banks Peninsula, excluding Central City. The zone does not include private cemeteries, church graveyards and urupa.

Note that cemeteries within the Central City area are covered in the Central City Chapter.

2.3 Scope of the Specific Purpose (Styx Mill Road Transfer Station) Zone

This is a transfer station located on Styx Mill Road to service the northern suburbs. The transfer station required special zoning because it is located near high amenity values zones which are Residential and Open Space Zone.

2.4 Scope of the Specific Purpose (Hospital) Zone

The zone applies to health facilities and infrastructure associated with health delivery. It includes private and public hospitals throughout the district.

Note that hospitals within the Central City area are covered in the Central City Chapter.

2.5 Scope of the Specific Purpose (School) Zone

This zone applies to all schools in Christchurch whether state schools, state integrated or private, and any preschools situated on school sites. The zone also covers two smaller tertiary institutions where the Built Form Standards for schools are more appropriate than the Built Form Standards for the larger tertiary institutions.

Note that schools within the Central City area are covered in the Central City Chapter.

As well there are two preschools zoned as "School zone" on part of the site of a school which was closed several years ago, but which is still designated. All other preschools are zoned as

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for the base zone that they are located within, which may be school zone where they are co-located with schools, but in most cases is residential. Many were established by resource consent.

2.6 Scope of the Specific Purpose (Tertiary Education) Zone

The tertiary education zone covers sites and facilities which make up the University of Canterbury (UC) and the Christchurch Polytechnic and Institute of Technology (CPIT). Note that the CPIT Madras Street site is covered in the Central City Chapter.

There are other tertiary institutions in Christchurch, but they are of much smaller scale. These facilities are either zoned as schools as a result of their smaller scale, or are located in commercial or other zones.

2.7 Scope of the Specific Purpose (Golf Resort) Zone

This zone applies to the Clearwater Golf Resort and the proposed Christchurch Golf Resort near Spencerville. For Clearwater, the general approach has been to retain the Operative Plan quotas of residential units and hotel bedrooms in the same locations on the ground as previously, but to adjust the numbers to reflect changes to the airport noise contours. To date there has been no development at the Christchurch Golf Resort, but the zone has been retained in view of the relatively short time for which it has been operative.

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3.0 STRATEGIC CONTEXT

3.1 Proposed Replacement District Plan overview and synopsis

1. The Specific Purpose Zone applies to a diverse range of unique and specialised land use activities across the District. These land use activities are usually historical, highly specialized and operated by one operator or entity. These activities do not quite fit in the general land use classifications such as Residential or Industrial and therefore classified as Specific Purpose Zone. A suite of tailor made planning provisions are required to enable the operations of such activities without undue limitations from neighbouring land use activities taking into consideration their often strategic nature, mode of operation and other constraints.
2. The Strategic Directions Chapter provides the following high-level policy direction about how these issues should be addressed and desired outcomes for the district:
 - a. recognising Manawhenua interests through acknowledgement of the traditional and cultural relationship between Manawhenua and natural and physical resources and the management of those in accordance with the principles of the Treaty of Waitangi and objectives and policies of the Mahaanui Iwi Management Plan;
 - b. providing for recovery and growth through:
 - i. the co-location of complementary and compatible activities and integration of new development with and within existing urban areas, transport networks and other infrastructure, thereby optimising the use of resources, improving people's connectivity and accessibility to employment, services, etc, and providing certainty about where development can occur.
 - ii. providing for and protecting the efficient operation, recovery and upgrade of major community facilities in a way that supports sustainable economic growth while minimising conflict with adjoining activities;
 - c. enhancing the health and wellbeing of communities, including by:
 - i. managing activities that generate health and/or amenity-related nuisance (such as noise and dust) or involve hazardous substances and protecting them from unacceptable risks from natural hazards;
 - d. valuing and protecting the natural environment through:
 - i. protecting and enhancing the district's water/wai resources through land use planning and stormwater management; and
 - ii. integration of land use and infrastructure (particularly strategic) to achieve the efficient and sustainable use of resources.

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3. The Specific Purposes Chapter includes a land use specific objectives and policies tailor made to suit each zone as outlined in Part 2 of this Report.

3.2 Research

1. The Council has commissioned technical advice and assistance from various internal and external experts and utilised this, along with internal workshops and feedback from strategic partners and key stakeholders, to assist with setting the plan framework for the Specific Purposes Chapter provisions. This advice includes the following:

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Table 1: Technical reports informing the Specific Purposes Chapter

Title	Author	Description of Report
All zones		
Evaluating the Effectiveness and Efficiency of the Christchurch City Plan – Project Report 28, January 2011, and Evaluating the Effectiveness and Efficiency of the Banks Peninsula District Plan – Addendum Report 28, January 2011.	Response Planning Consultants Limited.	Evaluate the effectiveness and efficiency of the policies, rules, or other methods in the Christchurch City Plan and Banks Peninsula District Plan. Refer to s5.3, s5.5, s6.2, s6.7 and s6.11 of the Christchurch report and s3.4 of the Banks Peninsula report.

2. In addition to the above report, the Council has compiled, reviewed and developed a collection of material on zone specific issues (refer to Bibliography within each zone evaluation). This information has been used to inform the Replacement District Plan and this Section 32 Report.

3.3 Stakeholder discussions

1. Meetings and discussions have been held with staff from CERA, Environment Canterbury, and Mahaanui Kurataiao Limited in preparation of the draft Specific Purposes Chapter to outline the approach to the chapter, direction of each zone and invite their feedback. A Collaborative Agency Group, comprising representatives of Environment Canterbury, Selwyn District Council, Waimakariri District Council, CERA, New Zealand Transport Agency (NZTA), Ngāi Tahu and the Ministry for Environment (MfE) (in an advisory role), has provided feedback through late 2014 and early 2015.
2. Ngai Tahu and the Rununga representing the Christchurch City Rohe have also provided input by way of a Rununga Focus Working Group.
3. As part of the development of provisions for each Zone in the Specific Purpose Chapter, discussions have been held with key operators to scope the issues, changes to operations that require new or amended provisions and other matters that need to be addressed. These matters have been taken into account in development of each zone and are discussed in the evaluation of the relevant zone in Part 2 of this Report.

3.4 Strategic planning documents

1. Many issues are of a strategic nature and therefore consideration has already been given to the strategic policy direction in higher order documents that have been carried through into the Strategic Directions Chapter of the District Plan Review.

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2. Those strategic matters and provisions that have been specifically given effect to or had regard to in the Specific Purposes Chapter are summarised in the table below. These documents already broadly identify the resource management issues for the District and provide the higher level policy direction to resolve these issues.
3. Decision of the Panel on the Strategic Directions Chapter also contains higher order objectives to reflect the outcomes sought in a number of strategic planning documents. A discussion of these objectives is contained within that decision. Those objectives within the Strategic Directions Chapter decision that guide the Specific Purposes are discussed in the evaluation of each zone in Part 2 of this document and set out in the 'Linkages between provisions' appendix with respect to each specific purpose zone. Those Strategic Directions having particular relevance to the Special Purpose Chapter are listed in Part 3.

Table 2: Higher order and guiding documents relevant to the Specific Purposes Chapter

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Document (Statutory obligation in italics)	Relevant provisions the SP Zone part of the Specific Purposes Chapter is required to take into account/give effect to
Canterbury Regional Policy Statement (CPRS) 2013 – <i>proposed District Plan must give effect to</i>	<p>Chapter 5 Land use and infrastructure Directs that development in the entire region is located and designed that enables communities to provide for their social, economic and cultural well being which avoids conflicts between incompatible activities. For the wider region provide sustainable development patterns that encourage within urban areas, housing choice, recreation and community facilities that support urban consolidation; encourage high quality urban design.</p> <p>Chapter 6 Recovery and Rebuilding of Greater Christchurch Directs that recovery of Greater Christchurch integrates strategic infrastructure and other infrastructure and services with land use development; the effects of land use activities on infrastructure.</p>
Recovery Strategy for Greater Christchurch – <i>proposed District Plan may not be inconsistent with</i>	<p>The Recovery Strategy lists six components of recovery each with associated goals. Those goals that are given specific effect to in this chapter are:</p> <p><i>(f) delivering smarter council and government planning and services;</i> <i>(g) acknowledging and celebrating the rich and diverse Ngāi Tahu, colonial and other heritages and connections;</i></p>
Land Use Recovery Plan (LURP)– <i>proposed District Plan must not be inconsistent with</i>	<p>Action 45 Directs the District Plan Review to reduce consenting and notification requirements The LURP directed amendments to Chapter 6 of the CRPS to enable rebuilding and redevelopment as outlined above.</p>
Mahaanui Iwi Management Plan (IMP) – <i>proposed District Plan must take into account</i>	<p>Directs the participation and particular interests of Ngai Tahu Papatipu Runanga are recognised and provided for in development and use of resources relating to water, landscape and coast. The issues and policies of relevance to the chapter include:</p> <p><i>a. Issue P3: Ngāi Tahu participation in urban and township planning and development.</i></p> <p><i>i. Policy P3.1: To require that local government recognise and provide for the particular interest of Ngāi Tahu Papatipu Rūnanga in urban and township planning.</i></p> <p><i>ii. Policy P3.2: To ensure early, appropriate and effective involvement of Papatipu Rūnanga in the development and implementation of urban township development plans and strategies, including...</i></p> <p><i>(b) Plan changes...</i></p>
New Zealand Urban Design Protocol – <i>proposed District Plan should promote</i>	<p>The New Zealand Urban Design Protocol is a voluntary commitment to specific urban design initiatives by signatory organisations, which include central and local government, the property sector, design professionals, professional institutes and other groups. Christchurch City Council is a signatory to the New Zealand Urban Design Protocol.</p>
MfE Guidelines for Crime Prevention Through Environmental Design (2005)	<p>Sets out a framework for incorporating crime prevention into quality urban designs. Principles include safe movement and connections; See and be seen; clear and logical and orientation; eyes on the street; showing a space is cared for; well-designed, managed and maintained environments; and using active security measures.</p>
Health in all Policies Approach	<p>An approach to public policies across sectors that systematically takes into account the health implications of decisions, seeks synergies, and avoids harmful health impacts, in order to improve population health and health equity</p>

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Burial and Cremation Act 1964, and any amendments	The Act's primary purpose is to ensure provision is made for the burial of the dead in a controlled and respectful manner which meets public expectations. Apart from a number of small amendments, the Act is substantially unchanged since its enactment. This is currently under review with the New Zealand Law Commission.
Historic Places Act 1993	This Act promotes the identification, protection, preservation, and conservation of the historical and cultural heritage of New Zealand.

3.5 Order in Council

1. The process for the Replacement District Plan is prescribed by the Order in Council made by Government on 7 July 2014. The Order in Council modifies the Act to provide a streamlined process for the review of the Christchurch City and Banks Peninsula District Plans and preparation of a Replacement District Plan. The Order in Council states that the Council must have particular regard to the Statement of Expectations (Schedule 4 of the order). The relevant expectations for the Specific Purposes Chapter include:

(a) clearly articulates how decisions about resource use and values will be made, which must be in a manner consistent with an intention to reduce significantly (compared with the existing district plans) —

- (i) reliance on resource consent processes; and*
- (ii) the number, extent, and prescriptiveness of development controls and design standards in the rules, in order to encourage innovation and choice; and*
- (iii) the requirements for notification and written approval:*

(b) contains objectives and policies that clearly state the outcomes that are intended for the Christchurch district:

(c) provides for the effective functioning of the urban environment of the Christchurch district, reflecting the changes resulting from the Canterbury earthquakes, including changes to population, land suitability, infrastructure and transport:

...

(i) uses clear, concise language and is easy to use.

2. Overall the provisions proposed in the Specific Purpose Chapter respond to the Statement of Expectations as follows:

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- The objectives and policies for the Specific Purpose Chapter provide clear direction on the purpose of each zone and the outcomes to be achieved which will contribute to improved consenting and decision making processes.
- Specific Purpose zones contain fewer development controls and design standards than the equivalent zones in the Operative City Plan. Controls are generally limited to those necessary to manage effects of core activities along boundaries of sites adjoining sensitive activities. Unnecessary controls have been removed. Some standards have been loosened to provide more flexibility. The development controls that remain are considered appropriate to meet policy directions and manage effects beyond site boundaries.
- Additional development controls have been included in some Specific Purpose Zones, for activities being provided for in addition to core Specific Purpose activities. The controls are considered necessary to avoid effects on wider strategic matters and maintain the operation of the core activity. The controls enable innovation and choice through matters of discretion as part of a consent process.
- Notification and written approval requirements have been used where relevant for non-compliance with Built Form Standards and some activities to ensure clarity in terms of process.

PART 2

4.0 ZONE-SPECIFIC ASSESSMENTS

4.1 Specific Purpose (Defence Wigram) Zone

4.1.1 RESOURCE MANAGEMENT ISSUES

4.1.1.1 RESOURCE MANAGEMENT ISSUE 1 – HOW TO ENSURE THE CONTINUED, SAFE AND EFFICIENT OPERATION OF AIRCRAFT FROM THE SITE, PARTICULARLY FOR DEFENCE AND EMERGENCY OPERATION

The Specific Purpose zone in Wigram is required for defence purposes, particularly the operation of aircraft and other activities in accordance with the designation.

4.1.1.2 RESOURCE MANAGEMENT ISSUE 2 – ENABLING THE CONTINUED EFFICIENT OPERATION OF THE MUSEUM IN A MANNER THAT IS COMPATABLE WITH THE SURROUNDING ENVIRONMENT

The increased use of the museum as an attraction and function and events venue will contribute to the city's economic and social well-being but potentially increases the adverse effects on the surrounding environment. These effects need to be addressed and effectively managed.

4.1.1.3 RESOURCE MANAGEMENT ISSUE 3 – CLARIFY OBJECTIVE, POLICIES AND RULES FOR BETTER USER-FRIENDLY INTERPRETATION

The existing provisions have been reviewed recently, but there is no overarching objective specific to this site. The lack of an objective means a lack of an integrated approach to and an understanding of the objective, policies and rules.

4.1.2 SCALE AND SIGNIFICANCE EVALUATION

The level of detail undertaken for the evaluation of the proposed District Plan provisions has been determined by an assessment of the scale and significance of the implementation of the proposed District Plan provisions. The scale and significance assessment considers the environmental, economic, social and cultural effects of the provisions and whether the provision;

- is predetermined by a higher order document; and/or
- is important to resolve an issue or problem particularly to protect life and property; and/or
- there are a wide range of policy options or only variations of a theme; and/or

- the policy direction (provision) will radically change from business and usual; and/or
- the policy will affect reasonable use of land; and/or
- adversely affects specific stakeholder interests including Maori; and/or
- gives rise to adverse effects and whether there is certainty of effects based on the availability of information to assess benefits and costs.

This issue is largely a site specific matter with the most significant matter being "is important to resolve an issue or problem particularly to protect life and property". The method of assuring this, is the approach slopes administered by the Civil Aviation Authority. Hence the level of detail in this report is relatively brief compared to other proposals. Nevertheless, this report acknowledges that the landing and take-off area is in the interest of national defence and the museum contributes to the community by attracting visitors to the city.

4.1.2.1 Objectives

The existing provisions have been reviewed recently, but there is no overarching objective specific to this site and the existing policy does not address satisfactorily the continued and safe operation of aircraft from the site. However, the existing policy and rules are generally considered adequate.

4.1.2.2 Policies and Rules

The Proposed policies and rules in this Chapter have been drafted in response to the three key issues identified above and to implement the objective. Providing explicitly for the function and events venue is the only significant policy shift in this Chapter.

As noted above, the function and events venue provides a key asset for the City, particularly given the loss of other venues recently. Although not part of the primary purpose of the site, it does not inhibit or preclude that purpose. The proposed standards echo the consented function and events venue activity.

To support the rules, the review includes a number of definitions. The definitions are largely based on those in the existing operative district plans, and while there have been some merging, clarifying and updating, none of the amendments are considered to be significant. Some new definitions have been included or an existing one amended and in these instances, the proposed plan looks to definitions in the statutory documents listed above for direction.

4.1.3 EVALUATION OF OBJECTIVES

Section 32(1) (a) of the Act requires the Council to evaluate the extent to which the objectives are the most appropriate way to achieve the purpose (Section 5) of the Act.

4.1.3.1 Evaluation of Proposed Objective

GENERAL POLICY DIRECTION OPTIONS & RECOMMENDATIONS
<ol style="list-style-type: none"> 1. Status Quo – retain existing policy, rules and assessment matters without an objective 2. Add an objective.

Option 2 is the preferred option. It is considered most likely to remedy the three key resource management issues identified above and give effect to the relevant statutory planning documents.	
ADOPTED GENERAL POLICY DIRECTION	
The above recommendation has been confirmed through the Technical Advisory Group, Collaborative Advisory Group, legal review, and Christchurch Joint Officials Group. It is not practical to retain all the existing provisions as they are out of date particularly the lack of a dedicated objective.	
OBJECTIVE MOST APPROPRIATE WAY TO ACHIEVE THE PURPOSE OF THE ACT	
Objective	Summary of Evaluation
That RNZAF Base Wigram is safe and functional for defence purposes, recognising the historical significance of the site to Christchurch and New Zealand, and provides for a range of ancillary educational and recreational activities.	<p>The objective is considered the most appropriate way to achieve the purpose of the Act because it:</p> <ul style="list-style-type: none"> • Is more targeted towards resolving the key Resource Management Issues than the alternative option. • Is better than the identified alternative option in giving effect to the relevant sections of the Act, having particular regard for: <ul style="list-style-type: none"> • the efficient use and development of the area, as well as enabling the community to provide for their and future generations well-being • through recognising and providing for the protection of its historic heritage, and • having particular regard for the maintenance and enhancement of amenity values. • Aligns with the provisions of the Strategic Directions Decision of the Proposed Plan, in particular the objectives and supporting policies relating to recovery of the City, specifically through clearer stated outcomes and concise language as well as the promotion of community facilities supporting the rebuilding of the city. • Aligns with the purpose of the RNZAF Base Wigram.

4.1.4 EVALUATION OF PROPOSED POLICIES, RULES AND METHODS

Section 32 (1) (b) requires an evaluation of whether the provisions are the most appropriate way to achieve the objectives by identifying other reasonable practicable options, assessing the efficiency and effectiveness of the provisions in achieving the objectives, and summarising the reasons for deciding on the provisions.

The assessment must identify and assess the benefits and costs of environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions, including opportunities for economic growth and employment. The assessment must if practicable quantify the benefits and costs and assess the risk of acting or not acting if there is uncertain or insufficient information available about the subject matter.

PROVISIONS (POLICY, RULE, METHOD) MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES	
Provision(s) most appropriate	Effectiveness and Efficiency
<p>Option 2</p> <p>Policy : Development of RNZAF Base Wigram To provide for the development of the former Wigram Airfield in a manner that:</p> <ol style="list-style-type: none"> recognises the historical significance of the site as the birthplace of land based commercial and military flying in New Zealand; recognises the special value and occupation by the RNZAF and its continued use for defence and search and rescue purposes; and enables a range of educational and recreational uses. <p>Policy : adverse effects – RNZAF Base Wigram To protect the character and amenity of the areas within and adjoining RNZAF Base Wigram.</p> <p>Policy: Air safety – RNZAF Base Wigram To provide for the safe operation of aircraft using RNZAF Base Wigram.</p> <p>Permitted activities - RNZAF Base Wigram Notwithstanding those activities provided for in Designation 2.7 (Minister of Defence – 2 “SP Defence”), in the Specific Purpose (Defence Wigram) Zone the activities listed below are Permitted Activities if they comply with standards set out in this table.</p>	<p>Effectiveness Option 2 is considered more effective in achieving the objective as it will:</p> <ul style="list-style-type: none"> Give effect to the relevant objectives and policies in the listed statutory documents, particularly those relating to amenity and the provision of infrastructure. Provide for the primary purpose of the site. Recognising and providing the historical importance of the site to Christchurch Enables a broad use of the facilities that will assist in maintaining viability of the Museum. <p>Efficiency Benefits</p> <ul style="list-style-type: none"> Ensure the continued use of the site for its primary purpose. Ensure the safe and continued operation of military and search and rescue aircraft through approach slopes. Enable the provision of recreational and educational activities, including the function centre, which makes efficient use of the infrastructure. Consenting requirements are minimised. <p>Costs</p> <ul style="list-style-type: none"> Additional activity may cause a reduction in amenity for adjoining residential owners as more ancillary activities occur on the site. Opportunity costs of retaining the facility as opposed to development for higher order uses. Restriction on night time hours could inhibit greater use of the building for functions. <p>Benefits are considered to outweigh costs and are greater than for Option 1.</p>
Options less or not as appropriate to achieve the Objectives and policies:	

<p>Option 1 (Status quo – current policy and rules)</p>	<p>Appropriateness Option 1 would retain the existing policy and rules. These are not as comprehensive as the proposed policies and rules and would not enable the continued functioning of the Base to the same degree.</p>
<p>Risk of Acting or Not Acting</p>	
<p>The information available is considered sufficient to inform the review. The amendments proposed are considered necessary.</p>	

APPENDIX 4.1.5: Linkages between provisions – Specific Purpose (Wigram Airbase and Museum) Zone

Issue	Directions	Objectives	Policies	Rules	Assessment Matters
<p>3.4.1 Providing for the different needs of the community</p>	<p>3.5.2.4 The district is a good place to do business</p> <p>3.5.2.6 A well designed urban environment</p> <p>3.5.3.3 The district's culture and heritage is valued.</p> <p>3.5.3.4 People have a sense of connection to and participate in their community</p> <p>3.5.3.5 People have access to recreational opportunities.</p> <p>3.5.4.4 Efficient and sustainable use of resources</p>	<p>21.1.1 Objective - RNZAF Base Wigram</p>	<p>21.1.1.1 Policy : Development of RNZAF Base Wigram</p> <p>21.1.1.2 Policy : adverse effects – RNZAF Base Wigram</p>	<p>Rules 21.1.2.1 - 4</p>	<p>21.1.2.5</p>
<p>3.4.3 Improving the quality of the urban environment</p>	<p>3.5.2.6 A well designed urban environment</p> <p>3.5.3.3 The district's culture and heritage is valued.</p> <p>3.5.3.4 People have a sense of connection to and</p>	<p>21.1.1 Objective - RNZAF Base Wigram</p>	<p>21.1.1.2 Policy : adverse effects – RNZAF Base Wigram</p>	<p>Rule 21.1.2.1 - 4</p>	<p>21.1.2.5</p>

Issue	Directions	Objectives	Policies	Rules	Assessment Matters
	<p><i>participate in their community</i></p> <p><i>3.5.3.5 People have access to recreational opportunities.</i></p> <p><i>3.5.4.4 Efficient and sustainable use of resources</i></p>				
<p>3.4.4 Protecting our resources, values, health and wellbeing</p>	<p><i>3.5.2.6 A well designed urban environment</i></p> <p><i>3.5.3.3 The district's culture and heritage is valued.</i></p> <p><i>3.5.3.4 People have a sense of connection to and participate in their community</i></p> <p><i>3.5.3.5 People have access to recreational opportunities.</i></p> <p><i>3.5.4.4 Efficient and sustainable use of resources</i></p>	<p><i>21.1.1 Objective - RNZAF Base Wigram</i></p>	<p><i>21.1.1.1 Policy : Development of RNZAF Base Wigram</i></p> <p><i>21.1.1.2 Policy : adverse effects – RNZAF Base Wigram</i></p> <p><i>21.1.1.3 Policy: Air safety – RNZAF Base Wigram</i></p>	<p><i>Rule 21.1.2.1 - 4</i></p>	<p><i>21.1.2.5</i></p>

4.2 Specific Purpose (Cemetery) Zone

4.2.1 RESOURCE MANAGEMENT ISSUES

RESOURCE MANAGEMENT ISSUE 4.2.1.1 – Provision of sufficient land for cemeteries

1. The provision of sufficient land for cemetery purposes is a principal resource management issue.
2. Several cemeteries in Christchurch have been functioning as a dedicated place for burials for decades; a few for over 100 years. With a growing diversity and aging population, and the demand for burial sites, there is a need to provide sufficient land for cemetery purposes to meet the community's needs.

RESOURCE MANAGEMENT ISSUE 4.2.1.2 – Recognition of natural and cultural heritage

1. Cemeteries are associated with all aspects of cultural and significant spiritual human activity. They provide a multitude of stories: of long happy and productive lives; of extreme tragedy; of generations of families connected with one area; and of religious, social and cultural practices. They are part of the urban fabric but are not always treated with respect and are regularly the target of mindless vandalism.
2. Cemeteries provide a kind of 'outdoor museum' of historical information, grave styles and materials, and cemetery vegetation planting. It also serves immediate neighbourhood by providing open space and sometimes thoroughfares. The historical, natural, cultural and aesthetic values of cemeteries are high, yet vandalism and the ravages of time have taken their toll on many of the graves.
3. There is a need, where appropriate, to recognise, protect, enhance and/or conserve the natural and cultural heritage of cemeteries.

RESOURCE MANAGEMENT ISSUE 4.2.1.3 – Recognition of a cemetery's multi-purpose function

1. Cemeteries have important open space values. It is important to maintain and enhance the open space and cultural values associated with cemeteries. Well-maintained cemeteries may serve as peaceful areas of open space for the community.
2. Certain passive activities such as walking, picnics and quiet enjoyment of the outdoors may be appropriate in such cemeteries.

4.2.2 SCALE AND SIGNIFICANCE EVALUATION

1. The level of detail undertaken for the evaluation of the proposed District Plan provisions has been determined by an assessment of the scale and significance of the implementation of the proposed District Plan provisions. The scale and significance assessment considers the

environmental, economic, social and cultural effects of the provisions. In making this assessment regard has been had as to whether the provision;

- a. is of regional or city-wide significance and whether the provisions are predetermined by a higher order document;
 - b. is important to resolve an issue or problem particularly to protect life and property;
 - c. has effects on resources that are considered to be a matter of national importance in terms of Section 6 of the Act;
 - d. adversely affects those with particular interests including Maori (consideration needs to be given as to whether there is certainty of effects based on the availability of information to assess benefits and costs);
 - e. limits options for future generations to remedy effects;
 - f. includes regulations or other interventions that will impose significant costs on individuals or communities; and
 - g. will directly assist in the City's recovery.
2. The level of evaluation able to be undertaken through this Section 32 has been significantly influenced by the truncated process and timeframe for the District Plan Review. The Section 32 evaluation will continue to be updated through the consultation process and in particular in response to recommendation from the Minister for the Canterbury Earthquake Recovery and submissions from the community and stakeholders.
 3. The issues covered in this Chapter are generally significant, both in terms of scale and timing. This is particularly so following the earthquakes, although it is also important to ensure that the long term attractiveness, vitality and sustainability of the district are not compromised.

4.2.2.1 Objectives

1. The objectives contained within the Specific Purpose (Cemetery) Zone give effect to the provisions relating to Chapter 6 Recovery and Rebuilding of Greater Christchurch, Chapter 12 Landscapes, Chapter 13 Historic Heritage, and Chapter 17 Contaminated Land, and emanate from the proposed Strategic Directions Chapter. Those Strategic Directions having particular relevance to the Specific Purpose (Cemetery) Zone are listed in Appendix 4.2.6. The scale and significance of the Strategic Directions objectives and policies has already been assessed under the Section 32 Report for the Strategic Directions Chapter.
2. The proposed Specific Purpose (Cemetery) Zone contains three objectives, all of which consolidates and/or provides more detail of the Strategic Directions objectives or policies. For this reason the evaluation of the Specific Purpose (Cemetery) Zone objectives rely to a certain extent on the Section 32 evaluation undertaken on higher order documents both past and present.

4.2.2.2 Policies and Rules

1. The evaluation of the policies and rules has focused on those provisions that will result in a substantial change to the development and management of cemeteries.

2. The policies and rules have been evaluated as a package as they together address the issue of the development and management of cemeteries.
3. The policies propose actions to achieve the objective by ensuring people, property and the environment are not adversely affected by the development and management of cemeteries.

4.2.3 EVALUATION OF OBJECTIVES

1. The objectives contained within the Specific Purpose (Cemetery) Zone give effect to the provisions relating to Chapter 6 Recovery and Rebuilding of Greater Christchurch, Chapter 12 Landscapes, Chapter 13 Historic Heritage, and Chapter 17 Contaminated Land, and emanate from the proposed Strategic Directions Chapter. Those Strategic Directions having particular relevance to the Specific Purpose (Cemetery) Zone are listed in Appendix 4.2.6. The scale and significance of the Strategic Directions objectives and policies has already been assessed under the Section 32 Report for the Strategic Directions Chapter.
2. The proposed Specific Purpose (Cemetery) Zone contains three objectives, all of which consolidates and/or provides more detail of the Strategic Directions objectives or policies. For this reason the evaluation of the Specific Purpose (Cemetery) Zone objectives rely to a certain extent on the Section 32 evaluation undertaken on higher order documents both past and present.
3. Section 32(1)(a) of the Act requires the Council to evaluate the extent to which the objectives are the most appropriate way to achieve the purpose (Section 5) of the Act.

OBJECTIVE MOST APPROPRIATE WAY TO ACHIEVE THE PURPOSE OF THE ACT	
Objective	Summary of Evaluation
<p>21.2.1.1 Objective – Cemeteries and crematoria</p> <p>a. Cemeteries and crematoria are provided in the Specific Purpose (Cemetery) Zone to enable cremation and interment services to meet the community’s needs.</p>	<p>The operational cemeteries in Christchurch are estimated to reach their capacity for burials in approximately 10 years’ time. This objective provides certainty for the availability of suitable land for cemetery purposes. This objective also recognises the needs of the community to meet their cultural and spiritual requirements regarding departure of loved ones. It meets the requirements of Section 5(2) and 31(1)(a) of the Act and key policies of the CRPS.</p>

<p>21.2.1.2 Objective - Natural and cultural heritage</p> <p>a. The cultural heritage, ecological, landscape, spiritual and religious values of cemeteries and crematoria are, where appropriate, recognised, protected, enhanced and/or conserved.</p>	<p>This objective seeks to protect and enhance, where appropriate, the natural, cultural, heritage, landscape and spiritual values by the integrated management of these areas as reserves and open spaces. It further recognises heritage cemeteries and the values associated with them. This objective also seeks to protect Māori values and traditions to their ancestral land, water, sites, wāhi tapu, fauna and flora, and other taonga. It meets the requirements of Section 5(2) and 31(1)(a) of the Act and key policies of the CRPS.</p>
<p>21.2.1.3 Objective – Passive cemetery activities</p> <p>a. Cemeteries and crematoria are developed and managed to provide for passive cemetery activities in the City.</p>	<p>This objective is appropriate because it seeks to promote the on-going integrated development and management of cemeteries and crematoria as public open space. It also seeks to promote and ensure safe public access in cemeteries and crematoria. It meets the requirements of Section 5(2) and 31(1)(a) of the Act and key policies of the CRPS.</p>
CONCLUSION	
<p>These objectives give effect to the CRPS. The CRPS is deemed to achieve the purpose of the Act and the District Plan must give effect to the CRPS.</p> <p>Consideration was given as to whether alternative objectives would more appropriately achieve the purpose of the Act, taking into account circumstances of the district.</p> <p>There is no other known alternative objective that would satisfy Councils statutory obligations under the Act.</p> <p>These objectives address issues 4.2.1.1 – 4.2.1.3 above.</p> <p>The Council therefore considers that the adopted objectives are the most appropriate way to achieve the purpose of the Act and addresses the storage, use, disposal and transport of hazardous substances.</p>	

4.2.4 EVALUATION OF PROPOSED POLICIES, RULES AND METHODS

1. Section 32(1)(b) requires an evaluation of whether the provisions are the most appropriate way to achieve the objectives by identifying other reasonably practicable options, assessing the efficiency and effectiveness of the provisions in achieving the objectives, and summarising the reasons for deciding on the provisions.
2. The assessment must identify and assess the benefits and costs of environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions, including opportunities for economic growth and employment. The assessment must, if practicable, quantify the benefits and costs and assess the risk of acting or not acting if there is uncertain or insufficient information available about the subject matter.
3. The policies and rules have been evaluated as a package as they together address the issue of the development and management of cemeteries.

4.2.5.1 PROVISIONS (POLICY, RULE, METHOD) MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES

21.2.1.1 Objective– Cemeteries and crematoria

- a. Cemeteries and crematoria are provided in the Specific Purpose (Cemetery) Zone to enable cremation and interment services to meet the community’s needs.

21.2.1.2 Objective - Natural and cultural heritage

- a. The cultural heritage, ecological, landscape, spiritual and religious values of cemeteries and crematoria are, where appropriate, recognised, protected, enhanced and/or conserved.

21.2.1.3 Objective – Passive cemetery activities

- a. Cemeteries and crematoria are developed and managed to provide for passive cemetery activities in the City.

Provisions most appropriate	Effectiveness and Efficiency
<p>Option 2: Create a new Specific Purpose (Cemetery) Zone</p> <p>1. Policies:</p> <p>21.2.1.1.1 Policy – Provision of cremation and interment services</p> <ul style="list-style-type: none"> a. The provision of cremation in a crematorium, interment and disinterment services, and its associated activities, shall ensure that risks and actual or potential adverse effects to people, property and the natural environment are minimised. <p>21.2.1.2.1 Policy – Natural and cultural heritage</p> <ul style="list-style-type: none"> a. The protection, enhancement and/or conservation of the cultural heritage, ecological, landscape, spiritual and religious values of cemeteries and crematoria shall be, where appropriate, recognised, promoted and/or conserved in the development, operation and management of cemeteries. <p>21.2.1.3.1 Policy - Compatibility</p> <ul style="list-style-type: none"> a. The location, design, bulk and scale of buildings shall be compatible with the size and purpose of the activity. b. Any passive cemetery activities and its associated structures are secondary to the primary purpose of interment. 	<p>Benefits</p> <ul style="list-style-type: none"> a. These proposed policies and methods will: <ul style="list-style-type: none"> i. promote the unique character of each cemetery. ii. guide, influence and advocate the use, development and management of cemeteries and crematoria as public open space. iii. recognise the cultural and spiritual values in relation to burials, cremation, cemeteries and the sites of significance to Ngāi Tahu. iv. promote the protection and enhancement of the cultural and historic features of cemeteries. v. ensure provision of land suitable for burial and ash interments for future generations. vi. promote and ensure safe public access in all cemeteries. vii. ensure the right of residents to be interred in any of the operational cemeteries within the Christchurch District. viii. encourage the use of some cemeteries for passive cemetery activities. ix. reduce the risk to the community and natural environment caused by poor design and management of cemeteries and crematoria. b. The new definitions will contribute to the provisions in the District Plan being consistent with the RMA and current related legislation. <p>Costs</p>

<p>2. Methods (Other than rules):</p> <p>The objectives and policies will be implemented through the following methods:</p> <p>a. Definitions, in particular:</p> <ul style="list-style-type: none"> i. Cemetery ii. Comprehensive consent iii. Crematorium/Crematoria iv. Interment v. Monument vi. Passive cemetery activities vii. Plot <p>b. District Plan</p> <ul style="list-style-type: none"> i. Appropriate zoning ii. Application of appropriate resource consent conditions. iii. Monitoring of compliance with rules and resource consent conditions. <p>c. Other Methods</p> <ul style="list-style-type: none"> i. Legislation, regulations and bylaws 	<p>a. These proposed policies and methods will require management and operational requirements that prevent and/or minimise adverse effects which could or may result in additional costs to cemeteries or crematoria.</p> <p>Efficiency and Effectiveness</p> <p>a. Overall the proposed policies and methods will:</p> <ul style="list-style-type: none"> i. ensure that new cemeteries are located with sufficient separation distances from other land use activities that may be adversely affected. ii. provide sufficient detail of how people and the environment are to be protected from the operations of cemeteries and crematoria. <p>b. The benefits of the policies and method are considered to outweigh the costs and will be most appropriate to achieve Objective 21.2.1.1, Objective 21.1.1.2 and Objective 21.2.1.3.</p>
<p>3. Rules:</p> <p>a) 21.2.2.1 General Provisions</p> <p>a. The following rules apply to activities that involve the use of cemeteries and crematoria listed in 21.2.45 Appendices and shown on the Planning Maps.</p> <p>b. Cemeteries are included in the Ministry for the Environment’s Hazardous Activities and Industries List (HAIL). As such, certain activities within the Specific Purpose (Cemetery) Zone may require consent from the Canterbury Regional Council under the requirements of the Resource Management (National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011.</p> <p>c. For existing and future cemeteries, where extensive works are expected to trigger consents from the Resource Management (National Environmental Standards for Assessing and Managing Contaminants in</p>	<p>Benefits</p> <p>a. The general provisions rule recognises the NES, Regional Plans and other chapters in the Proposed Replacement District Plan that may have rules for activities in cemeteries.</p> <p>b. The permitted activity rules will provide certainty that specific cemetery activities can occur without the need for resource consent and associated cost, provided they are designed, managed and operated in an appropriate manner to prevent adverse effects on people, property and the natural environment.</p> <p>c. Permitted activities P2, P4, P5 (E-G) and P6 will protect the unique character and heritage value of each cemetery.</p> <p>d. The rules introduce a set of standards which are clear and easy to implement. Activities that comply with these standards are provided for as permitted depending on whether they are within closed cemeteries or listed as a Heritage Place. Only activities that do not meet the given standards are treated as restricted discretionary</p>

<p>Soil to Protect Human Health) Regulations 2011, Canterbury Regional Council or Christchurch City Council, a comprehensive consent process shall be undertaken.</p> <p>d. Attention is drawn to the following chapters where relevant rules may apply in addition to the rules in this chapter. If the relevant provisions of the following chapters are not met then resource consent will be required in respect of that matter:</p> <ul style="list-style-type: none"> 4 Papakainga 5 Natural Hazards 6 General Rules and Procedures 7 Transport 8 Subdivision, Development and Earthworks 9 Natural and Cultural Heritage 11 Utilities, Energy and Infrastructure 12 Hazardous Substances and Contaminated Land 14 Residential 17 Rural 18 Public Open Space, Conservation and Recreation <p>b) Rule 21.2.2.2.1 Permitted Activities</p> <p>The activities listed below are Permitted Activities, where not listed as a restricted discretionary activity in Rule 21.2.2.2.2.</p> <ul style="list-style-type: none"> i. P1 Cremation, burial or interments, disinterment and burial plots ii. P2 Installation, repair and maintenance, and/or removal of monuments, vaults, or mausolea, except in closed cemeteries listed in Appendix 21.2.4.2. This rule does not apply to Addington Cemetery and Rutherford (Woolston) Cemetery, as permitted under RMA92028348. iii. P3 Installation of temporary markers iv. P4 Any single building, except for 	<p>activities. For most activities this is a cost-effective way of managing effects.</p> <ul style="list-style-type: none"> e. If a consent process is triggered the extent of assessment is targeted to the actual or potential effects on the people, property, natural environment, and the unique character of the relevant cemetery. f. Appropriate setbacks for building, concrete beams and burial plots from adjoining properties and Transport Zone will prevent any actual and potential adverse effects on the environment. <p>Costs</p> <ul style="list-style-type: none"> a. Potential costs for engaging experts to conduct a Detailed Site Investigation (DSI) as part of the comprehensive consent process. b. Potential additional costs of using measures to protect Council-managed stormwater systems close to cemeteries. <p>Efficiency and Effectiveness</p> <ul style="list-style-type: none"> a. The requirement to undertake a comprehensive consent process will avoid cemeteries applying for resource consents each time an activity to be undertaken would trigger consents from either the NES, Regional Plans or the City Plan. b. The plan seeks to enable activities subject to compliance with Activity Specific Standards. Use of Activity Specific Standards is considered the most efficient and effective mechanism. c. The Council has identified a list of matters over which it will restrict its exercise of discretion. These matters incorporate all the potential adverse effects on the environment that relate to activities within a cemetery. The effectiveness and efficiency of restricted discretionary activities will be enhanced by assessment matters that relate to relevant issues. Together these are considered an effective and efficient means of achieving the objectives for this section.
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cemeteries and crematoria listed in Appendix 9.4 Schedule of Significant Historic Heritage Places.

- v. **P5** General maintenance, including:
 - a. top dressing of graves;
 - b. mowing, fertilising, aeration etc of lawn areas;
 - c. all procedures to cover informal shrub planting to amenity planting of existing planting areas;
 - d. pruning of trees;
 - e. removal of planting areas (including native and exotic species), except for cemeteries listed in Appendix 9.4 Schedule of Significant Historic Heritage Places;
 - f. removal of plants on graves (including native and exotic species); and
 - g. removal of trees, except for those listed in Appendix 9.6 Schedule of Significant Trees or in cemeteries listed in Appendix 9.4 Schedule of Significant Historic Heritage Places.
- vi. **P6** Planting of new (native or exotic) trees and shrubs, ~~and~~ or the establishment of new lawn areas, except for cemeteries listed in Appendix 9.4 Schedule of Significant Historic Heritage Places
- vii. **P7** Graveyard services

c) Rule 21.2.2.2 Restricted Discretionary

- a. **RD1** Any activity listed in Rule 21.2.2.2.1 that does not meet one or more of the Built Form Standards in Rule 21.2.2.3
- b. **RD2** Any work on monuments, vaults or mausolea in the Akaroa French Cemetery and Mount Magdala Cemetery listed in Appendix 21.2.4.2

d) Rule 21.2.2.2.3 Non-complying activities

- a. **NC1** Any activity not provided as a permitted or restricted discretionary activity.

e) Rule 21.2.2.3 Built Form Standards

Standard	Parameter
1. Maximum height of any building	<ul style="list-style-type: none"> a. 8m b. 5m (closed cemeteries)
2. Minimum building setback	<ul style="list-style-type: none"> a. 5m from a road boundary b. 20m from the boundary with any zone other than a Transport Zone
3. Minimum setback for concrete beams and burial plots from internal boundaries	<ul style="list-style-type: none"> a. 10m
4. Daylight recession planes	<ul style="list-style-type: none"> a. Buildings shall not project beyond a building envelope constructed by recession planes, as shown in Appendix 14.10.2, from points 2.3 metres above internal boundaries adjoining a residential zone. <p>Note:</p> <ul style="list-style-type: none"> 1. There is no recession plane requirement for the

	<p>Specific Purpose (Cemetery) Zone unless it adjoins a Residential Zone.</p> <p>2. The level of site boundaries shall be measured from filled ground level except where the site on the other side of the internal boundary is at a lower level, then that lower level shall be adopted.</p>	
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Options less or not as appropriate to achieve the Objectives and policies:

Option 1: Status Quo - retain existing Christchurch City and Banks Peninsula District Plan provisions

Rely on current provisions of the Christchurch City and Banks Peninsula District Plans

Appropriateness

a. The current approach under the operative District Plan is effects-based. An effects-based plan can sometimes be less certain on the types of activities that are appropriate. This can lead to more consents required and certainly more time spent assessing compliance with the District Plan. The current different zoning of cemeteries will theoretically provide sufficient suitable land for cemetery purposes. The current approach does include protection for closed cemeteries and heritage-listed cemeteries. There is however a need to provide a consistent approach for all kinds of cemeteries within the District, including crematoria which have memorial gardens for ash interment purposes. This will consolidate provisions for all cemeteries, excluding privately-owned church graveyards and urupā. This option is therefore a less efficient approach.

Risk of Acting or Not Acting

The Response Planning 2011 Reports (refer to section 3.2 of this report) that evaluated the effectiveness and efficiency of the Christchurch City Plan and Banks Peninsula District Plan provide an adequate level of assessment of the existing provisions and where improvements should be considered. Further research and studies, as part of the development of the Cemeteries Master Plan and conservation plans, have been undertaken to provide direction for the development and management of the cemeteries owned, managed or maintained by the Council for the next 50 years. On this basis, it is considered that sufficient information exists about the proposed provisions without the need to take account of the risk of acting or not acting (s32(4)(b) of the Act).

APPENDIX 4.2.5: Linkages between provisions – Specific Purpose (Cemeteries) Zone

Issue	Directions	Objectives	Policies	Rules	Assessment Matters
<p><i>Strategic Directions Chapter</i></p> <p>3.4.1 Providing for the different needs of the community</p> <p>3.4.4 Protecting our resources, values, health and well-being</p>	<p>3.5.1 Recognising manawhenua interests</p> <p>3.5.3 Enhancing the health and well-being of communities</p> <p>3.5.3.3 The district's culture and heritage is valued</p> <p>3.5.3.4 People have a sense of connection to and participate in their community</p> <p>3.5.3.5 People have access to recreational opportunities</p>	<p>3.6.2 Development form and function</p> <p>3.6.3 Manawhenua</p> <p>3.6.4 Natural and cultural environment</p> <p>3.6.6 Amenity, health and safety</p>	<p>3.6.3.2 Protection of cultural heritage of significance to Ngāi Tahu</p> <p>3.6.3.3 Access to sites of significance</p>		
<p><i>Specific Purpose (Cemetery) Zone</i></p>		<p>21.2.1.1 Cemeteries and crematoria</p>	<p>21.2.1.1.1 Provision of cremation and interment services</p>	<p>21.2.2.1 General Provisions</p>	<p>21.2.2.4 Matters of Discretion</p>

Issue	Directions	Objectives	Policies	Rules	Assessment Matters
Resource Management Issue 2.4.1 Provision of sufficient land for cemeteries		21.2.1.2 Natural and cultural heritage	21.2.1.2.1 Natural and cultural heritage	21.2.2.2.1 Permitted Activities	
Resource Management Issue 2.4.2 Recognition of natural and cultural heritage		21.2.1.3 Passive cemetery activities	21.2.1.3.1 Compatibility	21.2.2.2.2 Restricted Discretionary	
Resource Management Issue 2.4.3 Recognition of a cemetery's multi-purpose function		21.2.2.2.3 Non-complying Activities	21.2.2.3 Built Form Standards		

4.3 Specific Purpose (Airport) Zone

This section will be inserted when Plan Change 84 - Special Purpose (Airport) Zone is resolved. This Plan change has been appealed.



4.4 Specific Purpose (Styx Mill Road Transfer Station) Zone

4.4.1 RESOURCE MANAGEMENT ISSUES

4.4.1.1 Issue 1: Disposal of household waste and resource recovery

RESOURCE MANAGEMENT ISSUE 1 – Disposal of household waste and resource recovery

The disposal of household waste needs to be conveniently located, safe and provide for an opportunity to recover some of the waste for recycling. Transfer stations have always played that role being conveniently located within neighbourhoods to take in waste from the general public at their convenience and also provide recovery services for recycling material. Styx Mill Road is one of three transfer stations in Christchurch City and is strategically located north of the city with a large catchment which is expected to grow as the new greenfields are being developed. While transfer stations provides a vital role to community, the nature of their business is such that nuisance in various forms can be a problem if not managed well. Therefore the provisions of the zone need to provide for mechanisms to mitigate against potential adverse effects of managing rubbish. The standards are primarily tailored around on-site management to ensure that adverse effects are minimised.

4.4.2 SCALE AND SIGNIFICANCE EVALUATION

1. The level of detail undertaken for the evaluation of the proposed District Plan provisions has been determined by an assessment of the scale and significance of the implementation of the proposed District Plan provisions. The scale and significance assessment considers the environmental, economic, social and cultural effects of the provisions. In making this assessment regard has been had to the following, namely whether the provisions;
 - a. be of regional or city wide significance
 - b. impede the City's recovery;
 - c. adversely affect people's health and safety ;
 - d. result in a significant change to the character and amenity of local communities.;
 - e. have effects on resources that are considered to be a matter of national importance in terms of Section 6 of the Act;
 - f. adversely affect those with particular interests including Maori (consideration needs to be given to whether there is certainty of effects based on the availability of information to assess benefits and costs);
 - g. limit options for future generations to remedy effects; and
 - h. whether the effects have been considered implicitly or explicitly by higher order documents;

4.4.2.1 Objectives

1. The objectives contained within this section of the Special Purpose Chapter give effect to the provisions relating to solid waste management contained within the Canterbury Regional Policy Statement and emanate from the proposed Strategic Directions Chapter. Those Strategic Directions having particular relevance to the Special Purpose Chapter are listed in Appendix 1. The scale and significance of the Strategic Directions objectives and policies has already been assessed under the Section 32 Report for the Strategic Directions Chapter.
2. The proposed Special Purpose Chapter contains several objectives all of which consolidates and/or provides more detail of the Strategic Directions objectives or policies. For this reason the evaluation of the Special Purpose Chapter objectives relies to a certain extent on the Section 32 evaluation undertaken on higher order documents both past and present.
3. Solid waste management does have city wide significance and as such a more detailed evaluation of this objective has been undertaken.

4.4.2.2 Policies and Rules

1. The rules for the Transfer Station relate primarily to onsite management and have been imposed to ensure that adverse effects are minimised mainly in terms of the amenities of the adjoining residents. Since the operative District Plan provisions are serving the purpose well, it is proposed to roll over the provisions without change. Activity categories have been limited to Permitted and Discretionary Activities.

4.4.3 EVALUATION OF OBJECTIVES

- a. Section 32(1)(a) of the Act requires the Council to evaluate the extent to which the objectives are the most appropriate way to achieve the purpose (Section 5) of the Act.

4.4.3.1 Evaluation of Proposed Objective 1

GENERAL POLICY DIRECTION OPTIONS & RECOMMENDATIONS

The Transfer Station offers a convenient, economic and safe way for the disposal of household waste within the neighbourhood. The station is strategically located within reach of residential neighbourhoods for ease access by residents. It also offers an opportunity for resource recovery through recycling.

The closure of the Transfer Station will mean that residents of the northern suburbs will have to drive long distances to Bromley or Parkhouse Road to dispose of small quantities of household rubbish. This is considered to be uneconomic and creates unnecessary traffic volumes across the city. A significant amount of land has been identified as future urban areas within the radius of this transfer station and these future residents will need somewhere convenient to dispose of their household waste.

ADOPTED GENERAL POLICY DIRECTION

The existing arrangements and provisions were reviewed and found to be serving the community very well and therefore no need to change. It is proposed that the provisions of the transfer station will roll over and maintain the current level of service under the existing consent conditions.

OBJECTIVE MOST APPROPRIATE WAY TO ACHIEVE THE PURPOSE OF THE ACT	
Objective	Summary of Evaluation
<p>OBJECTIVE 2. A safe, convenient and economic way to dispose of household waste is recognised and provided for.</p>	<p>1. Relationship to Resource Management Issue</p> <ul style="list-style-type: none"> a. Styx Mill Road Transfer Station is one of three transfer stations located strategically on the northern side of the City. The station serves a large community but over time residential development established within the boundaries of the station. As a result reverse sensitive is bound to occur mainly through nuisance due to nature of the operation of a transfer station. The resource consent was issued and a strict consent conditions imposed to address nuisance. b. The use of transfer stations is common practice throughout the city and the continued use of this transferred station has been recognised and provided for in the objectives of the RPS and the strategic Directions. c. The continued use of this transfer station is considered to be the most practical and efficient way to dispose of household waste for onward transmission to the landfill. There is no any other viable alternative to this option.

4.4.4 EVALUATION OF PROPOSED POLICIES, RULES AND METHODS

- a. Section 32 (1)(b) requires an evaluation of whether the provisions are the most appropriate way to achieve the objectives by identifying other reasonable practicable options, assessing the efficiency and effectiveness of the provisions in achieving the objectives, and summarising the reasons for deciding on the provisions.
- b. The assessment must identify and assess the benefits and costs of environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions, including opportunities for economic growth and employment. The assessment must if practicable quantify the benefits and costs and assess the risk of acting or not acting if there is uncertain or insufficient information available about the subject matter.

- c. The standards of operation of the Transfer Station are designed to control nuisance through management of operations. The suite of standards is considered adequate to control any potential adverse effects on the operations of the landfill and the transfer station.



APPENDIX 4.4.5: Linkages between provisions - Styx Mill Road Transfer Station Zone

Issue	Directions	Objectives	Policies
<p><i>Strategic Direction</i> <i>There are no specific directions on waste management other than waste minimization</i></p>	<p>3.4.4.5 Health and safety of people and the environment</p>	<p><i>3.6.1 Recovery and long-term future of the district</i></p>	<p>3.6.1.5 Policy - Development design and quality</p> <p><i>Viii. Environmentally sustainable – development is designed to be energy and water efficient, minimise the use of fossil fuels, minimise waste, manage stormwater, restore biodiversity and ecosystems, safeguard mauri and maximise passive solar gain.</i></p>

4.5 Specific Purpose (Hospital) Zone

4.5.1 OVERVIEW

The Specific Purpose (Hospital) Zone applies to the existing main hospital facilities, both private and public. The purpose of the zone is to enable those hospitals to play a key role in the recovery of Christchurch from the earthquakes and, in the longer term, provide accessible high quality emergency and other healthcare facilities for the communities they serve.

The Specific Purpose (Hospital) Zone also seeks to

- Provide clarity around the intended use of the zone
- Flexibility to enable hospitals to meet the changing demands of healthcare provisions,
- Enable efficient use of hospital sites and
- Ensure adverse effects on the residential environments are avoided or mitigated.

The zone includes the following sites:

- Hillmorton
- Burwood
- Princess Margaret
- St. Georges
- Nurse Maude
- Southern Cross

It should be noted that Christchurch Hospital, Lyndhurst and the former Christchurch Women's sites are now part of the Central City Chapter and are zoned Central City Specific Purpose Hospital zone.

4.5.1.1 Research

The Council has commissioned technical advice to assist with setting the Plan framework for the proposed Hospital zone provisions. This advice includes the following:

Title	Author	Description of Report
Urban Design Modelling of Hospital Interfaces	Rough and Milne	In response to concerns about the permitted baseline under the existing rules package, an assessment was undertaken of the development outcomes which could be achieved on 5 of the larger scale hospital sites. The second part of this work assessed the difference in these outcomes when the rules package was reviewed.
Urban Design Modelling of Nurse Maude sites	CCC	A modelling exercise similar to the urban design assessment above was undertaken.

Urban Design Evaluation of the Christchurch Hospital site	Context Urban Design	Report to inform the review of provisions for this site based on an understanding of the provisions sought by the DHB.
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In addition, discussions have been ongoing with the District Health Board regarding the use of their sites currently and into the future. This has enabled an understanding of how the sites will be used and the type of built form required to ensure efficient healthcare provision into the future. This dialogue has therefore helped shape the proposed rules package.

Limited consultation has also been undertaken with private hospital providers. This is due to severe time constraints and a need to await other information which will have a bearing on the options going forward (SAMs review for instance).

4.5.2 RESOURCE MANAGEMENT ISSUES

RESOURCE MANAGEMENT ISSUE 1 - Flexibility for Providers.

Healthcare provision has evolved significantly over the last decade impacting upon both the location and form of services. These changes, combined with the opportunities raised post earthquake for matters such as co-location, expansion of rebuilt facilities or disposal of sites, means that healthcare provision across the District needs greater flexibility in terms of how sites are used in the future.

The Government has allocated over \$600m towards the funding needed for the redevelopment of Christchurch and Burwood Hospitals. This funding is more than matched by the Canterbury District Health Board, while the private sector is investing significantly in redeveloping privately funded hospitals and healthcare facilities around the city. It is critical for the recovery of the City and the health and wellbeing of the regional community that these initiatives can get underway and completed without unnecessary delays due to the resource management framework.

RESOURCE MANAGEMENT ISSUE 2 – Streamlining Regulation for key hospital sites.

At present a wide range of hospital type developments are enabled within the Specific Purpose (Hospital) Zone. The zone currently comprises 24 sites of which 10¹ could be reasonably described as accommodating larger scale hospital facilities at some point in their history (some have been partially redeveloped for housing and others have been cleared). The remainder (60% of Specific Purpose (Hospital) Zone sites) accommodate facilities targeted at the elderly; these include rest homes, hospitals, and dementia care and retirement villages. Analysis of the City as a whole² indicates that there are a significant number of aged care facilities of which the vast majority are in Living zones.

In determining which sites should be retained within the Specific Purpose (Hospital) Zone, it is necessary to draw on the main purpose of the Hospital Zone. Given that this is now focused on larger scale, extensive hospital facilities, many of the sites which have been developed as elderly persons housing/retirement village care with associated medical care, no longer fit the zone purpose. These are essentially residential activities with on site healthcare facilities as per the definition of retirement village.

It is therefore proposed that these 'elderly care' sites are rezoned residential in order to better align with the objectives and policies within both the Specific Purpose (Hospital) and Residential chapters. This will also provide a more uniform approach in terms of the many other elderly care facilities across the City, the majority of which are already zoned residential.

Appendix 4.4.6.2 provides further background relating to the issue of site selection and the optimum way forward in terms of regulation.

¹ Sunnyside, Christchurch Women's, Templeton, Princess Margaret, Burwood, Christchurch Hospital, St Georges, Southern Cross, Nurse Maude Hospice and Akaroa.

² Monitoring & Information – CDHB and ratings information, 2014

RESOURCE MANAGEMENT ISSUE 3 - Intensification of Sites

The longer term strategy for public healthcare provision across the city is to intensify use of several of the main hospital sites e.g. Burwood and Hillmorton. It has been indicated that Princess Margaret may be closed over the longer term, as and when the intensification programme on the other sites has been commenced.

Whilst the private healthcare sector has no formal strategy for future development, the current trend has been for intensification and/or expansion of existing sites e.g. St Georges and Southern Cross and it is reasonable to assume this will be longer term aim for these sites, especially in light of recent land purchases adjacent to their current sites.

All sites are located in primarily residential areas. Some benefit from closer links to centres and more accessible transport corridors but all interface with residential communities at some point on their boundaries.

It is therefore recognised that there is a need and desire (from the perspective of health care providers) to intensify the use of hospital sites in the future. Healthcare provision is an important component of social recovery and community wellbeing and there is a need to ensure that hospitals can function efficiently within their existing sites, appreciating that the ability to expand outside their current boundaries is, in many cases, constrained.

It is also recognised that healthcare provision, especially over more recent years, includes a broad remit of activities including more traditional consulting, diagnosis and care as well as research and development, education and training and ancillary activities such as retail and office. The planning framework within the District Plan therefore needs to reflect the need to provide a range of activities.

RESOURCE MANAGEMENT ISSUE 4 – Responding to Environmental Context

The rules in the current Hospital Zone are relatively permissive, especially at the boundaries with adjacent residential properties. This issue has been raised by both consent planners and in Commissioner decisions. It has been recommended that Council revisit the current rules package to better address the potential adverse effects of hospital development at sensitive boundaries.

Assuming hospital sites will need to be intensified in future (therefore accepting that an increase in built form and potentially height and scale will be sought) there is a clear need to revisit the current rules package to determine a more effective set of provisions which try and balance both objectives (intensification and improved boundary interfaces). This potentially means adding more restrictive provisions to address problems such as overlooking, dominant buildings with long blank façade but in addition seeking opportunities for enabling site intensification e.g. increasing development height in locations away from boundaries.

Given the differing circumstances of each hospital site there will need to be some consideration of the specific characteristics of each site in order to determine a revised set of provisions. Overall however a simplified rules package should be provided in order to provide both landowners and communities with more certainty about the built form outcomes enabled through the Specific Purpose (Hospital) Zone

RESOURCE MANAGEMENT ISSUE 5: Use of Surplus Hospital Land.

From time to time, as hospitals rationalise their operations, land becomes surplus to requirements. Of those sites proposed for inclusion within the Specific Purpose (Hospital) Zone, only Princess Margaret may fall into this category at the current time. Whilst no formal announcement has been made, options to close it (all or partial) are being considered.

The Princess Margaret Hospital site offers good potential for future reuse, particularly for residential purposes. An alternative zoning for the site has been identified (Residential Suburban Density Transition) but it is recognised that the site does offer potential for a more comprehensive development with an increase in densities and opportunities for limited uses over and above that provided for via the Residential Suburban Density Transition Zone.

It is however inappropriate to recognise this matter within the Hospital provisions (see Ministers comments). It should be noted that a brownfield site policy is currently being developed (Residential Phase 1 amendments through hearings) and it is anticipated that this will offer scope to maximise the opportunities offered by the Princess Margaret hospital site.

4.5.3 Scale and significance evaluation

The level of detail in the evaluation below reflects an assessment of the scale and significance of the implementation of the proposed provisions i.e. whether the provision:

- a. is of regional or city-wide significance and/or is predetermined by a higher order document;
- b. is of importance to resolve an issue or problem particularly to protect life and property;
- c. has a wide range of policy options or only variations of a theme; or
- d. the policy direction will radically change from current provisions; and/or
- e. will affect reasonable use of land; and/or
- f. adversely impact those most directly affected or those with particular interests including Maori (consideration needs to be given to whether there is certainty of effects based on the availability of information to assess benefits and costs); and
- g. will directly assist in the city's recovery.

The detail in this report reflects the following observations regarding the site and significance of these effects associated with this proposal:

- the effects of the proposal are anticipated to be overwhelmingly positive for recovery and these is assumed to be little public debate about that;
- the potential adverse effects are anticipated to be localised, with some potential for effects on the wider community if hospitals expand into residential areas;

The evaluation of the policies and rules has focused on those provisions that will result in a substantial change to the management of hospital zoned land and are of greatest importance to ensure the objectives of the Specific Purpose (Hospital) Zone are achieved. The s32 has not focused on those provisions that reduce the level of regulatory control unless reducing the level of regulatory control is likely to give rise to adverse effects on the community.

Some policies and rules have been evaluated as a package, as they together address a particular issue and seek to meet a specific objective. Some rules may implement more than one policy, for example site coverage, therefore have been referred to multiple times. Following is a summary of the policies and rules considered to be of a scale and significance to justify a more comprehensive evaluation of options. The level of evaluation able to be undertaken through this Section 32 has been influenced by the truncated process and timeframe for the DPR. The evaluation reflects site visits and consultation undertaken to date and will continue to be updated following submissions from the community and stakeholders.

4.5.4 Evaluation of proposed objectives

Broadly the objectives seek to address the following key resource management issues:

- Manage intensification of hospital sites, as opportunities for expansion outside of current site boundaries is limited and consolidation of healthcare facilities is currently being undertaken post earthquake.
- Improve flexibility of hospital sites, enabling hospital providers to respond to changes in the evolving healthcare sector and provide new facilities and quality care.
- Provide for increasing levels of residential accommodation and medical facilities for the elderly and ensure that such facilities can be developed across the City within an appropriate planning framework. This will be undertaken through the residential rather than hospital Chapter.
- Manage the effects of large scale and bulky hospital buildings on surrounding residential neighbourhoods.

Section 32(1)(a) of the Act requires the Council to evaluate the extent to which the objectives are the most appropriate way to achieve the purpose (Section 5) of the Act.

4.5.4.1 Evaluation of Proposed Objectives

GENERAL POLICY DIRECTION OPTIONS & RECOMMENDATIONS
<p>Relevant objectives:</p> <p>Strategic Directions objectives:</p> <p>3.3.1 Enabling recovery and facilitating the future enhancement of the district The expedited recovery and future enhancement of Christchurch as a dynamic, prosperous and internationally competitive city in a manner that:</p> <ol style="list-style-type: none"> a) Meets the community's immediate and longer term needs for housing, economic development, community facilities, infrastructure, transport and social and cultural well-being; and b) Fosters investment certainty c) Sustains the important qualities and values of the natural environment <p>3.3.2 Objective - Clarity of language and efficiency The District Plan, through its preparation, change, interpretation and implementation:</p> <ol style="list-style-type: none"> a) Minimises: <ol style="list-style-type: none"> i. Transaction costs and reliance on resource consent processes and ii. The number, extent and prescriptiveness of development controls and design standards in the rules, in order to encourage innovation and choice; and iii. The requirements for notification and written approval; and b) Sets objectives and policies that clearly state the outcomes intended; and c) Uses clear, concise language so that the District Plan is easy to understand and use

3.3.7 Urban Growth, form and design

A well-integrated pattern of development and infrastructure, a consolidated urban form and a high quality urban environment that:

- a) Is attractive to residents, business and visitors and
- b) Has its areas of special character and amenity value identified and their specifically recognised values appropriately managed; and
- g) Promotes the reuse and redevelopment of buildings and land
- h) Improves overall accessibility and connectivity for people, transport (including opportunities for walking, cycling and public transport) and services; and
- i) Promotes the safe, efficient and effective provision and use of infrastructure including the optimisation of the use of existing infrastructure

Option 1 (Status Quo) Existing Plan Objective

The operative City Plan has the following objective for metropolitan community facilities including hospital facilities:

Provision of community facilities which serve metropolitan needs for educational, cultural and specialised services.

This objective does not specifically recognise hospitals other than in the explanation. This objective does not reflect the dynamic nature of this sector and describes a social rather than an environmental or planning outcome

Option 2 (Proposed Objective) **ENABLING HOSPITAL DEVELOPMENT**

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

This objective incorporates several elements including:

- a. Acknowledgment that public and private providers are the main players in the process of healthcare recovery and that hospital facilities have a need to develop and change;
- b. The need for hospital providers to have as much flexibility as possible in the use and development of their land and buildings, in order to respond to the current and future circumstances in Christchurch;
- c. Balancing these requirements with a continuing expectation of mitigation of any adverse effects on adjoining land uses such as visual dominance, loss of privacy, development which is noticeably out of scale with the surrounding area, parking issues etc.

ADOPTED GENERAL DIRECTION

While it is clearly possible to debate the wording of Option 2, it is considered that it is better than Option 1 (status quo) in responding to changing circumstances in the health sector in Christchurch.

OBJECTIVE MOST APPROPRIATE WAY TO ACHIEVE THE PURPOSE OF THE ACT

Objective

Summary of Evaluation

<p>Objective 21.5.1.1 – Enabling Hospital Development</p> <p>The evolving healthcare needs of Christchurch and the wider region are supported by efficient development of hospital sites while recognising the character and amenity values of the surrounding environment.</p>	<p>Relation to Resource Management Issue</p> <p>The proposed objective addresses the resource management issues identified above, specifically - flexibility for providers, increasing community use of education sites, and maintaining the amenity of neighbours.</p> <p>The objective also reflects the purpose of the Act in enabling people and communities to provide for their social, economic, and cultural well-being, while avoiding remedying or mitigating any adverse effects of activities on the environment.</p> <p>As a result of the circumstances in the health sector resulting from the Canterbury earthquakes and Government policy, it makes sense to adopt as flexible an approach as possible to planning provisions for hospital facilities.</p> <p>This is consistent with the Statement of Expectations in the Order in Council for the preparation of the replacement District Plan i.e. that a reduction in the number of resource consent processes should be sought in comparison with existing District Plans.</p> <p>Overall it is considered that the objective is the most appropriate way to achieve the purpose of the Act with regard to hospital provision in Christchurch.</p>
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4.5.5 Evaluation of proposed provisions (policies, rules and other methods)

The policies will be implemented through:

- a. Zoning of land – the Specific Purpose Hospital Zone will provide for larger scale, more extensive hospital development. In this proposed Replacement District Plan, the number of sites zoned as Specific Purpose (Hospital) has been reduced and sites which accommodated elderly care facilities with associated health facilities have been rezoned as residential. Overall, any hospital sites in which residential activities were the main activity (rather than healthcare) have been taken out of the Hospital zone. This provides more clarity about the type of development envisaged in the hospital zone and the built form anticipated within the zone.
- b. Wide ranging permitted activities enabled within hospital zones (such as healthcare facilities, ancillary retail and office)
- c. A package of built form and activity standards to ensure that hospital development is suitable to the context and character of the surrounding environment, contributes to the amenity of adjoining areas e. residential properties or streets, and achieves a good level of amenity for users.

Policies/ Rules/Method(s) Most Appropriate	Effectiveness and Efficiency
<p>21.5.1.1.1 Intensification Encourage more intensified and contained use of hospital sites in preference to expansion outside of existing boundaries.</p> <p>Built form provisions relating to height and setbacks in: 21.5.2.3.1.1 - Suburban sites 21.5.2.3.1.2 - Suburban service sites 21.5.2.3.1.3 & 4 Inner Urban sites</p> <p>Notification requirements as per RD 1-7</p>	<p>Effectiveness Increases in building height are an effective means of increasing development potential and improving the functionality of hospital facilities. It also provides an opportunity to increase building setbacks from streets and neighbours thereby improving the interface between the hospital zone and adjoining sites.. It is anticipated that the development potential lost through increased setbacks is compensated for via the height increases.</p> <p>Stepping up the height allowable at varying distances from boundaries (this is dependent on the type of site ie. an inner urban site may go higher close to the boundary as compared to a suburban site) is a way in which a balance can be struck between the needs of hospitals for large buildings and the need for surrounding residents not to be to “overwhelmed” by their proximity to these buildings. The heights and distance chosen should allow for an extra storey on their hospital sites without significant effect on neighbours.</p>

	<p>Greater road boundary and internal boundary setbacks than for residential uses are considered justifiable because the hospital buildings can be of considerable height and building length compared to their surrounding environments. Setbacks from the road provide a significant opportunity for establishment of identity and landscaping features.</p> <p>Efficiency More flexibility in built form rules should mean fewer consents are required. In addition there are reduced notification requirements for non-compliances. Only breaches of setback rules and proposals for multi-level car parking buildings or access within 15m of a residential boundary for inner urban sites can be notified. This will assist the timeframes and efficiency of anticipated consenting processes.</p> <p>There is also consistency as regards the level of amenity that neighbours of hospital buildings can expect along their boundaries. The size of hospital sites means that higher buildings are possible nearer the centre of hospital sites.</p> <p>Benefits</p> <ul style="list-style-type: none"> • More flexibility in built form rules and the scale of buildings permissible away from site boundaries. • Greater efficiencies in land use and functionality. • <p>Costs There are opportunity costs arising from the greater setback.</p>
Rule/method options less or not as appropriate to achieve the Objectives and Policies:	
<p>1. Option 1 (Status quo) Rollover existing hospital zone provisions.</p>	<p>Appropriateness This option would fail to address many of the key issues for the hospital zone i.e. the need to intensify the use of sites yet minimise the adverse effects of development along boundaries (especially with residential properties). It would neither support the overall direction of the District Plan Review in terms of simplifying the rules packages or</p>

	<p>take on board the direction through the Recovery Plan or Statement of Expectations. It is therefore inappropriate.</p>
<p>Option 2: Greater/Less Regulation eg. Less regulation could be seen as standardisation of Built Form Standards across all hospital. This could include for example</p> <p>a. Smaller road setbacks and internal boundary setbacks.</p> <p>b. More permissive recession plane rules.</p>	<p>Appropriateness</p> <p>1. Given the different characteristics of each of the hospital facilities, it is unlikely that a set of standards could be developed that would be suited to all sites and buildings. Standardisation would mean that the specific circumstances surrounding each of the hospitals would not be reflected in the rules. Where possible, hospitals with similar characteristics and a similar anticipated built form have been grouped and a single package of provisions applied. This has provided some simplification of the current provisions and provides plan users with some understanding as to the range of hospital environments and scale of buildings anticipated.</p> <p>The option presented seeks to provide the optimum balance of permissiveness (reducing consents, enabling recovery and redevelopment of healthcare facilities across the City) with a need to minimise the adverse effects on surrounding neighbours (therefore controlling overly dominant development).</p> <p>A greater level of regulation would not be enabling or efficient whereas less regulation would fail to meet the requirements to minimise adverse effects on the surrounding environment. As such both are considered an inappropriate option.</p> <p>2.</p>

Policies/ Rules/Method(s) Most Appropriate	Effectiveness and Efficiency
Policy - Comprehensive Development Policy - Comprehensive Development	Effectiveness This policy highlights that in different types of location, integration of hospital buildings

a) Ensure that hospital development is planned and designed to recognise and integrate with the local context by;				will have different outcomes. In suburban sites which are generally large, a wider setback which retains the green landscaped feel of these sites is appropriate but thereon there is much more ability for hospital providers to develop the site as they wish. In more urban areas however, especially in locations adjacent to public transport corridors, it is more appropriate to try and seek some integration of the hospital interfaces with the road corridor eg. Glazing or entrances. These matters haven't been specified in order to allow for innovation and choice but both the policy and matters of discretion reference this.
		Site Type	Site Name	
	Ensuring that the landscape setting of suburban hospital sites is retained and enhanced, particularly in regards to external boundaries	Suburban	Burwood Hillmorton Princess Margaret Lincoln Road (Hillmorton Service site)	
	Locating larger scale buildings towards the centre of sites, away from more sensitive edges.	Suburban Service		
	Encouraging pedestrian activity and higher quality amenity including planting along street frontages and in adjoining public and publicly accessible spaces.	Inner Urban	St Georges Nurse Maude Southern Cross	
	Providing visual interest and a human scale at the interface with the street, particularly at ground floor level whilst contributing to the character and coherence of the surrounding area.			
	Ensuring that the form and scale of buildings recognises the anticipated residential scale and form at hospital site boundaries of the site			
Activity status tables and built form provisions which seek to restrict the scale of permitted development in order that it is appropriate for its setting ie: RD 4 - Development within suburban site road setbacks is limited to 9m. RD 5 - Development with a continuous building length in excess of 20m RD 6 - Any development over 1000sqm GGFA given the potential impact of this scale of development on the integration of a hospital site. RD 7 - on inner urban sites, any multi-level car parking building or vehicular access within 15m of a residential boundary.				<p>Efficiency</p> <p>The provisions have a greater level of flexibility as compared with the Operative Plan provisions. There are also reduced notification requirements which will support a more efficient consenting process.</p> <p>Benefits</p> <ul style="list-style-type: none"> • More flexibility in built form rules and the scale of buildings permissible away from site boundaries. • Less complex rules • Targeted rules - focus on those matters which are key to the effective integration of hospital buildings into their surroundings (interface size). • Greater efficiencies in land use and functionality. <p>Costs</p> <p>There are still restrictions on the overall use of hospital zone land e.g setbacks. This will reduce the overall ability to develop sites to</p>

	<p>their maximum however, it is considered that these restrictions have been balanced in terms of the need to manage effects under the RMA.</p>
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Rule/method options less or not as appropriate to achieve the Objectives and Policies:

<p>2. Option 1 (Status quo) Rollover existing hospital zone provisions.</p>	<p>Appropriateness This option would fail to address many of the key issues for the hospital zone i.e. the need to intensify the use of sites yet minimise the adverse effects of development along boundaries (especially with residential properties). It would neither support the overall direction of the District Plan Review in terms of simplifying the rules packages or take on board the direction through the Recovery Plan or Statement of Expectations. It is therefore inappropriate.</p>
<p>3. Option 3 (Greater / Less Regulation in terms of the Rules Package)</p>	<p>Appropriateness The provisions outlined in the proposed chapter seek to provide the optimum balance of permissiveness (reducing consents, enabling recovery and redevelopment of healthcare facilities across the City) with a need to minimise the adverse effects on surrounding neighbours (therefore controlling overly dominant development). A greater level of regulation would not be enabling or efficient whereas less regulation would fail to meet the requirements to minimise adverse effects on the surrounding environment. The provisions as outlined in Option 2 have been developed with regular inputs from key stakeholders and an understanding of what can now be developed in the surrounding</p>

	<p>environment (Recovery Plan provisions). They therefore seek to provide the optimum balance between hospital landowners, neighbours and the surrounding community.</p>
<p>Risk of Acting or Not Acting</p>	
<p>Not acting (i.e. following the status quo) would fail to provide a more enabling planning framework for hospitals and as such would curtail recovery and longer term development of the District's hospitals. It would fail to provide an up to date review of the Hospital Zone and therefore would be based on a historic premise with no accounting of current development trends (e.g. the projected increase of long term elderly care with on site medical facilities).</p> <p>Acting (i.e. amending the provisions) will enable a greater scale of development although this will still be controlled in targeted areas e.g. on the most sensitive boundaries. To some observers, the permitted development may be considered overly large (it is an increase on what is already permitted) however, there has been a need to recognise the anticipated change in the surrounding City environment (as enabled through Recovery Plan and changes via Phase 1 District Plan provisions) and therefore this has had to be taken as the baseline context.</p>	

APPENDIX 4.5.6.1 Linkages between provisions – Specific Purpose (Hospital) Zone

Direction - Strategic Directions Chapter	RMA Issue – Hospital Zone	Objectives	Policies	Rules	Assessment Matters
<p>Objective 3.3.1 Expedited recovery and future enhancement of Christchurch as a dynamic, prosperous and internationally competitive city in a manner that</p> <p>a) meets the community's immediate and longer needs for housing, economic development, community facilities</p> <p>b) Fosters investment certainty and</p> <p>c) Sustains the important qualities and values of the natural environment</p>	Flexibility for providers	<i>21.5.1.1 Enabling Hospital Development</i>	<i>21.5.1.1.1 Intensification 21.5.1.1.2 Comprehensive Development</i>	<p>21.5.2.1 General Provisions</p> <p>21.5.2.2.1 - 5 Activity Status Tables</p> <p>21.5.2.3 Built Form Standards</p>	<p><i>21.5.5.1 City Context and Character</i></p> <p><i>21.5.5.2 Street Interface</i></p> <p><i>21.5.5.3 Access, parking and servicing</i></p>
	Streamlining regulation for key hospital sites	<i>21.5.1.1 Enabling Hospital Development</i>	<i>21.5.1.1.1 Intensification 21.5.1.2.1 Comprehensive Development</i>		
	Intensification of Sites	<i>21.5.1.1 Enabling Hospital Development</i>	<i>21.5.1.1.1 Intensification</i>		
	Responding to Environmental Context	<i>21.5.1.1 Enabling Hospital Development</i>	<i>21.5.1.1.2 Comprehensive Development</i>		
	Use of Surplus Hospital Land	<i>21.5.1.1 Enabling Existing Hospitals to Function and Redevelop</i>	<i>21.5.2.4 Alternative Zone Provisions</i>		

Direction - Strategic Directions Chapter	RMA Issue – Hospital Zone	Objectives	Policies	Rules	Assessment Matters
<p>3.3.2 Objective - Clarity of language and efficiency</p> <p>The District Plan, through its preparation, change, interpretation and implementation:</p> <p>a) Minimises:</p> <ul style="list-style-type: none"> i. Transaction costs and reliance on resource consent processes; and ii. The number, extent and prescriptiveness of development controls and design standards in the rules, in order to encourage innovation and choice; and iii. The requirements for notification and written approval; and <p>b) Sets objectives and policies that clearly state the outcomes intended; and</p>					

Direction - Strategic Directions Chapter	RMA Issue – Hospital Zone	Objectives	Policies	Rules	Assessment Matters
<p>c) Uses clear, concise language so that District Plan is easy to understand and use.</p> <p>Objective 3.3.7 A well- integrated pattern of development and infrastructure, a consolidated urban form and a high quality urban environment that:</p> <ul style="list-style-type: none"> a) Is attractive to residents, businesses and visitors b) Has its areas of special character and amenity value identified and their specifically recognised values appropriately managed 					

APPENDIX 4.5.6.2: Supporting information relating to zoning of hospital sites

This appendix provides Section 32 material relating to the following:

- Section 1: Changes to the Elderly Housing Market in relation to the Specific Purpose (Hospital) Zone
- Section 2: Sites Proposed to be Rezoned as Residential
- Section 3: Future interface options for the Hospital Chapter
- Section 4: Proposed future zoning for sites currently zoned Specific Purpose (Hospital) Zone in the Operative City Plan

Section 1 – Changes to the elderly housing market in relation to the Specific Purpose (Hospital) Zone

Introduction

This paper identifies one of the key issues apparent from review of the current Specific Purpose (Hospital) Zoned sites. It provides discussion around the issue and, drawing on analysis of this matter, proposes an option for the future of the Hospital Zone.

Background

The existing Special Purpose Hospital Zone (as it is currently known) comprises 24 sites of which 10³ could be reasonably described as accommodating larger scale hospital facilities at some point in their history (some have been partially redeveloped for housing and others have been cleared). The remainder (60% of Specific Purpose (Hospital) Zone sites) accommodate facilities targeted at the elderly; these include rest homes, hospitals, and dementia care and retirement villages.

Whilst it is relatively straightforward to categorise the larger scale hospital facilities (in terms of activities), it is more difficult to define the facilities within this wider 'retirement care focused' group. This is however necessary in order to clarify the purpose of the Hospital Zone going forward. This paper identifies some of the issues related to this matter and highlights options for dealing with these activities within the District Plan Review.

Changes/Trends in Accommodation for the Elderly

The Retirement Villages Association represents the interests of owners, developers and managers of retirement villages across New Zealand. Of the 142 member villages, 43 are within Christchurch City providing 2,111 dwellings. The association notes that retirement village living is about independent living and highlight the village community feel of the complexes which also offer a variety of amenities and opportunities.

Anecdotal evidence indicates that where the elderly housing market was once split into either rest homes or elderly persons units, there is now more of a continuum of care with both ends of the market increasingly providing a wider range of services.

Traditional rest home providers are expanding their market by developing independent units (for example the proposed development at the Rannerdale War Veterans site) whereas retirement villages are increasingly providing a wider range of supported care facilities. Within New Zealand, the Retirement Villages Association identify that 53 % of villages offer a continuum of care which includes a rest home and/or hospital on site. Within Christchurch this figure increases to over 65%. Examples of these 'continuum of care' villages within the Specific Purpose (Hospital) Zone include Windsor House, Parklands Hospital, Cashmere View and Edith Cavell Home and Hospital.

Analysis of the city as a whole⁴ indicates that there are a significant number of aged care facilities of which the vast majority are in living zones. In terms of ultimate development outcomes, there is no clear difference in terms of the types of activities and scale of

³ Sunnyside, Christchurch Women's, Templeton, Princess Margaret, Burwood, Christchurch Hospital, St Georges, Southern Cross, Nurse Maude Hospice and Akaroa.

⁴ Monitoring & Information – CDHB and ratings information, 2014

development between facilities located within the living zones and those sited within the Special Purpose Hospital Zone.

Recent applications which have come forward for retirement villages in Living Zones include Nazareth House on Brougham Street and Beckenham Court on Colombo Street. Both these developments offer a range of care (independent units through to rest home) and also include health care and shared community facilities. In the case of Nazareth House these include a 20 bed dementia unit, chapel, café, pharmacy, shop and small cinema.

District Plan Issues

The matters identified above therefore highlight a few key points pertinent to the development of District Plan Review options going forward:

1. Provision of accommodation options for the elderly is increasingly flexible – a continuum of care is increasingly offered over a single site/facility. In addition a wide range of ancillary facilities are provided.
2. There is no clear difference between the elderly housing which has or is being developed on sites within the Specific Purpose (Hospital) Zone and that developed in living zones.
3. There is a relatively clear split between the larger scale hospital sites and those used specifically by the elderly who also live on the site.

District Plan Options

It is anticipated that there will be further significant growth in the retirement housing market going forward. This is likely to be along the lines of those developments highlighted already i.e. those offering a continuum of care. Proposals for this type of development are expected across the city with both previously developed and greenfield sites offering development opportunities.

Given the fact that there is no clear distinction between the types of retirement villages/elderly persons care facilities being developed in living zones and those which have been developed in the Special Purpose Hospital Zone, one of the options is to rezone those located within the Hospital Zone as residential. This will simplify the current situation, provide more clarity around the primary purpose of the zones (residential or hospital) and give more certainty to the community about the development outcomes within the zones. Only the larger hospital facilities will therefore be retained within the Special Purpose Hospital Zone.

Section 2: Sites Proposed to be Rezoned as Residential

The proposed approach is that those sites which are essentially care homes/retirement villages with attached hospital care, will be rezoned residential. This will provide several benefits:

- i. It will improve the clarity of the Hospital Chapter objectives and policies by focusing on large scale, extensive hospital facilities.
- ii. It will also provide better alignment between these essentially residential activities and the zone (and rules) they sit within in.
- iii. It will simplify the consents framework for these sites.

There have been some discussions about the potential resistance from operators of these sites regarding the proposed zone change. As such a 'testing exercise' was undertaken which reviewed the proposed residential provisions as they relate to the future development of elderly care facilities and the impacts on existing care facilities. GHD undertook this exercise using scenario analysis of hypothetical developments on five existing hospital sites. The following conclusions have been provided:

- Many of the sites assessed had grown over time and now encompass land in both hospital and Living 1 zoned land.
- The resultant split zoning presents challenges when applying for consents for new development on the site or for the redevelopment of existing facilities and results in a far more complex consent process than would otherwise be the case.
- Overall the proposed changes will provide a better framework within which to assess the impacts of such facilities on surrounding residential areas. Some changes are however suggested in order to clarify activity status and ensure that the desired outcomes are achieved. In addition several changes are proposed to specific provisions to reduce the number of resource consents that are required for these developments.

A number of areas where provisions should be refined were identified. These relate to the proposed residential Chapter of the Plan.

- Definitions – there is a lack of clarity and crossover between the proposed definitions of 'health care facility', hospital and retirement village. The main issue is that smaller care facilities (rest homes) with no independent units fall outside the retirement village definition and more than likely are larger than the 200sqm cap for health care facilities. As such they would be assessed as discretionary whereas a retirement village is restricted discretionary. As this is unlikely to be the intent of the Plan, this matter should be addressed.
- Tree and Garden Planting Provisions: It has been highlighted that the planting provisions for retirement villages are particularly onerous and it is suggested that the planting requirement is reduced.
- Outdoor Living Space – The requirement to provide outdoor living space for exclusive use of each independent unit has been questioned. It is noted that outdoor living units for independent units are often communal and therefore this requirement will result in resource consents as applicants seek to provide communal rather than exclusive areas. It is recommended that the definition of outdoor living space be amended to allow for communal outdoor living areas for retirement villages.
- Site Coverage - Compliance with the 40% site coverage rule is difficult to comply with in terms of both the existing and proposed provisions due to the presence of internal accessways and the extent of building cover. It is recommended that the provision be

re-evaluated and that Council either consider a higher percentage or an exemption enabling the calculation to be done across the whole site including internal access ways.

In response to the matter of definitions, it is proposed that the following District Plan definitions are reviewed:

- Healthcare facilities (amend)
- Hospital (amend)
- Rest home (add)

Research to date indicates that definitions which provide more detail around the type of activities permitted as part of these facilities would be useful.

Section 3: Future options for the Hospital Chapter

The intention of the Hospital Chapter going forward is a focus on larger scale, extensive hospital facilities. Initial conversations with the DHB have confirmed that Princess Margaret Hospital will be closed at some point in the future and there are plans to intensify existing sites at both Burwood and Hillmorton. All existing public hospital sites will be retained along with private facilities at St Georges and Southern Cross.

Interface Modelling

There is strong evidence that a review of the built form provisions relating to the residential/hospital interface is required. Ongoing modelling assessment is being undertaken to assess the impact of the existing rules (under the permitted baseline) and from this, a number of options are being developed regarding provisions for height, setback, landscaping

Initial thinking has indicated that the hospital sites broadly fall into one of three categories (see table below)– Suburban, Urban and City Centre Further to completion of the modelling work, it is anticipated that it may be possible to provide interface rules specific to each of the hospital categories. This would simplify the current approach and provide more understanding in relation to the development outcomes anticipated for each of the type of hospitals.

Matrix outlining possible development outcomes by location.

	Large scale buildings close to frontages		Large scale buildings concentrated away from boundaries but extensive open space (campus style)		Lower scale buildings but widely dispersed across the site		Mix of scale with transition in height towards site boundaries.	
Suburban	Height Setback Site Coverage	N/A	Height Setback Site Coverage	High Large Low	Height Setback Site Coverage	Low(ish) Narrow(er) High	Height Setback Site Coverage	Mix Narrow(er) High
Urban	Height Setback Site Coverage	High Midway (akin to md housing) High	Height Setback Site Coverage	N/A	Height Setback Site Coverage	N/A	Height Setback Site Coverage	Mix Minimal High
City Centre	Height Setback Site Coverage	High Minimal High	Height Setback Site Coverage	N/A	Height Setback Site Coverage	N/A	Height Setback Site Coverage	High Minimal High

Categories – ‘type’ of hospital

- Suburban – large sites, originally parkland type environments e.g. Burwood, Hillmorton. A decision should be made as to whether we wish these sites to retain these characteristics or whether a more urban form would be more appropriate i.e. build up close to street frontages.
- Urban – surrounded by medium density housing, close to centres e.g. Southern Cross, Nurse Maude and St Georges
- City centre – Christchurch Hospital, Christchurch Women’s?

Modelling work on the hospital sites has subsequently been undertaken by both consultants and in house by Council staff. This is referenced earlier in the Section 32 – overview.

Section 4: Proposed future zoning for sites currently zoned Specific Purpose (Hospital) Zone in the Operative City Plan

Of the 24 existing Special Purpose Hospital Zoned sites, it is proposed that 9 are retained as Hospital Zones (Hillmorton, Christchurch Women's, Princess Margaret, Burwood, Christchurch, Southern Cross, St Georges, Lyndhurst and Nurse Maude).

Key:

RS	Residential Suburban
RSDT	Residential Suburban Density Transition
RMD	Residential Medium Density
KAC	Key Activity Centre
LNC	Local Neighbourhood Centre

Name of Hospital	Location	Open/Closed	Site Visit Notes	Proposed Zoning	Additional Zoning Info	GIS Notes
Sunnyside Hospital (rename as Hillmorton)	Covering the area contained by Lincoln & Annex Roads and Sylvan Street	Some existing buildings open, others closed. Site to be retained and redeveloped by the DHB. 'Middle' part of the zone has been redeveloped for housing.	The centre of the site has been redeveloped for housing with a mix of densities across the residential areas. There are some buildings cordoned off across the remainder of the site (earthquake damage?). Some industrial uses remain adjacent to residential. DHB have confirmed that they will seek to redevelop remaining part of site. Resource consents for the front part (onto Lincoln Road) are forthcoming – rebuild of laundry etc. The rear of the site is likely to take on services from PMH – development is likely to be significant.	2 Hospital Zones a) Site fronting Lincoln Road b) Large site between Annex and Sylvan Road bordering the motorway Rezone central portion of land as residential medium density as proposed new rules package is not workable in this		Site divided into 2. Section in the middle zoned as Open space. Site along Sylvan Street to be rezoned residential.

Name of Hospital	Location	Open/Closed	Site Visit Notes	Proposed Zoning	Additional Zoning Info	GIS Notes
				location (site too small).		
Templeton Hospital	Adjacent to Maddisons, Kirk & Newtons Roads	Site owned by Ngai Tahu. Used as carer's accommodation.		Not a good fit with the proposed Hospital Zone. Rezone as Rural Urban Fringe.		Large and small SP Hospital Zones changed to Rural Urban Fringe.
Prince Margaret Hospital	Cashmere Road near Bengal Drive & Hackthorne Road	Open DHB have confirmed the complex will close early 2016.	DHB state that there is complex damage at St Margaret's . Large site surrounded by established single and 2 storey houses. Existing redbrick buildings. Key location along Cashmere Road. Potential for comprehensive residential redevelopment.	Hospital Will attempt to incorporate policy signalling comprehensive redevelopment of the site for residential.		No Change
Burwood Hospital	Adjacent to Mairehau and Burwood Road	Open / redevelopment ongoing	Significant redevelopment plans. Ongoing redevelopment likely.	Hospital		No Change
St George's Hospital	On Leinster and Heaton Street	Open	Open – significant scale and large new development going on. 4 storey car parking building in middle. Heaton Street frontage otherwise residential, Papanui Street adjacent to centre. Leinster Street – more residential the further from Papanui Road.	Hospital		No Change
Southern Cross Hospital	Bealey Avenue	Open	Significant redevelopment recently. Some issues with the built form interface. Mary Potter site and Southern Cross have amalgamated.	Hospital		No Change
Fairhaven Hospital	91 Harewood Road	Open – Wesley Care	Current building is large 4 storey building with some smaller single story bungalows at the side. Large building is quite significant in scale, much larger than other buildings around about. Consent proposes 2 storey building (in	Residential	RSDT RMD was not proposed for this side of the railway line. RSDT would be more consistent with existing built	Changed

Name of Hospital	Location	Open/Closed	Site Visit Notes	Proposed Zoning	Additional Zoning Info	GIS Notes
			place of 4 storeys) so more sympathetic to surrounding area.		form and nearby zone, as proposed.	
Bethseda Hospital	235 Harewood Road	Open	Single storey. Very residential zone in appearance.	Residential	RMD. This site is a useful boundary to define the transition from proposed RMD around Bishopdale Mall and the transition into RS. Site is well located for the mall. It is probably at 30hh/ha as is so pushes it towards RMD.	Changed
St Winifred's Hospital	10 St Winifred's Place	Open	Cul de sac entrance. Single storey surrounded by residential. Max 2 storey in surrounding residential area.	Residential	RS. Is not close to a KAC or LNC.	Changed
Parklands Hospital	429 Papanui Road	Open	Recent development. 3 storey residential onto Papanui Road; 2 or single storey to the rear. Very residential in appearance – apartments.	Residential	RS. Sufficient area has been zoned RMD around Papanui.	Changed
Nurse Maude Hospital	15 Mansfield Avenue	Open	Large rebuild underway. Some buildings still open. Surrounding is residential – mainly 2 storey but is located close to Merivale centre.	Hospital	Hospital	Added in 32 McDougall Ave to Zone.
Churchill Hospital	40 Guild Street	Closed - post earthquake	Closed - Mainly demolished. Some bungalows to the side are still used. Land onto Guild Street being used as a Community Park. To the rear the site is being used as a contractor's yard. Surrounded with single storey / 2 storey max residential. See www.anglican-aged-care.com	Residential	Needs further investigation. Infrastructure Capacity. This site was subject to some interest for a special housing project. There is a waste water constraint in the area but presumably there is some capacity credit for the former use of the site. RS zone would be consistent with the surrounding uses but because of the site characteristics (bounded by two streams) it could support higher density with fewer effects on neighbouring properties.	Changed

Name of Hospital	Location	Open/Closed	Site Visit Notes	Proposed Zoning	Additional Zoning Info	GIS Notes
					RSDT by default but application of the EDM would be ideal for this site.	
Windsor House	47 New Brighton Road (1, Horseshoe Lake Road)	Open - includes a retirement village	Large site with some 3 storey in main area but significant amount of single storey independent units adjacent. Essentially functions as a retirement village	Residential	RMD	Changed
Woodchester Hospital	76 Banks Avenue	Closed	Demolished	Residential	Needs further investigation. Infrastructure Capacity. In the middle of the vacuum sewer area for which capacity is already constrained to support proposed RMD to the north. Sufficient RMD has been proposed around Shirley so this would have to be treated slightly differently. Banks Ave School across the road is to move in 2017 and that site can then be developed using the EDM. Might be an appropriate approach for this site. Land quality likely to be an issue (but not so much planning as a development problem). RSDT in view of problems with RMD but recognition that higher density is supportable.	Changed
St Nicholas Hospital	7 Kirkwood Avenue	Open	Single storey. Surrounded by residential and educational uses (Kirkwood School and Uni). Car parking significant issue along Kirkwood Road.	Residential	RS. This is part of the RS buffer between Riccarton RMD and Church Corner (likely to be considered in the future of RMD). Also within the	Changed

Name of Hospital	Location	Open/Closed	Site Visit Notes	Proposed Zoning	Additional Zoning Info	GIS Notes
					Riccarton waste water constraint area.	
Rannerdale War Veterans	59 Hansons Lane	Open	Open – recent interest in building independent units on part of the site.	Residential	RS. For now at least. Site is within the area that was considered for RMD around Church Corner KAC. Would likely be included in a future investigation once Riccarton waste water constraints are resolved.	Changed
Mary Potter Home & hospital	11 Caledonian Road (131 Bealey Avenue)	Open (amalgamated into Southern Cross)	Hospital sold 2004 - now Southern Cross.	Residential	RMD	No Change
Cashmere View Hospital	72 Rose Street	Open	The development is 2 storey and relatively new. The buildings looks like an apartment block along Rose Street and is setback with landscaping. To the rear are smaller scale hospital buildings and a large car park. There is ongoing development on the site too. Surrounding residential is one or 2 storey.	Residential	RS. Not near any KAC so can't justify RMD.	Changed
Lady King Hospital	63A Cashmere Road	Closed - now residential	This site is currently being redeveloped for residential use although this appears to be an existing residential earthquake rebuild.	Residential	Whatever replaces Living Hills Zone	Changed to Residential Hills
George Manning House	1 Hennessy Place	Open	This is a single storey development comprising mainly small bungalow units with a central hospital area. Appears very suburban residential in appearance.	Residential	RSDT.	Changed
Edith Cavell Home & Hospital	Corner of Head & Dryden Streets,	Open	Residential scale development set within Sumner residential area.	Residential	RS..	Changed to RS

Name of Hospital	Location	Open/Closed	Site Visit Notes	Proposed Zoning	Additional Zoning Info	GIS Notes
	Sumner (40, 40B-40E)					
Akaroa Hospital	Onuku Road	Closed	DHB have been considering other site. Recently confirmed they would remain on this site. Plans are for an integrated hospital/care facility.	Residential conservation	Residential Conservation	Changed to RC

Appendix 4.5.6.3 Basic Economic Assessment Options - Specific Purpose (Hospital) Zone

The following tables identify possible costs and benefits relating to Hospital Zone proposals:

1. Rezoning of current hospital sites used for aged care as residential

Site Owners

Proposed Benefits	Proposed Costs
The rules package (objectives, policies and rules) of the proposed zone (residential) better fit the development proposals anticipated i.e. retirement villages and aged care are a residential activity. Improved built form outcomes may eventuate with better integrated developments.	More control by Council over some matters – urban design, access etc. Landowners may see their development aspirations constrained by the revised zoning.
	May be additional costs resulting from more controls/requirements necessary as a result of rezoning as residential.

Neighbours

Proposed Benefits	Proposed Costs
Improved built form outcomes as revised rules better address development issues which have previously led to poor outcomes e.g. overlooking, dominant buildings etc	
Better integration of retirement villages with the surrounding environment given the matters of discretion proposed for retirement village activities. This will help lessen the impact of these sometimes insular developments on existing communities.	

2. Revised Rules Package for Hospital Zoned Sites

Site Owners

Proposed Benefits	Proposed Costs
The rules package (objectives, policies and rules) of the revised Hospital Zone better fit the development proposals anticipated e.g. an increased range of activities including offices, research and development etc.	More restrictive rules relating to development outcomes on boundaries with residential zones. These may reduce development yields sought in some locations.
Increase in permitted height of development in some locations will increase development yield.	

<p>Where appropriate, the hospital zoning has been extended to reflect the future development plans of hospital owners. This will mean that proposed developments are in line with the zone objectives and policies leading to an easier and less costly consenting process.</p>	
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Neighbours

Proposed Benefits	Proposed Costs
<p>Improved built form outcomes as revised rules better address development issues which have previously led to poor outcomes e.g. overlooking, dominant buildings etc</p>	

4.6 Specific Purpose (School) Zone

4.6.1 Overview

4.6.1.1 Research

1. The rapid rate of change in the education sector in recent years has meant that a considerable amount of updating of base information was required. Sources included Council held database information for designated (state) schools, the Ministry of Education website, especially in relation to the Greater Christchurch Education Renewal Programme, many individual school websites, aerial photos, Council land ownership and resource consent information, and numerous site visits. Discussions were held with resource consent staff. Evidence and transcripts from the Stage 1 Strategic Directions hearing in December 2015 have also been considered, as several parties covered educational issues in their submissions and evidence on Stage 1 of the proposed Replacement District Plan, even though that stage did not include the SP School Zone.
2. Hospital/residential interface assessments undertaken for the SP (Hospital) zone were examined, as hospitals and schools often include buildings of similar scale, and are both land uses are frequently located within residential zones.
3. Planning approaches to schools in district plans for other larger cities in New Zealand were also reviewed.

4.6.1.2 Key stakeholder discussions

1. During the drafting of this Chapter several discussions were held with representatives of the Ministry of Education in various roles, covering both schools and the early childhood education sector. Discussions were also held and information and advice obtained from some individual schools and planning agents for schools, covering both state integrated and private schools.

4.6.2 Resource management issues

4.6.2.1 Issue 1

RESOURCE MANAGEMENT ISSUE 1: Planning Methods to be used for Schools

The School Zone covers 161 schools in Christchurch and Banks Peninsula. Nearly three quarters of these (118 schools) are state schools, with 110 of these still operating, and 8 closed schools. There are 31 state integrated schools. As noted in the Section 32 for the Designations Chapter, in the future it is possible that most of the state integrated schools will be also be designated, as they are funded by the Ministry of Education, and most of these schools are seeking designation to facilitate their future planning. Currently state integrated schools are subject to the provisions of the School Zone. There are 13 private schools in Christchurch at present also subject to the provisions of the School Zone.

In the Environment Court decisions *Columba College vs Dunedin City Council* (2001), the Court endorsed expert planning opinion that there is no resource management reason for a distinction to be made between state and non-state schools in terms of effects. The City Plan proposed in

1995 had already adopted an even-handed approach by giving all schools a school zoning, and providing an alternative zoning for all schools when land was no longer required for education purposes. Despite initial opposition by the Ministry of Education to a schools zone for their schools (partly because the Council initially took the view that schools did not need to be designated, but later resiled from this position) these techniques have worked well in practice, and are continued in this Plan.

In this Plan, the nature of activities that can occur on designated school sites and the built form of those activities will continue to be controlled by the designation and any conditions attached, and by subsequent outline plans submitted. The School Zone provisions will however be used by Council as a general guide, with site specific variations depending on circumstances, in assessing and making recommendations to the Ministry of Education on new requirements and building proposals for existing sites. This is considered justifiable because the environmental outcomes sought by the Council and the community for designated schools are no different than those sought for schools which are not designated.

The second technique continued in this Plan is providing an alternative zoning for all schools, to be applied when land is no longer required for an education activity. Designated sites will have a nominal underlying zoning of School Zone, but also an alternative zoning (often residential) which they will default to if the designation is uplifted. In this Plan the concept of alternative zoning is extended to all other schools on grounds of equity and flexibility for providers. This effectively means that the School Zone also includes other non-school uses, generally in accordance with the zone surrounding the school). This enables land no longer required for education purposes to be developed in a manner which is compatible with the surrounding area and any remaining part of the facility, without the cost and delay of further planning processes. This removes the need for a zone change or protracted consent process to change the nature of the use, if it is permitted under the alternative zoning, while providing more certainty for education providers and also for the community over what may happen on surplus sites.

The advantages and disadvantages of these techniques are further elaborated on in the evaluation of methods section in 4.5.4 below, in light of the objectives and policies sought to be achieved.

4.6.2.2 Issue 2

RESOURCE MANAGEMENT ISSUE 2- Flexibility for Providers:

Significant changes have occurred in the education sector in recent years, and are likely to continue in the future. In Christchurch the Canterbury earthquakes, damage to school properties and changes in population within school catchments as a result of red zoning of some suburban areas, have led to a Greater Christchurch Education Renewal Programme for state education. Changes proposed by the Minister of Education in 2012 and finalised for the most part by early 2014 were a response not only to the need to rebuild, but also to do so efficiently by significant reorganisation of school locations.

Some state schools were closed in early 2014, or at the end of 2014, or are to be closed in the next few years, and some other schools are being relocated or merged on “cluster” sites in the next few years, with more up-to-date teaching facilities. As well there is now

significant use of shared facilities between several schools e.g. technology facilities, performance facilities, and space for specialist teachers.

Up to the date of notification of this Chapter there has not been any disposal of closed school land by the Ministry of Education, as needs across state schools in the City are being finalised before decisions are made about whether any land will be disposed of under Public Works Act provisions. However it is considered likely that some sites will be disposed of within the planning period.

A number of state schools now have Early Childhood Education facilities on their sites, particularly where the Ministry of Education considers there would otherwise be a deficiency of provision in the area; other preschools have been established by resource consent in residential zones. In this Plan pre-schools are included in the definition of education activity. There are approximately 280 pre-schools in the City of various types.

Similar changes have occurred for state integrated and private schools, as earthquakes have forced changes of location and rebuilding as a result of earthquake damage. This has created opportunities for modernisation, with shared and multi-use spaces being promoted by high construction costs. There has also been a trend to schools catering for a wider range of years of schooling on the same site, for integrated and private schools.

All these changes mean that there is a need for planning provisions for schools which are as flexible as possible, while still enabling zone objectives and policies to be achieved.

It is not considered that there are any options in this Plan other than to facilitate change in the education sector in relation to the overall use of land and buildings. With some exceptions relating to the place of schools in the context of surrounding areas and zones e.g. coverage and height controls, it is considered that Council's involvement in schools should be limited to what happens at the interface between schools and adjoining land uses.

4.6.2.3 Issue 3

RESOURCE MANAGEMENT ISSUE 3- Increasing Community Use of School Sites:

In recent years there has been more formal community use of school facilities, including sharing of land and of buildings with the Council/community, e.g. the Riccarton Library, located on Riccarton High School land and the Graham Condon Pool, located on Papanui High School land. It is expected that this trend will continue e.g. a sports complex may be located on the new Prestons School site. A further example is the Aurora (performance) Centre at Burnside High School which is extensively use by the community outside of school hours.

These uses involved significant new buildings and were subject to resource consents which primarily considered traffic parking, and noise effects; whereas there are numerous smaller scale and more informal community uses hosted in existing school buildings which do not require new buildings or facilities.

At the informal end of this spectrum is use of school buildings and grounds on a regular or one-off basis e.g. night classes (an education activity), use of halls and grounds for fund-raising activities e.g. fairs and gala days, and regular use of school playing fields by sports clubs on weekends.

However use of schools by communities as a resource may extend further, to the use of schools as community hubs, particularly in lower income areas. This concept envisages schools as hubs for social and health agencies having some interaction with or responsibility for children.

The proposed Replacement Plan makes community activities using school buildings a permitted use in school zones, but new buildings for social and health agencies will still be subject to consents, e.g. in regard to effects on adjoining residents and the wider community. This is because school zones are expected to be primarily used for education activity (albeit that this is widely defined), so that activities such as health clinics are appropriate, but health care facilities extending to hospitals and rest homes, or emergency facilities other than the use of schools as welfare centres, are not generally seen as appropriate because of their likely scale and traffic effects.

It is not considered that there are any options here other than to facilitate community use of school sites, subject to limitations on scale of such use.

4.6.2.4 Issue 4

RESOURCE MANAGEMENT ISSUE 4- More Intensive Use of Sites – Maintaining Amenity of Neighbours

Issues 2 and 3 above are interrelated, in that they appear to be adding to an existing trend towards more intensive use of sites. This was happening already as schools provided more shared or specialist facilities, and school clustering will certainly exacerbate this trend. There appears to have been additional and often larger buildings such as new gymnasiums and performance facilities, built both on state and private school sites in recent years, usually with no increase in site area, although some schools (often private ones) have acquired adjoining residential properties to provide room for school expansion. As noted above, the detail of what happens on particular sites is the education provider's responsibility. There will ultimately be a limit on the number of buildings that can be accommodated on a school site, since parking, traffic circulation, amenity landscaping and active and passive recreation space also need to be provided for. The Ministry of Education has its own guidelines for open space and playing field provision based on school rolls.

What is more relevant to the wider community is the interface between the particular school and its residential (or other) context. In the Christchurch City Plan, there are five types of Built Form Standards for schools: building coverage as a percentage of the site; recession planes and height, and road and internal boundary setbacks. These categories are continued in this Plan as they are still seen as relevant and necessary to protect residential amenity, however some standards are relaxed.

School Built Form Standards are divided into two groups – those for schools within a lower density surrounding zone eg Residential Suburban or Residential Suburban Density Transition,

and those for schools in higher density zones eg Residential Medium Density. This is for two reasons:

(a) parts of school sites may be redeveloped with the zoning of the surrounding area, and
(b) it is considered that, in the design and location of school buildings, some attempt should be made to fit at least those buildings on the edge of the school zone, within the amenity standards of that context, i.e. those “edge” buildings particularly should not overly dominate surrounding land uses with large building scale and mass.

Parking standards are specific to the type of educational activity, rather than the character of the surrounding area (see Chapter 7 and the Section 32 Report for that Chapter). Noise standards are the same for all educational activities as they are based on the acceptable levels of receipt of noise at the boundary of other zones eg all residential zones. (see Chapter 6 and the Section 32 Report for that Chapter). This Plan does not attempt to control hours of operation of educational activities, relying only on noise limits to protect aural amenity.

There are options as to the Built Form Standards which should be adopted for schools. Some of these options are discussed in the evaluation tables below. In this Plan coverage allowances have been increased and height rules refined by stepping up allowable heights with distance from residential boundaries; setbacks from road and internal boundaries have been retained as they were.

4.6.3 Scale and significance evaluation

1. The level of detail undertaken for the evaluation of the proposed District Plan provisions has been determined by an assessment of the scale and significance of the implementation of the those provisions. The scale and significance assessment considers the environmental, economic, social and cultural effects of the provisions. In making this assessment, regard has been had to the following, namely whether the provisions:
 - a. are of regional or city wide significance;
 - b. impede or promote the District’s recovery;
 - c. adversely affect people’s health and safety;
 - d. result in a significant change to the character and amenity of local communities;
 - e. have effects on resources that are considered to be a matter of national importance in terms of Section 6 of the Resource Management Act 1991;
 - f. will adversely affect those with particular interests, including Maori (consideration needs to be given to whether there is certainty of effects based on the availability of information to assess benefits and costs);
 - g. limit options for future generations to remedy effects;
 - h. the effects of which, have been considered implicitly or explicitly by higher order documents; and

- i. include regulations or other interventions that will impose significant costs on individuals or communities.

4.6.3.1 Objectives, policies and rules

1. The key objective contained within this Chapter (paraphrased) is to enable education providers to efficiently use and develop their land and buildings, while recognising that education facilities are hubs for communities and need to integrate well with the neighbourhoods within which they are located.
2. The level of evaluation able to be undertaken through this Section 32 has been influenced by the truncated process and timeframe for the DPR. This has meant that only a general analysis has been able to be undertaken for some proposed amendments as there has been insufficient time to consider the circumstances of all schools in detail. The evaluation reflects site visits and consultation undertaken to date and will continue to be updated following submissions from the community and stakeholders.
3. The Canterbury Recovery Strategy included the social goal of “strengthening community resilience, safety and wellbeing, and enhance quality of life for residents and visitors, by a) delivering community, health, education and social services that are collaborative, accessible innovative and inclusive; and b) supporting people, in particular those facing hardship and uncertainty, by providing quality housing, education and health services”. These goals are broad and fall in the first instance to be addressed by the education sector and not by the District Plan.
4. Chapter 6 of the Regional Policy Statement introduced by the Land Use Recovery Plan and setting the overall direction for the growth and development of Christchurch, does not deal with schools, other than in relation to providing for schools in Greenfield priority areas (for urban growth).
5. More specifically, the Schools Chapter has drawn on information on the Ministry of Education’s Greater Christchurch Education Renewal Recovery Programme /Property programme, although it is not a statutory direction, to provide context and some detail to the changes occurring in the schools sector in the City.
6. The Strategic Directions chapter of the District Plan has a Community Facilities and Education Activities Objective: Community Facilities and Education Activities : (a) The expedited recovery and establishment of community facilities and education activities in existing and planned urban areas to meet the needs of the community; and (b) The co-location and shared use of facilities between different groups is encouraged. This provides a context for the changes that have been made in the revised School Zone provisions.
7. These changes are designed to make the provisions as flexible as possible while not compromising the amenity of adjoining land uses, particularly residential, and while also recognising the contribution that education buildings and sites make to the character of neighbourhoods.
8. The existing City Plan provisions are already flexible, for example in providing “upfront” alternative zonings for schools if land is surplus to educational needs. The amendments made in this Review are essentially refinements of previous directions, rather than radical changes,

and should further assist recovery in the education sector, by reducing consents required for changes. The main changes in this School Zone review are:

- Objectives and policies made specific to educational facilities and simplified and streamlined.
- Provision for community activities to use existing school facilities as permitted activities, subject only to the standard noise and parking requirements for the zone. (Community activities will still need to meet individual school requirements as to use of facilities).
- Provision for established spiritual activities and facilities and additions to such facilities as permitted uses in school zones. In practice this relates mainly to sites which accommodate both Catholic churches and schools.
- Increase in allowable site coverage for all schools, since there is a need to provide for greater intensity of use of sites. A greater increase in site coverage for schools in lower density residential areas, as previous coverage restrictions appeared disproportionately low.
- A stepping up of permitted height away from the boundaries of residential zones, with an extra metre of height within 20 metres of boundaries for schools within lower density residential zones, and an extra 5 metres further away than 20m; and an extra 4 metres further away than 20 metres from boundaries for schools within higher density zones. These height increases still enable compliance with recession plane rules, which have not changed, and should enable schools to provide for an extra storey on buildings which are some distance from their boundaries.
- The policies also encourage schools to retain as much open space on their sites as practicable, as well as retaining mature trees where they can.

4.6.4 Evaluation of proposed objectives

Section 32(1)(a) of the Act requires the Council to evaluate the extent to which the objectives are the most appropriate way to achieve the purpose (Section 5) of the Act.

4.6.4.1 Evaluation of Proposed Objective 1: Use of Education Facilities

GENERAL POLICY DIRECTION OPTIONS & RECOMMENDATIONS

In Christchurch the Canterbury earthquakes, resulting damage to school buildings and land and changes in population within school catchments, have meant that there have been significant changes in the schools sector recently, including both temporary and permanent relocations of schools, much rebuilding and repairing and greater sharing and clustering of schools and facilities. Reorganisations and rebuilding are expected to continue in the near future.

The District Plan has no option but to facilitate these changes, by only imposing rules restricting uses of land, scale and form of buildings or requiring consents where there is a good reason on behalf of the community to do so, eg for the purposes of protecting adjoining residential amenity.

Option 1 (Status Quo) Existing Plan Objectives

The Operative City Plan has the following objectives for metropolitan and local community facilities including schools:

Provision of community facilities which serve metropolitan needs for educational, cultural and specialised services; and

Provision for accessible community facilities to meet educational, spiritual, health and other local needs.

There is no indication of at what point schools become of metropolitan versus local scale; more importantly these objectives imply that Council has a role to play in providing these facilities, which is not the case, as this is up to education providers. These providers also determine their own school catchments, desired locations and the general nature and scale of sites and buildings, with Council's role essentially being to follow on, by making appropriate planning provision for these activities in that location. For example virtually all new schools are established either by requirement of the Minister of Education or by resource consent; Council does not designate or zone sites for schools in anticipation of those sites being selected by the provider.

While schools may serve metropolitan or educational needs, they do not do so because of the policies or actions of Council. These objectives do not reflect the dynamic nature of this sector and describe a social rather than an environmental or planning outcome.

The Banks Peninsula District Plan does not appear to include any objectives and policies for schools, presumably because the Plan relied on the designation process for state schools in the district and because there were no private schools in that geographic area.

Option 2 (Proposed Objective) Use of Education Facilities

This objective incorporates several elements including:

- a. Acknowledgment that education providers are the main actors in the process of education recovery;
- b. Reference to the need for them to have as much flexibility as possible in the use and development of their land and buildings, in order to respond to the current circumstances in Christchurch;
- c. Reference to the place of schools within the wider network of education facilities across Christchurch. (ie the circumstances of schools may vary and may be dictated by the network and not by individual schools).
- d. Balancing this with a continuing expectation and need for Council to mitigate any adverse effects on adjoining land uses such as visual dominance, loss of privacy, development which is noticeably out of scale with the surrounding area, parking issues etc;
- e. Also balancing the fact that schools have a need to develop and change, with the fact that communities often have an interest in the open space and visual amenity that many schools provide.

ADOPTED GENERAL DIRECTION

While it is clearly possible to debate the wording of Option 2, it is considered that it is better than Option 1 (status quo) in responding to changing circumstances in the schools sector in Christchurch.

OBJECTIVE MOST APPROPRIATE WAY TO ACHIEVE THE PURPOSE OF THE ACT

Objective	Summary of Evaluation
<p>Objective 21.6.1.1 – Use of Education Facilities</p> <p>Education providers are able to efficiently use and develop their land and buildings, within the wider network of education facilities across Christchurch, for:</p> <ol style="list-style-type: none"> (i) education activity; and as (ii) hubs for a diverse range of community activities, <p>while:</p> <ol style="list-style-type: none"> (iii) mitigating adverse effects on the amenity of adjoining zones, and (iv) recognising and enhancing the contribution of education buildings and sites to the character of neighbourhoods. 	<p>Relation to Resource Management Issue</p> <p>The proposed objective relates clearly to the resource management issues identified above of flexibility for providers, increasing community use of schools sites, and maintaining the amenity of neighbours.</p> <p>The potential for adverse effects on neighbours is an issue at present, particularly because of the trend towards more intensive use of school sites. Against this, a benefit of schools in the neighbourhood other than educational needs being met locally, is that school sites often make an important contribution to the character of areas by providing a secondary network of open space. Large and older school sites often include mature trees which can add to visual amenity and a sense of greenspace in an area, even if the school site is not always open to the public for informal recreational use.</p> <p>The scale and significance evaluation above, refers to statutory influences which have contributed to this revised objective, in particular the intent of the Canterbury Recovery Strategy. The Ministry of</p>

	<p>Education’s Greater Christchurch Education Renewal Recovery Programme /Property programme has had a significant influence, and the Strategic Directions Chapter of this Plan includes a Community Facilities Policy which refers to the recovery of education facilities.</p> <p>The objective also reflects the purpose of the Act in enabling people and communities to provide for their social, economic, and cultural well-being, while avoiding remedying or mitigating any adverse effects of activities on the environment.</p> <p>Because of the circumstances of education as a result of the Canterbury Earthquakes, there is very little option but to adopt as flexible an approach as possible to planning provisions for schools.</p> <p>This is consistent with the Statement of Expectations in the Order in Council for the preparation of the replacement District Plan, in that reliance on resource consent processes should be reduced, compared with the existing District Plans.</p> <p>Overall it is considered that the objective is the most appropriate way to achieve the purpose of the Act with regard to schools.</p>
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4.6.4.2 Evaluation of proposed Objective 2 – Changing needs for educational land and buildings

GENERAL POLICY DIRECTION OPTIONS & RECOMMENDATIONS	
<p>Option 1 (Status Quo)-No Plan Objective The Operative Plan included similar rule provisions listing all schools and providing an alternative zoning to be applied when activities not defined as education activities, or any activities on a site which the school has disposed of, take place on the site. However there is no objective or policy base for this rule.</p> <p>Option 2 (Proposed Objective) – Changing Need for Educational Land and Buildings This policy is intended to provide some context for the school listings and rule in 21.6.2.3.2 where any activities or facilities which are permitted activities in the alternative zone for that site listed in the Chapter, are also permitted activities in the school zone.</p>	
ADOPTED GENERAL DIRECTION	
Option 2	
OBJECTIVE MOST APPROPRIATE WAY TO ACHIEVE THE PURPOSE OF THE ACT	
Objective	Summary of Evaluation

Objective 21.6.1.2 - CHANGING NEEDS FOR EDUCATIONAL LAND AND BUILDINGS

Education providers have some flexibility, and the community some certainty, as to the future use of education sites when land and/or buildings become surplus.

Relation to Resource Management Issue

This objective relates to the ongoing issue of change in the schools sector and the need for flexibility for providers, but also a degree of certainty for communities as to future use of school sites when land becomes surplus.

The objective would have been useful to provide context for the rule on the matter contained in the Operative Plan , but is doubly relevant now since the Canterbury earthquakes have led to greatly accelerated change in the education sector and made it much more likely that some education sites will be disposed of. At the time of writing, 8 state schools in Christchurch and one state integrated school had been closed, several more were planned to be closed in the years from 2015 to 2018 and the longer term locations of at least three further schools were unclear due to geotechnical issues or previous location in the CBD.

This objective also relates to the issue of which planning methods Council should use for schools. While providing an alternative zoning for all schools may appear complex, it is understood that private and state-integrated schools (which are not designated at the time of writing) do appreciate flexibility as to what they would be permitted to do with any surplus land. It could be argued that it is unusual to specify two zonings for a site, but the zonings are not a double up as each applies in different circumstances. Alternative zonings are considered justifiable given the extent of changes in the schools sector at present, some of which, and the timeframes attached, are foreseeable. Reducing the need for resource consents or zone changes as much as possible is in line with the Statement of Expectations in the Order in Council for the District Plan and is efficient in the present circumstances.

In this Plan, converting school land to uses not provided for in the school zone, but provided for in the surrounding area, is a permitted activity. It should be noted that community activities which do not require additional buildings are now permitted uses in the zone.

4.6.5 Evaluation of proposed policies, rules and methods

4.6.5.1 Evaluation of Planning Methods to be Used for Schools – Issue 1



Rules/Method(s) Most Appropriate	Effectiveness and Efficiency
<p>Option 1: Status Quo as in City Plan</p> <p>(i) Specific Purpose (School) zoning as the nominal underlying zoning for designated state schools, and another alternative zoning which is defaulted to if the land is no longer required for educational purposes and the designation is uplifted, and</p> <p>(ii) Specific Purpose (School) zoning for state-integrated (currently) and private schools, with another alternative zoning, which is defaulted to if the land is no longer required for educational purposes.</p>	<p>Effectiveness</p> <ol style="list-style-type: none"> 1. Public and private schools are treated similarly in terms of zoning, as effects are the same. (Columba College case) 2. This option has worked well in practice and provides a guide for state schools and the community as to what outcomes would normally be expected in school zones. MOE will not need to supply outline plans if their proposed development complies with the School Zone. 3. Ministry of Education can use designations to reject CCC recommendations on new requirements and outline plans, making the zoning of state schools nominal only. <p>Efficiency</p> <ol style="list-style-type: none"> 4. Flexible because removes need for further planning processes, with associated cost, when changing use of surplus school sites to that of surrounding zoning. <p>Benefits</p> <ol style="list-style-type: none"> 5. Zoning is specifically designed for education uses. Giving all schools a school zoning, enables the unique nature of schools as a land use to be better recognised. 6. Provides certainty for both schools and community as to likely types of uses which could occur if school use ceases on all or part of site. <p>Costs</p> <ol style="list-style-type: none"> 7. The approach is unusual and can appear complex for state schools. 8. There may be a perception that school zoning will devalue sites in comparison with residential or business zonings. In reality provision for the uses permitted in specified alternative zonings, if land is no longer required for education purposes, should mitigate this effect. 9. May not allow for public input at time of land

	use change in the future.
Rule/method options less or not as appropriate to achieve the Objectives and Policies:	
<p>Option 2:</p> <p>Scheduling and/or an overlay over a base zoning the same as the surrounding area, for all schools. (State schools still designated).</p>	<p>Appropriateness</p> <ol style="list-style-type: none"> 1. Scheduling or overlays used as “spot zones” are not as clear as zoning or designations on the face of the Planning Maps. 2. Scheduling or overlays are likely not to provide for a range of compatible community uses to occur on school sites. Resource consents would be required for any non-school use (i.e. not very flexible). 3. A base residential zone would likely have Built Form Standards which would be inappropriate for most schools, which usually require large sites and buildings. 4. Any restrictions on scale in residential zones would impact significantly on schools. Hours of operation would make it difficult to zone school hostels for example as residential, as they need to operate 24 hours a day. 5. This would mean a schools overlay or scheduling over a base zone, would need to have specific rules or (ideally standard) designation conditions attached, which in reality would be little different to a zoning. 6. Technique does give certainty as to what can occur on the site if it ceases to be used for education purposes. 7. Efficient for schools in disposing of land.
<p>Option 3. Simplification of Planning Method :</p> <ol style="list-style-type: none"> (i) Designation and underlying zoning only for state schools, and (ii) School zoning only for private schools (and for state-integrated schools at present). 	<p>Appropriateness</p> <ol style="list-style-type: none"> 1. Not consistent with the principle of treating all schools the same for resource management purposes. 2. School Zone or schools designation clearly identifies school sites on planning maps 3. Less certainty for the school and community (for non-designated sites) as to future use of

	<p>land if education, community or recreational uses cease.</p> <ol style="list-style-type: none"> 4. Plan change or resource consent required for non-educational activities if not provided for in underlying zone for state schools or schools zone for private schools. May be less efficient for schools disposing of land. 5. If a school site or portion of it is surplus to requirements, need for a rezoning or resource consent for other uses provides opportunity for public input, and potentially the consideration of a wider range of other potential uses based on circumstances at the time that the land is disposed of.
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Risk of Acting or Not Acting

The information available is considered sufficient to inform the proposed provisions without the need to take account of the risk of acting or not acting (s32(4)(b) of the Act).

4.6.5.2 Evaluation of Proposed Policy/Method 2 - Changes to Permitted Activities

Rules/Method(s) Most Appropriate	Effectiveness and Efficiency
<p>Option 1: Changes to Permitted Activities</p> <p>a. Provision for community activities using school facilities as permitted activities in the School Zone. Where they involve new buildings or facilities, a Restricted Discretionary Activity application will be required .</p> <p>b. Existing stand alone churches and church facilities as permitted in the school zone, even where they are not ancillary to educational activity.</p>	<p>Effectiveness</p> <ol style="list-style-type: none"> 1. More effective and clearer in encouraging community activities to occur in school zones (Issue 2) . This is in line with trends towards multi-use of some school facilities, including by the community. Consents are required only for larger scale activities which need new buildings. NB Temporary fund raising activities are covered by separate rules on temporary activities in Ch 6. 2. There are over 20 Catholic schools in Christchurch, nearly all of which have parish churches on their sites. The churches were established at the same time as the schools and cannot be said to be ancillary to the schools. It is appropriate to include them as permitted uses in the School Zone, and their built form characteristics are not dissimilar to school buildings. NB churches which are not on school sites are scheduled in Ch 6 as spiritual activities. <p>Efficiency</p> <ol style="list-style-type: none"> 3. Separating out community activities from community facilities in the definitions, assists in focusing consents only on larger scale community facilities in school zones, where effects are likely to be greater. 4. Effects of existing churches are usually minimal and they are well accepted in residential areas. Given the extent of damage caused to existing churches in the earthquakes, it is appropriate to facilitate rebuilds. <p>Benefits</p> <ol style="list-style-type: none"> 5. Resolves the confusion that exists in the Operative Plan where any community activity occurring in schools is considered under an alternative zoning, not a schools zoning, which also implies that the rules of that other zoning (eg residential) including Built Form Standards, apply. In many cases this is nonsensical. 6. Reduced cost and delay in rebuilding churches on school sites which were damaged in earthquakes. <p>Costs</p>

Rule/method options less or not as appropriate to achieve the Objectives and Policies:

Option 2: Status Quo as in City Plan

- a. Community uses not clearly provided for in schools zone, but only as a use that can occur by application of an alternative zoning.
- b. No specific provision for churches associated with schools on school sites, except by virtue of the definition of education activity including the words “and ancillary religious facilities”.

Appropriateness

- 1. This is confusing given that the intention appears to be to provide for such uses in the school zone. This is not clear even in the reasons for rules.
- 2. Unnecessary consents if the community use is a relatively minor one with effects very similar to those of schools.
- 3. Difficult and unproductive to debate what ancillary means in this context
- 4. Churches which need to rebuild as a result of earthquake damage are unnecessarily restricted if they want to rebuild differently than previously, as they would need to rely on existing use rights.

Risk of Acting or Not Acting

The information available is considered sufficient to inform the proposed provisions without the need to take account of the risk of acting or not acting (s32(4)(b) of the Act).

4.6.5.3 Evaluation of Proposed Policy/Method 3 -Proposed Changes to Built Form Rules

Rules/Method(s) Most Appropriate	Effectiveness and Efficiency
<p>Option 1: Proposed Changes to Built Form Rules</p> <p>a. Increases in permitted site coverage</p> <p>b. Stepping up of height with distance from internal boundaries</p> <p>c. No change to internal boundary or road setbacks except small increase in road setbacks for schools within higher density zones.</p> <p>d. Retention of Operative Plan recession plane rules</p>	<p>Effectiveness</p> <ol style="list-style-type: none"> 1. Increases in coverage are considered appropriate as this matches allowable coverage in surrounding zones. 25% especially is considered too restrictive in Christchurch circumstances post earthquakes and as NZ cities become more “densified”. 2. Stepping up height allowable at distances of greater than 20m from internal boundaries is one way in which a balance can be struck between the needs of schools for large buildings, and the desire of surrounding residents not be to “overwhelmed” by their proximity to these buildings. The heights and distance chosen should allow for an extra storey for schools further in to their sites without significant effect on neighbours. E.g. buildings will still be able to comply with recession planes. 3. Greater road boundary and internal boundary setbacks than for residential uses are considered justifiable because school buildings can be of considerable height and building length. Setbacks of 10m from the road provide a significant opportunity for establishment of identity and landscaping features, or in some cases drop-off areas on site at the front of schools. 4. Increasing the road scene setback from 3m to 4m for schools in higher density residential zones is considered a very minor change and is proposed solely to provide a better opportunity for landscaping with slightly larger growing species. The previous 3m was minimal. 5. The City Plan and proposed Replacement Plan recession plane provisions are considered appropriate. Recession plane provisions proposed by the Ministry of Education as designation conditions are based on Auckland plan provisions and are considered too lenient for Christchurch’s more southerly location e.g. for houses on the south side of schools in winter. They are also

inconsistent with the recession planes used for the remainder of Christchurch.

Efficiency

- 6. More flexibility in the Built Form Rules should mean fewer consents are required for school buildings.
- 7. There is consistency in regard to the level of amenity that neighbours of schools can expect in regard to built form.

Benefits

- 8. More flexibility in Built Form Rules and scale of buildings is permissible away from site boundaries.
- 9. Potentially more effective landscaping in the road setbacks of schools within higher density residential areas.

Costs

- 10. A metre of land is “lost” at the road frontage of school sites within higher density residential areas.

Rule/method options less or not as appropriate to achieve the Objectives and Policies:

Option 2: Greater Changes to Built Form Rules

- a. Further increases in site coverage, or no distinction between coverage rules for schools within different zones.
- b. Smaller road setbacks and internal boundary setbacks.
- c. More permissive recession plane rules

Appropriateness

1. Not considered appropriate as schools are part of the neighbourhoods they are located in and should fit to some degree with that residential character. Some of the older schools closer to the City Centre have high coverage with small areas of playground space, and it would be inappropriate for this to be the default option.
2. Smaller internal boundary setbacks not considered appropriate as a default option. It is important to provide enough space for landscaping or other screening methods between schools and houses to preserve privacy, reduce visual dominance and overlooking, and to allow distance to attenuate school noise e.g. that coming from open windows.
3. Road setbacks are need to provide enough space for identity and landscaping features, and in some cases to provide drop-off areas on site at the front of schools, or to facilitate noise reduction adjoining busy roads.

Risk of Acting or Not Acting

The information available is considered sufficient to inform the proposed provisions without the need to take account of the risk of acting or not acting (s32(4)(b) of the Act).

Appendix 4.6.6.4 – Linkages between provisions – Specific Purpose (School) Zone

Strategic Directions (Panel Decision 26 February 2015)	School Zone Objectives	Policies	Rules
<p>Objective: Community Facilities and Education Activities</p> <p>(a) The expedited recovery and establishment of community facilities and education activities in existing and planned urban areas to meet the needs of the community;</p> <p>(b) The co-location and shared use of facilities between different groups is encouraged.</p>	<p>21.6.1.1 OBJECTIVE -- USE OF EDUCATION FACILITIES</p> <p>Education providers are able to efficiently use and develop their land and buildings, within the wider network of education facilities across Christchurch, for:</p> <p>(i) education activity; and as</p> <p>(ii) hubs for a diverse range of community activities, while:</p> <p>(iii) mitigating adverse effects on the amenity of adjoining zones, and</p> <p>(iv) recognising and enhancing the contribution of education buildings and sites to the character of neighbourhoods.</p>	<p>21.6.1.1.1 Policy – Community Use of Education Facilities</p> <p>21.6.1.1.2 Policy – Amenity of Neighbourhoods</p> <p>21.6.1.1.3 Policy – Contribution of Education Sites to the Character of Neighbourhoods</p>	<p>21.2.3.1 Permitted Activities</p> <p>21.6.2.3.2 Restricted Discretionary Activities</p> <p>21.6.2.3.3 Discretionary Activities</p> <p>21.6.2.4.1 Permitted Activities for Built Form</p> <p>21.6.2.4.2 Restricted Discretionary Activities for Built Form</p> <p>21.6.2.4.3 Discretionary Activities for Built Form</p>
	<p>21.6.1.2 OBJECTIVE- CHANGING NEEDS FOR EDUCATIONAL LAND AND BUILDINGS</p>	<p>21.6.1.2.1 Policy – Alternative Development Provisions</p>	<p>21.6.3 Alternative Zone Provisions Applicable to Activities other</p>

Strategic Directions (Panel Decision 26 February 2015)	School Zone Objectives	Policies	Rules
	Education providers have some flexibility, and the community some certainty, as to the future use of education sites when land and/or buildings become surplus.		than Education, Spiritual or Community Activities in the Special Purpose (Schools) Zone

Appendix 4.6.6.2 – Bibliography – Specific Purpose (School) Zone

- Greater Christchurch Education Renewal Property Programme Fact sheets – Ministry of Education 2012.
- Shaping Education: Future Direction – Ministry of Education website, 2012-2014
- Ministry of Education Learning Community Cluster lists and maps of facilities for Christchurch
- Equipping Schools to Fight Poverty: A Community Hub Approach – Paper to PPTA Annual Conference 2013.

4.7 Specific Purpose (Tertiary Education) Zone

4.7.1 Overview

The Tertiary Education Zone covers sites and facilities which make up the University of Canterbury (UC) and the Christchurch Polytechnic and Institute of Technology (CPIT). UC has three sites, including the main site between Ilam and Clyde Roads, the secondary site between Waimairi and Ilam Roads, and the former College of Education site between Dovedale and Parkstone Avenue. CPIT's main site is between Madras and Barbadoes St south of the City Centre, with a secondary campus, the "Trades Innovation Institute" at Sullivans Road/Ensors Road. A third CPIT owned site at Hassals Lane in Opawa is also zoned tertiary education in this Plan in anticipation of likely future uses at that site. Note that the CPIT Madras St site is covered in more detail in the Section 32 Report for the Central City Chapter.

There are other tertiary institutions in Christchurch, but they are of much smaller scale. These include The Academy, the Avonmore Tertiary Institute, Te Wananga o Aotearoa, Laidlaw College (formerly the Bible College) and branches of the Aoraki Polytechnic and the Southern Institute of Technology. These facilities are either zoned as schools as a result of their smaller scale, or are located in commercial or other zones.

4.7.1.1 Research

1. The rapid rate of change in the education sector in recent years has meant that provisions for tertiary education needed to be carefully reviewed. Sources of information included the Ministry of Education website and Tertiary Education Commission's websites, especially in relation to the Greater Christchurch Education Renewal Programme, and the University of Canterbury and Christchurch Polytechnic Institute of Technology websites. Submissions on the Stage 1 Strategic Directions Chapter from the UC and CPIT were also considered, as tertiary education providers submitted on Stage 1 of the proposed Replacement Plan, even though that stage of the Plan did not cover the Specific Purpose (Tertiary Education) Zone.
2. Other sources were aerial photos, Council resource consent information, and site visits. Discussions were held with CCC resource consent and transport planning staff. District Plan provisions for other cities in NZ with universities were also reviewed.

4.7.1.2 Key Stakeholder discussions

During the drafting of this chapter discussions were held with those responsible for the physical environments of both facilities, the Director – Learning Resources of the University of Canterbury and the Director – Learning Environments of Christchurch Polytechnic Institute of Technology, and their planning consultants. It is understood that UC have consulted with a range of groups on their future development plans, and CPIT have published their plans and ongoing updates on their website. A meeting was held with representatives of the Ilam and Upper Riccarton Residents Association to discuss their concerns about potential UC developments.

4.7.2 RESOURCE MANAGEMENT ISSUES

4.7.2.1 Issue 1

RESOURCE MANAGEMENT ISSUE 1 - Flexibility for Providers:

As for schools, changes which were already occurring in the tertiary education sector in Christchurch have been accelerated by the Canterbury earthquakes. Extensive damage to UC and CPIT buildings has led both institutions to undertake major repair and rebuilding programmes, with significant financial contributions from Government. Much temporary “decanting” ie relocating of departments from building to building has occurred, e.g. at the time of writing the UC has three temporary “villages” of prefabricated single storey buildings to provide more floorspace, located on their sites at Kirkwood Avenue, Waimairi Road and Dovedale Crescent under temporary activity consents. Temporary buildings are also located on the Dovedale site for the Unlimited School.

Rebuilding has presented the opportunity to modernise facilities. Both institutions have taken the opportunity to reorganise what happens where on their campuses, and to create more efficient and logical “precinct” areas, of buildings with related disciplines or functions. Both have master plans for their sites showing their campus development plans. In the case of UC this acknowledges the university as a hub for Crown Research Institutes via a Research and Innovation precinct on (Creyke Road) and provides precincts for Engineering, Health and Wellbeing, Student Housing, and a Regional Science and Innovation Centre. In the case of CPIT a more formal and publicly available Master Plan shows anticipated changes in the campus up to the year 2022. A major theme is bringing more functions back to the main site from disparate buildings in streets around that site, with nursing training moving to the new Health Precinct near the Christchurch Hospital. More greenspace is also expected to be created on the main site. Several new buildings are being added at the Ensors Road/Sullivan Avenue Trades Training site to cater for the demand for skilled workers for the Canterbury rebuild.

All these changes mean that planning provisions for these tertiary education facilities need to be as flexible as possible, while still enabling zone objectives and policies to be achieved.

It is not considered that there are any options for this Plan other than to facilitate change in the tertiary education sector in relation to the overall use of land and buildings. With some exceptions relating to the context of surrounding areas and zones e.g. coverage and height controls, it is considered that Council’s involvement with these institutions should be limited to what happens at the interface between the edges of the sites and adjoining land uses.

Note that the parking and access provisions relevant to these facilities are found in Chapter 7 Transport.

4.7.2.2 Issue 2

RESOURCE MANAGEMENT ISSUE 2 - Increasing Community Use of Tertiary Education Sites

In recent years there has been more community use of tertiary education facilities, and greater cooperation between these major educational institutions and business, industry, health and research sectors. In the case of UC this includes co-operating directly with Crown Research Institutes located on university land at the edge of the site, and more cooperation with commercial research enterprises. In regards to public use, this includes use of performance and recreation facilities, temporary use of buildings for one-off events and extensive informal use of the grounds for passive recreation.

The proposed Replacement Plan makes community activities using tertiary education buildings a permitted use in Tertiary Education Zones, but new buildings not related to education, training or research will still be subject to consents, for example in regard to effects on adjoining residents and the wider community. This is because Tertiary Education Zones are expected to be primarily used for tertiary education activity (albeit that this is widely defined), and other unrelated activities could have significantly different effects e.g. in relation to traffic generation.

It is not considered that there are any options here other than to facilitate wider community use of tertiary education sites, subject to compatibility with educational uses and limitations on scale of such use.

4.7.2.3 Issue 3

RESOURCE MANAGEMENT ISSUE 3 - More Intensive Use of Sites – Maintaining Amenity of Neighbours

Rebuilding and functional reorganisation of buildings as a result of the earthquakes appears to be resulting in more intensive use of some of the Tertiary Education zoned sites. Some of this intensity is temporary, for example the UC villages but some is permanent, for example increasing building coverage at the CPIT main site. As noted above, the detail of what happens on particular sites is the education provider's responsibility. There will ultimately be a limit on the number of buildings that can be accommodated on tertiary education sites, since parking, traffic circulation, amenity landscaping and active and passive recreation space also need to be provided for. The UC sites have a park-like character which contributes significantly to its "brand".

The wider community has come to expect a relatively pleasant interface between these larger institutions and their residential (or other) neighbours, with "edge" buildings not overly dominating surrounding land uses with large building scale and mass.. In the Christchurch City Plan, there are five types of Built Form Standards for tertiary education facilities: building coverage as a percentage of the site; recession planes and height, and road and internal boundary setbacks. These categories are continued in this Plan as they are still seen as relevant and necessary to protect residential amenity, however some standards are relaxed.

Parking standards are specific to the tertiary education and are found in Chapter 7. Noise standards are the same as for all educational activities as they are based on the acceptable levels of receipt of noise at the boundary of other zones, for example all residential zones. See Chapter 6. This Plan does not attempt to control hours of operation of educational activities, relying only on noise limits to protect aural amenity. It does however introduce a new rule on sale of alcohol at night-time from any part of the UC Dovedale campus to supplement the rule in Part 6 which limits sale or supply of alcohol at these hours to areas further than 75m from a residential zone. This is not considered adequate in the context of the Dovedale site which is surrounded by residential zoning.

There are options as to the Built Form Standards which should be adopted for tertiary education facilities. Some of these options are discussed in the evaluation tables below. In this Plan coverage allowances have been increased for some sites (note that for this zone coverage includes impervious surfaces as well as buildings) and height rules refined by stepping up allowable heights with distance from residential boundaries. Setbacks from internal boundaries have been retained as they were, but road boundary setbacks for most sites have been reduced to provide more flexibility for locating buildings.

4.7.2.4 Issue 4

RESOURCE MANAGEMENT ISSUE 4 - New Tertiary Education Zonings at Montana Avenue (UC) and Hassals Lane (CPIT)

Two new Tertiary Education Zones/areas of zone have been included in this Plan. They are on the south side of Montana Avenue at the northern edge of the main UC site, and at the site owned by CPIT at Hassals Lane, Opawa.

The zoning at Montana Avenue recognises the fact that UC now owns all of the land on the south side of the street except for one site which is still privately owned. The land nearest Creyke Road has been owned by UC for some time with houses used for University purposes, and carparking on the rear of the sites backing onto the Engineering precinct. The remaining houses have been acquired more recently. UC now proposes to use this land for a student village of medium density housing for first year students. This partially replaces an original proposal to site all new student accommodation on the UC Dovedale site; and derives from a recognition that it is better to locate first year students closer to the main site. The Dovedale site is now more likely to accommodate older students, students with families etc, as an element of future reorganisation and redevelopment of that campus.

The CPIT has owned the Hassals Lane site, not far from its Sullivan Avenue campus for some years, originally using it for horticultural training. The site has two road frontages and is currently well screened from surrounding residential areas by large trees. The site now proposed to be zoned Tertiary Education adjoins the Te Kura Kaupapa Maori o Waitaha school to its east. It is currently occupied by the Sevenoaks private school, which is anticipated to move to a site at Halswell within the next few years. When the site becomes vacant, it is expected to be redeveloped by CPIT, but specific uses have yet to be finalised. Built Form Standards for this site are similar to those for schools in residential areas, including height standards which step up with distance from the boundaries.

4.7.3 Scale and significance evaluation

The level of detail undertaken for the evaluation of the proposed District Plan provisions has been determined by an assessment of the scale and significance of the implementation of the those provisions. The scale and significance assessment considers the environmental, economic, social and cultural effects of the provisions. In making this assessment, regard has been had to the following, namely whether the provisions:

- a. are of regional or city wide significance;
- b. impede or promote the District's recovery;
- c. adversely affect people's health and safety;
- d. result in a significant change to the character and amenity of local communities;
- e. have effects on resources that are considered to be a matter of national importance in terms of Section 6 of the Resource Management Act 1991;

- f. will adversely affect those with particular interests, including Maori (consideration needs to be given to whether there is certainty of effects based on the availability of information to assess benefits and costs);
- g. limit options for future generations to remedy effects;
- h. the effects of which, have been considered implicitly or explicitly by higher order documents; and
- i. include regulations or other interventions that will impose significant costs on individuals or communities.

4.7.3.1 Objectives, policies and rules

1. The key objective contained within this chapter (paraphrased) is to enable education providers to efficiently use and develop their land and buildings, while recognising that education facilities are hubs for communities and need to integrate well with the neighbourhoods within which they are located.
2. The level of evaluation able to be undertaken through this Section 32 has been influenced by the truncated process and timeframe for the DPR. The evaluation reflects site visits and consultation undertaken to date and will continue to be updated following submissions from the community and stakeholders.
3. The Canterbury Recovery Strategy included the social goal of “strengthening community resilience, safety and wellbeing, and enhance quality of life for residents and visitors, by a) delivering community, health, education and social services that are collaborative, accessible, innovative and inclusive; and b) supporting people, in particular those facing hardship and uncertainty, by providing quality housing, education and health services”. These goals are broad and fall in the first instance to be addressed by the education sector and not by the District Plan.
4. Chapter 6 of the Regional Policy Statement introduced by the Land Use Recovery Plan and setting the overall direction for the growth and development of Christchurch, does not deal specifically with tertiary education.
5. However the Tertiary Education Chapter in this Plan has drawn on information from the Ministry of Education and Tertiary Education Commission’s Greater Christchurch Education Renewal Recovery Programme to provide context for the changes occurring in the tertiary education sector in the City.
6. The Strategic Directions chapter of the District Plan has a Community Facilities and Education Activities Objective: Community Facilities and Education Activities : (a) The expedited recovery and establishment of community facilities and education activities in existing and planned urban areas to meet the needs of the community; and (b) The co-location and shared use of facilities between different groups is encouraged. This provides a context for the changes that have been made in the revised Tertiary Education Zone provisions.
7. The changes are designed to make the provisions as flexible as possible while not compromising the amenity of adjoining land uses, particularly residential, and while also recognising the contribution that education buildings and sites make to the character of neighbourhoods.

8. The existing City Plan provisions are already relatively flexible. The amendments made in this Review are essentially refinements of previous directions, rather than radical changes, and should further assist recovery in the tertiary sector, by reducing consents required for changes in “built infrastructure.” The main changes in this Tertiary Education Zone review are:
- Resolving confusion in the City Plan definition of “site” for the Tertiary Education Zone, by splitting up the definition of site for the purpose of activity standards, which will be considered across the facility as a whole, from the standard definition of site for the purposes of built form and general city-wide standards e.g. parking, which will be considered separately for each “site” which is part of that facility. It is not considered that it is the Council’s role to dictate what uses should occur on which piece of Tertiary Education zoned land. This also removes the potential interpretation that one institution can use or develop the other institution’s facilities or land.
 - Objectives and policies made specific to educational facilities and simplified and streamlined. In the Operative Plan policy direction was effectively contained in the “environmental results anticipated” for the Zone.
 - Provision for community activities to use existing tertiary education facilities as permitted activities, subject only to the standard noise and parking requirements for the zone..
 - Increase in allowable site coverage for some tertiary education sites e.g. the UC site west of Ilam Road, and the Dovedale site, which is close to its maximum coverage under the Operative Plan . Note that site coverage in this Zone includes impermeable surfaces used for parking and traffic circulation. There is a general need to ensure that greater intensity of use of sites can be accommodated by the rules without decreasing the amenity of surrounding neighbours.
 - A stepping up of permitted height away from the boundaries of residential zones. Since permitted heights varied between particular sites in the Operative Plan , in practice this means more restrictive height than previously within 30m of a residential zone boundary for the UC main site and for the UC Dovedale site (this is counterbalanced by reductions in road setback), more restrictive height within 20m of a residential boundary for the UC site west of Ilam Road, but then more generous height further into that site; and stepping up of heights for the CPIT Sullivan Avenue and Hassals Lane sites. These height increases still enable compliance with recession plane rules, which have not changed, and should enable extra stories for buildings further from boundaries.
 - No change in setbacks from internal boundaries but a reduction in road setback required from 15m to 10m for all tertiary education sites except the UC Dovedale site. The UC Dovedale site is surrounded on three sides by residential zoning, and maintaining the setback at 15m for this site will assist in protecting residential amenity. The decrease from 15m to 10m for most of the sites is because it is considered that in the current circumstances of rebuilding and some intensification, that this will give providers slightly more flexibility in use of their sites. Note that this is counterbalanced by decreases in allowable height near residential boundaries.
 - The policies also encourage tertiary education providers to retain as much open space on their sites as practicable, as well as retaining mature trees where they can.

4.7.4 Evaluation of proposed objectives

Section 32(1)(a) of the Resource Management Act (the Act) requires the Council to evaluate the extent to which the objectives are the most appropriate way to achieve the purpose (Section 5) of the Act.

4.7.4.1 Evaluation of Proposed Objective 1: Use of Education Facilities

GENERAL POLICY DIRECTION OPTIONS & RECOMMENDATIONS

In Christchurch the Canterbury earthquakes, extensive damage to tertiary education buildings and land and fluctuations in enrolments have brought significant changes in the tertiary sector recently.

Much temporary “decanting” i.e. relocating of departments from building to building has occurred on sites as the opportunity is taken to modernise and reorganise campus layouts. Reorganisation and rebuilding are expected to continue in the near future.

The District Plan has no option but to facilitate these changes, by only imposing rules restricting uses of land, scale and form of buildings or requiring consents where there is a good reason on behalf of the community to do so.

Option 1 (Status Quo) Existing Plan Objectives

The operative City Plan has the following objective for metropolitan community facilities including tertiary education facilities:

Provision of community facilities which serve metropolitan needs for educational, cultural and specialised services.

This objective implies that Council has a role to play in providing these facilities, which is not the case, as this is up to education providers. These providers also determine the locations and the general nature and scale of sites and buildings, with Council’s role essentially being to follow on, by making appropriate planning provision for these activities in that location.

This objective does not reflect the dynamic nature of this sector and describes a social rather than an environmental or planning outcome.

Option 2 (Proposed Objective) Use of Education Facilities

This objective incorporates several elements including:

- a. Acknowledgment that education providers are the main actors in the process of education recovery;
- b. Reference to the need for them to have as much flexibility as possible in the use and development of their land and buildings, in order to respond to the current circumstances in Christchurch;
- c. Reference to the fact that tertiary facilities operate in a wider context of a network of education facilities;

- d. Balancing this with a continuing expectation of mitigation of any adverse effects on adjoining land uses such as visual dominance, loss of privacy, development which is noticeably out of scale with the surrounding area, parking issues etc;
- e. Also balancing the fact that tertiary facilities have a need to develop and change, with the fact that communities may have an interest in the open space and visual amenity that these facilities provide.

ADOPTED GENERAL DIRECTION

While it is clearly possible to debate the wording of Option 2, it is considered that it is better than Option 1 (status quo) in responding to changing circumstances in the tertiary education sector in Christchurch.

OBJECTIVE MOST APPROPRIATE WAY TO ACHIEVE THE PURPOSE OF THE ACT

Objective	Summary of Evaluation
<p>Objective 21.7.1.1 – Use of Education Facilities</p> <p>Education providers are able to efficiently use and develop their land and buildings, within the wider network of education facilities across Christchurch, for:</p> <ul style="list-style-type: none"> • education activity; and as • hubs for a diverse range of community activities, while: • mitigating any adverse effects on the amenity of adjoining zones, and • recognising and enhancing the contribution of education buildings and sites to the character of neighbourhoods. 	<p>Relation to Resource Management Issue</p> <p>The proposed objective relates clearly to the resource management issues identified above of flexibility for providers, increasing community use of education sites, and maintaining the amenity of neighbours.</p> <p>The potential for adverse effects on neighbours is an issue at present, particularly because of the trend towards more intensive use of sites. Against this, a benefit of tertiary education facilities in the neighbourhood, other than its impact on property values, is that these large sites can make an important contribution to the character of areas by providing a secondary network of open space. The UC sites in particular include mature trees which add to visual amenity and a sense of greenspace in an area, and most areas of the grounds are able to be used informally by the public for walking and cycling.</p> <p>The scale and significance evaluation above refers to statutory influences which have contributed to this revised objective, in particular the intent of the Canterbury Recovery Strategy. The Ministry of Education and Tertiary Education Commission’s Greater Christchurch Education Renewal Recovery Programme had a significant influence, and the Strategic Directions Chapter of this Plan includes a Community Facilities Policy which refers to the recovery of education facilities.</p> <p>The objective also reflects the purpose of the ACT in enabling people and communities to provide for</p>

	<p>their social, economic, and cultural well-being, while avoiding remedying or mitigating any adverse effects of activities on the environment.</p> <p>Because of the circumstances in tertiary education resulting from the Canterbury Earthquakes, it makes sense and there is little option but to adopt as flexible an approach as possible to planning provisions for Tertiary Education zoned facilities.</p> <p>This is consistent with the Statement of Expectations in the Order in Council for the preparation of the replacement District Plan, in that reliance on resource consent processes is likely to be reduced, compared with the existing District Plans.</p> <p>Overall it is considered that the objective is the most appropriate way to achieve the purpose of the ACT with regard to tertiary education in Christchurch.</p>
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4.7.4.2 Evaluation of Proposed Objective 2 - Changing Needs For Educational Land and Buildings

GENERAL POLICY DIRECTION OPTIONS & RECOMMENDATIONS	
<p>Option 1 (Status Quo)-No Plan Objective</p> <p>The Operative Plan included similar rule provisions listing tertiary institutions with a specific tertiary zoning and providing an alternative zoning to be applied when activities not defined as education activities, or any activities on a site which the institution has disposed of, take place on the site. However there is no objective or policy base for this rule.</p>	
<p>Option 2 (Proposed Objective) – Changing Need for Educational Land and Buildings</p> <p>This policy is intended to provide some context for the Rule in 21.7.2.3.2 where any activities or facilities which are permitted activities in the alternative zone for that site listed in the chapter, are also permitted activities in the Tertiary Education zone.-It is not anticipated that there will be much change in the extent of the land areas used for tertiary education in the planning period, although the future of the CPIT Hassals Lane site is unclear at present.</p>	
ADOPTED GENERAL DIRECTION	
Option 2	
OBJECTIVE MOST APPROPRIATE WAY TO ACHIEVE THE PURPOSE OF THE ACT	
Objective	Summary of Evaluation
<p>Objective 21.7.1.2 - CHANGING NEEDS FOR EDUCATIONAL LAND AND BUILDINGS</p> <p>Education providers have some flexibility and the community some certainty, as to the future use of education sites when land and/or buildings become surplus.</p>	<p>Relation to Resource Management Issue</p> <p>This objective relates to the ongoing issue of change in the tertiary education sector and the need for flexibility for providers, but also a degree of certainty for communities as to future use of tertiary education sites if all or part of any sites become surplus.</p>

	<p>While providing an alternative zoning for tertiary sites may appear complex, the alternative zonings are not a double up as each applies in different circumstances. Reducing the need for resource consents or zone changes as much as possible is in line with the Statement of Expectations in the Order in Council for the District Plan and is efficient in the present circumstances.</p> <p>In this Plan, converting tertiary education land to uses not provided for in the Tertiary Education Zone itself but in the surrounding zone, is a permitted activity.</p>
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4.7.5 Evaluation of proposed policies, rules and methods

4.7.5.1 Changes to Permitted Activities

Rules/Method(s) Most Appropriate	Effectiveness and Efficiency
<p>Option 1: Changes to Permitted Activities</p> <p>a. Provision for community activities using tertiary education facilities as permitted activities in the Tertiary Education Zone, if such use is compatible with the use of the site for education activity. Where those community activities involve new buildings or facilities, a restricted discretionary activity application will be required.</p>	<p>Effectiveness</p> <p>1. This is a lesser issue than for schools as tertiary education facilities are often more specialised. However this rule is more effective and clearer in allowing community activities to occur in Tertiary Education Zones (Issue 2). Consents required only for larger scale activities which need new buildings.</p> <p>Efficiency</p> <p>2. Separating out community activities from community facilities in the definitions, assists in focusing consents only on larger scale community facilities wishing to locate in Tertiary Education Zones, where effects are likely to be greater.</p> <p>Benefits</p> <p>3. Resolves the confusion that exists in the Operative Plan where any community activity occurring on tertiary education sites is considered under an alternative zoning, not an education zoning, which also implies that the rules of that other zoning, (e.g. residential) including Built Form Standards, apply. In many cases this is nonsensical.</p> <p>Costs</p>
<p>Rule/method options less or not as appropriate to achieve the Objectives and Policies:</p>	
<p>Option 2: Status Quo as in City Plan</p> <p>a. Community uses not clearly provided for in Tertiary Education Zone, but only as a use that can occur by application of an alternative zoning.</p>	<p>Appropriateness</p> <p>1. This is confusing given that the intention appears to be to provide for such uses in the Tertiary Education Zone.</p> <p>2. Unnecessary consents if the community use is a relatively minor one with minor effects.</p>
<p>Risk of Acting or Not Acting</p>	
<p>The information available is considered sufficient to inform the proposed provisions without the need to take account of the risk of acting or not acting (s32(4)(b) of the Act).</p>	

4.7.5.2 Evaluation of Proposed Policy/Method 2 - Proposed Changes (or Not) to Built Form Rules for Tertiary Education sites

Rules/Method(s) Most Appropriate	Effectiveness and Efficiency
<p>Option 1: Proposed Changes to Built Form Rules</p> <ul style="list-style-type: none"> a. Increases in permitted site coverage for UC site west of Ilam Road and UC Dovedale site. b. Reduction of allowable height near boundaries, and stepping up and increases of allowable height with distance from internal boundaries. c. No change to internal boundary setbacks but some changes to road setbacks. d. Retention of Operative Plan recession plane rules 	<p>Effectiveness</p> <ol style="list-style-type: none"> 1. Small increases in coverage on these two UC sites are seen as appropriate as existing coverage rules are considered restrictive in post earthquake Christchurch, with rebuilding and reorganisation of UC buildings and functions. Coverage permitted for the site west of Ilam Road is still low, because of the Ilam Fields and University Staff Club grounds. Coverage at the Dovedale site including impermeable surfaces is approaching 40% and an increase to 45% is considered appropriate to provide more flexibility for redevelopment of this site, without losing its park-like character. Note that temporary activity consents on this site will eventually expire, requiring the removal of the temporary village and school. 2. Stepping up height allowable at distances of greater than 20m from internal boundaries is a way in which a balance can be struck between the needs of tertiary institutions for large buildings, and the need for surrounding residents not be “overwhelmed” by their proximity to these buildings. The heights and distance chosen should allow for an extra storey for the tertiary institutions further in to their sites without significant effect on neighbours. Buildings will still be able to comply with recession planes. Maximum heights across the centre of the west of Ilam and Dovedale sites are still significantly less than for the main UC site.

	<p>3. Greater road boundary and internal boundary setbacks than for residential uses are considered justifiable because tertiary education buildings can be of considerable height and building length. Setbacks of 10m from the road provide a significant opportunity for establishment of identity and landscaping features, and are consistent with those required for schools.</p> <p>4. The current and proposed recession plane provisions (unchanged in this Plan) are considered appropriate. Note that recession planes do not apply to road frontages.</p> <p>Efficiency</p> <p>6. More flexibility in built form rules should mean fewer consents are required.</p> <p>7. There is consistency in regard to the level of amenity that neighbours of tertiary institutions and schools can expect in regard to built form near their boundaries. The size of tertiary sites means that higher buildings are possible nearer the centre of tertiary sites.</p> <p>Benefits</p> <p>8. More flexibility in built form rules and scale of buildings is permissible away from site boundaries.</p> <p>Costs</p> <p>9. Some residents may oppose reducing road setbacks from 15m to 10m for the two main UC sites.</p>
<p>Rule/method options less or not as appropriate to achieve the Objectives and Policies:</p>	
<p>Option 2: Greater Changes to Built Form Rules</p> <p>a. Further increases in site coverage, or no distinction between coverage rules for different tertiary sites.</p> <p>b. Smaller road setbacks and internal boundary setbacks.</p>	<p>Appropriateness</p> <p>1. Further increases in site coverage are not considered appropriate at this time. UC sites and the two out of centre CPIT sites are located in suburban neighbourhoods and their buildings should fit to some degree with that residential character.</p> <p>2. Smaller internal boundary setbacks not</p>

<p>c. More permissive recession plane rules.</p>	<p>considered appropriate as a default option. It is important to provide enough space for landscaping or other screening methods between tertiary institutions and houses to preserve privacy, reduce visual dominance and overlooking, and to allow distance to attenuate noise e.g. that coming from open windows, or in the case of the Trades Innovation Institute, to attenuate construction noise from activities both within and outside buildings.</p> <p>3. Road setbacks are needed to provide enough space for identity and effective landscaping features, and in some cases to facilitate noise reduction adjoining busy roads. This Plan already proposes a reduction in this zone for road scene setbacks from 15m to 10m for most sites, but it is not anticipated that buildings will have a uniform 10m setback. UC is concerned that they will lose a line of temporary buildings on the Kirkwood village (ex University Oval) site if they were required to meet the 15m road setback for new development, and the 10m setback will not solve this problem. However the current tall narrow hedge on the road frontage is not especially attractive as a long term screening measure, nor is it particularly appropriate from a CPTED (Crime Prevention through Environmental Design) perspective.</p> <p>4. There is no clear justification for recession planes to be more lenient for tertiary buildings than they are at present. Sites are large enough that recession planes should be able to be complied with.</p>
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<p>Risk of Acting or Not Acting</p>
<p>The information available is considered sufficient to inform the proposed provisions without the need to take account of the risk of acting or not acting (s32(4)(b) of the Act).</p>

4.7.5.3 Evaluation of Proposed Policy/Method 3 - Rezoning to Tertiary Education Zone at Montana Avenue (UC) and Hassals Lane (CPIT)

<p>Rules/Method(s) Most Appropriate</p>	<p>Effectiveness and Efficiency</p>
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Option 1: Proposed Rezoning to Tertiary Education Zone

a. Rezoning at Montana Avenue – all of south side of street from residential to Tertiary Education

FOR MONTANA AVENUE

Effectiveness

1. This is seen as the most effective option because UC already owns all but one of the properties, and leaving that site zoned residential will not make any difference to the long term outcome of redevelopment of this block for student housing or other university purposes. UC will eventually acquire the last residential property.
2. Even if the line of houses were not rezoned for Tertiary Education in this Plan, it is likely that UC would seek resource consent or a private plan change to use the land for this purpose. As the site is contiguous with the main university site and is on the south side of the road, thus creating opportunities for direct linkages with the main UC site and reducing building dominance and shading effects for the north side of the road, it is possible that consent would be granted, or a private plan change to rezone the land be approved.
3. Comprehensive development will create a better design outcome than development which leaves out some sites.

Efficiency

4. It is efficient to rezone the land at this District Plan review because the land is already being used for tertiary education purposes and redevelopment is likely to take place within the planning period.

Benefits

5. Providing for student hostels/housing on a site which is contiguous with the main university site will reduce effects of student behaviour (noise, mess etc) on neighbours, by effectively internalising some of the effects.
6. Use of this location for some of the demand for new student hostels/accommodation will reduce the number of new beds which need to be provided on the Dovedale site.

	<p>Costs</p> <p>7. The owner of the remaining property on the south side of the street and some of the owners on the north side of the street are likely to oppose the rezoning.</p>
<p>b. Rezoning at Hassals Lane from residential to Tertiary Education</p>	<p>FOR HASSALS LANE</p> <p>Effectiveness</p> <p>1. This is seen as the most effective option because CPIT already owns the property. Leaving the site zoned residential does not reflect the nature of the use as an educational site, and will make little difference to the long term outcome of redevelopment of this site for CPIT purposes.</p> <p>2. Even if the site were not rezoned for Tertiary Education in this Plan, for example if it was rezoned to the Schools Zone to reflect its current use, this is a relatively short term land use. It is likely that CPIT would seek resource consent or a private plan change to use the land for tertiary education purposes. As the site currently in question is close to the CPIT Trades Innovation Institute it could be used for spillover trades training activities or revert back to horticultural use. Alternatively and with appropriate roading and access improvements it may be suitable for standalone CPIT uses.</p> <p>Efficiency</p> <p>3. It is efficient to rezone the land at this District Plan review because change of use of this site is very likely to take place within the planning period and the current zoning does not reflect the site uses anyway.</p> <p>Benefits</p> <p>4. The site is close to the Trades Innovation Institute at Sullivans Av. and is sufficiently distant from most residential neighbours that it can probably be used more intensively without significant adverse effects.</p>

	<p>5. An additional site for tertiary education activity will provide further functional flexibility to CPIT and thereby contribute to tertiary sector recovery.</p> <p>Costs</p> <p>6. As the site is surrounded by land classified by the DBH as TC2 and TC3, the site could well require significant geotechnical strengthening of land, especially if large buildings were proposed.</p> <p>7. Access to the site via the surrounding road network can be gained only from the west and south. Access and quality of roading standard would need to be significantly improved to facilitate more intensive use of the site.</p>
Rule/method options less or not as appropriate to achieve the Objectives and Policies:	
<p>Option 2:</p> <p>Leave zoning at Montana Avenue as it is</p>	<p>Appropriateness FOR MONTANA AVENUE</p> <p>1. Leaving the zoning on the south side of Montana Avenue as Residential Suburban Transition Zone would be a good option from the effects perspective, if there was no real change in use of the sites eg if they were used by UC for accommodation for visiting academics etc. However this would make no contribution to the demand for more student housing as UC rolls increase.</p> <p>2. If there was no ability to use the Montana Avenue site for student housing, this would either require additional student housing to be located on the Dovedale site, which will be even more unpopular with surrounding residents than the current scale of additional development proposed there; or another site or other sites would need to be found.</p>

	<p>3. There are few other large enough sites on existing UC land, and further land might need to be acquired. Locating more student housing for example on the Ilam Fields adjoining existing student housing would be strongly opposed by residents, and is likely to compromise longstanding recreational use of the Fields for rugby, cricket and events</p>
<p>Leave zoning at Hassals Lane as it is, or amend it to Schools Zone</p>	<p>FOR HASSALS LANE</p> <p>1. This is an unusual site in an urban setting as it has effectively been “underutilised” for some years. In addition both the use of this site and the use of the site immediately to the east which now accommodates the Te Kura Kaupapa o Waitaha (state) school, have been effectively ignored in the past by the zoning of the site as residential.</p> <p>2. Changing the zoning to School Zone would reflect its current use but the Sevenoaks school intends to build a new school on its site in Halswell in 2016. A School Zone would mean that education activity was a permitted activity on the site, and the definition of education activity can encompass tertiary education. However the coverage standard and height standards for schools are less generous than those proposed for this site under a Tertiary Education zoning.</p> <p>3. A change of use for this site seems highly likely within the planning period, and delaying the rezoning will create a need for further planning processes in the near future. The issue of roading and traffic can be addressed by the high traffic generator rule in Chapter 7.</p>
<p>Risk of Acting or Not Acting</p>	
<p>The information available is considered sufficient to inform the proposed provisions without the need to take account of the risk of acting or not acting (s32(4)(b) of the Act).</p>	



Appendix 4.7.6.1 – Linkages between provisions – Specific Purpose (Tertiary Education) Zone

Strategic Directions (Panel decision 26 February 2015)	Tertiary Education Zone Objectives	Policies	Rules
<p>Objective: Community Facilities and Education Activities</p> <p>(a) The expedited recovery and establishment of community facilities and education activities in existing and planned urban areas to meet the needs of the community;</p> <p>(b) The co-location and shared use of facilities between different groups is encouraged.</p>	<p>21.7.1.1 OBJECTIVE -- USE OF EDUCATION FACILITIES</p> <p>Education providers are able to efficiently use and develop their land and buildings, within the wider network of education facilities across Christchurch, for:</p> <p>(i) education activity; and as</p> <p>(ii) hubs for a diverse range of community activities, while:</p> <p>(iii) mitigating adverse effects on the amenity of adjoining zones, and</p> <p>(iv) recognising and enhancing the contribution of education buildings and sites to the character of neighbourhoods.</p>	<p>21.7.1.1.1 Policy – Community Use of Education Facilities</p> <p>21.7.1.1.2 Policy – Amenity of Neighbourhoods</p> <p>21.7.1.1.3 Policy – Contribution of Education Sites to the Character of Neighbourhoods</p>	<p>21.7.2.3.1 Permitted Activities</p> <p>21.7.2.3.2 Restricted Discretionary Activities</p> <p>21.7.2.3.3 Discretionary Activities</p> <p>21.7.2.4.1 Permitted Activities for Built Form</p> <p>21.7.2.4.2 Restricted Discretionary Activities for Built Form</p> <p>21.7.2.4.3 Discretionary Activities for Built Form</p>
	<p>21.7.1.2 OBJECTIVE- CHANGING NEEDS FOR EDUCATIONAL LAND AND BUILDINGS</p>	<p>21.7.1.2.1 Policy – Alternative Development Provisions</p>	<p>21.7.3 Alternative Zone Provisions Applicable to Activities other than Education, Spiritual or Community Activities in the</p>

Strategic Directions (Panel decision 26 February 2015)	Tertiary Education Zone Objectives	Policies	Rules
	Education providers have some flexibility, and the community some certainty, as to the future use of education sites when land and/or buildings become surplus.		Special Purpose (Tertiary Education) Zone

Appendix 4.7.6.2 – Bibliography – Specific Purpose (Tertiary Education) Zone

- Greater Christchurch Education Renewal Property Programme Fact sheets – Ministry of Education 2012.
- Shaping Education: Directions for Education Renewal in Greater Christchurch – Ministry of Education and Tertiary Education Commission, 2012.
- Dovedale Campus Site Approaches – Stakeholder Engagement Report – University of Canterbury March 2014.
- Canterbury Well-Being Index Factsheet – Participation in Education. CERA, June 2014.

4.8 Specific Purpose (Lyttelton Port) Zone

Provisions for the Specific Purpose (Lyttelton Port) Zone are to be considered through the Lyttelton Port Recovery Plan process.



4.9 Specific Purpose (Golf Resort) Zone

4.9.1 Overview

1. The Specific Purpose Golf Resort Zone covers one existing and one proposed golf resort:
 - a. The Clearwater Golf Resort off State Highway 1/Johns Road near Belfast (existing); and
 - b. The Christchurch Golf Resort, off Spencerville Road (proposed).
2. The Clearwater Golf Resort began its development under Private Plan Change 11 to the Waimairi and Eyre County District Schemes. This plan change was made operative in these transitional plans in June 1997. The original plan change provided for 200 resort hotel bedrooms and 30 residential units associated with an international standard golf course. In 2004 and 2005 Clearwater Resort Ltd sought provision for additional development, and in 2005 Council notified Variation 93 to the City Plan which was effectively a private variation prepared by the proponent.
3. Variation 93 provided for zoning of additional land as Open Space 3D (Clearwater) and expansion of the resort by increasing the maximum number of hotel bedrooms to 350 and the maximum number of residential units to 111. The number of 111 was arrived at as a combination of what was existing and consented (31 residential units) at the time, a “transfer of development rights” (42 residential units) from the “Isaac Conservation Park” to the west, and 38 additional units permitted under an environmental compensation package. These 42 residential units could theoretically have been established on Isaacs land under the mainly Rural 4 zoning allowing one unit per 20 ha. This land had an encumbrance placed on titles “sterilising” development opportunities. The argument was that, had the 42 houses been permitted on the Isaacs land, they would have been within noisier environments in terms of the airport noise contours, than in their proposed locations at Clearwater. A greater part of the Isaacs land was set aside for quarrying than would have been permitted under the Rural Quarry zone, with the rest of that land reserved for conservation and recreation activities. After appeals seeking greater provision for offices at Clearwater (eventually disallowed by the High Court), Variation 93 was finally made operative in November 2009. The Variation included an Outline Development Plan (ODP) specifying that activities were to be located in particular areas. This Section 32 Report focuses on the Clearwater Open Space 3D zoning as it was in the Operative Plan and reviews that zoning. It does not further discuss the Isaacs land to the west also covered in Variation 93.
4. The Christchurch Golf Resort was proposed by a separate developer by private plan change to the City Plan (Plan Change 45) notified in 2009. This zoning was eventually made operative in 2011, having been caught up in the Environment Court appeals on Proposed Change no. 1 to the Regional Policy Statement (RPS). The rezoning to Open Space 3D (Christchurch Golf Resort) was of 132 ha of rural land on the western side of the Lower Styx River for a golf resort and a maximum of 150 residential units and 330 apartment bedrooms. The golf academy dormitory was also allocated a further 160 bedrooms, as the academy was expected to attract local, national and international students. An additional 43 ha of land adjoining the Styx River was rezoned at the same time to Conservation 3 (Waterway Conservation) Zone. It was proposed that the corridor would be planted and other improvements made to enable public use and enjoyment of the area. Again an Outline Development Plan was included in the plan change, with various types of development to be located in particular areas. One of the important provisions of the plan change was that

all built development was to be located on a terrace above the Lower Styx Ponding Area, which affects more than half of the site.

5. To date there has been no development at Christchurch Golf Resort. One of the options discussed below was to delete the zone from the proposed Replacement Plan, but it has been decided to retain the zone in revised form in view of the relatively short time that the zone has been operative at this location.
6. The issues are relatively similar for both resort locations and have been discussed together below. The zone provisions have however been separated into two separate packages of rules for clarity.

4.9.1.1 Research

1. Clearwater Golf Resort has an extensive “planning history” and Council has numerous documents on file relating to it. These include pre-notification and notification documents on Variation 93, numerous resource consent applications and reports, and building consent summaries. These and current planning issues at Clearwater have been discussed with CCC consents and legal staff. Evidence and transcripts from the Stage 1 Strategic Directions hearing in December 2015 have also been considered.
2. The Clearwater Residential Entitlements Register and Clearwater Hotel Entitlements Register have been provided to Council by company representatives. These, and aerial photo maps showing previous City Plan airport noise contours, as well as the revised airport noise contours, were used on a site visit to cross-check and update figures already collated for resource consents and building consents issued at Clearwater. This provided as accurate a picture of the extent of development now existing as possible.
3. Council also holds numerous documents on the proposed Christchurch Golf Resort which were considered in drafting the reviewed provisions for this zone. A site visit confirmed that no development has occurred on the ground to date.

4.9.1.2 Stakeholder discussions

4.9.1.2.1 Key stakeholders

Discussions were held with Clearwater’s legal representative in January 2015. Evidence given and transcripts from the Strategic Directions hearing in December 2014 indicated the position of CIAL on Clearwater. At the time of writing no consultation had been undertaken with representatives of the Christchurch Golf Resort for the purposes of this proposed District Plan.

4.9.2 RESOURCE MANAGEMENT ISSUES

4.9.2.1 Issue 1

RESOURCE MANAGEMENT ISSUE 1 – Is Resort Development “Urban” Development?

Perhaps the most significant planning issue with regard to both resorts is encapsulated in Operative City Plan Policy 6.3A.1:

“To ensure peripheral urban growth does not occur in a form detached from current urban boundaries, or which promotes a dispersed and unco-ordinated pattern of development”. The explanation to this policy notes that:

- (a) Isolated pockets of development can subsequently provide a pretext for infilling of adjoining or intervening rural land; and
- (b) A compact urban form promotes better utilisation of existing infrastructure and services, and assists in the forward planning and staging of utility provision.

Proposed Change No. 1 to the Regional Policy Statement reflected this general direction towards a consolidated urban form. This was further reflected in Chapter 6 to the Regional Policy Statement made operative through the Land Use Recovery Plan (LURP) in late 2013. (Policy 6.3.1 and Map A). Policy 6.3.1 (4) is “to ensure new urban activities only occur within existing urban areas or identified greenfield priority areas as shown on Map A, unless they are otherwise expressly provided for in the CRPS.”

The Clearwater Resort is not otherwise expressly provided for in the RPS. The definition of “urban activities” for Greater Christchurch under the RPS (and the proposed Replacement Plan definition of urban activities (Stage 1) is virtually the same), is

“ activities of a size, function, intensity or character typical of those in urban areas and includes:

- residential units (except rural residential activities) at a density of more than one household unit per 4 ha of site area;
- Business activities, except those that fall within the definition of rural activities;
- Sports fields and recreation facilities that service the urban population (but excluding activities that require a rural location);
- Any other land use that is to be located within the existing urban area or new Greenfield Priority Area.”

The Objective on Urban Growth, form and design in the decisions version of the Strategic Directions Chapter of the proposed District Plan reflects this direction eg

"c) Provides for urban activities only within the existing urban areas and 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."

This raises the question of whether a golf course requires a rural location. Clearly a rural location is not necessary but the proponent of an international standard golf course may desire such a location. A golf course could qualify as a “large footprint recreational activity” as part of the rural activities definition for Greater Christchurch in the RPS. However associated residential units

would be considered as urban activities under both the RPS and the replacement District Plan, and a resort hotel is a business activity and cannot be considered a typical rural activity.

The Council is of the view that golf resorts do not fit easily within any of the usual land use categories, and may be considered to be of a different design and nature to more standard urban development in suburban locations. Golf resorts are unlikely to be able to find large enough sites within existing urban boundaries. In addition as a matter of economics it is unlikely that golf courses of international standard can be built without resort and/or residential components. However to avoid large scale detached urban development, it is considered that the scale of the associated residential development needs to be capped, and concerns about efficiency of service provision resolved.

4.9.2.2 Issue 2

RESOURCE MANAGEMENT ISSUE 2 –Are Units Containing Resort Hotel Bedrooms actually Residential Units?

An ongoing issue between the Clearwater Golf Resort and the Council has been the nature of resort hotel bedroom development at the resort, and whether the groups of bedrooms are in reality residential units. This is because there is no limit on extended or additional landlord (owner) occupancy, over and above the four weeks per year that owners are guaranteed under Clearwater leases. Lack of clarity about what is a hotel bedroom has been made worse over the years because of variations in terminology both by the applicants and by the Council in describing these units in building consents; also by the marketing of resort hotel units as residential units. In the past Clearwater have advised that their overall concept also includes residential unit owners choosing to make their homes available for short or longer term leases, thus blurring the distinction.

For the purposes of this discussion and for the revised provisions in this chapter of the replacement District Plan, most of the buildings to the east of the clubhouse complex have been considered to be residential units other than those in three clusters at the beginning of Harts Creek Lane, and those three clusters and all buildings to the west, resort hotel bedrooms. The “hotel bedrooms” are built in 1, 2, and 3 bedroom configurations. As with other resorts in New Zealand, owners lease the hotel bedrooms or group of bedrooms back to the resort for use by the hotel for guest accommodation, via a “key” system., and it is understood from Clearwater that all “hotel bedroom units” are at least theoretically in the pool of bedrooms. There are many overseas owners, so it is also understood that probably over 90% of the hotel bedrooms/units are used for rental at any point in time.

Variation 93 extended the definition of resort hotel to include “any land, buildings or group of buildings....that operate under a hotel management agreement or hotel lease” and also added the wording “hotel serviced accommodation”. This was intended to dissuade residential occupation of the hotel units. A recent lease agreement used by Clearwater for the Boathouse development includes an additional provision that the tenant (Clearwater) shall provide house cleaning for at least one hour a month, and restaurant room service at least once per month, during periods of additional landlord (owner) occupancy. This is not considered adequate to convert what would otherwise be residential activity into resort hotel activity.

The question must now be asked: does this distinction matter and why?

As noted in Issue 1 above, one of the concerns is whether a golf resort constitutes urban development detached from the rest of the urban area. At this point Council has accepted that while golf resorts have associated urban development, this is of a different design and nature to conventional urban development. This does not mean that opportunity for associated residential development should be unlimited.

A further reason for questioning the extent of residential development in such locations is that it could promote inefficiency in infrastructure and service provision. This was a legitimate concern in the early years of Clearwater but is less of a concern now, because changes to the Local Government Act in 2002 allowed a Council to require development contributions if the effect of a development or developments required the Council to provide new or upgraded infrastructure. Clearwater is now fully serviced for both water supply and sewerage. Sewerage was initially piped to the Belfast sewage treatment plant and a pipeline now takes all of Belfast's sewage to the City's main sewage treatment plant at Bromley.

While there was a policy in the Operative Plan requiring upgrading of the Clearwater Avenue/Johns Road intersection when intersection delays reached a certain level, this rule has been dropped from the replacement District Plan. While average delays at the intersection have reached the trigger level, this is primarily a result of changes in traffic movements since the Canterbury earthquakes rather than a result of development at Clearwater. As well, four laning of all of State Highway One along this corridor is proceeding and this intersection will be upgraded by NZTA anyway in the near future as part of this roading improvement programme.

It needs to be noted that if hotel bedrooms were occupied at a high occupancy rate virtually all year round, this could have a similar effect on infrastructure as if the resort hotel bedrooms were residential units. Such high occupancy rates are considered unlikely however.

There is an additional administrative reason why it would be important to distinguish between resort hotel bedrooms and residential units, which is that the absence of such a distinction makes it very difficult to determine when and where development at Clearwater has reached the quotas for each type of development specified in the Operative Plan provisions.

The last reason for continuing to require a distinction between residential units and resort hotel bedrooms, is now the strongest argument in resource management terms. This is that hotel bedrooms by their nature are occupied by people on a short term basis, and they are less likely to be affected by relatively high levels of airport noise, or find it a nuisance, than occupants of residential units living there all year round.

Clearwater has stated that all new owners of residential units in the resort are required to be Members of the Resort Society and that the Resort Society has no a complaints covenant in favour of the airport. It needs to be emphasised here that while acoustic insulation is required for all new noise sensitive activity within the 55 dB airport noise contour, and has been for some years, this is not primarily an issue of internal noise, but of external noise affecting amenity of persons outside buildings, and potentially internal amenity if windows are required to be open in hot weather. As will be discussed below, the airport noise contours have recently shifted outwards. While the hotel bedrooms at the western end of the resort (RC7) built prior to 2013 were outside of the old 55 dB Ldn line, and presumably were built without noise insulation, they are all now within that noise contour.

This is considered to be adequate justification for Council to continue to distinguish between residential units and resort hotel bedrooms. While consents have already been granted in respect of most of the Operative Plan quota of both residential units and resort hotel bedrooms, Council proposes to set a limit of 3 months occupancy on resort hotel bedrooms in respect of the remaining development that will complete the resort.

4.9.2.3 Issue 3

RESOURCE MANAGEMENT ISSUE 3 – Noise Sensitive Activities within the 50 dB Ldn Airport Noise contour

As a result of new noise modelling by a group of noise experts for Selwyn District Environment Court cases in 2007, the airport noise contours have expanded outwards along the western edge of the built up area of the City and in the Clearwater area. The revised shapes and sizes of the three noise contour lines were based on updated assumptions about aircraft mix and the flight technology now used, and updated figures for ultimate capacity of the airport as a result of the proposed SIMOPs (simultaneous operation of both runways) mode of operation. This was reflected in the new 50 dB Ldn contour which was mapped in Chapter 6 to the Regional Policy Statement, and made operative via the LURP in December 2013. Council has to give effect to the RPS and consequently the airport noise contour lines were shifted in the City Plan. This has had the effect of putting all of the Clearwater resort within the new 50 dB Ldn line, where new noise sensitive activities are to be avoided; and instead of only a small amount of existing and proposed development being within the 55 dB Ldn line, about half of the developed area is now within it. This includes all of the resort hotel development to the west of the clubhouse.

The 50dB Ldn contour was originally used in Policy 6.3A.7 of the City Plan for discouraging urban growth in the direction of the airport via rezonings. During the resolution of airport appeals on the City Plan in 2005 and 2006, this policy was reworded and widened to use the words “noise sensitive activities” within the 50dB Ldn contour, and then in the RPS in 2013 the word “discouraged” was changed to “avoid”. Prior to 2013 the words “discourage” had left room for an exception for Clearwater, but when the RPS used the words “avoid” no exception was made. This would imply that there should be a freeze on any new development at the Clearwater Resort, including development which has been consented but not yet built, and the existing development there would have to rely on existing use rights.

However the change to the City Plan to reflect the RPS (also included in the LURP) while providing an exception for Clearwater, used the wording “except activities in the Open Space 3D (Clearwater) zone” which is open to interpretation and could be seen as allowing further development beyond that provided for in the operative City Plan zoning.

A compromise has been reached between the LURP’s two conflicting positions, as a result of caucusing during the rewording of the Strategic Directions Chapter of stage 1 of the replacement District Plan, and the Panel decision issued in February 2015. The proposed relevant objective in that chapter now reads:

"Objective 3.3.12(b) : Strategic infrastructure, including its role and function, is protected by avoiding adverse effects from incompatible activities, including reverse sensitivity effects, by, amongst other things:

(iii) Avoiding noise sensitive activities within the 50 dB Ldn noise contour for Christchurch International Airport, except

- For permitted activities within the Open Space 3D (Clearwater) Zone of the Christchurch City Plan, or activities authorised by a resource consent granted on or before 6 December 2013;"

The Council has proceeded on the assumption that it is not realistic to freeze all development at Clearwater and to rely on existing use rights. It is also of the view that not allowing consents already issued to be implemented would be relatively draconian (and now not in line with the Panel's decision on the Strategic Directions Chapter). The remaining question is whether the original quotas of 111 residential units and 350 hotel bedrooms will be "rubberstamped" by the parties. This question appears to have been answered by the Panel's wording for the Infrastructure Objective set out above, and by the fact that witnesses for CIAL stated that they are prepared to live with the level of development previously agreed to, even though the noise contours have shifted.

A site visit and review of Council's building consent and resource consent records has enabled a new count of existing development at Clearwater to be made for this section 32 assessment. As at 11 January 2015, using the new airport contours and the operative City Plan numbers, there were 71 residential units either complete or under construction at the eastern end of Clearwater, ie there are potentially 40 more able to be built, 28 of these on existing vacant lots and 12 on unsubdivided land. While 4 of the 40 would be within the new 55dB Ldn contour, the remaining 36 would be between the new 50 and 55 dB Ldn contours.

At Harts Lane and at the western end of the resort, there were 170 "hotel bedrooms" completed or under construction as at 11 January 2015, and resource consents issued for a further 73. All of the unbuilt resource consented rooms are within the new 55 dB Ldn contour. This total of 243 leaves capacity for a further 107 hotel bedrooms to be built somewhere in the resort according to the 350 total. Pre-application discussions have taken place on a proposal for a 90 bedroom hotel near the clubhouse.

In the reviewed Golf Resorts Chapter, the approach has been to rollover the Operative Plan quotas of residential units and hotel bedrooms in the same locations on the ground as previously, but to adjust the numbers to reflect the changes to the noise contours. The only additional change made is to provide for hotel bedrooms as permitted activities in the clubhouse and facility area, as this was not previously provided for. The hotel location currently proposed is partly within the new 55 dB Ldn contour, but mostly outside of it.

4.9.2.4 Issue 4

RESOURCE MANAGEMENT ISSUE 4 - Golf Resorts in Floodprone Areas

Clearwater Golf Resort is located within the Waimakariri Stopbank Floodplain as it is within the line of the secondary (remote) stopbanks at the south side of the Waimakariri River. The Stopbank Floodplain was the subject of Plan Change 32 which introduced a high hazard area into the Plan where new residential units and other habitable buildings were to be avoided. Based on the modelling undertaken for the floodplain, Clearwater would have some high hazard areas. High Hazard was defined as areas which would be subject to the deepest (over 1m in depth) and highest velocity floodwaters, in the event of a major flood caused by a breakout from the primary

stopbank system. The remainder of the floodplain was considered at lower flood hazard but still required to adopt raised floor levels for new development, excepting farm related accessory buildings etc, via similar rules to those for Flood Management Areas in the City Plan.

By the time that Plan Change 32 was proposed in 2010, Variation 93 providing for the expansion of Clearwater was already operative, and the Clearwater Resort was excluded from the Plan Change 32 rules. This was on the basis that Variation 93 included flood protection provisions for the then unbuilt and expanded areas of development at the eastern end of the resort – Resort Community Areas 5A, 5B and 5C and Resort Community Area 6, the latter an isolated area near the Groynes. The RC6 area is not anticipated to have any built development. These provisions required a higher level of flood protection than the rest of the floodplain. The effect was that the level of flood protection to be achieved via raised ground levels, was equivalent to provision for floor levels to be above a 1 in 10,000 year flood plus 400mm freeboard. A 1 in 10,000 year flood figure was agreed with Ecan and was used because at the time of the agreement, it was unclear whether the Resort would eventually be inside or outside the completed secondary stopbank, and that was the design standard for the secondary stopbank. At the time of writing no information was available on flood protection measures required or adopted for the other Resort Community Areas at Clearwater RC1, RC3, RC4 and RC7, although it appears that hotel bedrooms in the RC7 area at least, have been built at relatively high floor levels, and building platform levels for areas such as RC1, RC3, and RC4 appear to be well above golf course and lake levels.

A significant portion (more than half) of the area of land zoned for the Christchurch Golf Resort is within the Lower Styx Ponding Area. The outer boundary of the ponding area is a natural terrace with a clear change in ground levels, and all built development is to be located on the terrace above the ponding area. The land within the ponding area is shown as Golf Course and Open Space on the ODP for the resort. Flooding issues and the design, construction and operation of the golf course drainage system and proposed wetlands are important elements of a Management Plan which must be prepared for the golf course before it is constructed.

Both resorts contain high flood hazard areas in Stage 2 of the pRDP, but in each case built development is located above the modelled high hazard areas.

4.9.3 Scale and significance evaluation

1. The level of detail undertaken for the evaluation of the proposed District Plan provisions has been determined by an assessment of the scale and significance of the implementation of the those provisions. The scale and significance assessment considers the environmental, economic, social and cultural effects of the provisions. In making this assessment, regard has been had to the following, namely whether the provisions:
 - a. are of regional or city wide significance;
 - b. impede or promote the District's recovery;
 - c. adversely affect people's health and safety;
 - d. result in a significant change to the character and amenity of local communities;
 - e. have effects on resources that are considered to be a matter of national importance in terms of Section 6 of the Resource Management Act 1991;
 - f. will adversely affect those with particular interests, including Maori (consideration needs to be given to whether there is certainty of effects based on the availability of information to assess benefits and costs);
 - g. limit options for future generations to remedy effects;
 - h. the effects of which, have been considered implicitly or explicitly by higher order documents; and
 - i. include regulations or other interventions that will impose significant costs on individuals or communities.

4.9.3.1 Objectives, policies and rules

1. The objective for golf resorts recognises that golf resorts of international standard can provide economic and social benefits to the region, and also bring other recreational opportunities to the local community, but that golf resorts and associated limited residential development should have no significant adverse effects on the natural or adjoining rural environments. The policies for resorts attempt to improve on the relatively weak policy base of the operative District Plan with regard to this type of development.
2. The Canterbury Recovery Strategy is silent on golf resorts as is Chapter 6 of the Regional Policy Statement, although it could be argued that there is provision for golf courses themselves (as opposed to golf resorts) as "large footprint recreational activities" as part of the rural activities definition for Greater Christchurch in the RPS.
3. As noted in the issues section, the latest draft version of the Strategic Directions chapter of the proposed replacement Plan has two policies which are relevant: one on Urban Consolidation which does not allow for Clearwater's resort development specifically, and one on Avoiding the Effects of Activities on Strategic Infrastructure, which does. The wording of this exception, "except the limited extent of activities authorised within the Open Space 3D (Clearwater) zone effectively sets the scene for the proposed Replacement Plan Specific Purpose (Golf Resort) Zone provisions.

4. The reviewed golf resort objectives and policies:
 - a. Provide a clearer policy base for golf resorts, confirming that their primary function is recreational and that associated “urban” activities should be complementary and subsidiary to this in scale and nature;
 - b. Emphasise that the provision of public open space and recreation facilities has been limited at Clearwater to date, and that improvements agreed need to be constructed during the completion phase of development at Clearwater.
 - c. Limit urban development provided for at Clearwater to that provided for in the previous City Plan or authorised by resource consent prior to the notification of this Plan.
5. The effect of the reviewed Clearwater rules is similar to that of the operative City Plan rules, with the main differences being:
 - The definition of resort hotel is amended slightly, to further dissuade residential occupation of hotel bedrooms, and a limit of three months per calendar year is introduced for owner occupancy of future hotel bedrooms.
 - Maintaining the ODP for the resort in its current form (updated for changed zone names), but introducing a rule clarifying that activities are required to be located within the relevant Activity Areas as listed in the permitted activity rules and shown on the ODP.
 - Rolling over the Operative Plan total quotas of residential units and hotel bedrooms in the same general locations (Activity Areas) on the ground as previously, but adjusting the allocations within and outside the 55 dB Ldn line to reflect the recently amended (and enlarged) noise contours.
 - Providing for hotel bedrooms as permitted activities in the clubhouse and facility area, and varying slightly the hotel bedroom number allocations within and outside the 55 dBA Ldn line to reflect this.
 - Dropping the previous provision requiring a concept plan prior to any subdivision or development taking place in new activity areas at Clearwater, the previous staging rule and the previous civil defence rule.
 - Amending the mean finished ground levels to express them in relation to the reference drainage level of Christchurch City Council Datum.
 - Introducing a new rule for subdivision in both golf resorts, that allotments for residential units, resort apartments or resort hotel bedrooms shall only be subdivided when a building or buildings are still allowable for that allotment within the maximum number limits specified for the zones.
6. Very few changes have been made to the Christchurch Golf Resort provision at this stage. The main changes are as follows:
 - Rationalisation of the overly detailed rules and sometimes conflicting figures contained in the operative zone provisions eg clarifying the maximum number of resort apartment bedrooms provided for as a permitted activity and as a discretionary activity.

- Increasing the setbacks from the Lower Styx Ponding Area boundary (the edge of the terrace) on geotechnical grounds, to provide at least some mitigation of the possibility of lateral spread in the event of a major earthquake.

4.9.4 Evaluation of proposed objectives

Section 32(1)(a) of the Resource Management Act (the Act) requires the Council to evaluate the extent to which the objectives are the most appropriate way to achieve the purpose (Section 5) of the Act.

4.9.4.1 Evaluation of Proposed Objective 1: Golf Resort Development

GENERAL POLICY DIRECTION OPTIONS & RECOMMENDATIONS	
<p>Option 1 (Status Quo) Existing Plan Objectives</p> <p>The operative City Plan has no objective for the Open Space 3D zoned golf resorts. Instead they are introduced into the Plan by explanations excepting them from policies such as the Urban Growth policy about the urban boundary (the word “unique” in describing the detached urban activity was removed by Plan Change 45, in providing for a second detached resort outside the urban boundaries). The closest that the Operative Plan comes to an objective is the zone statement and anticipated environmental results for the zones at 6.1.9 and 6.1.11. These are generally descriptive of what development is expected to occur, using the words “integrated” resort community and emphasising extensive landscaped open space that includes lakes and waterways, as well as residential, visitor accommodation and recreational activities, and ecological restoration in the case of the Christchurch Golf Resort.</p>	
<p>Option 2 (Proposed Objective) Golf Resort Development</p> <p>The proposed objective for the Golf Resort Zone is more specific than the statements contained in the zone statements in the operative City Plan. It incorporates several elements including:</p> <ol style="list-style-type: none"> Providing golfing and associated facilities to an international standard; Providing other recreational opportunities other than golfing (with a policy stating that this includes recreation for the local community); Providing for residential development, which it is stated will be limited in these locations; Emphasising the dominant character of extensive open space and lake or riparian settings Emphasising the need to have no significant adverse effects on adjoining rural environments. 	
ADOPTED GENERAL DIRECTION	
<p>Option 2 is considered clearer and more positive and therefore better than Option 1 in setting out Council’s intended outcomes for the existing Clearwater Golf Resort and the proposed Christchurch Golf Resort.</p>	
OBJECTIVE MOST APPROPRIATE WAY TO ACHIEVE THE PURPOSE OF THE ACT	
Objective	Summary of Evaluation
Objective 21.9.1.1 OBJECTIVE - GOLF RESORT DEVELOPMENT	Relation to Resource Management Issue

<p>For the Clearwater Golf Resort and Christchurch Golf Resorts to provide golfing and associated facilities (including resort facilities) of international standard, which can bring economic and social benefits to the City and region, and to provide other recreational opportunities, and limited residential development, within extensive open space and lake or riparian settings, with no significant adverse effects on the natural or adjoining rural environments.</p>	<p>The proposed objective relates clearly to the resource management issues identified above of:</p> <ul style="list-style-type: none"> i. Is Resort Development “Urban” Development ii. Are Resort hotel bedrooms residential units iii. Noise sensitive activities within the 50dBA Ldn airport noise contour and iv. Golf resorts in floodprone areas <p>Council’s policy direction on Items 1, 2 and 3 is further elaborated in Policy 21.9.1.1.2 and in Policy 21.9.1.1.4 for flooding issues.</p> <p>The scale and significance evaluation above refers to statutory influences which have contributed to this revised objective.</p> <p>The objective also reflects the purpose of the Act in enabling people and communities (those within the resort as well as the wider public) to provide for their social, economic, and cultural well-being, while avoiding remedying or mitigating any adverse effects of activities on the environment.</p> <p>The previous provisions for the golf resorts were complex, and in some cases not very clear. While some of this complexity remains, because of the numerous issues at play and the need for relative consistency over time, the provisions have been streamlined where possible.</p> <p>This is consistent with the Statement of Expectations in the Order in Council for the preparation of the replacement District Plan.</p> <p>Overall it is considered that the objective is the most appropriate way to achieve the purpose of the Act with regard to golf resorts in Christchurch.</p>
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4.9.5 Evaluation of proposed policies, rules and methods

4.9.5.1 Evaluation of proposed policy/method 1 - Development Options for Clearwater Golf Resort

Rules/Method(s) Most Appropriate	Effectiveness and Efficiency
<p>Option 1: Clearwater Golf Resort - Development Limited to that Previously Provided for or Authorised by Consent</p> <ul style="list-style-type: none"> a. 111 residential units in total b. 350 bedrooms in total c. Total GFA of offices of no more than 2000m² d. Total GLFA of retailing other than of food and beverages of no more than 2000m² 	<p>Effectiveness</p> <ol style="list-style-type: none"> 1. This option allows for the completion of the resort concept provided for in Variation 93. There are options as to where the remaining hotel bedrooms can be provided. 2. There are not enough hotel bedrooms left in the quota to allow for both the further hotel bedrooms already resource consented and the 90 bedroom hotel currently proposed near the clubhouse, and consents for some 19 bedrooms would need to be surrendered if the 90 bedroom proposal is to proceed within operative and proposed District Plan rules. <p>Efficiency</p> <ol style="list-style-type: none"> 3. This is efficient in that most of the development which was provided for under Variation 93 has already occurred, and some of the remainder of the development which can occur within the Variation 93 quotas is already preset as to location. For example there are currently 28 vacant residential lots within partly or nearly fully developed Resort Community Areas. Building houses on these lots will have little effect on the established pattern of development.

4. There could be still be debate as to where the remaining hotel bedrooms could or should be developed, especially if they are developed under resource consents, as has been the norm at Clearwater. Within the new 55 dBA Ldn contour, there are already many more hotel bedrooms consented than provided for in the Operative Plan quotas, solely because the noise contours have shifted after consents were issued.

5. How much development of what type could occur in RC areas 5B and 5C has been unclear. New counts of total development at the resort to date (even if details are disputed) will clarify and limit this development, especially if a largenumber of hotel bedrooms are “taken out” by development near the clubhouse.

Benefits

6. CIAL may accept this scenario, based on evidence given at the December 2014 Strategic Direction hearing. This is because of previous undertakings to accept this level of development in these general locations.

7. The revised zone provisions do not expose any more people to noise nuisance or amenity effects than previously. Although resource consent for a hotel beside the clubhouse could have this effect for a few people, the bulk of those guests would benefit from a less noisy environment.

8. The total floorspace permitted for non-food and beverage retailing and for offices at Clearwater is still appropriate in the context of the proposed District Plan commercial provisions and in the context of earthquake recovery.

Costs

	<p>9. Some of the hotel bedrooms and residential units already built within the new 55 dB Ln line may not have adequate insulation to meet the indoor acoustic insulation standards which will now be required in these locations.</p> <p>10. New development within the 55 dB Ldn line will need to be acoustically insulated, which is likely to increase construction costs. However this is a result of shifts in the noise contours, rather than changes in planning provisions.</p>
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Rule/method options less or not as appropriate to achieve the Objectives and Policies:

<p>Option 2: Clearwater Golf Resort - No Further Development at All within the 50 dB Ldn Airport Noise Contour</p>	<p>Appropriateness</p> <ol style="list-style-type: none"> 1. It could be argued that all further development within the 50 dB Ldn line is inappropriate, because it would not be in accord with the wording proposed for the Urban Consolidation policy as a result of planner caucusing on the Strategic Directions Chapter of the proposed Replacement Plan. 2. This is inconsistent with the exception proposed for Clearwater in the policy on Effects of Activities on Strategic Infrastructure drafted as a result of planner caucusing on the Strategic Directions Chapter of the proposed Replacement Plan. 3. This is also inconsistent with the potentially greater allowance made for further development within the existing residentially zoned urban area of Christchurch which is located within the 50dB Ldn noise contour. 4. It is also inconsistent with agreements reached with external parties in the past, and is potentially unreasonable in light of consents already granted. 5. Development in some areas of the resort will appear incomplete eg RC3 and RC4 which are currently being developed.
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	<ol style="list-style-type: none"> 6. There is no certainty that SIMOPs will ever be implemented, and it is certainly unlikely to occur within the planning period. The volume of air traffic landing and taking off from Christchurch International Airport has only increased slowly post earthquakes. 7. Against this, it could be argued that a preventative approach to noise nuisance is justified, and that volumes of air traffic will still increase over time.
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Rule/method options less or not as appropriate to achieve the Objectives and Policies:

<p>Option 3. Clearwater Golf Resort - Allow the resort to expand further than previously provided for</p>	<p>Appropriateness</p> <ol style="list-style-type: none"> 1. It is understood that Clearwater wish to proceed with more development than is currently provided for in the City Plan (or in the proposed Replacement Plan) eg they are of the view that 11 more houses are able to be provided for under the transfer of development rights from the Isaacs land to the west, in addition to the 42 specified in the City Plan. This is not the case, since both the certificate of compliance issued by Council, and the deed of agreement between Council, Clearwater and The Isaac Wildlife Trust were for 42 units only. 2. Increasing the scale of development provided for at Clearwater is not considered to be appropriate at this time of uncertainty in the Strategic Directions policies of the pRDP. As well , how existing golf resort development is considered in the relevant higher level planning documents eg the RPS should be resolved first. 3. It may never be appropriate to provide for further development at Clearwater beyond that which has already been agreed, because of the expansion of the airport noise contours. 4.
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Risk of Acting or Not Acting

The information available is considered sufficient to inform the proposed provisions without the need to take account of the risk of acting or not acting (s32(4)(b) of the Act).

4.9.5.2 Evaluation of Proposed Policy/Method 2 - Proposed Rollover of Existing Golf Resort zoning for the Christchurch Golf Resort

Rules/Method(s) Most Appropriate	Effectiveness and Efficiency
<p>Option 1: Christchurch Golf Resort - Rollover of Existing Golf Resort zoning, with Increases in Setbacks from the Lower Styx Ponding Area boundary (edge of the terrace)</p>	<p>Effectiveness</p> <ol style="list-style-type: none"> 1. No consultation has occurred with the proponents of the private plan change which led to this zoning and rollover of the zoning is considered the most appropriate option in that circumstance. 2. The Plan change leading to this zoning was only made operative in 2011, and it is considered unreasonable to remove the zoning from the Plan when only a few years have elapsed since that time. 3. While it is understood that the proponent of the plan change has not proceeded with the development to date for financial reasons, another developer may wish to take the project over. 4. Although there is no liquefaction potential classification for the land, all of Spencerville township is Technical Category 3. No geotechnical information was provided for the Plan change (2009), but it appears likely that built development would require significant geotechnical assessment and land and building strengthening. There could potentially be lateral spread near the edge of the river terrace in a significant earthquake event. Setbacks from the edge of the terrace were minimal in the Plan change eg 0.5m for the clubhouse and 5m for other buildings and have been increased to 10m and 15m respectively as a precautionary measure. <p>Efficiency</p> <ol style="list-style-type: none"> 5. Allowing the zoning to remain provides for the possibility of a golf resort proceeding here in the future, potentially providing economic and social benefits to the region.

	<p>Benefits</p> <p>6. The zone change was approved partly on the basis of the ecological benefit to the Styx River corridor of restoration of the riparian area, and wetland creation within the golfcourse.</p> <p>7. Golf resort zoning will facilitate public access along the river by the creation of a walkway and bridleway connection.</p> <p>Costs</p> <p>8 Some decrease in land available for development near the edge of the terrace.</p>
<p>Option 2: Christchurch Golf Resort - Allow the land at Spencerville Road previously zoned Open Space 3D to revert to rural zoning</p>	<p>Appropriateness</p> <ol style="list-style-type: none"> 1. it is understood that the development has not proceeded to date and may not proceed for financial reasons. 2. Allowing the land to revert to rural zoning would remove debate over the appropriateness of a golf resort in this location, which is detached from the boundary of urban areas of Christchurch. 3. Red zoning of Brooklands and demolition of some houses at Spencerville because of significant earthquake and land damage, may reduce the marketability of golf resort zoning in this location. 4. Inclusion of large parts of the Golf Resort land at Spencerville in the high hazard notation in the proposed District Plan will not assist with marketability, even it there is an awareness that all buildings would be located higher than maximum water levels. 5. From an environmental and flooding perspective it may be beneficial to avoid risks associated with significant earthworks to create the golf course, within the Lower Styx Ponding Area 6. There has been insufficient investigation of geotechnical issues for the land given the

	Canterbury earthquakes. It is possible that the land or part of the land has performance characteristics in a large earthquake which would be equivalent to TC3, which could make it difficult to develop some of the land and significantly increase the costs of building.
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Risk of Acting or Not Acting

The information available is considered sufficient to inform the proposed provisions without the need to take account of the risk of acting or not acting (s32(4)(b) of the Act).



Appendix 4.9.6.1 – Linkages between Provisions – Specific Purpose (Golf Resorts) Zone

Strategic Directions (as in Panel decision 26 February 2015)	Golf Resort Objectives	Policies	Rules
<p>Objective 3.3.12(b) : Strategic infrastructure, including its role and function, is protected by avoiding adverse effects from incompatible activities, including reverse sensitivity effects, by, amongst other things:</p> <p>(iii) Avoiding noise sensitive activities within the 50 dB Ldn noise contour for Christchurch International Airport, except</p> <p>(iii) For permitted activities within the Open Space 3D (Clearwater) Zone of the Christchurch City Plan, or activities authorised by a resource consent granted on or before 6 December 2013;</p>	<p>21.9.1.1 OBJECTIVE -- GOLF RESORT DEVELOPMENT</p> <p>For the Clearwater Golf Resort and Christchurch Golf Resorts to provide golfing and associated facilities (including resort facilities) of international standard, which can bring economic and social benefits to the City and region, and to provide other recreational opportunities, and limited residential development, within extensive open space and lake or riparian settings, with no significant adverse effects on the natural or adjoining rural environments.</p>	<p>21.9.1.1.1 Policy – Benefits to the Community</p> <p>21.9.1.1.2 Policy – Limit on Scale of Development and Types of Activity</p> <p>21.9.1.1.3 Policy – Visual Integration and Mitigation of Effects</p> <p>21.9.1.1.4 Policy – Careful Siting</p>	<p>Clearwater</p> <p>21.9.2.2.1 Permitted Activities – Clearwater Golf Resort</p> <p>21.9.2.2.2 Restricted Discretionary Activities – Clearwater Golf Resort</p> <p>21.9.2.2.3 Discretionary Activities – Clearwater Golf Resort</p> <p>21.9.2.3 Built Form Standards – Clearwater Golf Resort</p> <p>21.9.2.4 Area Specific Standards – Clearwater Golf Resort</p> <hr/> <p>Christchurch Golf Resort</p> <p>21.9.3.2.1 Permitted Activities – Christchurch Golf Resort</p> <p>21.9.3.2.2</p>

Strategic Directions (as in Panel decision 26 February 2015)	Golf Resort Objectives	Policies	Rules
			<p>Restricted Discretionary Activities – Christchurch Golf Resort</p> <p>21.9.3.2.3 Discretionary Activities - Christchurch Golf Resort</p> <p>21.9.3.3 Built Form Standards - Christchurch Golf Resort</p> <p>21.9.3.4 Area Specific Standards – Christchurch Golf Resort</p> <hr/> <p>21.9.4 Matters of Discretion</p>

Appendix 4.9.6.2 – Bibliography – Specific Purpose (Golf Resorts) Zone

- Proposed Clearwater Variation to the City Plan -Notification report to Council – 21 July 2005.
- Variation 93 – Clearwater and the Isaac Conservation Park , and Section 32 - notified 30 July 2005
- Evidence and transcripts from Strategic Directions Hearing, Stage 1 proposed District Plan Review
- Planning Expert Conferencing Statement, Drafting of Proposals 1- 3 regarding Strategic Directions, 17 December 2014.
- Proposed Private Plan Change 45 to the City Plan – notification documents – July 2009, hearings evidence and Commissioner recommendation to Council.

4.10 Specific Purpose (Ruapuna Motorsport) Zone

This section will be inserted when Plan Change 84 - Ruapuna - Management of Noise - is resolved. This Plan change has been appealed.



PART 3

Appendix: Proposed Christchurch District Plan – Strategic Directions

These Strategic Directions provisions are from the chapter decision notified on 26 February 2015.

Provision	Policy Direction
3.3.1 Objective - Enabling recovery and facilitating the future enhancement of the district	<p>The expedited recovery and future enhancement of Christchurch as a dynamic, prosperous and internationally competitive city, in a manner that:</p> <ul style="list-style-type: none">(a) Meets the community’s immediate and longer term needs for housing, economic development, community facilities, infrastructure, transport, and social and cultural wellbeing; and(b) Fosters investment certainty; and(c) Sustains the important qualities and values of the natural environment.
3.3.3 Objective - Ngāi Tahu Manawhenua	<p>A strong and enduring relationship between the Council and Ngāi Tahu Manawhenua in the recovery and future development of Ōtautahi (Christchurch City) and the greater Christchurch district, so that:</p> <ul style="list-style-type: none">(a) Ngāi Tahu Manawhenua are able to actively participate in decision-making; and(b) Ngāi Tahu Manawhenua’s aspirations to actively participate in the revitalisation of Ōtautahi are recognised; and(c) Ngāi Tahu Manawhenua’s culture and identity are incorporated into, and reflected in, the recovery and development of Ōtautahi; and(d) Ngāi Tahu Manawhenua’s historic and contemporary connections, and cultural and spiritual values, associated with the land, water and other taonga of the district are recognised and provided for; and(e) Ngāi Tahu Manawhenua can retain, and where appropriate enhance, access to sites of cultural significance.

	(f) Ngāi Tahu Manawhenua are able to exercise kaitiakitanga.
<p>3.3.6 Objective - Natural hazards</p>	<p><i>[The requirement for further or alternative strategic direction in respect of “Natural hazards” will be reconsidered by the Panel as part of considering the Chapter 5 Proposal.]</i></p> <p>(a) New subdivision, use and development, shall:</p> <ul style="list-style-type: none"> (i) be avoided in areas where the risks of natural hazards to people, property and infrastructure are assessed as being unacceptable; and (ii) otherwise be undertaken in a manner that ensures the risks of natural hazards to people, property and infrastructure are appropriately mitigated; <p>(b) Except that new strategic infrastructure may be located in areas where the risks of natural hazards to people, property and other infrastructure are assessed as being unacceptable, provided that:</p> <ul style="list-style-type: none"> (i) there is no reasonable alternative; and (ii) the strategic infrastructure has been designed to maintain, as far as practicable, its integrity and form during natural hazard events.
<p>3.3.7 Objective - Urban growth, form and design</p>	<p>A well-integrated pattern of development and infrastructure, a consolidated urban form, and a high quality urban environment that:</p> <ul style="list-style-type: none"> (a) Is attractive to residents, business and visitors; and (b) Has its areas of special character and amenity value identified and their specifically recognised values appropriately managed; and (c) Provides for urban activities only: <ul style="list-style-type: none"> (i) within the existing urban areas; and (ii) 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 (d) Increases the housing development opportunities in the urban area to meet the intensification targets specified in the Canterbury Regional Policy Statement, Chapter

	<p>6, Objective 6.2.2 (1); particularly:</p> <ul style="list-style-type: none"> (i) 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 (ii) in those parts of Residential Greenfield Priority Areas identified in Map A, Chapter 6 of the Canterbury Regional Policy Statement; and (iii) in suitable brownfield areas; and (e) Maintains and enhances the Central City, Key Activity Centres and Neighbourhood Centres as community focal points; and (f) Identifies opportunities for, and supports, the redevelopment of brownfield sites for residential, business or mixed use activities; and (g) Promotes the re-use and re-development of buildings and land; and (h) Improves overall accessibility and connectivity for people, transport (including opportunities for walking, cycling and public transport) and services; and (i) Promotes the safe, efficient and effective provision and use of infrastructure, including the optimisation of the use of existing infrastructure; and (j) Co-ordinates the nature, timing and sequencing of new development with the funding, implementation and operation of necessary transport and other infrastructure.
<p>3.3.9 Objective – Natural and cultural environment</p>	<p><i>[The requirement for further or alternative strategic direction to be provided in respect of the “Natural and cultural environment” will be reconsidered by the Panel as part of its further hearing of relevant proposals.]</i></p> <p>A natural and cultural environment where:</p> <ul style="list-style-type: none"> (a) People have access to a high quality network of public open space and recreation opportunities, including areas of natural character and natural landscape; and (b) Important natural resources are identified and their specifically recognised values are appropriately managed, including: <ul style="list-style-type: none"> (i) outstanding natural features and landscapes, including the Waimakariri River, Lake Ellesmere/Te Waihora, and parts of the Port Hills/Nga Kohatu Whakarakaraka o Tamatea Pokai Whenua and Banks Peninsula/Te Pātaka o

	<p>Rakaihautu; and</p> <ul style="list-style-type: none"> (ii) the natural character of the coastal environment, wetlands, lakes and rivers, springs/puna, lagoons/hapua and their margins; and (iii) indigenous ecosystems, particularly those supporting significant indigenous vegetation and significant habitats supporting indigenous fauna, and/or supporting Ngāi Tahu Manawhenua cultural and spiritual values; and (iv) the mauri and life-supporting capacity of ecosystems and resources; and <p>(c) Objects, structures, places, water/wai, landscapes and areas that are historically important, or of cultural or spiritual importance to Ngāi Tahu Manawhenua, are identified and appropriately managed.</p>
<p>3.3.11 Objective – Community facilities and education activities</p>	<ul style="list-style-type: none"> (a) The expedited recovery and establishment of community facilities and education activities in existing and planned urban areas to meet the needs of the community; and (b) The co-location and shared use of facilities between different groups is encouraged.
<p>3.3.12 Objective – Infrastructure</p>	<p><i>[The requirement for alternative strategic direction in respect of Objectives 3.3.12 (b) (iii) and (iv) will be reconsidered by the Panel as part of its further hearing of relevant proposals.]</i></p> <ul style="list-style-type: none"> (a) The social, economic, environmental and cultural benefits of infrastructure, including strategic infrastructure, are recognised and provided for, and its safe, efficient and effective development, upgrade, maintenance and operation is enabled; and (b) Strategic infrastructure, including its role and function, is protected by avoiding adverse effects from incompatible activities, including reverse sensitivity effects, by, amongst other things: <ul style="list-style-type: none"> (i) avoiding noise sensitive activities within the Lyttelton Port Influences Overlay area; and (ii) managing activities to avoid adverse effects on the National Grid, including by identifying a buffer corridor within which sensitive activities will generally not be provided for; and

	<ul style="list-style-type: none">(iii) avoiding noise sensitive activities within the 50dBA Ldn noise contour for Christchurch International Airport, except:<ul style="list-style-type: none">• within an existing residentially zoned urban area; or• within a Residential Greenfield Priority Area identified in the Canterbury Regional Policy Statement Chapter 6, Map A; or• for permitted activities within the Open Space 3D (Clearwater) Zone of the Christchurch City Plan, or activities authorised by a resource consent granted on or before 6 December 2013; and(iv) managing the risk of bird strike to aircraft using Christchurch International Airport; and <p>(c) The adverse effects of infrastructure on the surrounding environment are managed, having regard to the economic benefits and technical and operational needs of infrastructure.</p>
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